VOLUME 3

Public Comments and Responses on the DEIR/S

Marin-Sonoma Narrows (MSN) HOV Widening Project

Along US 101, project begins 0.5 km (0.3 mi) south of the Route 37 interchange in the City of Novato (Marin County), and ends 0.5 km (0.3 mi) north of the Corona Road Overcrossing in the City of Petaluma (Sonoma County).

Final Environmental Impact Report
Final Environmental Impact Statement

US 101
KP 30.0/44.5 (PM 18.6/27.7) in Marin County
KP 0.0/11.5 (PM 0.0/7.1) in Sonoma County
July 2009
SCH #2001042115
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Introduction

The California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA), in cooperation with the Transportation Authority of Marin (TAM) and the Sonoma County Transportation Authority (SCTA), propose to address congestion along US 101 between State Route 37 in Novato (Marin County) and just north of the Corona Overcrossing in the City of Petaluma (Sonoma County) by constructing high occupancy vehicle (HOV) lanes and widening and realigning the highway. This proposed project is called the Marin-Sonoma Narrows HOV Widening Project (MSN Project).

This document is Volume 3 of the Final Environmental Impact Report/Environmental Impact Statement (FEIR/S) for the MSN Project. It contains the comments submitted during the public comment period for the October 2007 Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/S), as well as Caltrans' responses to these comments. The public comment period extended from October 16, 2007 to December 14, 2007; comments on the DEIR/S were received from local residents, organizations, and businesses, as well as local, regional, state, and federal agencies.

The commenters provided their comments in the form of letters and emails submitted to Caltrans during the public comment period, as well as spoken testimony and comment cards submitted at the two public hearings held for the MSN Project. The public hearings were held at the Sonoma-Marin Fairgrounds in Petaluma, California on November 6, 2007, and at the Novato Unified School District Board Room in Novato, California on November 14, 2007.

This volume consists of three chapters:

- Chapter 1, List of Commenters
- Chapter 2, Master Responses
- Chapter 3, Comments Received and Caltrans Responses

Chapter 1, List of Commenters

Chapter 1 presents a complete listing of the federal, state, regional and local agencies; business and community organizations; and individual citizens who submitted

comments on the DEIR/S, and explains the system of identifying codes assigned to each letter.

Chapter 2, Master Responses

Approximately 90 comment letters and emails, which contained more than 610 individual comments, were received on the DEIR/S for the MSN Project. Although these comments reflect a wide variety of concerns regarding the project and the DEIR/S, many of the commenters expressed concerns on similar issues. In an effort to avoid excessive repetitiveness and redundancy in the responses, as well as provide thorough responses that comprehensively address all pertinent related issues, Master Responses were prepared for a number of issues that were raised by multiple commenters. The following Master Responses are presented in Chapter 2:

- Master Response on Cumulative Air Quality (Section 2.1)
- Master Response on Greenhouse Gas Emissions (Section 2.2)
- Master Response on Need and Purpose (Section 2.3)
- Master Response on Induced Travel (Section 2.4)
- Master Response on Range of Alternatives (Section 2.5)
- Master Response on Smart Mobility Report (Section 2.6)
- Master Response on Use of Current Information (Section 2.7)

Chapter 3, Comments Received and Caltrans Responses

Chapter 3 presents scanned copies of all comment letters, comment cards, and emails received during the public comment period for the DEIR/S, as well as transcripts of the public meetings held for this project. Most letters contained numerous distinct comments; each individual comment within each letter is delineated with black brackets in the left margin of the letter and identified with a unique sequential alphanumeric code based on the commenter codes described in Chapter 1. Chapter 3 also presents Caltrans' responses to all of these comments. Many responses are specifically tailored to the individual comment, while some responses refer the reader to one or more of the Master Responses in Chapter 2.

Chapter 3 is presented in landscape format with each comment letter on the right half of the page and the corresponding Caltrans responses on the left.

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Acronyms and Abbreviations

µg/m^3	micrograms per cubic meter
AADT	average annual daily traffic
AASHTO	American Association of State Highway and Transportation Officials
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ac	acre, a measurement of land area
AC	asphaltic concrete
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AEP	Association of Environmental Professionals
APE	Area of Potential Effects
BA	Biological Assessment
BAAQMD	Bay Area Air Quality Management District
BAT	Best Available Technology
BCT	Best Conventional Technology
BIR	Bridge Inspection Report
BMP	best management practice
BO	Biological Opinion
CA NFA	California No Further Action
CA SLIC	California Spills, Leaks, Investigations and Cleanups
CA WDS	California Water Resources Control Board - Waste Discharge System
CAFE	Corporate Average Fuel Economy
Caltrans	California Department of Transportation
CAP	Climate Action Program
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCCS	Central California coast steelhead
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDP	California Department of Parks
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CIP	Capital Improvement Project

CMA	Marin County Congestion Management Agency
CMIA	Corridor Mobility Improvement Account
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CPUC	California Public Utilities Commission
CRLF	California red-legged frog
CRZ	clean recoverable zone
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency Database
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel, the measurement of noise that best represents human perception
dbh	diameter at breast height
DEED	Deed Restriction Program
DEIR/S	Draft Environmental Impact Report/Environmental Impact Statement
diesel PM	diesel particulate matter
DPS	distinct population segment
DTSC	California Department of Toxic Substances Control
EB	eastbound
EDR	Environmental Data Resources
EFH	essential fish habitat
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EJ	Environmental Justice
EMFAC2007	EMission FACtor modeling software by CARB
EO	Executive Order
ESA	environmentally sensitive areas
FA	Federal Agency
FEIR/S	Final Environmental Impact Report/Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FHWG	Fisheries Hydroacoustic Working Group
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
FIGR	Federated Indians of Graton Rancheria
FIRM	Flood Insurance Rate Maps
ft	foot/feet

GCC	global climate change
GGBHTD	Golden Gate Bridge, Highway and Transportation District
GHG	greenhouse gas
ha	hectare, a metric measurement of land area
HICOMP	State Highway Congestion Monitoring Program
HOV	high occupancy vehicle
HRER	Historic Resources Evaluation Report
I	Individual Citizens
I/C	interchange
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITS	Intelligent Transportation Statement
km	kilometer(s)
km/h	kilometers per hour
KP	kilometer post
LC	Local Community and Business Groups
LEDPA	Least Environmentally Damaging Preferred Alternative
LJ	Local Jurisdiction
LOS	level of service
LUST	leaking underground storage tanks
m	meter(s)
m^2	square meters
MALT	Marin Agriculture Land Trust
MCDEH	Marin County Department of Environmental Management
MCE	maximum credible earthquake
mg/m^3	milligrams per cubic meter
mi	mile(s)
MIS	Major Investment Study
MMWD	Marin Municipal Water District
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
mpg	miles per gallon
mph	miles per hour
MSAT	Mobile Source Air Toxics
MSE	mechanically stabilized embankment
MSN	Marin-Sonoma Narrows
MSN Project	Marin-Sonoma Narrows HOV Widening Project
MTA	Mendocino Transit Authority
MTC	Metropolitan Transportation Commission
NAAQS	National Ambient Air Quality Standards
NAC	Federal/State Noise Abatement Criteria

NAHC	Native American Heritage Commission
NB	northbound
NCRA	North Coast Rail Authority
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act of 1966
NMFS	National Marine Fisheries Service
NMWD	North Marin Water District
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOAA Fisheries	National Oceanographic and Atmospheric Administration's National Marine Fisheries Service
NOD	Notice of Determination
NOI/NOP	notice of intent/notice of preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
OGAC	open-graded asphalt concrete
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OWCEQ	Oak Woodlands Conservation Environmental Quality Act
PA	Programmatic Agreement
PAG	Policy Advisory Group
Pb	particulate matter, lead
PM	post mile
PM_{10}	fine particulate matter (less than 10 microns in diameter)
PM_{25}	fine particulate matter (2.5 microns in diameter or less)
PPDG	Caltrans Project Planning and Design Guide
ppm	parts per million
PRC	California Public Resources Code
Protocol	Caltrans' August 2006 *Traffic Noise Analysis Protocol*
PS&E	plans, specifications and estimates
PSI	Preliminary Site Investigation
PSR	Project Study Report
RA	Regional Agency
RAP	Relocation Assistance Program
RCB	reinforced concrete box
RCP	reinforced concrete pipe
RIP	Regional Implementation Program
ROD	Record of Decision

ROG	reactive organic gas
ROW	right-of-way
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RWQCB	California Regional Water Quality Control Board, San Francisco District
SA	State Agency
SAA	Streambed Alteration Agreement
SAP	Sampling and Analysis Plan
SB	Senate Bill
SB	southbound
SCDEH	Sonoma County Department of Environmental Management
SCTA	Sonoma County Transportation Authority
SCWA	Sonoma County Water Agency
SEL	sound exposure level
SFHA	Special Flood Hazard Area
SHOPP	State Highway Operation and Protection Program
SHP	State Historic Park
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SLC	State Lands Commission
SMART	Sonoma Marin Area Rail Transit
SMHM	salt marsh harvest mouse
SO_2	sulfur dioxide
SOV	single occupancy vehicles
SR	State Route
SSP	Contract Special Provisions
STIP	State Transportation Improvement Program
SWDR	Storm Water Data Report
SWF/LF	solid waste facilities/landfill sites
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAM	Transportation Authority of Marin
TASAS	Traffic Accident Surveillance and Analysis System
TCM	Transportation Control Measures
TCRP	Transportation Congestion Relief Program
TDC	Targeted Design Constituents
TEA-21	Transportation Equity Act for the 21st Century
TENS	Technical Noise Supplement
TIP	Transportation Implementation Plan
TKN	total Kjeldahl nitrogen
TNAP	Traffic Noise Analysis Protocol
TRANSDEF	Transportation Solutions Defense and Education Fund

TSM	Transportation Systems Management
TSS	total suspended solids
USACE	United States Army Corps of Engineers
USCG	United States Coast Guard
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
VCP	Voluntary Cleanup Program
VIA	Visual Impact Assessment
VMT	vehicle miles traveled
VOC	volatile organic compound
WB	westbound
WCB	Wildlife Conservation Board

Chapter 1 List of Commenters

This chapter lists the agencies, organizations, groups and individuals who provided written and/or oral comments on the Marin-Sonoma Narrows HOV Widening Project (MSN Project) Draft Environmental Impact Report/Environmental Impact Statement (DEIR/S) during the public comment period, which extended from October 16, 2007 through December 14, 2007. A court reporter was present to take a verbatim transcript of the two public meetings, which were held at the Sonoma-Marin Fairgrounds in Petaluma, California on November 6, 2007 and at the Novato Unified School District Board Room in Novato, California on November 14, 2007; these public meeting transcripts are included with the rest of the comment letters and emails in Chapter 3 (see Section 3.6, Comments and Responses for Individual Citizens).

Each comment letter, comment card and email submitted during the public comment period was assigned a unique identifying code consisting of one of the group codes shown below in Table 1-1 plus a sequential number.

Table 1-1 Commenter Group Code and Type

Group Code	Commenter Type
FA	Federal Agency
SA	State Agency
RA	Regional Agency
LJ	Local Jurisdiction (City or County)
LC	Local Community/Business Group
I	Individuals

Thus, comment letters submitted by federal agencies were designated FA1, FA2, FA3, etc.; letters from state agencies were designated SA1, SA2, etc., and so on.

The subsections below list the agencies, organizations, and individuals in each commenter group who submitted comments, along with the identifier code that was assigned to each one.

1.1 Federal Agencies

The name in parentheses indicates the representative of the agency who signed the comment letter.

FA1 U.S. Environmental Protection Agency (USEPA) (Connell Dunning)
FA2 National Marine Fisheries Service (NMFS) (Dick Butler)
FA3 U.S. Coast Guard (USCG) (David Sulouff)

1.2 State Agencies

The name in parentheses indicates the representative of the agency who signed the comment letter.

SA1 California Department of Fish and Game (CDFG) (Scott Wilson)
SA2 California Assemblymember Jared Huffman, Sixth District
SA3 California Public Utilities Commission (CPUC) (Kevin Boles)
SA4 California Regional Water Quality Control Board, San Francisco District (RWQCB) (Brendan Thompson)

1.3 Regional Agencies

The name in parentheses indicates the representative of the agency who signed the comment letter.

RA1 Golden Gate Bridge, Highway and Transportation District (GGBHTD) (Alan Zahradnik)
RA2 Marin Municipal Water District (MMWD) (Paul Helliker)
RA3 North Marin Water District (NMWD) (Drew McIntyre)
RA4 Sonoma County Transportation Authority (SCTA) (Suzanne Smith)
RA5 Sonoma Marin Area Rail Transit (SMART) (Lillian Hames)
RA6 Sonoma County Water Agency (SCWA) (Connie Munger)
RA7 Sonoma County Regional Parks Department (Kenneth Tam)
RA8 Transportation Authority of Marin (TAM) (Dianne Steinhauser)

1.4 Local Jurisdictions

The name in parentheses indicates the representative of the City or County who signed the comment letter.

LJ1 County of Marin, Department of Parks and Open Space (James Raives)
LJ2 County of Marin, Department of Public Works (Eric Steger)
LJ3 Marin County Supervisor, District 5, Judy Arnold
LJ4 City of Novato (David Wallace)
LJ5 City of Petaluma (Vincent Marengo)

1.5 Local Community/Business Groups

The name in parentheses indicates the representative of the organization or group who signed the comment letter. A skipped identifying code number is the result of a comment letter that was deleted from the comments database after initially being assigned a code in error (e.g., duplicate versions of the same letter).

LC1 Petaluma River Council (David Keller)
LC2 Sonoma County Bicycle Coalition (Christine Culver)
LC3 Sustainable Novato (Edward Mainland)
LC4 Marin County Bicycle Coalition (David Hoffman)
LC5 North Coast Rivers Alliance (Frank Egger)
LC7 Petaluma Chamber of Commerce (Onita Pellegrini)
LC8 Sierra Club (Doug Wilson)
LC9 Marin Audubon Society (Barbara Saltzman)
LC10 Marin Conservation League (Roger Roberts)
LC11 Transportation Solutions Defense and Education Fund (TRANSDEF) (Marc Chytilo)

1.6 Individual Citizens

These are the individual citizens who submitted comment letters, cards and emails. A skipped identifying code number is the result of a comment letter that was deleted from the comments database after being initially assigned a code in error. In cases where individuals submitted comments more than once, distinguishing information is supplied in parentheses.

I1	Ana Flores
I2	Angela Garvin
I3	Mary Glardon (11/6/07 comment card)
I4	Melissa Abercrombie
I5	Rhonda Berberich (email)
I6	Rhonda Berberich (comment card)
I7	Ruth and Norm Lynch
I8	Sean Buckley
I9	Tim Hurley
I10	Steven Seifert
I11	Residents of Arlington Drive [petition signed by multiple individuals]
I12	Tinoco Family
I13	Brian Redroci
I14	Marla Fields
I15	Bill Kortum
I16	Marge and Bob Schram
I17	Carla OCodhain
I18	Dennis Coleman
I19	Connie Ritchie
I20	Claire McCarthy
I21	Dominga Lopez
I22	Greg Abell
I23	Chip Worthington
I24	Lisa Pedrani
I25	Eleanor Sluis
I26	Frank Penry
I27	Eva Andrews
I28	Heracleo Munoz
I29	Ed and JoAnn Johnson
I30	John Silvestrini
I31	Jonathan Kopp
I32	Les Pierce
I33	Linda and Hoot Smith
I34	Diane Reilly Torres (12/14/07 email)
I35	Diane Reilly Torres (11/18/07 email)
I36	Diane Schaumleffel (comment card 12/10/07)
I37	Diane Schaumleffel (comment card 12/12/07)

I38	Edith Rivasplata (email)
I39	Edith Rivasplata (letter)
I41	George Bertram III (11/16/07 letter)
I42	Janice Cader-Thompson (email)
I43	Janice Cader-Thompson (comment card)
I44	Kevin and Kirsten Strain
I45	Marilee Montgomery
I46	Marian Giddings (comment card)
I47	Residents of Stuart Drive [petition signed by multiple individuals]
I48	Marian Giddings (email)
I49	Neal Osborne
I50	Frank Egger
I51	George Bertram III (10/29/07 letter)
I54	Mary Glardon and Kevin Bodwell (12/13/07 email)
I55	Public meeting transcript—Marin County
I56	Public meeting transcript—Sonoma County
I57	Donald Trudeau
I58	Thomas Saberi
I59	Residents of Kenwood Drive [petition signed by multiple individuals]
I60	Susan Stompe
I62	Tony Silveira

Chapter 2 Master Responses

This chapter contains the Master Response essays that were prepared to address the key issues that were raised by numerous commenters regarding the MSN Project and the DEIR/S. They are presented below in alphabetical order, and include the following:

- Master Response on Cumulative Air Quality (Section 2.1)
- Master Response on Greenhouse Gas Emissions (Section 2.2)
- Master Response on Need and Purpose (Section 2.3)
- Master Response on Induced Travel (Section 2.4)
- Master Response on Range of Alternatives (Section 2.5)
- Master Response on Smart Mobility Report (Section 2.6)
- Master Response on Use of Current Information (Section 2.7)

2.1 Master Response on Cumulative Air Quality

2.1.1 Introduction

A number of comments were received regarding the MSN Project DEIR/S discussion of cumulative air quality. This Master Response provides a justification for why the discussion of cumulative air quality impacts evaluated in the DEIR/S is reasonable and appropriate and satisfies the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

2.1.2 Summary of Comments

Comments submitted concerning the DEIR/S's cumulative air quality analysis claim that the discussion is flawed for the following reasons:

- The DEIR/S's analysis of cumulative air quality presumes that the region will remain in non-attainment status for ozone and fine particulate matter (less than 10 microns in diameter) (PM_{10}), rather than determining whether the project will help or hinder attainment.

- No quantitative analysis of ozone precursor emissions is presented for either the proposed project or cumulative conditions.

- No quantitative analysis of congestion versus emission is presented, and therefore the DEIR/S claim that the decrease in congestion would offset the increase in vehicle miles traveled (VMT) is not supported.

- The DEIR/S does not consider induced demand that would result from the new high occupancy vehicle (HOV) lanes, which would further increase the VMT of the traffic in the area.

2.1.3 Presumption of Future Non-Attainment

The comment concerning the presumption of the DEIR/S that the region will remain in non-attainment status for ozone and PM_{10} is believed to refer to the following text in Section 5.5, Cumulative Impacts Discussion, of the DEIR/S:

> Although air quality has improved over the years, the area continues to be in non-attainment of the state ozone and PM_{10} ambient air quality standards and in non-attainment of the federal ozone standard. The approved and pending land development projects, in combination with large transportation improvements that increase capacity, would continue to emit air pollutants that would contribute to cumulative air quality impacts without the MSN Project. (Page 5-21, lines 399-405)

This passage states that air quality in the region has improved in the recent past; however, the region is still considered to be in non-attainment of the state PM_{10} and ozone ambient air quality standards. The passage then states that approved and future transportation projects would further contribute to air quality impacts. However, the passage does not imply that this contribution would result in the region remaining in non-attainment status. Contrary to the comments, the DEIR/S does not presume the region will remain in non-attainment status of ozone and PM_{10}.

2.1.4 The MSN Project's Role in Achieving Attainment

The MSN Project is one of the many projects in the region designed to improve air quality. Section 3.2.6.3 of the DEIR/S (and in Volume 1 of this FEIR/S) states that the provision of HOV lanes is one of the recommended transportation control measures (TCMs) in the Bay Area Air Quality Management District's (BAAQMD's) *Bay Area 2000 Clean Air Plan*, which is designed to help the region achieve attainment of the ambient air quality standards. The MSN Project is also listed in the Metropolitan Transportation Commission's (MTC's) 2009 Transportation Improvement Program (TIP IDs MRN050034 and SON070004) and the *Final Transportation 2035 Plan* adopted on April 22, 2009 (Reference Number 230702).

According to the *EIR for the Transportation 2035 Plan* (MTC, 2009a), the plan would reduce carbon monoxide (CO) and ozone precursors compared to the non-implementation of the plan. In addition, the Transportation Improvement Program states that the transportation program would conform to federal ambient air quality plans and would help the region attain federal air quality standards. Because the MSN Project is incorporated into the regional transportation plans and because those plans are consistent with air quality management plans to attain state and federal ambient air quality standards, the MSN Project would be expected to contribute to regional air quality improvements.

The BAAQMD's *Bay Area 2005 Ozone Strategy* states that reactive organic gas (ROG) and nitrogen oxide (NO_x) (ozone precursors) emissions will decrease in the region between 2000 and 2020; specifically, it predicts that emissions from mobile sources will decrease by 73 percent ROG and 75 percent NO_x by 2020. This decrease would largely result from more fuel-efficient future vehicle fleets that will emit fewer emissions of ROG and NO_x, and from the implementation of a variety of TCMs that are designed to reduce congestion. As such, a quantitative analysis of ROG was not required to be performed because HOV lanes are one of the TCM measures shown not to have a significant impact to air quality.

2.1.5 Mitigating Factors that Reduce Air Emission Effects of Induced Vehicle Miles Traveled

The DEIR/S states that the MSN Project would cause induced travel demand, due to increased capacity that would increase the VMT in the Marin-Sonoma Corridor. On page 3.2-82, lines 1763 to 1766, the DEIR/S states:

> The VMT estimated for the Fixed HOV Lane Alternative would be slightly higher than that for the No Build Alternative, because the additional capacity associated with the project would increase the efficiency of the roadway and attract rerouted trips from elsewhere in the transportation network.

In addition, Table 3.2-11 in the DEIR/S (which is now Table 3.2-12 in Volume 1 of this FEIR/S) illustrates that the implementation of the MSN Project would increase the PM peak hour VMT over the No Build by only 0.11% during A.M. Peak and 0.14% over the No Build during PM Peak.[1] This minor increase in VMT and

[1] Due to an error, Table 3.2-11 in the DEIR/S contained incorrect values; the projected increase in VMT according to that table was 0.24% in the AM peak and 0.58% in the PM peak. The corresponding Table 3.2-12 in this FEIR/S presents the corrected values shown here, indicating that peak hour VMT increases would be substantially lower than those shown in DEIR/S Table 3.2-11.

associated emissions would be offset by the decrease in emissions from a more fuel-efficient vehicle fleet in the future. This conclusion is supported by the *2005 Ozone Strategy Plan*, which, as noted above in Section 2.1.4, predicts that ROG and NO_x emissions from mobile sources will decrease significantly by 2020.

Results from the California Air Resource Board's (CARB's) emission modeling software, EMFAC2007 version 2.3, for traffic at various speeds in Marin County for the years 2008 and 2030 indicate a similar decrease in ROG and NO_x. For Marin County, the average ROG and NO_x emissions per VMT would decrease by 77 percent and 74 percent, respectively. Therefore, the VMT increase from the MSN Project would not cause significant impact to the region's air quality.

2.1.6 MTC's Study of HOV Lanes – Analysis of Induced VMT and Air Quality

MTC prepared the *2002 HOV Lane Master Plan Update* in March 2003. The plan contained an analysis of the impacts of implementing HOV lanes throughout the Bay Area, including an assessment of air quality in 2010. According to this plan, the implementation of planned HOV lanes in the Bay Area would generally reduce VMT, increase transit ridership, decrease vehicle hours of delay, and reduce ROG and NO_x emissions (Section 11, Air Quality, pages 47 – 55).

The *2002 HOV Lane Master Plan Update* also discussed whether HOV lanes might induce more vehicular traffic. A primary conclusion of the discussion is reproduced below.

> Since most Bay Area freeway corridors will be congested in the future due to projected growth in the region's population and jobs, the peak direction commute period will have little available capacity that could induce individuals to take extra trips - with or without HOV lanes. Bay Area HOV lanes currently operate as mixed flow lanes during non-commute periods. Non-commute trips (e.g., shopping, recreation) show lower sensitivity to time and cost variables in traditional models; therefore, the availability of new capacity would likely be a weak incentive to induce additional non-commute trips (page 52 -53).

According to the *2002 HOV Lane Master Plan Update*, most TCMs such as HOV lanes reduce both ROG and NO_x emissions. In the past, HOV lane emission benefits in regional air quality plans have been accounted for in the "baseline" emission inventory for the State Implementation Plan (SIP). This approach is preferred, rather than identifying HOV lanes as a separate TCM, since it provides for a more

systematic analysis of the transportation network. It is also consistent with the way in which the transportation air quality "conformity" analysis has been carried out under the regulations promulgated by the U.S. Environmental Protection Agency (USEPA). Studies (including the *2002 HOV Lane Master Plan Update*) report that HOV lanes do not cause significant impacts to cumulative air quality, and therefore a quantitative analysis of congestion versus emissions was not necessary.

2.1.7 Conclusion

The DEIR/S notes that the MSN Project in combination with other projects would contribute to cumulative air quality impacts in the region; however, it does not suggest that the Bay Area will remain in non-attainment for ozone and PM_{10}. The DEIR/S, as well as this FEIR/S, acknowledge that the MSN Project would cause a slight increase in VMT due to induced demand. However, as supported by regional air quality plans, ozone precursors are projected to decrease substantially in the future due to the implementation of TCMs and a more fuel-efficient future vehicle fleet. These factors would offset the emissions expected from the slight increase in VMT caused by the MSN Project, and thus, the project would not result in a cumulatively considerable contribution to cumulative air quality impacts.

2.1.8 References

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2.2 Master Response on Greenhouse Gas Emissions

A number of comments were received regarding greenhouse gas (GHG) emissions for the MSN Project. This master response provides the following on this topic:

- Summary of types of comments received pertaining to GHG emissions
- Summary responses to these GHG-related comments
- Project-level analysis of GHG impacts
- Avoidance, Minimization and Mitigation Measures implemented to reduce the GHG emissions impacts of the MSN Project

2.2.1 Summary of Comments on GHG Emissions

Multiple comments were received from agencies and individuals concerning how GHG emissions are addressed in the DEIR/S in terms of project alternatives, the traffic analysis, and cumulative GHG emissions. Comments were also made toward Caltrans' role in GHG policy development. These comments are summarized below.

PROJECT ALTERNATIVES

GHG-related comments pertaining to project alternatives included the following:

- Alternatives should be presented, including rail, transit, conversion of existing lanes to high occupancy vehicle (HOV), and rapid bus transit, that would de-incentivize auto use and thereby reduce GHG emissions.
- The multimodal alternative requested during the MSN Project scoping process would result in lower overall GHG emissions by encouraging drivers to switch their trips to transit, which would result in less highway congestion. The multimodal alternative would also create a shift in development practices to "smart growth," which would implement regional planning initiatives directed at climate protection.
- The EIR/EIS should calculate the net change in GHG emissions caused by the project, as well as compare the change in emissions between project alternatives and a transit alternative.

TRAFFIC ANALYSIS

GHG-related comments pertaining to the traffic analysis in the DEIR/S included the following:

- Inadequate traffic analysis in the DEIR/S fails to adequately address the potential increase in GHG emissions resulting from an increase in vehicle miles traveled (VMT) as well as speed variations and acceleration/deceleration cycles.

- Increasing highway capacity promotes single occupant vehicles (SOVs), which increases GHG emissions.

- The traffic analysis failed to properly account for induced demand, which results in underestimating GHG emissions.

- The analysis fails to use a "Comprehensive Modal Emissions Model" to provide an analysis of carbon dioxide (CO_2) emissions showing that vehicles traveling at lower average speeds with more acceleration/deceleration events release higher amounts of CO_2. Improving traffic flow will reduce CO_2 emissions by increasing average traffic speeds during peak periods, reducing high speeds, and smoothing out the stop-and-go effect, which allows a more constant traffic flow for longer durations.

- Commenters recommend using "complete induced demand modeling," which requires accounting for each of the separate components of induced demand. These include shifts to longer routes, changes in destinations causing longer trips, change in travel mode, and changing home or work locations resulting in longer trips.

- A quantitative analysis of congestion and GHG emissions should include a graph of the project time period and the predicted GHG emissions.

- The DEIR/S's assertion that "…it is reasonable to expect that emissions of carbon and ozone precursors would be reduced compared to No Build conditions…" would require a quantitative analysis of congestion versus emissions.

CUMULATIVE GHG EMISSIONS

Comments pertaining to cumulative GHG emissions included the following:

- Cumulative GHG analysis should consider VMT and induced growth, and should correct estimated VMT that results from induced demand.
- Cumulative analysis of GHG emissions should quantitatively analyze congestion vs. emissions.

CALTRANS ROLE IN GHG POLICY DEVELOPMENT

Comments pertaining to Caltrans' role in advancing GHG policy development by leading the development of GHG emissions protocols included the following:

- Commenters were disappointed that Caltrans is not providing a protocol for GHG emissions and global climate change (GCC), in addition to not providing mitigation in reducing these emissions.
- Summary conclusions of Caltrans' Standard Environmental Reference Guidelines should be included in the FEIR/S.
- The document should show implementable projects and policies that will measurably reduce GHG emissions, and should show emissions reductions or increases for both projects and policies.
- Comments also cited Assembly Bill (AB) 32, which calls upon state agencies to reduce GHG emissions, and referred to Caltrans' Climate Action Program (CAP) which includes Caltrans' plans to contribute to the State's GHG emissions reduction targets.

2.2.2 Summary Responses to Greenhouse Gas Comments

Caltrans and FHWA thank all of the commenters for their views. The following subsections address the commenters' concerns regarding the abovementioned categories of issues pertaining to GHGs and climate change.

Project Alternatives. Caltrans looked at many different alternatives. While CO_2 or GHG emissions were not among the criteria used to evaluate the alternatives, congestion reduction was a basis for evaluating the alternatives. Because of the close relationship between congestion and higher CO_2 emissions at speeds of 0-25 mph, congestion reduction is a close substitute for evaluating GHG-reducing alternatives.

Therefore, Caltrans did take emissions associated with congestion, including GHG emissions, into consideration during the project alternatives analysis process.

It should also be noted that the Build Alternatives propose the addition of HOV lanes that can be used by multi-modal vehicles (e.g., express bus service, carpoolers, some hybrid vehicles, etc.). The high-occupancy capacity in effect increases multi-modal capacity and GHG emissions-reduction capacity. Please also see the Master Response on Range of Alternatives (Section 2.5 below), and Volume 1, Chapter 2, Project Alternatives.

Traffic Analysis. The comments regarding analysis of induced demand and vehicle miles traveled are addressed in Section 2.4 of this volume, in the Master Response on Induced Travel. Modeling and quantifying GHG emissions is addressed in Volume 1, Section 4.3.6, Climate Change. Please also see the *GHG Project-Level Analysis* section below. The comments regarding ozone precursors emissions are discussed in the Master Response on Cumulative Air Quality (Section 2.1 above).

Cumulative GHG Emissions. The comments on this topic are addressed in the Master Response on Induced Travel (Section 2.4 below) and in Volume 1, Section 4.3.6, Climate Change.

Caltrans role in GHG Protocol Development. A discussion on this topic is presented in the Climate Change section in Volume 1 of this FEIR/S (Section 4.3.6).

2.2.3 Project-Level GHG Analysis

Caltrans has conducted a quantitative analysis comparing the CO_2 emissions of the Build and No Build Alternatives to existing levels using the EMFAC2007 emission modeling software (version 2.3), and the analysis shows that CO_2 emissions will increase over existing levels under either scenario.

For the quantitative analysis of CO_2 emissions of the MSN Project, please refer to Volume 1 of this FEIR/S, Section 4.3.6, Climate Change. A discussion of limitations and uncertainties with modeling and impact assessment can also be found in this section.

Caltrans is attentive to addressing GHG once federal, state and regional regulatory agencies have adopted methodologies and criteria for analysis and assessment. While the regulations and tools for assessing project-level GHG emissions evolve, Caltrans is developing climate change strategies with various agencies and programs statewide

(see the new Table 4-4 in Volume 1 of this FEIR/S). For more information on Caltrans' role in statewide efforts toward reducing GHG Emissions, please see Section 4.3.6 in Volume 1 or the *Climate Action Program at Caltrans* document (Caltrans, 2006).[2] Caltrans is also implementing its own internal policies such as the Director's Policy (DP) 23-R1, effective June 2007. DP 23-R1 acknowledges that Caltrans incorporates energy efficiency and climate change measures into the planning, development, design, operations and maintenance of transportation projects and facilities. Caltrans further intends to create a comprehensive long-term energy policy to incorporate energy efficiency and climate change policy, planning and implementation. As noted above, Caltrans also has a CAP in place to better facilitate and promote GHG emission reduction measures. The CAP balances program delivery within the context of recent regulations, such as AB 32, by:

- Creating transportation strategies that contribute to the State's GHG emission reduction targets;
- Developing proper guidelines and performance measures and developing quantifiable reporting protocols to monitor GHG footprints and provide feedback for program development; and
- Assuring that Caltrans staff receive proper training to carry out related activities.

2.2.4 Avoidance, Minimization, and Mitigation Measures

The MSN Project will incorporate measures to reduce GHG emissions and potential climate change impacts. These include:

- Use of reclaimed water to conserve energy.
- Landscaping to reduce surface warming and reduce CO_2 through photosynthesis.
- Use of Portland cement (a lighter colored surface to reduce reflectivity).
- Use of energy-efficient lighting, such as LED traffic signals.
- Idling restrictions for trucks and equipment.

[2] Available online: http://www.dot.ca.gov/docs/ClimateReport.pdf

In addition to Caltrans' active role in reducing GHG emissions, useful incentives for reducing GHG emissions from the transportation sector can be found in AASHTO's *Primer on Transportation and Climate Change* (2008), CAPCOA's *CEQA and Climate Change* white paper (2008), and documents released from the California Attorney General's Office, among others.

2.2.5 Conclusion

As subsequent project phases move forward, the FEIR/S may need to be reevaluated for consistency with current regulations, in order to reassess and hopefully reaffirm the validity of its conclusions. Changes in environmental conditions or laws that may result in new conclusions with regard to impacts not addressed in the original document would require additional analysis and possibly mitigation. For instance, GHG emissions associated with the MSN Project could be evaluated following adoption of criteria and analytical methodology to maintain consistency with current practices and regulations.

For further discussion regarding GHGs, please refer to Section 4.3.6 in Volume 1 of this FEIR/S.

2.2.6 References

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2.3 Master Response on Need and Purpose

2.3.1 Introduction

A number of comments were received regarding the MSN Project's need and purpose. This Master Response presents a summary of these comments, the role of the Lead Agency in formulating a need and purpose, consultations Caltrans conducted in formulating the need and purpose, and consideration of objectives in the need and purpose. Lastly, it discusses the adequacy of the MSN Project need and purpose under CEQA and NEPA.

2.3.2 Summary of Comments on Need and Purpose

Multiple comments were received from agencies and individuals concerning the alleged shortcomings in the MSN Project DEIR/S, including the following:

- The stated purpose of "reduce congestion along US 101" is overly simplistic.
- The project's need should be clearly outlined - is it simply reducing congestion or are effects on air quality and reduction of vehicle miles traveled (VMT) also factors in reviewing alternatives?
- The need and purpose of the project should consider parking, consumer cost savings, transport diversity, improved traffic safety, reduced pollution, energy conservation, efficient land use, improved future health, and minimal impact on the environment.
- The narrow range of objectives precludes the consideration of other alternatives that emphasize transit, such as the Sonoma Marin Area Rail Transit (SMART) project.
- The need and purpose is inadequate because it did not provide a statement of objectives describing the underlying purpose of the project, nor did it include an objective of addressing the capacity restraints in the corridor.

2.3.3 Lead Agency Role in Defining Purpose

In general, the delineation of a project's purpose, or its goals and objectives, is within the purview of the Lead Agency(ies) (in the case of the MSN Project, Caltrans and the Federal Highway Administration [FHWA]). The purpose must be sufficiently

broad to allow for consideration of different ways of accomplishing the purpose. As noted by the commenters, prescribing a set of goals and objectives that are so tightly drawn as to preclude consideration of alternatives would violate a fundamental tenet of NEPA—namely, the formulation and consideration of alternatives. By the same token, project goals and objectives that are so broad do not readily respond to a project's needs nor allow a reasonable narrowing of the range of alternatives. Both CEQA and NEPA allow lead agencies wide latitude in establishing the goals and objectives since those agencies are proposing and sponsoring the action.

Establishment of the need and purpose occurred through a thorough process that involved multiple meetings with local, state, and federal agencies, and not, as some comments have suggested, in isolation.

2.3.4 Consensus by Others on Project Need and Purpose

Because the MSN Project is subject to regulations of both NEPA and CEQA, the planning and design of the MSN Project was extensively reviewed by a number of other state and federal agencies. The FHWA published a Notice of Intent and Caltrans published a Notice of Preparation to inform the public of the project. After these notices were issued, public scoping meetings were held to solicit input from the public and various public agencies about the scope of the environmental analysis. In addition, Caltrans met with state, federal, and local agencies in Marin and Sonoma Counties.

Finally, it should be noted that the MSN Project is being reviewed under the NEPA/404 "Integration Memorandum of Understanding," which is intended to streamline the NEPA and Section 404 Clean Water Act processes. As described in the DEIR/S (page 6-5), both NEPA and Section 404 of the Clean Water Act require consideration of alternatives; NEPA requires consideration of alternatives that could achieve the need and purpose for a proposed action, while the 404 process requires consideration of alternatives to avoid and minimize impacts to wetlands. As part of this process, signatories to the Memorandum of Understanding, which include, but are not limited to, FHWA, Caltrans, the U.S. Environmental Protection Agency, the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, and the Regional Water Quality Control Board, meet to discuss the progress of the project. These agencies also agreed on the need and purpose and the range of alternatives presented by Caltrans and FHWA (see Appendix B of the DEIR/S and this FEIR/S).

In light of these efforts, it should be clear that the identification of the purpose and need was vetted by a variety of stakeholders.

2.3.5 Needs within the MSN Project Boundaries

Section 3.1 of the DEIR/S (and in Volume 1 of this FEIR/S) identifies numerous past and current transportation studies that support the largely foregone conclusion that congestion on US 101 is a problem and is expected to worsen. In addition to traffic congestion, Chapter 1 of the DEIR/S discusses several other features that impede highway operations and thereby contribute to congestion and vehicle delays. These features include the following:

- A bottleneck occurs where US 101 changes from a six-lane freeway to a four-lane expressway.
- Traffic is slowed on the expressway section of US 101 as vehicles enter and exit the expressway's at-grade intersections.
- Vertical and horizontal roadway curves do not meet design standards.
- Shoulder widths do not meet current design standards and thus do not provide adequate pull-out areas for disabled vehicles.
- Portions of US 101 historically flood, because existing culverts are undersized to handle runoff during large storms.

As a result, these specific deficiencies should be corrected as part of any major capital investment to provide HOV lanes within the US 101 corridor.

Some who commented suggested a variety of other objectives, including saving parking spaces, project cost savings, transport diversity, energy conservation, efficient land use, and improved future health. Opportunities to achieve corollary benefits, such as those discussed below, are commendable but needn't be explicitly identified. Following are additional objectives that commenters posited and a discussion of how Caltrans regards them within the project need and purpose and alternatives analysis.

Environmental Protection Objectives. Some who commented felt the DEIR/S should have specifically mentioned protection of the environment as an objective. Yet Caltrans' stated approach to dealing with corridors that involve sensitive natural

resources is first and foremost avoidance of the resources, then minimization of potential harm, and lastly mitigation. The DEIR/S, in its discussion of environmental resources (Chapter 3 of Volume 1), describes the specific efforts by Caltrans to avoid impacts as part of the conceptual design of the project and the access options.

Air Emissions Objectives. Others who commented questioned whether the project is intended to solely relieve congestion or if reduction of air emissions or vehicle miles traveled were also considerations. These issues need not be treated as independent objectives. Caltrans' role is to provide for and enhance mobility. The region and the State, in their efforts to reduce traffic congestion and attain air quality goals, have recommended the installation of HOV lanes. Thus, it would appear that relieving congestion and improved air emissions need not be considered as mutually exclusive objectives.

Safety Objectives. Other comments suggest that the project purpose is deficient because safety is not identified as a specific project purpose. The safety aspect was previously considered in developing the need and purpose; however, the project does not qualify as a safety project because it does not exhibit the accident rate that meets or exceeds the state average for accidents on similar facilities monitored by the Traffic Accident Surveillance and Analysis System (TASAS). However, the project would correct the deficiencies discussed in Chapter 1, and provide corollary safety benefits by bringing the roadway to standard and correcting the drainage issues.

2.3.6 Statement of Objectives, Range of Objectives, Underlying Purpose, and Capacity Restraints in Corridor

For the purposes of streamlining the EIR/S, the statement of objectives required under CEQA Guidelines has been cast in terms of the need and purpose and also complies with CEQA Section 15124, subd. [b], which states that the description of the project shall contain:

> "[a] statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding consideration, if necessary. The statement of objectives should include the underlying purpose of the project."

The project's need and purpose defines the need for congestion relief, standardizing roadway features and improving drainage. Caltrans and FHWA use congestion as a performance measure of the highway operations. Caltrans and FHWA also use

comparisons between existing physical conditions of the facility and current design standards. Some who commented stated that establishing “congestion relief” as a project objective narrows the range of alternatives. However, the goal of congestion relief is comparable to identifying needs based upon alleviating “capacity restraints in the corridor” or a need to “increase traffic volumes,” as yet others have suggested. Therefore, using congestion relief as a project objective has not narrowed the range of alternatives to exclude other modes, such as transit. See also Section 2.5, Master Response on Range of Alternatives.

Under NEPA, an agency’s statement of need and purpose is examined under a reasonableness standard. Caltrans and FHWA have adequately described the logic underlying the highway project, the project’s substantial independent utility (see pg. 1-4 in Volume 1 of this FEIR/S), and the project’s ability to relieve congestion even if no other projects are constructed (see Volume 1, Section 3.1.10, Traffic and Transportation). Also, the EIR/S does not commit Caltrans and FHWA to a definite course of action with respect to any other project.

2.4 Master Response on Induced Travel

Several comments were received on the concern that the MSN Project would substantially increase vehicle miles traveled (VMT). The following Master Response has been prepared to respond to this concern.

The concept of induced travel derives from the fact that after a highway has been improved, travel speeds are also improved, and thus more travelers will use the highway, increasing the total amount of traffic on it. This increased traffic is said to be the result of "induced travel."

Studies have shown that the increased traffic on an improved highway is due primarily to six separate factors:

1. **Route changes –** Some travelers who previously did not use the highway will modify their routes to use the improved highway because it has become the fastest route to their destination. For these travelers, the quickest route to their destination did not include traveling on the highway before the improvement, but does after the highway is improved and its travel speeds are increased.

2. **Departure time changes –** Some travelers will have been shifting the time that they begin their trips to avoid congested highway conditions during peak travel periods. Once the facility is improved and congestion decreased, some travelers will shift their travel back to their preferred time during the peak periods, thus increasing peak period travel.

3. **Mode shifts** – Improved travel speeds along the improved highway will make it more attractive and some travelers will change from alternative travel modes and begin driving on the improved facility.

4. **Destination changes** – Some travelers will take advantage of improved travel speeds along the improved highway to travel to more distant destinations than they otherwise would have.

5. **Additional trips –** Because of the improved travel speeds along the improved highway, some trips that would not otherwise have been taken will be taken.

6. **New development/Additional land use** – In time, improved travel speeds along the highway may encourage additional development along the highway. Trips to and from the new development will increase the traffic on the highway.

The first factor, route changes, does not represent additional or induced travel. Rather, it represents travelers shifting the route for their trips. These routes may be longer or shorter than those taken before the highway improvement. Vehicles taking a freeway rather than local streets will likely have a more uniform travel speed with fewer stops and starts. This should decrease the amount of air pollution created by the vehicle. Also, it is usually better for local circulation if through traffic that was diverted to local streets returns to the freeway. Route changes and their effect on corridor VMT have already been taken into account in the travel models used for this project.

The second factor, departure time changes, also does not represent additional or induced travel. It simply represents travelers who choose to travel at different times. This factor is not explicitly accounted for in the traffic model used for this project but should have no effect on the total VMT. This is because the time within the day that travelers choose to travel will have no effect on the total amount of travel during a 24-hour period.

The third factor, mode shift, also does not represent additional travel. It could represent additional motor vehicle travel as travelers shift from other travel modes to motor vehicle travel. The traffic model used to analyze this project's traffic volumes includes a "mode split" step that models these effects.

Thus, the first three factors represent increases in the number of vehicles using the highway during peak periods but do not represent induced travel. Rather, they represent decisions by travelers concerning where, when, and how they will make trips they are already making on the transportation system. These three factors could result in more travelers than otherwise expected using the highway during the peak period, but do not represent increased travel.

The fourth and fifth factors, destination changes and additional trips, do represent induced travel. If a traveler begins making longer trips or making more trips, the total VMT will increase, all other factors being equal. Neither of these factors is accounted for in most traffic models, including the one used to analyze the traffic effects for this project. Nearly all travel demand models assume that the number of trips and the length of trips taken by a given household are constant and not changed by the highway conditions. Although there has been some controversy concerning the

relative contribution of induced travel to the total traffic volume, recent research (see References below) indicates that the contribution is small. One recent study in California, which examined the question of induced travel through comparison of improved and unimproved highway segments, found no statistical difference between the improved and unimproved segments and thus "no evidence of induced demand."

The sixth factor, travel associated with new development/additional land use, typically applies where a new highway is constructed in an undeveloped area. This is not the case with the MSN Project as US 101 is a well-established highway. Local government plans and zoning have a far greater influence on local development patterns than any improved access allowed by the addition of HOV lanes. Even if additional development does occur along the US 101 corridor, it will likely have been diverted from other parts of the area and not represent additional development for Marin and Sonoma Counties.

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2.5 Master Response on Range of Alternatives

2.5.1 Introduction

Caltrans and FHWA received several comments on the range of alternatives considered and the alternatives analysis of the MSN Project. This Master Response summarizes and addresses these comments, as well as summarizing the alternatives evaluation process and the public and agency review of the range of alternatives.

2.5.2 Summary of Comments on Alternatives

Some commenters on the MSN Project DEIR/S stated that the alternatives analysis is inadequate and that Section 2.4, Alternatives Considered and Withdrawn (which is now Section 2.6 in Volume 1 of this FEIR/S), does not adequately address potential alternatives, including a commuter rail alternative. Other comments about the DEIR/S alternatives analysis include the following:

1. The entire alternatives development process was short-sighted and narrow in its focus, predisposing a narrow range of alternatives.

2. CEQA's alternatives analysis must describe "a range of reasonable alternatives... that feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects."

3. Potential alternatives should factor in public transit, road pricing, "smart growth" land use strategies, and air quality.

4. One commenter suggested a new alternative that would include the following actions:

    - Provide the shortfall in construction funding to enable Sonoma Marin Area Rail Transit (SMART) to build a commuter rail and bicycle-pedestrian path system from Cloverdale to Larkspur Landing; furthermore, fund the annual operations subsidy of SMART.

    - Use the pattern of densification of land use opportunity sites created by the Sonoma/Marin 1997 Multi-Modal Transportation & Land Use Study (Calthorpe Study) in the project's forecasting and operational study.

- Conduct further design studies on the potential to convert the existing auxiliary lane from State Route (SR) 37 to Rowland into a mixed flow lane, and convert a mixed flow lane there into a high occupancy vehicle (HOV) lane.

- In the southbound direction, design queue jump access for HOVs passing from the northern-most HOV point on northbound US 101 in Sonoma to the 2-lane section of the Narrows (Segment B). According to the suggested alternative, Caltrans would construct HOV lanes in Segment C consistent with the Calthorpe Study recommendation. From the northern project limits to the SR 116 East interchange in the northbound direction, Caltrans would design queue jump access for HOVs passing from the southernmost HOV point on southbound US 101 in Sonoma to the two-lane section of the Narrows.

- Upgrade Segment B to freeway status, correct operational deficiencies as well as drainage and flooding problems, and exclude HOV lanes from being constructed.

- Look for feasible mitigations to preserve substantial numbers of redwood trees when constructing the new North Petaluma Overhead.

- Construct Access Option 12b, after optimally locating access roads to reduce tree removal and minimize their cross-sections, consistent with context-sensitive design for rural roads.

- Build bicycle and pedestrian facilities in the corridor.

2.5.3 Evaluation Process and Consensus by Others on Alternatives

Because the MSN Project is subject to regulations of both the NEPA and CEQA, the planning, alternatives analysis, and project development processes of the MSN Project were extensively reviewed by a number of other state and federal agencies.

The FHWA published a Notice of Intent and Caltrans published a Notice of Preparation to inform the public of the project in 2001. Subsequently, Caltrans and FHWA evaluated and ranked 26 options, and presented the top four in the DEIR/S. This analysis and the assumptions are presented in Appendix A of the DEIR/S.

The evaluation underwent interdisciplinary scoring and review. Additional public meetings were then held to present the four top-ranking alternatives (see Chapter 6 of the DEIR/S and in Volume 1 of this FEIR/S). These options were also presented for input to Marin and Sonoma city and county agency officials. In addition, Caltrans held numerous public meetings with the Policy Advisory Group, representing a body of locally-elected Marin and Sonoma County officials, where the results of the evaluation process were also presented and discussed.

2.5.4 Response to Comments on Alternatives

In the DEIR/S, Caltrans and FHWA acknowledge that providing congestion relief in the project corridor demands a multi-modal transportation approach, and no single entity or project can fully address the travel demand in the Marin-Sonoma Corridor. However, congestion reduction is not the only need and purpose of the MSN Project. Other operational corrections include standardizing the infrastructure, and upgrading drainage facilities to reduce flooding. The alternatives that were considered and withdrawn (Transportation Systems Management, Express Bus Service, High Occupancy Toll Lanes, Commuter Rail Service, and Mixed Flow Lanes) are discussed in the document and clearly state where these alternatives fail to meet the need and purpose of the project.

Of particular interest to some who commented were Transportation Systems Management (TSM), express bus service, and commuter rail service. TSM enhancements and express bus service as stand-alone alternatives are not viable due to limitations of the existing infrastructure. However, these alternatives will be able to be better utilized under the MSN Project Build Alternatives. That the commuter rail service and express bus service were withdrawn as stand-alone alternatives does not mean that these services have no value; they just do not meet the need and purpose of the project as comprehensively as the proposed Build Alternatives.

Under CEQA and NEPA, the range of alternatives in an EIR/EIS is governed by the rule of reason. The rule of reason requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR need examine in detail only the ones that the Lead Agency determined could feasibly attain most of the basic objectives of the project. The range of feasible alternatives is to be selected and discussed in a manner to foster meaningful public participation and informed decision-making (CCR.14, sec. 15126.6, subd. [f]). In addition, feasibility is a key concept in determining which alternatives to analyze in depth. The EIR needs to incorporate

detailed analysis only for alternatives which the Lead Agency determines could feasibly attain most of the basic objectives of the project (CEQA Guidelines 15126.6[a]).

Among the factors that Caltrans and FHWA took into account when addressing the feasibility of alternatives for the MSN Project were economic viability and consistency with regional planning. Economic viability was demonstrated in February 2007 when the California Transportation Commission allocated $120 million toward the MSN Project from the Corridor Mobility Improvement Account (CMIA) that was created when Proposition 1B was approved by California voters in November 2006. In current transportation funding processes, regional planning is also correlated with economic viability. As has been disclosed in the DEIR/S, the MSN Project is one of many projects in the Metropolitan Transportation Commission (MTC) Regional Transportation Plan. In addition, the MSN Project would extend the HOV lane system, which is part of MTC's vision for strategic expansion in the Bay Area.

In light of the previous discussion, here are Caltrans and FHWA's responses to the general comments on the range of alternatives. In the process of following the requirements for the alternatives analysis described above, Caltrans and FHWA have found that:

- Funding the construction and operation of the SMART project with funds that have been allocated to the MSN Project is not feasible. The existence of a funding shortfall for the SMART project, or for any other transportation project that some members of the public deem to be preferable to the MSN Project, is not a sufficient justification for proposing an alternative that does not meet the need and purpose of the MSN Project; furthermore, if the MSN Project is not constructed, the resources will simply go back into the CMIA and State Highway Fund toward other highway projects. In addition, the economic viability of the MSN Project has already been demonstrated and the Build Alternatives proposed meet the need and purpose of the project (see Section 2.3, Master Response on Need and Purpose). Although SMART does not fulfill the need and purpose of the MSN Project, it remains one of several viable projects with the potential to provide additional improvements to the transportation system in the Marin-Sonoma corridor if alternative funding sources are identified.

- Land use assumptions for the traffic operational study are adequate and provide sufficient information to decisionmakers. As is customary, Caltrans used Association of Bay Area Governments (ABAG) land-use assumptions as a basis for the traffic analysis, and these assumptions were disclosed in the DEIR/S Section 3.1.9, Traffic and Transportation (which is Section 3.1.10 in Volume 1 of this FEIR/S). The adequacy of the traffic studies is not dependent upon the commenter's stated specifications. For further discussion of land use assumptions, please also see Master Response on Use of Current Information.

- Discussion of alternatives need not be exhaustive. The alternatives analysis has provided enough information for Caltrans, FHWA, and other decisionmakers to make a reasoned choice. The project improvements under the preferred alternative meet the project's need and purpose. The MSN Project, like many transportation projects, has been screened by the federal, regional, and local transportation planning processes. If a separate proposal, as described, is found with logical termini, and having independent utility with an adequate need and purpose, then it, too, could feasibly be sponsored as a viable project. But the Build Alternatives proposed in the DEIR/S are adequate to meet the need and purpose of the MSN Project.

The following bullet items address the specific alternative proposed under point 4 (starting on page 2-25). Overall, the alternative proposed does not seem to provide marked benefits over previously analyzed alternatives, including environmental or transportation benefits. In the process of following the requirements for the alternatives analysis described above, Caltrans and FHWA have found that:

- HOV lanes proposed under the MSN Project can be considered facilities that provide queue jumping past bottlenecks for carpools, transit, and other qualified HOV lane users. The Preferred Alternative would also provide HOV bypass lanes at existing interchanges, which is also a facility that provides queue-jumping benefits.

- Meeting the needs of correcting operational deficiencies would still entail realigning the mainline and standardizing lanes, shoulders and medians. Consequently, this measure would still cause considerable environmental impacts. Furthermore, not building the HOV lanes through Segment B would not be consistent with regional, and local transportation plans. Therefore,

additional alternatives are not needed to correct operational deficiencies and meet conformity with regional and local transportation plans.

- The MSN Project has incorporated avoidance and minimization measures to preserve environmental resources, and these measures will continue to be implemented throughout the design and construction phases. Therefore additional alternatives are not needed to achieve the desired mitigation and preservation of trees.

- The MSN Project development process has incorporated context-sensitive features, including design exceptions to avoid environmental resources and reuse of existing roads to minimize impacts to the rural character in Segment B. Further refinements to the project design to avoid tree removal or incorporate further context-sensitive features will be considered during the design phase. Therefore, additional alternatives do not need to be studied to reduce tree removal and incorporate context-sensitive design.

- The MSN Project does include bicycle/pedestrian lanes to replace bicycle access that is currently provided along the expressway shoulder (see DEIR/S Section 3.1.9/Section 3.1.10 in Volume 1 of this FEIR/S). The project also fulfills specific goals expressed at meetings with SMART and the local bicycle and pedestrian community: namely, that the Class 1 and Class 2 lanes provide connections to the SMART bikeway, Olompali State Historic Park (SHP), and San Antonio Road. These connections are also evident in the project mapping provided in Volume 2 of the FEIR/S. Therefore, additional alternatives to provide bicycle/pedestrian access are not needed.

It should also be noted that the MSN Project is being reviewed under the NEPA/404 "Integration Memorandum of Understanding," which is intended to streamline the NEPA and Section 404 Clean Water Act processes. NEPA requires input from signatory agencies on the range of alternatives that could achieve the need and purpose for a proposed action. Caltrans has extended participation in this process to non-signatory agencies as well, including the U.S. Environmental Protection Agency, the U.S. Army Corps of Engineers, the National Oceanic and Atmospheric Administration, the California Department of Fish and Game, and the Regional Water Quality Control Board. The NEPA/404 process also requires consideration of alternatives toward avoidance, minimization of wetlands and other waters of the U.S. The consensus of these agencies on the need and purpose, range of alternatives, and

mitigation are documented in correspondence in Appendix B in the DEIR/S and FEIR/S.

The previous discussion of the alternatives analysis process and the agencies' achievements under the NEPA/404 process demonstrate that Caltrans and FHWA have met the requirements under NEPA and CEQA for analyzing an adequate range of alternatives for the MSN Project.

2.6 Master Response on the Smart Mobility Report

This Master Response addresses comments submitted during the public comment period pertaining to a report entitled *Review of Marin Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement*, dated December 2007, which was prepared for the Transportation Solutions Defense and Education Fund (TRANSDEF) by Smart Mobility, Inc. This report (hereinafter referred to as "the Smart Mobility report" or "the report") was submitted to Caltrans as an attachment to TRANSDEF's comment letter and is therefore included in this volume (see the attachments to letter LC11 in Section 3.5, beginning on page 3.5-108).

The subsection headings in this Master Response correspond to the subsection headings in the Smart Mobility report.

2.6.1 Greenhouse Gas Emissions and Vehicle Miles Traveled

On page four, the Smart Mobility report states, "The DEIR/DEIS documentation of the modeling process used is incomplete, but it indicates that Caltrans has taken a shortcut that makes VMT estimates invalid." The report then continues to infer that the auto trip tables were extrapolated and interpolated to the forecast years of 2010 and 2030 and used for the forecasting process. Because of this, it says that only the changes for trip assignment were changed by the differences between the Build and No Build scenarios. This is incorrect. The person trip tables, not the auto trip tables, were used. Therefore, the changes in mode choice were taken into account.

The trip distribution did not iterate to take into account the final projected congestion levels on the transportation network. However, this is rarely done because of the difficulties of getting travel demand models to converge on valid forecasts using this method. It is also noteworthy that the trip distribution did assume that US 101 will continue to experience congestion during peak periods after construction of the MSN Project. See the Master Response on Induced Travel (Section 2.4) for more information concerning this topic.

Also on page 4, the Smart Mobility report states, "The fourth effect, induced travel from land use changes, cannot be accounted in a four-step model unless the model is coupled with a land use allocation model that results in different future land use projections for different transportation alternatives." Integrated land use

transportation models are a field of research in transportation demand modeling that may yield improved traffic forecasts. However, integrated land use-transportation models are a recent development in transportation demand modeling and there are only a handful of models worldwide that even attempt to implement integrated land use transportation modeling, and the effectiveness of these models has not been determined. Development of such a model suitable to evaluate this project would take years and large sums of money. In addition, especially in an already developed area subject to extensive land use control such as the project area, many other factors probably have a larger part in determining development patterns than transportation facilities (see, e.g., D.T. Hartgen's *The Impact of Highways and Other Major Road Improvements on Urban Growth in Ohio* (2003a) and *Highways and Sprawl in North Carolina* (2003b).

The final paragraph on page 4 states, "The state of the practice in transportation modeling is to include model feedback." The model procedure used for this project is actually state of the practice because it iterates on the mode choice and trip assignment phase. Sometimes models will iterate on the trip distribution phase and even include integrated land use models; however, both of these procedures are very advanced, and their omission certainly does not render a forecast invalid.

On pages 5 and 6, the report attempts to derive the additional or induced traffic due to this project. It starts with the estimated additional morning and afternoon peak hour VMT from the DEIR/S. Unfortunately, due to an error the projected VMT values that were provided in Table 3.1-15 in the DEIR/S were incorrect. Table 3.1-15 has been corrected in Volume 1 of this FEIR/S, and the corrected table is reprinted below.

Table 3.1-15 Projected Increase in Vehicle Miles Traveled Countywide (in thousands of miles), Year 2030

Alternatives	Project Area		Marin County and Sonoma County	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
No Build	5,312	6,358	16,614	20,133
Build Alternatives	5,318	6,367	16,625	20,154
Difference	6	9	11	21
Percent Increase	0.11%	0.14%	0.07%	0.10%

As the corrected table shows, for Marin and Sonoma Counties overall, the project is projected to result in approximately 11,000 additional VMT in the AM peak hour and

21,000 more VMT in the PM peak hour. These figures are larger than the corresponding 4,000 and 12,000 additional VMT values erroneously presented in this table in the DEIR/S, but are of the same order of magnitude. The Smart Mobility report states that Caltrans emphasizes that this represents a small fraction of the total VMT for Marin and Sonoma Counties. This is correct; VMT is only projected to increase by 0.07% during the AM peak and 0.10% during the PM peak across both counties, as shown in the corrected table. Even looking at VMT increase within the Project Area only, the VMT would increase by only 0.11% in the AM peak and 0.14% in the PM peak. The important point is that these changes are very small (less than two-tenths of one percent), well within the margin of uncertainty for the model, and certainly do not signal an extensive change in the amount of travel in Marin and Sonoma Counties.

In the first paragraph on page 6, the report states that not all the added travel will take place in the AM and PM peak hours. This is of course correct. Since the report estimates that 16% of the overall VMT occurs in the AM and PM peak hours, it also estimates that 16% of the added VMT resulting from construction of the project would occur during those periods. This is clearly incorrect. It is not the addition of highway capacity that may increase VMT; it is the reduction of congestion. If a highway was never congested, adding additional lanes to it would not influence people to make additional trips on the highway. It is only the reduction of congestion and delay that may influence travelers to use a highway more. Therefore, the addition of the HOV lane should have no effect on the number of drivers using a freeway during uncongested off-peak hours. In fact, it may actually decrease the number of drivers using the freeway during off-peak hours; some drivers who had been using the freeway during off-peak times to avoid congestion may switch back to using it during peak periods once the congestion decreases. The report then states that the projected amount of induced travel should be increased by 3 to 5 times to account for factors unaccounted for in the modeling. Many references state that induced traffic should not be increased by nearly this amount (see, e.g., “Induced Travel: Frequently Asked Questions” [FHWA, 2008]).

As an alternate approach to estimate the added travel, the Smart Mobility report applies elasticity factors ranging from 0.39 to 1.0 to the theoretical 24-hour capacity of the added lanes. There are at least two important shortcomings to this procedure. First, the elasticity of travel with respect to highway capacity is very uncertain and varies widely depending upon project conditions. In fact, as was stated previously, additional travel does not respond directly to increased capacity; rather, it may arise

from the reduced congestion and decreased travel times that the additional capacity may bring about. This is behind the second shortcoming to Smart Mobility's procedure: the elasticity may be high in the peak hour, but be much lower over the entire 24 hours. This is because over much of the day the highway is not congested, so the additional capacity would not be expected to cause appreciable increased traffic.

2.6.2 Traffic Analysis

The report is correct that the project will increase traffic on some roadways that connect to US 101. However, the project will also reduce traffic on roads that parallel US 101 because traffic that had been forced onto these roads by congestion on US 101 will divert back onto US 101.

The report also states, "Large amounts of money are commonly spent to improve bottlenecks with little increase in traffic speeds." The report then quotes a paragraph from a newspaper editorial concerning a highway project in Chicago that only served to move additional traffic to a downstream bottleneck. In a highly congested area such as the San Francisco Bay Area, removing roadway bottlenecks will usually bring at least some added traffic to downstream bottlenecks. However, this does not mean these projects are futile or worthless. If properly chosen, projects such as the MSN Project can reduce travel times and decrease travel times for a large majority of travelers and offer many benefits.

2.6.3 Regional Context

The DEIR/S did examine the project within the context of regional transportation plans, land use plans, and potential growth.

The MSN Project is in conformity with regional transportation plans and local general plans, which is fully detailed in Section 3.1.2 in Volume 1 of this FEIR/S. While one can argue that there are more efficient and sustainable land use plans than those currently adopted within the region, under CEQA these adopted plans and projections are the required reference point for both the amount and spatial distribution of growth.

To look at the potential impact of the proposed project on the spatial distribution of growth, the growth analysis selected six study areas from south Novato to Rohnert Park. Considerations for selection of these analysis zones included potential effects

from improved accessibility to jobs, perceived concerns of growth inducement potential, and remaining build-out potential.

The MSN Project Growth Study (Parsons, 2005) found that the improved speed of the mainline traffic on US 101 under the proposed improvements would cause a slight increase in growth pressures in the area only if land use constraints were not considered. When the constraining effect of the land use plans of Marin and Sonoma Counties was considered, the growth analysis projected no impact for the area. Furthermore, the commuter time-savings of two to ten minutes for mixed-flow traffic over the entire length of the proposed project were found to be not substantial enough to cause material shifts in residential location.

The scope and results of the growth study were reviewed by an expert panel, which included planners from the two counties and local cities, who agreed with the study's conclusion, saying that the land use plans for this area would not change because of the project and that the time savings were too small to have an important effect on growth. The growth study also found that county planning officials have no intention of relaxing their land use controls in the study areas.

The HOV lane is only one step toward more sustainable transportation. Other actions, such as providing increased transit service and higher density land use to support transit, would be complementary. While such additional actions are beyond the scope of this project, they are not precluded by it.

References

Federal Highway Administration (FHWA). 2008. "Induced Travel: Frequently Asked Questions." 17 April. Online: http://www.fhwa.dot.gov/planning/itfaq.htm#qsup1.

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_____. 2003b. *Highways and Sprawl in North Carolina*. The John Locke Foundation, Raleigh, NC. Sept.

Parsons. 2005. *Growth Inducement Analysis Report. Marin-Sonoma Narrows from Ignacio Boulevard, Novato to Old Redwood Highway, Petaluma.*

Smart Mobility, Inc. 2007. *Review of Marin Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement*. Prepared for the Transportation Solutions Defense and Education Fund (TRANSDEF). December.

2.7 Master Response on Use of Current Information

This response has been prepared to address comments received on the DEIR/S regarding Caltrans' and FHWA's use of information for technical studies in cases where the basis of information has been updated since studies were completed. In particular, Caltrans and FHWA received comments on the land use assumptions used in the traffic operations report. These comments can be summarized as follows:

- The DEIR/S relies on 1998 land use projections, despite the availability of 2003 data with dramatically different land use priorities, assumptions, and projections.

- Some who commented suggest that differences between land use assumptions used for the MSN Project traffic analysis and more recent assumptions constitutes a substantially different impact analysis, and therefore a supplemental environmental document must be prepared (under NEPA) and recirculated (under CEQA). The question is whether a new study using more current land use assumptions would result in substantially different impacts over the previous study.

2.7.1 Standards Under CEQA and NEPA

Public Resources Code section 21166 states:

> When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or any responsible agency, unless one or more of the following events occurs:
>
> a) Substantial changes are proposed in the project, which will require major revisions of the environmental impact report.
>
> b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
>
> c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

On the NEPA side of the equation, 23 C.F.R. section 771.130 states in part:

> **771.130 (a)(2) and 771.130 (b)- Supplemental environmental impact statements.**
>
> a) A draft EIS, final EIS, or supplemental EIS may be supplemented at any time. An EIS shall be supplemented whenever the Administration determines that: . . . (2) New information or circumstances relevant to environmental concerns and bearings on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.
>
> b) However, a supplemental EIS will not be necessary where: (1) The changes to the proposed action, new information, or new circumstances result in a lessening of adverse environmental impacts evaluated in the EIS without causing other environmental impacts that are significant and were not evaluated in the EIS. . . .

2.7.2 Land Use Assumptions in Project Forecast

The traffic forecasts for this project were based upon Association of Bay Area Governments (ABAG) land use projections. These land use forecasts are the only region-wide land use forecasts available for the Bay Area and their use for state highway projects is required by regulation. The transportation demand in the travel demand models used to forecast traffic for this project are based upon the residences, employment and services projected in the ABAG land use projections. These projections are periodically updated, generally every two years. They are entitled "*Projections XXXX*" where XXXX is the year, such as 2003 or 2007, when the projections are issued.

The ABAG land use forecasts are long-term forecasts. The rate of growth in any area may vary widely on a year-to-year basis but average out to a forecast rate in the long run, so it would not be appropriate to modify the land use projections based upon a short-term trend. In addition, this section of highway is already congested, and the congestion would be expected to remain, even if population growth in the project area slowed or stopped.

Trip tables are an essential part of a travel demand model. Trip tables are computerized matrices that present how many trips are forecast to be made between every pair of zones in the travel demand model. The trip tables are based upon the land uses forecast for each zone. In other words, the number of trips leaving or entering a given zone depend upon the number of residences, jobs, stores, etc. that are projected to occupy this zone. The land use forecasts used in the travel demand model

that was used to forecast traffic for this project are based upon the ABAG land use projections discussed previously. The trip tables characterize the travel patterns for the model. Travel demand models include both base year trip tables for the recent past that are used to ensure the model is behaving reasonably given known conditions, and future year trip tables used to forecast traffic.

The travel demand models used to forecasts the traffic for this project was developed using the following procedure. The 1998 base year and 2020 future year trip tables were developed by Marin County Congestion Management Agency (CMA) based on ABAG's *Projections 2000* land use data. The trip tables were initially developed for Marin County's 293-zone model; they were then converted for use in the Marin-Sonoma model with 397 zones and then interpolated and extrapolated out to year 2010 and year 2030. The factors used to do this were developed based on ABAG *Projections 2002* land use data (pg. 9, *Traffic Operational Analysis Report* [Caltrans, 2005]).

To verify that there have been no changes in land use assumptions that would lead to significantly different results than those presented in the DEIR/S, Caltrans and FHWA compared ABAG *Projections 2000* vs. *Projections 2003* and *Projections 2000* vs. *Projections 2007* land use assumptions. The year 2020 is compared because the model's year 2010 and year 2030 trip tables were developed based on the year 2020 trip tables. The data are shown below in Table 2-1.

Table 2-1 ABAG Land Use Assumptions 2007 vs. 2000

	Year 2020 Projection			
Marin County:	**2000**	**2007**	**Difference**	**Percentage Change**
Total Population	275,400	270,600	-4,800	-1.77%
Households	111,430	110,490	-940	-0.85%
Employed Resident	167,100	138,900	-28,200	-20.30%
Total Jobs	150,510	149,860	-650	-0.43%

	Year 2020 Projection			
Sonoma County:	**2000**	**2007**	**Difference**	**Percentage Change**
Total Population	571,200	535,200	-36,000	-6.73%
Households	215,830	206,840	-8,990	-4.35%
Employed Resident	317,000	255,500	-61,500	-24.07%
Total Employment	299,110	276,780	-22,330	-8.07%

Table 2-1 ABAG Land Use Assumptions 2007 vs. 2000

Bay Area Region:	Year 2020 Projection			
	2000	2007	Difference	Percentage Change
Total Population	8,026,900	8,069,700	42,800	0.53%
Households	2,839,630	2,941,760	102,130	3.47%
Employed Resident	4,438,300	4,080,900	-357,400	-8.76%
Total Jobs	4,687,950	4,280,700	-407,250	-9.51%

Source: ABAG's *Projections 2000* and *Projections 2007*

As shown in Table 2-1, the 2007 assumptions in the Total Population, Households, Employed Residents and Total Jobs sectors indicate decreased values compared to 2000 in Marin and Sonoma Counties. Most notably, the 2007 projections show a significantly lower number of employed residents in Marin and Sonoma Counties compared to 2000, meaning that the MSN Project forecast overestimated trips from this sector. Consequently, the land use assumptions used for the DEIR/S were conservative, and performing the forecast with updated land use assumptions would not yield significant new impacts or information.

Likewise in Table 2-2 below, there are either decreases or slight increases (maximum 0.93%) between 2000 and 2003 land use assumptions in these same sectors in Marin and Sonoma Counties. Again, performing a new forecast with 2003 or 2007 land use assumptions would not yield significant new information in terms of project impacts.

Consequently, Caltrans and FHWA have determined that using land use assumptions more recent than those used in the traffic operations report is not necessary. Furthermore, Caltrans and FHWA have met the standard for not recirculating the environmental document under CEQA or supplementing it under NEPA.

Table 2-2 ABAG Land Use Assumptions 2003 vs. 2000

Marin County:	Year 2020 Projection			
	2000	2003	Difference	Percentage Change
Total Population	275,400	275,700	300	0.11%
Households	111,430	112,110	680	0.61%
Employed Resident	167,100	161,400	-5,700	-3.53%
Total Jobs	150,510	151,930	1,420	0.93%

Table 2-2 ABAG Land Use Assumptions 2003 vs. 2000

Sonoma County:	Year 2020 Projection			
	2000	2003	Difference	Percentage Change
Total Population	571,200	551,500	-19,700	-3.57%
Households	215,830	206,900	-8,930	-4.32%
Employed Resident	317,000	297,900	-19,100	-6.41%
Total Employment	299,110	283,420	-15,690	-5.54%

Bay Area Region:	Year 2020 Projection			
	2000	2003	Difference	Percentage Change
Total Population	8,026,900	8,168,300	141,400	1.73%
Households	2,839,630	2,950,970	111,340	3.77%
Employed Resident	4,438,300	4,543,590	105,290	2.32%
Total Jobs	4,687,950	4,752,590	64,640	1.36%

Source: ABAG's *Projections 2000* and *Projections 2003*

References

Association of Bay Area Governments. 1999. *Projections 2000: Forecasts for the San Francisco Bay Area to the Year 2020*. Oakland, CA.

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California Department of Transportation (Caltrans). 2005. *Traffic Operational Analysis Report. Route 101 Marin-Sonoma Narrows Widening Project*. February.

Chapter 3 Comments Received and Caltrans Responses

This section presents scanned images of the comment letters received (including regular letters, emails, comment cards from the public meetings, and the public meeting transcripts) as well as Caltrans' responses to each individual comment identified within each letter. Comments and responses are organized within this section as follows:

3.1 Comments and Responses for Federal Agencies (FA)
3.2 Comments and Responses for State Agencies (SA)
3.3 Comments and Responses for Regional Agencies (RA)
3.4 Comments and Responses for Local Jurisdictions (LJ)
3.5 Comments and Responses for Local Community and Business Groups (LC)
3.6 Comments and Responses for Individual Citizens (I)

To locate a particular comment and associated Caltrans response, consult Chapter 1 for the alphanumeric identifying code assigned to the comment letter of interest, then turn to the corresponding subsection listed above. Each subsection begins with a detailed table of contents listing each letter received, and indicating the page on which that letter and associated response(s) can be found.

In some cases, the response refers the reader to a Master Response. The Master Responses are located in Chapter 2; see the main Table of Contents to locate the page number of the specified Master Response.

3.1 Comments and Responses for Federal Agencies

LETTER: FA1. SIGNATORY: UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA). 3.1-2
LETTER: FA2. SIGNATORY: NATIONAL MARINE FISHERIES SERVICES (NMFS). 3.1-5
LETTER: FA3. SIGNATORY: UNITED STATES COAST GUARD (USCG). 3.1-13

Letter: FA1.
Signatory: United States Environmental Protection Agency (USEPA).

Response to Comment FA1-1

Caltrans and FHWA considered several alternatives to balance environmental impacts with the need and purpose. The Build Alternatives and access options presented in the DEIR/S and this FEIR/S, along with modifications made in conjunction with our regulatory partners, reduced the project footprint to the maximum extent practicable while still meeting the need and purpose. Caltrans and FHWA will continue to implement avoidance and minimization measures during the design and construction process.

Response to Comment FA1-2

Caltrans agrees with the comment.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 14, 2007

Melanie Brent
Office of Environmental Analysis
Caltrans District 4
111 Grand Avenue
P.O. Box 23660
Oakland, CA 94623-0660

Subject: Draft Environmental Impact Statement/Environmental Impact Report for the Marin-Sonoma Narrows HOV Widening Project, Marin and Sonoma Counties, California (CEQ # 20070447)

Dear Ms. Brent:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. EPA has previously provided feedback on this project through the *National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding, 2006* (NEPA/404 MOU). Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) for the proposed project as Environmental Concerns – Adequate Information (EC-1). Please see the enclosed "Summary of EPA Ratings."

FA1-1 We note that the DEIS provides a thorough and user-friendly description of the project and its environmental impacts. We commend Caltrans on avoiding and minimizing impacts to wetlands and other resources through the alternative development process. However, we encourage further efforts to avoid and minimize potential adverse impacts, to the greatest extent practicable, to sensitive biological, farmland, community, and cultural resources through the remaining planning and design process and future construction. Specifically, any project design modifications that would further avoid existing trees and result in fewer impacts to wetlands should be identified in the Final EIS.

FA1-2 While the impacts projected for the two build alternatives do not differ significantly, EPA believes that the Fixed HOV Lane Alternative would best meet the purpose and need of the project. Traffic projections for 2010 indicate bottlenecks and delays in the southbound direction during both AM and PM peak periods, and 2030 projections indicate bottlenecks and delays in both directions during both peak periods. Therefore, having HOV lanes

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Letter - FA1

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available in both directions during both peak periods would be prudent. The fixed HOV lanes would also be available to mixed flow traffic during off-peak periods, providing more efficient movement of vehicles throughout the day. In choosing between the four access options, and as more detailed information on amounts of impacts becomes available, we encourage Caltrans to choose the option that will minimize impacts to wetlands and other environmental resources. FA1-2

EPA is also supportive of the inclusion of bicycle and pedestrian infrastructure in the project, as it is consistent with various transportation plans for the area. In addition, encouraging alternative transportation options to automobiles will lessen the impacts to air quality and other resources from automobile use. FA1-3

We appreciate the opportunity to review this DEIS and look forward to future coordination on the project. The next steps in the NEPA/404 MOU process are agreement on the Least Environmentally Damaging Practicable Alternative (LEDPA), the only alternative that is permittable pursuant to the Clean Water Act (CWA) Section 404(b)(1) Guidelines, and 2) the conceptual mitigation plan. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Michael Monroe of EPA's Wetlands Regulatory Office at 415-972-3453 or monroe.michael@epa.gov, or Carolyn Mulvihill of my staff at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

Connell Dunning

FOR Nova Blazej, Manager
Environmental Review Office

Enclosure:
Summary of EPA Rating Definitions

cc. Cesar Perez, Federal Highway Administration
Joyce Ambrosius, NOAA Fisheries
Jane M. Hicks, U.S. Army Corps of Engineers
Ryan Olah, U.S. Fish and Wildlife Service
Brendan Thompson, Regional Water Quality Control Board

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Response to Comment FA1-3

The support of the USEPA for bicycle and pedestrian infrastructure is acknowledged.

Letter - FA1

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SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

Letter: FA2.
Signatory: National Marine Fisheries Services (NMFS).

Response to Comment FA2-1

The commenter is correct: the Chinook species considered in the DEIR/S is fall-run Central Valley Chinook, not California Coastal Chinook. That distinction has been corrected in the FEIR/S. The NMFS Biological Opinion (BO), which is presented as Appendix O in the Appendices volume, also addresses effects and proposed protective measures for Central California coast steelhead (CCCS) and southern Distinct Population Segment (DPS) North American green sturgeon as well as addressing Essential Fish Habitat (EFH) for fall-run Central Valley Chinook salmon.

Response to Comment FA2-2

All proposed avoidance, minimization and conservation measures for threatened salmonids (including CCCS and fall-run Central Valley Chinook salmon) described in Section 3.3.6.4 in Volume 1 of this FEIR/S are applicable for and would be protective of North American green sturgeon as well. The NMFS BO (Appendix O in the Appendices volume) also addresses effects and proposed protective measures for CCCS and southern DPS North American green sturgeon as well as addressing EFH for fall-run Central Valley Chinook salmon.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
777 Sonoma Ave., Room 325
Santa Rosa, CA 95404-4731

December 5, 2007

In response refer to:
SWR/ F/SWR3:DHW

Melanie Brent, Office Chief
Office of Environmental Analysis
CalTrans District 4
111 Grand Avenue
P.O. Box 23660
Oakland, California 94623-2929

Dear Ms. Brent:

Thank you for the opportunity to comment on the Draft Environmental Impact Report /Environmental Impact Statement (DEIR/S) for the Marin-Sonoma Narrows (MSN) Project. CalTrans is proposing the MSN Project to alleviate traffic congestion on Highway 101 (Hwy 101) beginning south of State Route 37 (SR 37) in Novato (Marin County) heading north and ending at the Corona Overcrossing in Petaluma (Sonoma County) - a distance of 16.1 miles. The MSN Project involves adding High Occupancy Vehicle (HOV) lanes, which will require widening road and bridge surfaces and bridge replacements. These MSN Project actions will expand the existing Hwy 101 footprint, and in doing so could affect Federally listed threatened Central California Coast (CCC) Distinct Population Segment (DPS) steelhead (*Oncorhynchus mykiss*) and critical habitat for this species as listed under the Endangered Species Act (ESA) of 1973 as amended.

FA2-1 Additionally, some of the waterways located in the MSN Project area are deemed Essential Fish Habitat (EFH) pursuant to Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) for Central Valley (CV) fall run Chinook salmon (*O. tshawytscha*) Evolutionary Significant Unit (ESU). The MSN Project DEIR/S states the ESU for consideration under MSFCMA to be California Coastal (CC) Chinook, which NMFS believes to be incorrect since this ESU's range terminates at the Russian River. Fall run CV Chinook utilize north San Francisco Bay and its tributaries, including the Petaluma River during migrations to and from the Sacramento River. Fall run CV Chinook adults may be present in the MSN Project area near the end of the proposed construction time frame.

FA2-2 The southern population of North American green sturgeon was listed as threatened on June 6, 2006 (71 FR 17757). Promulgation of the rules pertaining to defining take for this species (ESA section 4(d)) has not been completed. An ESA 4(d) rule for this species is expected to be proposed in 2008. The majority of spawning adults from the southern population are concentrated in the Sacramento River, and these fish may be found throughout the area as they

Letter - FA2

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migrate through San Pablo Bay. One adult green sturgeon, tagged with an acoustic transmitter, was detected in the Petaluma River near the Port in 2007. Juvenile green sturgeon likely utilize some of the Petaluma River year-round as rearing habitat. Critical habitat has not yet been proposed or designated for this species, although an effort is currently underway to do so.

FA2-2 San Antonio Creek, Novato Creek, and the Petaluma River, including its tributaries, provide migratory corridors for adult and juvenile CCC steelhead to and from spawning and rearing habitat further upstream from the project site. Populations of steelhead within this CCC DPS are at critically low levels. Any adverse impacts to them must be minimized to assure that these species do not become extinct.

FA2-3 The fall run CV Chinook salmon ESU is not Federally listed under the ESA but is considered a species of concern. MSFCMA provisions still apply for this ESU.

NMFS has comments for the following topics addressed in the DEIR/S:

Bridge Crossings

FA2-4 The Hwy 101 Bridge crossing San Antonio Creek would be replaced with a new structure, while a second crossing would be constructed just west of the historic San Antonio Bridge, for two-way traffic on San Antonio Road. The Petaluma River Bridge would be removed and replaced with a new bridge design. Bridges will be widened at the Novato and Lynch Creek crossings. Activities are likely to occur, at some or all of these locations, during bridge construction/modifications, that could adversely affect listed salmonids and their associated habitat within the MSN Project area.

FA2-5

1. The need for dewatering or diverting water from the project area can arise if flow persists far enough into the construction season, which is more likely to occur in a wet year, and may also require fish relocation activities. The DEIR/S does not expand on the methods that may be used for these activities should the need arise. The Petaluma River will most likely require dewatering for removal and replacement of piles as proposed in section 2.3.1. Common Design Features of the Build Alternative (lines 193-197).

   a. Please discuss the methods that could be used in the event that dewatering and/or fish relocation is required at bridge crossings. Please include cofferdam dimensions if available.

FA2-6

   b. Please list all locations, in addition to the bridge crossings, where dewatering and fish relocation activities could occur.

   c. CalTrans should contract with a NMFS-approved biologist to relocate fish for this project. Please discuss the techniques proposed for fish collection, containment, and relocation.

Response to Comment FA2-3

The avoidance and minimization measures to protect fall-run Central Valley Chinook salmon EFH are provided in Vol. 1, Sections 3.3.5.4 and 3.3.6.4 of the FEIR/S and are also addressed in the NMFS BO (see Appendix O in the Appendices volume).

Response to Comment FA2-4

Impacts to listed salmonid species are addressed in Vol. 1, Section 3.3.5.3 of the FEIR/S. Additionally, impacts are also addressed in the NMFS BO for listed fish species and fall-run Central Valley Chinook salmon EFH.

Response to Comment FA2-5

Detailed construction information is presented in the NMFS Biological Opinion (see Appendix O in the FEIR/S Appendices volume).

Response to Comment FA2-6

Dewatering and fish relocations would likely be necessary at the bridge crossings at Novato Creek, Petaluma River, and San Antonio Creek (3 locations). No other locations would require dewatering and fish relocations. If dewatering at a site is required, a qualified Caltrans or approved contract biologist will be present during the dewatering period to inspect and ensure that sensitive aquatic species are not trapped within the cofferdams. If CCCS or North American DPS green sturgeon are found within the project area, an NMFS-approved biologist will capture and relocate these fish from the site. Once the project design plans are finalized and prior to any in-stream construction activity begins, Caltrans will submit for approval a Dewatering, Fish Capture and Relocation Plan to the appropriate resource agencies, including NMFS. This plan will detail appropriate techniques for fish collection, containment and relocation.

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FA2-7 d. Please provide information about the use of falsework for supporting the bridge spans during construction and include all alternative methods that would keep timber pads out of the creek channel.

FA2-8 2. Striking piles into both wetted channel and dry substrate produces multiple pressure waves capable of causing physical injuries to fish located in nearby water. Pathologies associated with very high sound levels are collectively know as barotraumas. These include hemorrhage and rupture of internal organs, including the swim bladder, and kidneys in fish. Death can be instantaneous, occur within minutes after exposure, or occur several days later. High sound pressure levels can also result in hearing damage to fish.

a. Please discuss the measures proposed to minimize sound impacts during pile driving activities.

FA2-9 b. Please detail the pile removal and replacement methods that are proposed for the bridge crossings at San Antonio Creek and the Petaluma River.

c. Please describe the types of hammers that could be used for pile driving for each bridge location where applicable.

FA2-10 3. NMFS concurs with the guiding principle under 2.3.1. Common Design Features of the Build Alternatives, lines 138-140, proposed by the CalTrans Policy Advisory Group that proposes the use of spanning bridgework over waterways to reduce the amount of the project footprint and thus the amount of environmental disturbances.

a. Please list any locations where these design features cannot be considered, including an explanation for the decision and the alternate design.

FA2-11 4. NMFS also concurs with the Petaluma River Bridge *Pre-cast Tee Girder Option* in that it minimizes pier placement within watered creek channels and will not contribute to additional habitat loss.

a. This option was proposed in the DEIR/S only for Petaluma Creek. Please list the options that are available for the other bridge crossings on San Antonio, Novato, and Lynch Creeks.

FA2-12 5. Both bridge alternatives mentioned on page 3.1-116, lines 2464-2467, will extend the north embankment southward toward the Petaluma River to allow for a new, shorter span.

a. This alternative would appear to narrow the passage corridor used by salmonids during migration. The loss of habitat also could have a potential impact to provisions provided for Pacific salmon under the MSFCMA. Please include a discussion on the

Response to Comment FA2-7

Detailed construction information is presented in the NMFS BO, which is included as Appendix O in the FEIR/S Appendices volume.

Response to Comment FA2-8

Caltrans, in coordination with the Federal Highway Administration (FHWA) and the Departments of Transportation in Oregon and Washington, established a Fisheries Hydroacoustic Working Group (FHWG) in order to improve and coordinate information on fishery impacts due to underwater sound pressure caused by in-water pile driving. In addition to the above transportation agencies, the FHWG is composed of representatives from the NMFS' Southwest and Northwest Regions, U.S. Fish and Wildlife Service, California Department of Fish and Game, and the U.S. Army Corps of Engineers. The FHWG is supported by a panel of hydroacoustic and fisheries experts who have been recommended by the FHWG members. A Steering Committee oversees the FHWG and is composed of managers with decision-making authority from each of the members' organizations.

The goal of the FHWG is to reach agreement on: 1) the nature and extent of knowledge about the current scientific basis for underwater noise effects on fish; 2) interim guidelines for project assessment, mitigation, and monitoring for effects of pile-driving noise on fish species; and 3) future scientific research needed to satisfactorily resolve uncertainties regarding hydroacoustic impacts on fish species.

Per the NMFS-issued BO (see Appendix O in the Appendices volume), pile driving will only occur during daylight hours to avoid peak fish movement times. Noise levels will be monitored during pile-driving activities, and if the noise thresholds are exceeded (206 dB peak and 187 dB sound exposure level [SEL]), all work will stop and Caltrans will implement measures in consultation with NMFS to reduce the noise impacts to acceptable levels. Each pile-driving incident shall be monitored

and recorded in a log that includes the sound levels at the stopping time and starting time. If sound levels are above the thresholds, actions will be taken to lower the sound level to a level that will not produce injurious sound pressure to salmonids. Sound attenuation devices will be used for all pile-driving activities.

If Caltrans is unable to meet sound attenuation criteria, then pile driving shall only occur from May 15 through November 30 to allow adult and smolt steelhead migration. At the Petaluma River location, if pile driving commences within the June 15 to October 31 timeframe in the first work season, Caltrans will monitor these activities using hydroacoustic equipment for a period of no less than two weeks. If the sound levels fall below the sound thresholds listed above, then Caltrans may continue to pile drive until November 1. Otherwise, Caltrans may continue to pile drive as long as additional sound attenuation can reduce underwater sound below the thresholds. For a complete discussion of affected species and proposed mitigations, see Section 3.3, Biological Environment, in Volume 1 of this FEIR/S.

Response to Comment FA2-9

b. Detailed construction information is presented in the NMFS BO (see Appendix O in the Appendices volume).

c. Caltrans has agreed to monitor noise levels from pile-driving activities. If the noise thresholds (206 dB peak and 187 dB SEL) are exceeded for five hammer strikes, work will be stopped and additional noise-attenuation measures will be implemented.

Piling installation shall conform to the requirements of Caltrans Standard Specifications. The relevant excerpts are as follows:

49-1.05 Driving Equipment

- Driven piles shall be installed with impact hammers that are approved in writing by the Engineer. Impact hammers shall be steam, hydraulic, air or diesel hammers. Impact hammers shall develop sufficient energy to drive the piles at a penetration rate of not less than 1/8 inch per blow at the specified nominal resistance.
- Vibratory hammers shall not be used for installation of piles, unless otherwise shown on the plans or specified in the special provisions.
- Hammers with an external combustion engine that are not single action shall have a transducer that records ram velocity.
- Double acting diesel hammers with internal combustion engines shall have a transducer that records bounce chamber pressure.
- For hammers with no visual way of observing the ram stroke, a printed readout showing hammer energy during driving operation shall be provided to the Engineer by the Contractor.
- Steam or air hammers shall be furnished with boiler or air capacity at least equal to that specified by the manufacturers of the hammers to be used. The boiler or air compressor shall be equipped with an accurate pressure gage at all times. The valve mechanism and other parts of steam, air or diesel hammers shall be maintained in first class condition so that the length of stroke and number of blows per minute for which the hammer is designed will be obtained. Inefficient steam, air or diesel hammers shall not be used.
- When necessary to obtain the specified penetration and when authorized by the Engineer, the Contractor may supply and operate one or more water jets and pumps, or furnish the necessary drilling apparatus and drill holes not greater than the least dimension of the pile to the proper depth and drive the piles therein. Jets shall not be used at locations where the stability of embankments or other improvements would be endangered. In addition, for steel piles, steel shells, or steel casings, when necessary to obtain the specified penetration or to prevent damage to the pile during installation, the Contractor shall provide special driving tips or heavier pile sections or take other measures as approved by the Engineer.
- The use of followers or underwater hammers for driving piles will be permitted if authorized in writing by the Engineer. When a follower or underwater hammer is used, its efficiency shall be verified by furnishing the first pile in each bent or footing sufficiently long and driving the pile without the use of a follower or underwater hammer.

Please note that the above specifications only apply to permanent pilings, i.e., piles for the bridges, retaining walls, etc. that are shown in the Contract Plans. There are no specifications for contractor-installed piles for shoring, cofferdam or falsework. In other words, contractor may use vibratory means to install the pilings unless otherwise restricted. Any

restrictions would have to be stated in the Contract Special Provisions (SSP) or listed in the permits (usually included in the SSP).

Response to Comment FA2-10

A clear span of Novato, Washington and Lynch Creeks is not practical. At these locations the existing bridges will be widened, requiring that the widening match the structure depth of the existing bridge in order to provide the same water opening while matching the adjacent roadway grade. The proposed San Antonio Creek Bridge is a three-span box girder structure with two piers in the floodplain. The proposed span length of 45 m is the upper limit for box girder spans. Other structure types with longer spans were considered but rejected due to excessive costs.

Response to Comment FA2-11

Please see the response to Comment FA2-10 above.

Response to Comment FA2-12

As stated in Section 3.3 in Volume 1 of this FEIR/S, potential impacts to aquatic habitats in the Petaluma River would result in permanent impacts to CCCS, fall-run Chinook salmon and southern DPS North American green sturgeon that could use the project area for seasonal rearing and migration.

There will be approximately 0.09 ha (0.22 ac) of permanent effects as a result of the replacement of the Petaluma River Bridges. Since the falsework piles, trestle piles, and cofferdams will likely be in place for longer than 1 year, they are considered to be permanent impacts. There will also be approximately 0.11 ha (0.27 ac) of permanent effects due to the shading from the widening of the bridge.

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FA2-12 loss of habitat through this area (*i.e.*, what is the amount of habitat loss in this area, in linear feet or acreage, as a result of the north embankment extension into the river).

FA2-13 b. Narrowing of the Petaluma River channel can artificially influence the natural hydraulic patterns to which migrating steelhead are accustom. Please include a discussion on any hydrologic studies conducted for the north embankment extension including any resulting hydraulic effects.

Riparian Habitat

FA2-14

1. On page 3.3-9 the DEIR/S discusses the riparian inventory along the creeks within the project boundaries and Table 3.3-1 provides the tree numbers that could potentially be impacted. Page 3.3-11, beginning on line 190, states that loss of riparian vegetation would mainly result from the bridge work over Novato Creek, San Antonio Creek, and Lynch Creek. Loss of riparian habitat decreases the shading on creeks, which results in increased water temperatures. Juvenile salmonids depend on insects that inhabit overhanging vegetation as a food source. Bank destabilization results from riparian vegetation removal and contributes to increased turbidity levels in waters. Riparian zones are buffers to land-based contaminants that are carried toward creeks during storm events.

   a. Please provide additional information on mitigation programs to compensate for the removal of riparian habitat, tree removal (*e.g.*, *Quercus* sp.) and ground cover (*e.g.*, pickleweed) around all creek and river banks.

   b. Please explain how the trees proposed for removal in Table 3.3-1 on page 3.3-10 be replaced in regard to the species type and concentration.

   c. Please provide the amount of riparian habitat, in linear feet or acreage, mentioned on page 3.3-1.1, lines 192-198, that would be removed from Novato Creek, San Antonio Creek, and Lynch Creek.

   d. Also on pages 3.3-19-3.3.-20, lines 132-134, the DEIR/S states that the bank vegetation along Novato and Rush Creeks is composed of non-riparian wetland which contradicts the preceding sentence.

Temporary Impacts to Salmonid Habitat

FA2-15 1. Please elaborate further on the potential impacts to CCC steelhead habitat in Novato Creek, San Antonio Creek, Lynch Creek, and the Petaluma River as mentioned in lines 726-730 on page 3.3-39.

FA2-16 2. Please provide more information on the blind-ended channel, including any fish

Response to Comment FA2-13

When the January 2006 Preliminary Drainage Report was being completed, there was a north embankment extension option being considered. A new single bridge was planned to replace the existing seismically inadequate twin bridge structures, but the proposed bridge foundation elements were to be located outside of the FEMA Special Flood Hazard Area (100-yr floodplain). No change in horizontal alignment is anticipated for the new Petaluma River bridge, although some increase in vertical alignment (3-4 meters) is probable. Falsework used during construction of the bridges may have temporary impacts on water surface elevations in the channel and may need to be evaluated at a later date.

The proposed north embankment extension does not encroach into the limits of the Petaluma River channel waterway and therefore will not likely influence the natural hydraulic patterns. As an alternative to building a shorter bridge that requires the extension of the northern embankment, Caltrans had also prepared a longer bridge alternative that would not require the extension of the embankment. The final selection of the bridge alternative has not been determined.

Response to Comment FA2-14

1a. Caltrans is exploring several options for conducting an extensive riparian and oak tree mitigation project to compensate for effects to riparian and oak tree habitat. Potential areas in which Caltrans is currently seeking mitigation opportunities include nearby California State Parks, conservation covenants on private parcels located within the project limits, and a portion of Skaggs Island in San Pablo Bay.

Caltrans will mitigate for potential effects to pickleweed, which provides habitat for the salt marsh harvest mouse, at the Petaluma River Bridge in coordination with the USFWS.

Caltrans will plant all slopes affected by the project with native grasses and shrubs to stabilize the slopes against erosion. Caltrans will install

native plants appropriate for the locations. Caltrans may also plant site-adapted native tree species such as willows, oaks, California bay laurel, and California buckeye to compensate for tree removal along San Antonio Creek. These trees will provide shading for the creek once they have matured, lowering the water temperature for aquatic organisms, and further stabilizing the banks against erosion. Caltrans will cover newly planted areas with a biodegradable straw/coconut erosion control mat as directed by the Caltrans Office of Landscape Design, CDFG, and the Caltrans Office of Biological Sciences and Permits. Caltrans will monitor the plantings over a period of time to measure and document efficient survival success and growth.

1b.Caltrans is working with CDFG to determine the appropriate mitigation.

1c. According to Caltrans' current analysis, approximately 0.77 ha (1.9 ac) of riparian vegetation along San Antonio Creek could potentially be removed. Approximately 0.02 ha (0.5 ac) of riparian vegetation along Lynch Creek could potentially be removed. (These acreages may be revised during the final design process.) Riparian vegetation is not present on the banks Novato Creek; the inclusion of Novato Creek in the cited passage on page 3.3-11 of the DEIR/S was an error (see also response to item 1d below).

1d. The vegetation around Novato and Rush Creeks consist of isolated stands of pickleweed and saltgrass. The statement made in Section 3.3.2.3 of the DEIR/S referring to riparian vegetation in Novato Creek (cited in item 1c above) is incorrect; this has been corrected in Section 3.3.2.3 in Volume 1 of this FEIR/S.

Response to Comment FA2-15

More detailed information regarding impacts to species with designated Essential Fish Habitat and federally listed species is provided in the USFWS and NMFS Biological Opinions for the project (see Appendices N and O, respectively, in the Appendices volume).

Response to Comment FA2-16

Caltrans has no specific knowledge of any fish surveys in the blind-ended channel referenced in the comment. No surveys were conducted by Caltrans in this channel since it will not be impacted by the project. There will be no impacts to CCCS, green sturgeon, or Chinook salmon in the blind-ended tidal channels adjacent to the Redwood Landfill or downstream of the flap gate at Lakeville Road, as these areas will be completely avoided during the project.

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FA2-16 surveys that are known to exist, and the impacts that may occur in these waters as a result of the MSN Project activities (*e.g.*, increased turbidity, loss of habitat, *etc.*).

Future MSN Project Materials

Please send a hard copy and a CD- ROM format for the final EIR/S and all other MSN Project materials to NMFS at the following address: 777 Sonoma Avenue, Rm. 325, Santa Rosa, California, 94505.

If you have any questions concerning the above comments please contact Mr. Dave Walsh at (707) 575-6016 or dave.walsh@noaa.gov.

Sincerely,

Dick Butler
Santa Rosa Area Office Supervisor
Protected Resources Division

cc: R. Strach, NMFS, Sacramento
K.Schaeffer, EFH, NMFS, Santa Rosa
copy to file and project ARN# 151422SWR2007SR00497

Letter: FA3.
Signatory: United States Coast Guard (USCG).

Response to Comment FA3-1

Text has been revised to reflect suggested changes.

Response to Comment FA3-2

A 401 Water Quality Certification will be required for the project.

Response to Comment FA3-3

Caltrans has added subsections to address the temporary and permanent impacts to navigation due to the construction of the bridge (see the "Navigation" subsections in Sections 3.1.10.2 and 3.1.10.3 in Volume 1 of this FEIR/S).

The existing Petaluma River bridge provides a 30.48-m (100-ft) wide waterway channel measured between the existing bridge fenders. The existing minimum vertical clearance was measured at 21.52 m (70.6 ft) at the time of its completion. In order to facilitate the construction of the new bridge, a temporary 18-m (60-ft) wide opening will be maintained for navigation in the river. At the north and south sides of the opening a temporary fender system consisting of driven piles and steel and timber barriers will be placed to protect the falsework and/or erection towers from being hit by a vessel. In order to contain debris from bridge removal, a protection platform may be required to be built under the existing structures. The protection platform will temporarily reduce the vertical clearance to 19.8 m (65 ft). Caltrans may also request permission from the U.S. Coast Guard (USCG) for short-term full river closure up to 72 hours duration in order to facilitate certain construction operations.

The new bridge will not reduce the existing navigational opening on the Petaluma River and the new Pier 3 will be located above the waterway limit. A new bridge fender system or a closed fill system will likely be required for Pier 4 even though it will be located closer to the north bank. The new vertical clearance over the waterway (measured within the limits

U.S. Department of Homeland Security
United States Coast Guard

Commander
District Eleven

U.S. Coast Guard Island, Bldg 50-2
Alameda, CA 94501-5100
Staff Symbol: (dpw)
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Fax: (510) 437-5836

16590
Petaluma River (12.5)
November 27, 2007

California Department of Transportation
Attn: Melanie Brent
111 Grand Ave.
P.O. Box 23660
Oakland, CA 94623-0660

Dear Ms. Brent:

We have completed our review of the Draft Environmental Impact Statement (DEIS), dated October 2007, for the Marin-Sonoma Narrows (MSN) HOV Widening Project, which includes the proposed replacement of the US 101 Highway Bridge, across the Petaluma River, mile 12.5, at Petaluma, Sonoma County, California.

The following revisions/additions are requested:

FA3-1 a. Page S-10 lines 226-227, Public Agencies with Review, Approval, and Permit Responsibilities. Delete "in accordance with Section 9 of the Rivers and Harbors Act" and replace with "in accordance with the General Bridge Act of 1946 as amended." Please state that a Coast Guard Bridge permit must be applied for and issued before bridge construction begins.

FA3-2 b. Please address the need for a section 401 Water Quality Certification (WQC) for the bridge structure as a source of discharge into navigable waters of the United States. Before a Coast Guard permit application can be processed a WQC must be applied for and that application must be submitted with the bridge permit application. A WQC must be issued, or waived, before a Coast Guard Bridge Permit is issued.

FA3-3 c. Please include a section on the temporary impacts to navigation that may occur during construction of the bridge as well as permanent impacts to navigation once the bridge is complete.

FA3-4 d. We have not yet been formally invited by Federal Highway Administration to serve as a cooperating agency for National Environmental Policy Act. We agree to participate as a cooperative agency for NEPA and should be listed as a cooperative agency in the draft and final NEPA Documents.

of the existing bridge fender limits) will also not reduce the existing navigational opening. Acceptable clearance will be determined by the USCG, such that current and future navigation is not impaired by the structure.

Response to Comment FA3-4

A letter from FHWA to the U.S. Coast Guard dated May 13, 2008 formally requested that the USCG be a participating agency as defined by regulations set forth by the Council on Environmental Quality (40 C.F.R. §§ 1501.6 & 1508.5) for the Marin-Sonoma Narrows Project. Text in Section S.3 has also been added to reflect that the USCG is a cooperating agency on the project.

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16590
November 27, 2007

You may contact Mr. Carl Hausner, Project Manager, by telephone at (510) 437-3515 to discuss this project and the bridge permitting process.

Sincerely,

DAVID H. SULOUFF
Chief, Bridge Section
Eleventh Coast Guard District
By direction of the District Commander

Copy: Mr. Cesar Perez, Federal Highway Administration
Mr. Connell Dunning, US EPA CED 2
Mr. Mike Monroe, US EPA WTR 8
NMFS Southwest Region
Ms. Jane Hicks, USACE San Francisco District
Mr. John Cleckler, U.S. Fish and Wildlife Service

2

3.2 Comments and Responses for State Agencies

LETTER: SA1. SIGNATORY -CALIFORNIA DEPARTMENT OF FISH AND GAME (CDFG). 3.2-2
LETTER: SA2. SIGNATORY: CALIFORNIA ASSEMBLYMEMBER JARED HUFFMAN, 6TH DISTRICT. 3.2-5
LETTER: SA3. SIGNATORY: CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC). 3.2-8
LETTER: SA4. SIGNATORY: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SAN FRANCISCO BAY REGION (RWQCB). 3.2-9

Letter: SA1.
Signatory -California Department of Fish and Game (CDFG).

State of California

Memorandum

To : Ms. Melanie Brent, Office Chief
Division of Environmental Planning and Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612

Date: November 6, 2007

Scott Wilson FOR
From : Chuck Armor, Regional Manager
Department of Fish and Game – Bay Delta Region, Post Office Box 47, Yountville, California 94599

Subject : Marin-Sonoma Narrows HOV Widening Project-Draft Environmental Impact Report, SCH 2001042115

Department of Fish and Game (DFG) staff has reviewed the draft Environmental Impact Report (EIR) for the Marin-Sonoma Narrows HOV Widening Project (MSN) and is providing comments on fisheries, wildlife, and botanical resources that may be impacted by the proposed project. DFG appreciates the opportunity to comment on the proposed project but encourages early consultation and coordination with all responsible and trustee agencies.

SA1-1 The MSN Project, located on Highway 101 in Marin and southern Sonoma counties, proposes to widen and realign the existing highway in order to relieve traffic congestion between the towns of Novato and Petaluma. Potential construction- related impacts include loss of wetland, oak woodland, riparian woodland, and salt marsh habitat. Depending on the highway route alternative selected, approximately 1,706 native and non-native trees will be removed (569 which are oak trees) and up to 8.78 acres of wetland and other jurisdictional waters will be impacted. DFG is concerned about the impacts to resources caused by the loss of oak and riparian woodland, the potential removal of 1,706 trees, the loss of up to 8.78 acres of wetland and other jurisdictional waters, and ultimately the impacts to special status species within the project alignment including salt marsh harvest mouse (*Reithrodontomys raviventris)* (SMHM), Central California coast steelhead (*Oncorhynchus mykiss*), California coast Chinook (*Oncorhynchus tshawytscha*), and California red-legged frog (*Rana aurora draytonii)*. DFG has determined that the document is lacking in specific mitigation conservation measures for permanent loss of habitat and is requesting that CalTrans further develop and identify on-and off-site mitigation areas in order to ensure appropriate mitigation for loss of habitat.

SA1-2 The proposed project has the potential to impact wetland habitat within the project area. California's remaining wetlands provide significant and essential habitat for a wide variety of fish and wildlife species. Development in or conversion of wetlands is strongly discouraged and retaining existing wetland habitat through avoidance is recommended.

Response to Comment SA1-1

Caltrans is in the process of identifying off-site mitigation areas and on-site conservation measures such as revegetation for impacts to jurisdictional wetlands, oak woodlands, riparian areas, California red-legged frog, salt marsh harvest mouse (SMHM), and special-status fish. See the responses listed below for further details regarding mitigation to be implemented for jurisdictional wetlands (SA1-4), oak woodlands (SA1-5), riparian areas (LJ2-11), special-status fish (LC5-5, FA2-2, and FA2-3), and SMHM (FA2-14).

Response to Comment SA1-2

The CEQA document acknowledges that the project should avoid existing wetlands within its footprint as much as is feasible. In compliance with Section 404(b)(1) Guidelines, the "least environmentally damaging practicable alternative" or LEDPA was evaluated and determined to be the Fixed HOV Lane Alternative with Access Option 12b. LEDPA requires that the practicable alternative chosen is the one that causes the least harm to the "aquatic environment" as long as the alternative does not have other significant adverse environmental consequences. The aquatic environment includes wetlands and other jurisdictional waters of the United States. Caltrans has requested concurrence from USEPA and the USACE that the Fixed HOV Lane Alternative with Access Option 12b is the LEDPA.

Letter - SA1

Page 2

Ms. Melaine Brent 2 November 6, 2007

SA1-3 If it is necessary to develop wetland habitat, DFG's no net loss policy requires that the converted wetland habitat be mitigated for on an acre-for-acre basis. The DEIR indicates that there will be permanent impacts to 8.78 acres of wetlands and jurisdictional waters.

SA1-4 DFG recommends that Caltrans purchase appropriate wetland habitat within areas adjacent to the alignment including the "Vachini" property suggested by Caltrans staff during pre-consultation meetings with DFG, and purchase wetland credits at the Burdell Mitigation Bank, or another appropriate mitigation bank in Marin or Sonoma counties.

SA1-5 Marin and Sonoma counties have suffered extensive loss of oak and riparian woodland, and further impacts to native habitats and species which rely on them may be cumulatively significant in the context of other related past, present, and reasonable foreseeable probable future impacts (California Environmental Quality Act [CEQA], Section 15355). Based on review of the DEIR, CalTrans needs to further develop and identify on-and off-site mitigation areas for impacts associated to oak and riparian woodland and special status bird habitat; the DEIR fails to identify specific mitigation areas and ratios appropriate for the level of impacts associated with the MSN Project. Mitigation scenarios should be developed for these impacts and should include setting aside, on-site or off-site, acreage for retention in perpetuity at a ratio of 3:1 for every acre of oak woodland habitat impacted. These sites should be maintained in perpetuity and managed under an approved management plan with a appropriate monitoring and maintenance scheduled to be conducted for a minimum of 10 years to ensure compliance. Furthermore, for individual oak trees with at least one trunk of 6 inches or more dbh or multi-trunked native oaks with aggregate diameter of 10 inches or more, Caltrans should replace in-kind any oak tree removed with specimen trees (no less than 15-gallon size) with a total diameter equal to the individual or total combined diameter of the removed tree in a suitable location.

SA1-6 The DEIR indicates that activities associated with construction of the proposed route may impact salmonid habitat within Novato, San Antonio, and Lynch creeks and the Petaluma River. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, DFG may require a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of SAAs is subject to CEQA. DFG, as a responsible agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the SAA notification process, please access our website at www.dfg.ca.gov/1600; or to request a notification package, contact the Streambed Alteration Program at (707) 944-5520.

Response to Comment SA1-3

It is acknowledged that the CDFG's no net loss policy requires that the converted wetland habitat be mitigated for on an acre-for-acre basis. Although the final wetland mitigation ratio will be negotiated with the USACE and RWQCB, the mitigation ratio will be at least 1:1.

Response to Comment SA1-4

Caltrans is still looking into appropriate wetland habitat to mitigate for any wetland losses and the sites mentioned in the comment are being considered. Any wetland mitigation credits purchased for the project will be in either Marin or Sonoma County.

Response to Comment SA1-5

Caltrans is in the process of finalizing the mitigation for impacts to oak woodland. Caltrans is working with CDFG to determine the appropriate mitigation. By implementing this mitigation for oaks, special-status bird species that utilize this habitat will also benefit.

Response to Comment SA1-6

Caltrans acknowledges that a Streambed Alteration Agreement may be necessary for this project. Caltrans will obtain any necessary permits prior to the start of construction. Volume 1 of this FEIR/S documents the potential impacts to stream resources in Table 3.3-2 under the "Other Waters of the U.S." column. Potential impacts to riparian trees are listed in Section 3.3.2.3. Riparian trees are represented under the Native Oaks, Other Natives and Non-Native Trees rows in Table 3.3-1 and are also discussed separately in Section 3.3.2.3. Avoidance, mitigation, monitoring and reporting commitments for impacts to riparian trees are discussed in Section 3.3.2.4 for riparian impacts and in Section 3.3.3.4 for Other Waters of the U.S. Caltrans will comply with CDFG requirement for completion of the SAA.

Letter - SA1

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If you have questions, please contact Mr. Jeremy Sarrow, Environmental Scientist, at (707) 944-5573; or Mr. Greg Martinelli, Water Conservation Supervisor, at (707) 944-5570.

cc: Ryan Olah
U. S. Fish and Wildlife Service
2800 Cottage Way, Room W-205
Sacramento, CA 95825-1846

State Clearinghouse

Letter: SA2.
Signatory: California Assemblymember Jared Huffman, 6th District.

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0006
(916) 319-2006
FAX (916) 319-2106

DISTRICT OFFICE
3501 CIVIC CENTER DRIVE, SUITE 412
SAN RAFAEL, CA 94903
(415) 479-4920
FAX (415) 479-2123

JRichards- please handle
12/11 cc: Rlowie.

Assembly
California Legislature

COMMITTEES
CHAIR, ENVIRONMENTAL SAFETY AND TOXIC MATERIALS
APPROPRIATIONS
UTILITIES AND COMMERCE
WATER, PARKS AND WILDLIFE

JARED HUFFMAN
ASSEMBLYMEMBER, SIXTH DISTRICT

December 5, 2007

Mr. Bijan Sartipi, Director
Caltrans
111 Grand Avenue
Oakland, CA 94612

RE: Draft Environmental Impact Report: Novato Narrows

Dear Mr. Sartipi:

Thank you for releasing the Novato Narrows DEIR within the timeframe discussed in recent public meetings on the subject. While I appreciate that things are moving forward, it is also important that the DEIR reflect accurate information about the capacity improvements that can realistically be expected from the project.

SA2-1 In this regard, it is my understanding that a recent meeting on the DEIR revealed that CalTrans is using traffic projections derived from outdated general plans. Further, it is my understanding that CalTrans' projections ignore the dramatic increase in traffic that would result from the proposed Graton casino project in Rohnert Park. As you know, I strongly support the Novato Narrows project and the completion of a continuous HOV lane in both directions on this heavily congested and dangerous stretch of highway. But I am concerned that by using such obsolete and incomplete data, CalTrans would appear to be overstating the capacity improvement of Highway 101 from the Novato Narrows project.

SA2-2 Indeed, the failure to consider increased traffic from the proposed casino along Highway 101 near Rohnert Park would suggest a very serious overstatement of capacity improvement. Station Casinos and the Graton tribe are proposing a massive Las Vegas-style casino with 2,000 to 5,000 slot machines and a variety of resort amenities. A leading gambling industry expert on traffic planning for casinos estimates that each slot machine generates approximately 13.6 vehicle trips per day. In the case of the Graton casino, that means at least 27,200 and possibly as much as 68,000 new vehicle trips on Highway 101 every day. Cars and buses would come from all over the Bay Area, including the San Francisco, the East Bay, Napa, Vallejo, and beyond. All major routes into Marin and Sonoma County would be impacted, especially Highway 101.

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Response to Comment SA2-1

The land uses in the travel demand models used to forecast future traffic volumes for state highway projects are not based upon general plans. These plans are not consistent regarding projected future developments and assumed differing time periods to achieve plan build-outs, so they would not yield realistic or consistent results if used as a basis to forecast traffic.

Therefore, the Association of Bay Area Governments (ABAG) land use projections are the basis for the modeling and analysis of state highway projects. These projections are internally consistent and are projected to occur in a particular year. The commenter is correct that the model used was based upon the ABAG land use forecasts from the year 2000, an older set of land use forecasts. When the forecasts were begun, the model used was the most up-to-date suitable model available.

The capacity of a highway is the number of vehicles that can use a given section of highway in a given time period. This is a function of the characteristics of the highway, not of the number of vehicles traveling on it, so it is not affected by the traffic on the highway. However, the relationship between the volume of vehicles trying to use a highway and the capacity of the highway determines how well the highway operates, so the forecast volumes are important when trying to determine the future operational characteristics of a highway.

Please also see the response to Comment SA2-2 below.

Response to Comment SA2-2

The Graton Rancheria Casino was not originally included in the traffic projections for this project because when the projections were produced

the Graton Rancheria Casino was only a conceptual proposal without the information needed for a traffic forecast.

Based on the Casino's Draft EIR, the additional demand will total around 18,000 vehicle trips per day When factoring in an additional 18,000 vehicle trips, we have to take into account certain aspects of this additional traffic: 1) the vehicle trips are spread out over a 24-hour period with only a fraction traveling in one particular direction at any given time; 2) the casino peak hour occurs at a different time- usually later - than the commuter peak hour; and 3) the 18,000 additional vehicle trips will be spread out throughout the entire casino study area, not just specifically at the project site.

The information from the casino project's Final Traffic Impact Study (dated Sept. 2007) indicates that the casino would generate a 10% increase in Average Daily Traffic (ADT) north of Old Redwood Hwy intersection. Therefore, the additional 18,000 vehicle trips per day will not add an overwhelming amount of traffic to the project area, and the MSN Project would remain an effective way to relieve the congestion currently experienced at this location on Highway 101 even with the construction of the casino.

Letter - SA2

Page 2

SA2-3 Traffic projections in the DEIR should be based on the latest land use plans and should obviously account for the very real possibility of a staggering increase in Highway 101 traffic from the proposed casino. Critical land use and transportation decisions in my district hinge in part on the traffic capacity of Highway 101, so the accuracy of the DEIR traffic projections has implications well beyond the Novato Narrows project itself.

Please consider these comments and concerns as you revise the DEIR. I understand that taking these additional factors into account could lead to some sobering conclusions – including the possible revelation that completing the Novato Narrows project will merely limit the future worsening of congestion rather than reduce current congestion levels. Still, it is better that we have complete and accurate information in the DEIR so that we can better address our region's transportation and land use challenges now and in the future.

Sincerely,

JARED HUFFMAN
Assemblymember, 6th District

JH: lb

Response to Comment SA2-3

See the responses to Comments SA2-1 and SA2-2.

Letter: SA3.
Signatory: California Public Utilities Commission (CPUC).

Response to Comment SA3-1

While the project does not propose a bike path in Segment C, it does propose bike/pedestrian lanes in Segment B. The proposed paths in Segment B are not adjacent to the railroad corridor but do come into proximity with the proposed Sonoma-Marin Area Rail Transit (SMART) Station at Petaluma Boulevard South. Comment regarding bicyclist/pedestrian safety has been noted.

Our project will not encroach on SMART ROW, except during construction of the Petaluma Boulevard Bridge. This area does not contain any bicycle/pedestrian lanes. Please see Sections 3.1.9 and 3.1.10 in Volume 1 of this FEIR/S.

The MSN Project crosses over SMART tracks at the Franklin Overhead, North Novato Overhead, US 101/SR 116 Separation and Overhead, and North Petaluma Overhead. Caltrans and SCTA will comply with the GO 88-B process during the final design stages.

STATE OF CALIFORNIA — Arnold Schwarzenegger, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 10, 2007

Melanie Brent
State of California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612

RE: Marin-Sonoma Narrows HOV Widening Project, SCH# 2001042115

Dear Ms. Brent:

SA3-1 As the state agency responsible for rail safety within California, we recommend that this project, adjacent to or near the SMART rail corridor in the Counties be planned with the safety of the rail corridor in mind. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way (ROW).

Part of the project includes pedestrian/bikes paths paralleling US 101; at both the northern and southern portions of Segment C, US 101 is in close proximity to the existing rail corridor; if a proposed pedestrian/bike path is planned near or adjacent to the rail corridor, then continuous vandal resistant fencing to limit the access of trespassers onto the railroad ROW should be included as part of the project. Since the project includes modifications to several existing grade-separated crossings it is legally required to obtain authority to construct from the Commission through the General Order (GO) 88-B process. Additional information on GO 88-B can be found at:

http://www.cpuc.ca.gov/PUC/Transportation/crossings/Filing+Procedures/go88B.htm

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the Counties.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles
Environmental Specialist
Rail Crossings Engineering Section

cc: Mitch Stogner, NCRA
Lillian Hames, SMART

Letter: SA4.
Signatory: California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB).

Response to Comment SA4-1

The Fixed HOV lane alternative with Access Option 12b has been identified as the Preferred Alternative. Caltrans and FHWA took into consideration a number of factors in identifying the Preferred Alternative and access option. The discussion of the Preferred Alternative in Volume 1, Chapter 2 of this FEIR/S is similar to the discussion that Caltrans and FHWA have presented at meetings with the RWQCB under the NEPA/404 process. Caltrans and FHWA will continue to implement avoidance and minimization measures into the design and construction processes of this project.

California Regional Water Quality Control Board

San Francisco Bay Region

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
http://www.waterboards.ca.gov/sanfranciscobay

Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

January 11, 2008
File No.: 2148.02, 2158.02 (BT)

California Department of Transportation
Attn: Ms. Melanie Brent
PO Box 23660
Oakland, CA. 94623-0660

SUBJECT: Comments on the Draft Environmental Impact Report for the Marin-Sonoma Narrows Project (SCH#2001042115)

Dear Ms. Brent:

Thank you for giving the Regional Water Quality Control Board (Water Board) staff the opportunity to comment on the California Department of Transportation's (Department's) Draft Environmental Impact Report (DEIR) for the Marin-Sonoma Narrows Project (Project).

Purpose and Need and Range of Alternatives

We are satisfied with the range of alternatives presented in the DEIR, and in particular, the reduced level of permanent impacts to wetlands and waters. The DEIR presents three Project alternatives: no-build, reversible HOV lane, and fixed HOV lane alternatives. We agree with the Department's purpose and need for the proposed Project, and therefore, do not encourage the no-build alternative. The DEIR notes that the fixed (one lane each direction) and reversible HOV lane (one temporally shared lane) options have similar footprints and environmental impacts. Nevertheless, we prefer the fixed HOV lane option over the reversible lane option because the fixed lane option would increase auto capacity at all hours of the day and improve the flow of traffic in both north and southbound directions. The reduced congestion should result in a level of pollutant emissions lower than what would be produced under the reversible HOV lane option.

SA4-1 The DEIR further divides the two build alternatives into four "access options." To echo comments made to the Department by the USEPA in a letter dated December 14, 2007, we also prefer whichever access option results in the lowest level of impacts to wetlands and waters of the U.S. Based upon the DEIR, access options 14b and 14d are preferable to options 4b and 12b because projected impacts to wetlands and waters of the U.S. and native trees appear to be less significant. Regardless of the selected access option, the Department must continue to identify opportunities to reduce permanent impacts to wetlands and waters of the U.S.

California Environmental Protection Agency

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Letter - SA4

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Response to Comment SA4-2

Caltrans is considering onsite water quality treatment to the maximum extent practicable and to the San Francisco Bay Regional Water Quality Control Board's specific requirement of providing treatment of stormwater runoff from an area of impervious surface equivalent to the area of new and redeveloped impervious surface associated with the project.

Response to Comment SA4-3

Caltrans is still looking into appropriate wetland habitat to mitigate for any wetland losses. The Burdell Mitigation Bank, among others, is being considered. Any wetland mitigation credits purchased for the project will be in either Marin or Sonoma County. All mitigation will be approved by the U.S. Army Corps of Engineers and/or the Regional Water Quality Control Board.

Caltrans will plant all slopes affected by the project with native grasses and shrubs to stabilize the slopes against erosion. Caltrans will install native plants appropriate for the locations. Caltrans may also plant site-adapted native tree species such as willows, oaks, California bay laurel, and California buckeye to compensate for tree removal along San Antonio Creek. These trees will provide shading for the creek once they have matured, lowering the water temperature for aquatic organisms, and further stabilizing the banks against erosion.

Post-Construction Stormwater Treatment

SA4-2 The DEIR notes that the fixed and reversible HOV lane alternatives would result in approximately 205 acres of new impervious surface. The Department must provide treatment of stormwater runoff from an area of impervious surface equivalent to the area of new *and* redeveloped impervious surface associated with the Project. The Department must demonstrate that this level of treatment shall be provided before the Water Board may issue Waste Discharge Requirements and/or 401 water quality certification (Water Board permits) for the Project. Should it prove infeasible to treat runoff onsite, the Department shall identify alternative treatment that will provide a water quality benefit equivalent to the foregone treatment. If the Department must identify alternative treatment for the Project, the treatment must be identified prior to issuance of a Water Board permit. Because of the challenges involved in identifying alternative stormwater treatment, we recommend the Department make every effort to meet the Water Board's treatment mandate onsite.

Mitigation

SA4-3 The DEIR projects approximately 3 acres of permanent and 16 acres of temporary impacts to other waters of the U.S. When preparing a mitigation proposal, please consider that impacts to linear water features, such as creek channels, should be mitigated using linear features. In other words, one of the metrics used to evaluate the adequacy of impacts to creeks is the linear feet of impacted channel in relationship to the linear feet of mitigation activities in channels. The Department should maximize linear mitigation opportunities by identifying onsite potential to enhance or restore existing or relocated linear features (e.g., earthen instead of cement-lined ditches, native vegetation planted at top of bank).

If you have any questions, please contact me at (510) 622-2506, or via e-mail to BThompson@waterboards.ca.gov.

Sincerely,

Brendan Thompson
Environmental Specialist

cc: State Clearinghouse
Keith Lichten, Water Board
Mike Monroe, USEPA, WTR 8, San Francisco
Hal Durio, Army Corps of Engineers
Joyce Ambrosius, NOAA Fisheries
Ryan Olah, U.S. Fish and Wildlife Service
Cesar Perez, Federal Highway Administration
Farhad Mansourian, Marin County Public Works

California Environmental Protection Agency

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3.3 Comments and Responses for Regional Agencies

LETTER: RA1. SIGNATORY: GOLDEN GATE BRIDGE HIGHWAY AND TRANSPORTATION DISTRICT (GGBHTD). 3.3-2
LETTER: RA2. SIGNATORY: MARIN MUNICIPAL WATER DISTRICT (MMWD). 3.3-4
LETTER: RA3. SIGNATORY: NORTH MARIN WATER DISTRICT (NMWD). 3.3-6
LETTER: RA4. SIGNATORY: SONOMA COUNTY TRANSPORTATION AUTHORITY (SCTA). 3.3-8
LETTER: RA5. SIGNATORY: SONOMA MARIN AREA RAIL TRANSIT (SMART). 3.3-11
LETTER: RA6. SIGNATORY: SONOMA COUNTY WATER AGENCY (SCWA). 3.3-21
LETTER: RA7. SIGNATORY: SONOMA COUNTY REGIONAL PARKS. 3.3-22
LETTER: RA8. SIGNATORY: TRANSPORTATION AUTHORITY OF MARIN (TAM). 3.3-25

Letter: RA1.
Signatory: Golden Gate Bridge Highway and Transportation District (GGBHTD).

November 28, 2007

GOLDEN GATE BRIDGE
HIGHWAY & TRANSPORTATION DISTRICT

Ms. Melanie Brent, Office Chief
Division of Environmental Planning and Engineering
Department of Transportation
P.O. Box 23660
Oakland, CA 94623-0660

Re: **Comments on Marin-Sonoma Narrows HOV Widening Project**
Draft Environmental Impact Report/Draft Environmental Impact Statement

Dear Ms. Brent:

The Golden Gate Bridge, Highway and Transportation District (District) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the Marin-Sonoma Narrows (MSN) HOV Widening Project. The District offers the following comments.

District staff understand from the MSN DEIR/DEIS that HOV lanes are proposed along US 101 from State Route 37 in Novato to Corona Road in Petaluma. US 101 would be widened, realigned, and converted from an expressway to a freeway between Novato and Petaluma. In addition, frontage roads would be constructed and ramp metering would be installed along portions of US 101. The MSN DEIR/DEIS identifies fixed and reversible HOV lane alternatives in addition to a no-build alternative. All existing Golden Gate Transit bus stops would continue to be accommodated by the proposed project at the following freeway interchanges: Rowland Boulevard, DeLong Avenue, Atherton Avenue, South Petaluma Boulevard and Lakeville Highway.

RA1-1 As identified in Table 2-1 of the MSN DEIR/DEIS, HOV bypass lanes are included on all ramps with proposed metering, except the northbound ramp at DeLong Avenue in Novato. While the District currently does not operate bus service on the northbound DeLong Avenue ramp, the District would like an HOV bypass lane included so buses can use it should service be routed onto the ramp in the future.

RA1-2 The District would like all HOV bypass lanes positioned on the ramps so that buses can access them after serving freeway bus pad and ramp stops without crossing the mixed-flow lane(s). In addition, the District would like the mainline HOV lanes designed so they do not preclude bus operations with median bus stations, should they be proposed in the future. Median bus stations permit continuous express bus operations within the HOV lanes, reducing and/or eliminating the need to cross mixed-flow lanes to serve existing bus pad and ramp stops.

RA1-3 The District requests that Section 3.1.8.1 (Line 1325) be corrected to state that the Atherton Avenue park-and-ride lot contains 63 parking spaces. Also, Section 3.1.8.1 (Lines 1267, 1269 and 1272) and Figure 3.1-9 should be modified to reflect our current operations. Golden Gate Transit provides service within the project area as follows: Routes 49, 51, 52, 54, 56, 58, 70, 71, 80 and 153 operate within Novato. Routes 73, 74, 75, 76 and 80 operate within Petaluma. Routes 52, 54, 56, 70, 71, 72, 72X, 73, 74, 75, 76 and 80 operate along the portions of US 101 affected by the project.

1011 ANDERSEN DRIVE • SAN RAFAEL, CA 94901-5381 • USA

Response to Comment RA1-1

An HOV bypass lane is also being proposed for the northbound DeLong on-ramp. Table 2-1 in Volume 1 of the FEIR/S has been revised to reflect that HOV bypass will be included on the northbound DeLong on-ramp.

Response to Comment RA1-2

Comments noted. During final design, Caltrans will consider positioning of HOV lanes so as to allow for smooth transit operation.

Response to Comment RA1-3

The number of spaces at the Atherton park-and-ride lot and the Golden Gate Transit operations information have been corrected in Section 3.1.9.1 and Figure 3.1-9 in Volume 1 of this FEIR/S.

Letter - RA1

Page 2

The District supports the proposed project's intent to improve freeway operations along US 101. The District prefers the fixed HOV lane alternative over the reversible HOV lane alternative because providing HOV lanes in the non-peak travel direction would facilitate the District's bus service, which operates on US 101 in both directions all day every day, should off-peak direction mixed-flow lanes become congested.

Thank you for providing the District with the opportunity to submit comments on the MSN DEIR/DEIS. You may contact David Davenport, Associate Planner, at (415) 257-4546 if you have any questions regarding these comments.

Sincerely,

Alan Zahradnik
Planning Director

c: C. Kupersmith, General Manager
D. Davenport
J. Spilman, SCTA
E. Schatmeier, TAM
A. Van Doren, MCTD

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Letter: RA2.
Signatory: Marin Municipal Water District (MMWD).

Response to Comment RA2-1

The utilities section of the FEIR/S (Volume 1, Section 3.1.8) has been revised to include the North Marin Water District and its service area under the Affected Environment. The Impacts section has also been revised to fully address the potential impacts to this utility. The meetings that Caltrans and FHWA have had with this stakeholder have been noted in Chapter 6, Table 6-3.

MARIN MUNICIPAL WATER DISTRICT

220 Nellen Avenue Corte Madera CA 94925-1169
www.marinwater.org

December 14, 2007

Ms. Melanie Brent, Office Chief
Division of Environmental Planning and Engineering
Department of Transportation
P.O. Box 23660
Oakland, CA 94623-0600

Dear Ms. Brent:

RA2-1 The Marin Municipal Water District (MMWD) has reviewed your Draft Environmental Impact Report / Draft Environmental Impact Statement for the proposed "Marin-Sonoma Narrows (MSN) HOV Widening Project".

Our review indicates that your proposed project will not have a direct impact on facilities owned by MMWD. However, it does appear that the project will have a very significant impact on the existing 30 inch diameter potable water pipeline extending from Petaluma to Novato that is owned by the North Marin Water District (North Marin).

This pipeline is very important to the residents of the urbanized areas of Marin County. The pipeline operates near its capacity for most of the year conveying water from Sonoma County to both North Marin and MMWD. Today it provides about 40% of the annual potable water needs of the more than 250,000 residents of North Marin and MMWD.

Most of the existing pipeline is in easements adjacent to the western end of the existing Highway 101 expressway. Our review of your project indicates that in excess of 50% of the length of this critical pipeline may have to be re-located to facilitate your project. It is imperative that the flow of water from Sonoma County to Marin County not be interrupted by your project.

The District is somewhat concerned that the DEIR/ DEIS does not seem to recognize the importance of the pipeline facility. It is not mentioned specifically and its owner, North Marin, is not identified as a major stakeholder in your project planning purpose. The environmental impacts of the relocation work are not discussed at all and the timeline for the relocation, which could be in excess of two years, is not included in the widening project schedule.

In summary, MMWD is concerned that your DEIR / DEIS does not adequately address the impacts of the widening project on potable water supply in Marin County. We would like to ask that the final document recognize the importance of the existing facility, identify the North Marin Water District as an important stakeholder in the project and identify possible

recycled recyclable

Letter - RA2

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RA2-1 pipeline relocation options and their environmental impacts, so that required pipeline construction can proceed in a timely fashion under conditions already addressed in your final EIR / EIS document.

Thank you for the opportunity to comment on this important project. I f you have questions or need more information on this matter, please contact Mr. Dana Roxon of our staff at 415-945-1590.

Sincerely,

Paul Helliker

Paul Helliker
General Manager

cc
North Marin Water District

Steve Kinsey
Judy Arnold
Marin County Board of Supervisors

Diane Steinhauser
Transportation Agency of Marin

Letter: RA3.
Signatory: North Marin Water District (NMWD).

Response to Comment RA3-1

Caltrans North Region Hydraulics concurs with the comment regarding the sentence placement in the DEIR/S. This has been addressed in the FEIR/S.

Response to Comment RA3-2

The discussion in the FEIR/S concerning the Utilities affected environment section has been expanded to reflect the service areas of the North Marin Water District and Marin Municipal Water District. Water supply sources and contractual relationships are outside the project scope. Hydrology and water quality issues within the project purview are discussed in Sections 3.2.2 and 3.2.3 in Volume 1 of this FEIR/S.

Response to Comment RA3-3

This information is noted and has been added to the FEIR/S under the impacts to utilities section (Section 3.1.8 in Volume 1).

Response to Comment RA3-4

It is customary for Caltrans to enter into agreements with utility companies concerning relocations due to project construction. The project impacts within the environmental study area are encompassed in this FEIR/S, which is undergoing CEQA review. The environmental study area includes proposed right-of-way within which the utilities can be relocated. However, once more detailed design plans are available, Caltrans will reassess the potential impacts associated with the relocation in an addendum under Section 15164 of the CEQA Guidelines.

Regarding facility upgrading, it is Caltrans' policy to reimburse utilities for in-kind replacement of their facilities. The need for upgrades or improvements would be based upon a utility company's operational needs and independent of the MSN Project. Therefore, upgrades would be a separate action for which Caltrans and FHWA are not responsible.

Caltrans congratulates NMWD for applying their expertise to their operations to reduce greenhouse gas emissions.

north marin water district
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December 19, 2007

Melanie Brent
Office Chief
Division of Environmental Planning and Engineering
Department of Transportation
P.O. Box 23660
Oakland, CA 94623-0600

RE: Notice of Availability - Draft Environmental Impact Report (DEIR) for the Proposed Marin-Sonoma Narrows HOV Widening Project

Dear Ms. Brent:

The North Marin Water District (NMWD) has reviewed the subject Draft Environmental Impact Report for the above referenced project and has the following comments:

RA3-1 1. Chapter 1, Section 1.2.4, Need to Address Drainage Problems and Recurring Flood Hazards, Page 1-15, Lines 289-292

This sentence discusses flooding of the northerly intersection of San Antonio Road during heavy storm events. It is believed that this narrative is more appropriately discussed under the heading of "*San Antonio Creek*" area rather than "*Birkenstock*" area.

RA3-2 2. Chapter 3, Section 3.1.7 Utilities/Emergency Services, 3.1.7.1 Affected Environment, Utilities, Page 3.1-48, Line 1117

NMWD suggests that this paragraph be expanded to identify that the North Marin Water District receives 80% of its water supply from the Russian River under contract with Sonoma County Water Agency and delivered from NMWD's 7.1 mile long, 30-inch diameter aqueduct located immediately west of and parallel to Hwy. 101 throughout the Marin-Sonoma Narrows (Phase B) project.

Marin Municipal Water District deliveries of Russian River water are also conveyed through this aqueduct. Thus, this pipeline is very important to the residents of the urbanized areas of Marin County. The pipeline operates near its capacity for most of the year and now provides about 40% of the annual potable water needs of the more than 250,000 residents within the NMWD and Marin Municipal service areas.

RA3-3 3. Chapter 3, Section 3.1.7 Utilities/Emergency Services, 3.1.7.2 Impacts, Utilities, Page 3.1-49, Line 1160

It is recommended that this sentence be expanded to reflect that the proposed widening project will require a significant relocation (approximately 50%) of NMWD's 7.1 mile aqueduct between Kastania Road and the City of Novato.

RA3-4 4. Chapter 3, Section 3.1.7 Utilities/Emergency Services, 3.1.7.2 Impacts, Utilities, Page 3.1-49, Line 1166

DIRECTORS: JACK BAKER • RICK FRAITES • STEPHEN PETTERLE • DENNIS RODONI • JOHN C. SCHOONOVER
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Letter - RA3

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Response to Comment RA3-5

Please refer to the Master Response on Greenhouse Gas Emissions.

Response to Comment RA3-6

Please see the response to Comment RA3-4.

Response to Comment RA3-7

The commenter is correct, the existing and simulated views were inadvertently reversed in the DEIR/S. The figures have been corrected in this FEIR/S.

Response to Comment RA3-8

Caltrans will attempt to incorporate recycled water facilities into final project design, and will coordinate with NMWD to assess feasibility and develop plans.

Response to Comment RA3-9

Caltrans North Region Hydraulics concurs with the comment regarding sentence placement in the DEIR/S. This has been addressed in the FEIR/S.

Response to Comment RA3-10

Phase 1 of the project will require relocation of NMWD's pipeline. Caltrans will work with the NMWD during final design to ensure the least disruptive and most timely process.

Ms. Melanie Brent
December 19, 2007
Page 2 of 2

RA3-4 / RA3-5 Please include NMWD as an agency that CalTrans will need to enter into utility agreements. It should be clearly stated that any right of way acquisition and CEQA review for relocated water facilities work necessitated by the Marin-Sonoma Narrows project will be CalTrans' responsibility. The DEIR should reflect that said relocated aqueduct will require upsizing to eliminate continued use of the existing Kastania Pump Station and reduce greenhouse gas emissions associated with electric pumping operation. Pursuant to AB32, Global Warming Solutions Act of 2006, Section 38592(a) states: "All State agencies shall consider and implement strategies to reduce their greenhouse gas emissions". Additionally, one of the overall objectives of CalTrans Climate Action Program is that CalTrans " . . . plans . . . and projects as a whole contribute to the State's CHG emission reduction targets."

RA3-6 The CalTrans DEIR should further consider accommodating Marin Municipal Water District's contemplated water supply pipeline within the project limits or expansion of the NMWD aqueduct to accommodate Marin Municipal deliveries.

RA3-7 5. Chapter 3, Section 3.1.10 Visual/Aesthetics, 3.1.10.3 Impacts, Bridge Widening, Page 3.1.100

It appears that the photo simulation shown in Figure 3.1-24 should be reversed with the photo shown in Figure 3.1-25.

RA3-8 6. Chapter 3, Section 3.1.10 Visual/Aesthetics, 3.1.10.4 Avoidance, Minimization, and/or Mitigation Measures, Standard Highway Landscaping, Page 3.1-139, Line 2950

NMWD requests that any landscaping improvements be designed for potential future use of recycled water and include purple pipes and other appropriate recycled water facility appurtenances.

RA3-9 7. Chapter 3, Section 3.2 Physical Environment, Section 3.2.2 Affected Environment, Birkenstock Area, Page 3.2-9, Line 127

Similar comment to that of Comment #1 above.

RA3-10 In addition to the above mentioned comments, NMWD would like to utilize this opportunity to stress the importance of the North Marin aqueduct in providing reliable water service to our Novato customers for health and safety purposes. With 80% of the District's supply delivered through this pipeline, it is imperative that CalTrans ensure that NMWD is a critical stakeholder during the detailed design phase of the project. Furthermore, the timeline for this project must adequately accommodate NMWD's work necessary to design, bid and construct necessary pipeline relocations (an estimated duration of two years) prior to start of CalTrans construction phase.

Thank you for the opportunity to comment.

Sincerely,

Drew McIntyre
Chief Engineer

cc: Steve Kinsey
Judy Arnold
Marin County Supervisors

Dianne Steinhauser
Transportation Authority of Marin

DM: edb
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Letter: RA4.
Signatory: Sonoma County Transportation Authority (SCTA).

Response to Comment RA4-1

Please see the Master Response on Need and Purpose.

Response to Comment RA4-2

Please see the Master Response on Need and Purpose.

Response to Comment RA4-3

The "No Build" alternative in and of itself cannot cause an impact and is only used as a baseline for the comparison of impacts of the "Build" alternatives.

Response to Comment RA4-4

Support of all the soundwalls within the limits of Sonoma County by the SCTA, and local residents, has been noted and will be considered in making our final decision. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

12/14 JRichards- please handle

SCTA Sonoma County Transportation Authority

Keeping Sonoma County Moving

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December 11, 2007

Bijan Sartipi
California Department of Transportation
111 Grand Avenue
Oakland, CA 94623

RE: Comments on the Draft Environmental Impact Report/Draft Environmental Impact Statement on the Marin-Sonoma Narrows HOV Widening Project

Dear Mr. Sartipi,

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Draft Environmental Impact Statement on the Marin-Sonoma Narrows HOV Widening Project. The SCTA has reviewed the document and the Board offers the following comments.

RA4-1

1. SCTA staff is concerned about the omission of any safety discussion under the operational deficiencies. Safety is a significant enough concern to warrant its own section in the summary (which could include accident data, freeway speeds on non-controlled access highway, bicycle and pedestrian access to roadway with vehicles traveling at freeway speeds, and cross-turning movements in three locations).

RA4-2

2. Similarly, in Chapter 1, Section 1.3, SCTA feels that addressing/improving safety should be among the purposes of the project. Although the document identifies operational deficiencies in this section, SCTA feels that improving safety is a stand alone purpose of this project and should be identified as such.

RA4-3

3. In Chapter 3, Section 3.2.6, air quality impacts of the project's two build alternatives and access options are discussed in detail, however, SCTA feels that greater detail should be added to the air quality discussion of the "No Build" alternative. The document clearly states in Section 3.1.9 that queues and delays are expected to increase in the future, based on planned growth in both counties, but the air quality impacts caused by such congestion are not addressed in the discussion of the no build alternative air quality impacts in section 3.2.6.

RA4-4

4. Also found in Chapter 3 is the discussion of noise impacts expected from the proposed project. In section 3.2.7.4 the document identifies four locations in Sonoma County where existing noise qualifies through the Federal Noise Abatement Criteria (NAC) for sound abatement. One

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Letter - RA4

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December 11, 2007

of the factors identified in the document for consideration in making the determination to build the walls is whether or not the walls are "acceptable/desirable to the local jurisdictions". SCTA supports the construction of the proposed Sonoma County soundwalls that are supported by residents and local jurisdictions. At least two of the proposed locations for soundwalls have been identified by a number of now defunct federal and state noise abatement programs, as evidenced by correspondence on file with the Department in reference to this project. Support from the area's residents is also evidenced by signed petitions found on file with the Department. RA4-4

RA4-5 5. In reviewing the document, staff noted a considerable list of past, present and reasonably foreseeable future projects in the assessment of cumulative impacts in Chapter 5, however, it was noted that the list of highway projects does not match the list of related highway projects in the Summary section of the document. SCTA approves of the list of highway projects used in the Summary section and suggests that the same list be used in the Cumulative Impacts Assessment in Chapter 5.

Finally, the following minor editorial changes should be considered.

RA4-6 1. Table S-1, Related Transportation Projects in the MSN Project Area should be updated to include current information:

- East Washington is also working to complete PSE;
- The Central Project (HOV from Old Redwood Hwy to RP Expressway) PA/ED complete as of 8/31/07. Design is already underway;
- The widening *and* soundwall project from Wilfred Ave to Hwy 12 is complete. Landscaping of that section is set to begin construction in October 2007;
- Steele Lane Interchange project is currently under construction;
- Steele Lane to Windsor River Road Environmental Studies are Complete. Design is currently at 65% PSE.

RA4-7 2. Table S-2 should reflect on-going environmental impacts of the No-Build alternative such as continued congestion, increased emissions, on-going safety concerns of having bicyclists share the road way with motorist traveling at freeway speed. Please clarify with additional text the statements of construction impacts in the No-Build Alternative column in this table.

RA4-8 3. On page 3.1-62, the document identifies the SCTA's 2001 Countywide Transportation Plan (CTP) as the policy guidance document for planning transportation in the county. Please note that the 2001 CTP was updated to the "2004 Comprehensive Transportation Plan."

We look forward to continuing to work with the Department on this important project.

Sincerely,

Suzanne Smith
Executive Director, SCTA

Response to Comment RA4-5

Table S-1 is a simple itemization of transportation projects in Sonoma and Marin Counties. Figure 5-2 in Chapter 5 shows projects in the Visual/Aesthetics geographic study area (see Section 5.2 in Volume 1) and cumulative decline in visual quality in the US 101 corridor since 2001. The following projects were omitted from the cumulative analysis for the reasons explained below:

Project Name	Reason Omitted
US 101 Widening/Soundwall, north of Wilfred to SR 12	Initial Study dated 2001 (predates study period)
US 101/SR 116 Sep/Overhead	Categorical Exemption. No aesthetically contributing elements
Southbound Auxiliary Lane in Petaluma	Categorical Exemption. No aesthetically contributing elements

Response to Comment RA4-6

This information has been updated in Table S-1 according to our latest information.

Response to Comment RA4-7

The No Build Alternative is the baseline condition against which the Build Alternatives are compared. The DEIR/S and this FEIR/S do present the minutes of delay due to increased congestion under the No Build Alternative (see Tables 3.1-12 and 3.1-13 in Volume 1 of this FEIR/S).

In terms of emissions, neither individual projects nor the No Build can be "taken out" and measured individually from regional air quality

management plans. However, as stated in the Master Response on Cumulative Air Quality, the MSN Project is incorporated into the regional transportation plan, which is consistent with air quality management plans to attain state and federal ambient air quality standards, whereas the No Build is not.

Although bicycle use along the expressway shoulder is not prohibited, it is not a designated bicycle route and is not being planned for designation. It is expected that low usage would continue due to the lack of a continuous bicycle access between Novato and Petaluma under the No Build Alternative, especially where a bicycle route in the SMART corridor may become available. Therefore bicycle/pedestrian safety in Segment B is not expected to be an issue under the No Build.

Response to Comment RA4-8

Thank you for bringing this to our attention; the text has been updated accordingly in the FEIR/S.

Letter: RA5.
Signatory: Sonoma Marin Area Rail Transit (SMART).

Response to Comment RA5-1

Reference to a 75-mile rail system for SMART has been changed to 70 miles.

Response to Comment RA5-2

Text has been changed to reflect proper terminus of SMART in Larkspur.

Response to Comment RA5-3

This information has been updated to be consistent with current SMART forecasts.

Response to Comment RA5-4

Text has been updated to be consistent with current SMART data.

SONOMA-MARIN SMART AREA RAIL TRANSIT

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December 14, 2007

Melanie Brent, Office Chief
Division of Environmental Planning & Engineering
California Department of Transportation
111 Grand Street, Mail Station 8B
Oakland, CA 94612

Re: Comments on Marin-Sonoma Narrows (MSN) HOV Widening Project DEIR/DEIS

Dear Ms. Brent,

The staff of the Sonoma-Marin Rail Transit District (SMART) thanks you for the opportunity to comment on the Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/S) for the Marin-Sonoma Narrows (MSN) HOV Widening Project. Our staff comments are as follows:

SMART Project Details

RA5-1

1) On page 2-36 (line 533), the text states that SMART proposes a 75-mile rail system. On page 3.1-54, however, the text states that the SMART system is 70 miles long. The latter is correct. The former should be corrected to say "70-mile long system".

RA5-2

2) On page 2-36 (line 538), the text states that some commuters on SMART rail will be traveling northbound from San Rafael. This language implies that the southern terminus of the SMART project is in San Rafael which is incorrect. The southern terminus of the rail line is Larkspur.

RA5-3

3) On page p. 3.1-54 (line 1295), SMART's forecasted ridership is said to be 4,800 daily passengers. SMART's updated ridership estimated for its 2006 FEIR, was 5,050 daily passengers in 2025. Moreover, the document says that service would be on weekdays only. However, SMART has recently proposed that four weekend roundtrips between Cloverdale and Larkspur be operated Saturdays, Sundays, and holidays. Weekend service is currently being analyzed in a Supplemental EIR.

RA5-4

4) Regarding the service pattern outlined on page 3.1-54 (line 1293), SMART's latest proposal is four daily round trips between Windsor and Larkspur (not three as stated in the DEIS/DEIR); and one daily round trip between

Letter - RA5

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RA5-4 Petaluma and Larkspur (not two as stated in the DEIS/DEIR), in addition to the other end-pairs that are correctly stated. This service pattern applies to weekday service.

MSN Project Need and Justification

RA5-5 5) The DEIR correctly notes on page 3.1-4 (line 113) that the 1997 Calthorpe Study did not call for a widening of Highway 101 from Petaluma to Novato as proposed by this project, due to a poor cost/benefit ratio. However, on page 3.1-13 (line 300), the DEIR claims that the proposed project is "consistent" with the Calthorpe Study. This reference is contradictory and misleading.

RA5-6 6) In a similar vein, on page 3.1-4 (line 106) the DEIR claims that a continuous HOV lane through Marin and Sonoma Counties was a goal of the Calthorpe Study. This is incorrect. The main goal of the Calthorpe Study was to *"determine how to most efficiently spend public money on transportation improvements and how to create a pattern of land use that can most efficiently take advantage of transportation options while maintaining a high quality of life for Marin and Sonoma County residents."* While investments in HOV lane expansion were analyzed as part of that Study, creating a continuous HOV lane was not a goal or sub-goal of the Study and was not reflected in the Preferred Scenario.

RA5-7 7) The DEIR, on page 1-1 (line 22) cites a Major Investment Study (MIS) that was completed in May, 2000, and examined "a full range of alternatives to relieve congestion in the U.S. 101 North". This document does not appear to have ever been released to the public. Our inquiries to the local partner agencies TAM and SCTA yielded no awareness of this document. If this is an internal Caltrans engineering report that was never made public that should be clarified in the text. If the report considered only roadway-oriented improvements, this too should be clarified in the text. As it's currently written, the DEIR implies that the MIS is a well-known and comprehensive alternatives analysis that established the policy foundation for this project. This does not appear to be the case.

RA5-8 8) In table S-1, on page S-25, the potential for NCRA freight service is not acknowledged or considered in the document. The same comment applies to lines 325-335,on page 1-16, "Need to Serve Goods Movement."

Construction Related Transportation Impacts

RA5-9 9) On page 3.1-84 (line 2009), the text states that construction *may* cause traffic delays. Given that roadway projects that involve lining a road with k-rail always causes traffic delays, why is this statement qualified? The text should acknowledge that construction *will* cause delay.

RA5-10 10) On page 3.1-84, (line 2006-2010), it would be helpful if the document provided estimates of how many lane-hours of closures would be required during construction, based on other similar work Caltrans has undertaken.

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Response to Comment RA5-5

Although the Calthorpe study did not include upgrading Segment B to freeway status as part of its "preferred scenario," it did not discount this alternative from being viable. It states on pg. 116 of the study, "However, should state or federal funds become available to upgrade this area to freeway status (addressing several safety issues with the introduction of new interchanges, on/off ramps, frontage roads, modified shoulder conditions etc.) both counties may wish to consider its implementation." Therefore the MSN Project is consistent with the study.

Response to Comment RA5-6

The text has been corrected to indicate that a continuous HOV lane through Marin and Sonoma Counties was *studied* in regional planning documents.

Response to Comment RA5-7

The commenter is inquiring about the role and availability of the Marin-Sonoma Counties Major Investment Study (MIS) Summary (Draft), prepared May 2000, as it relates to Caltrans' decisionmaking process. Caltrans District 4 (the District) prepared this document to satisfy a requirement in the ISTEA (Intermodal Surface Transportation Efficiency Act of 1991). As such, it was an internal informational document prepared for FHWA in anticipation of requests for federal funding. With the adoption of TEA-21 (Transportation Equity Act for the 21st Century, 1998), the MIS ceased to be a requirement, which is why the Marin-Sonoma Counties MIS was drafted but never finalized. By the time the Project Study Reports were approved (1999-2001), covering the approximate MSN Project boundaries, there were planning documents by Sonoma County Transportation Authority, the Marin Congestion Management Agency, and the Metropolitan Transportation Commission's Regional Transportation Plan discussing plans to address congestion in the US 101 corridor. These plans are subject to public review, and they are

discussed in Section S.6 and Section 3.1.2, Land Use Planning, of the DEIR/S (and in Volume 1 of this FEIR/S). The MIS does not add any new information to these documents that are publically available and already discussed in the EIR/S. Therefore, the recirculation of the DEIR/S is not required.

Although the District did not rely on the MIS for any project decisions, Caltrans is including it as part of the administrative record for the purposes of disclosure. The text in the FEIR/S Section 1.1 has been revised to state that the "MIS discusses a range of alternatives to relieve congestion in the US 101 North Bay corridor." Information has also been added to explain the role of the MIS, that public review of this document was not required under ISTEA, and that the MIS ceased to be required with the passage of TEA-21. The MIS has also been listed in Chapter 9, Technical Studies and References, in Volume 1 of this FEIR/S; as with all references, it is available upon request to the District.

Response to Comment RA5-8

Text has been revised to include the proposed NCRA freight service.

Response to Comment RA5-9

During project construction, roadway capacities would be maintained at levels similar to existing conditions through construction staging; therefore construction-related delays would be minimized. This information has been added to the construction impacts discussion.

Response to Comment RA5-10

Since construction activities would take place in non-peak hours and roadway capacities would be maintained at levels similar to existing conditions through construction staging, construction related delays would be minimized.

Letter - RA5

Page 3

RA5-11

11) Regarding page 3.1-52 (lines 1236-1245), given that techniques (e.g., HCM 2000) exist for doing so, providing an estimate of the number of vehicle hours of delay caused by the construction would be helpful in assessing the project's impacts.

12) The DEIR should provide additional information about the impact of daily construction-related delays, including the impact on queuing and travel times in the corridor.

RA5-12

13) The DEIR should give an indication of how long construction activities would last? 1 year? 3 years? 5 years?

RA5-13

14) On page 3.1-86, the text notes that Caltrans will try to manage construction related delays, primarily by providing information. However, the presence of the SMART rail could service as a critical mitigation measure. The FEIR should consider how the impact of lane closures and daily delays for the duration of the project might vary depending on whether the SMART rail service is in place.

Mapping

RA5-14

15) On pages S-15 thru S-18, the aerial mapping appears to be old. For example, the quarry noted in S-5c has been under site preparation for another use for some time.

Transportation Issues and Impacts

RA5-15

16) On pages S-4 and S-5 (lines 93-108), the *Countywide* vehicle hours of delay are shown in the figure. Vehicle hours of delay for the MSN project segment would be more meaningful, and should be readily available from data already collected (e.g., from HICOMP data). In 2000, Caltrans estimated the AM peak hour delay from Old Redwood Highway (Penngrove) to Kastania Road was 1,110 vehicle hours per weekday. (Same comment applies to L 107-119, page 1-6).

RA5-16

17) Regarding Figure S-4 on page S-13: Why are two 10 foot shoulders necessary for a reversible HOV lane? Why isn't one 2-4' shoulder and one 10 foot shoulder sufficient? Doesn't this bias the cost of the reversible HOV lane alternative upward? (Comment also applies to Figure 2-2, page 2-5)

RA5-17

18) In Figure 1-5 on page 1-10, the figure shows reverse peak (southbound PM) backups in 2010. In 2007, we are not aware of any such backups. Given more recent 2007 traffic volume counts, is such a backup in 2010 likely to occur?

RA5-18

19) On page 2-14 (line 234), why would the reversible lane need to be closed during off- peak periods? Caltrans operates reversible lanes during some off-peak hours, e.g., Caldecott Tunnel (SR 24) and I-15 in San Diego.

RA5-19

20) On page 2-17 (lines 293-305), there is no mention of how the Class I path

3

Response to Comment RA5-11

Since construction activities would take place in non-peak hours and roadway capacities would be maintained at levels similar to existing conditions through construction staging, construction related delays would be minimized.

Response to Comment RA5-12

The MSN Project will be constructed in a series of phased projects. The first phase of construction will take approximately 3 years starting in 2010. Future phases of construction will be done as funding becomes available.

Response to Comment RA5-13

Since construction activities would take place in non-peak hours and roadway capacities would be maintained at levels similar to existing conditions through construction staging, construction related delays would be minimized.

It would be extremely hard to model the effect the SMART rail project would have on construction delays. When scheduling road closures, etc., no reduction in traffic due to the project is assumed. Therefore any reduction due to the SMART project would only lessen delays, and not taking SMART into account would be a conservative assumption. When considering the impact of the SMART rail project on construction-related delays, it is important to remember that whether to take US 101 or SMART rail would not be a simple either/or decision for all travelers. Many of the travelers on US 101 are traveling to destinations that could not conveniently be reached using SMART rail.

Response to Comment RA5-14

The commenter is correct; the aerial mapping was flown in 2002. However, the purpose of the aerial maps is to show the project limits and proposed project features.

For the purposes of the technical studies, Caltrans did not rely on the aerial mapping. Caltrans technical staff conducted extensive ground surveys, multiple field reviews, and consultations with various regulatory and local agencies. Therefore, updated aerial maps would not significantly change the results of technical studies or any project findings.

The commenter notes that a site identified as a quarry on Figure S-5c in the DEIR/S is actually under development for a different purpose. The updated information is appreciated; however, for the reasons stated above, it is not necessary to revise the figures.

Response to Comment RA5-15

Caltrans District 4 collects data in both the spring and fall seasons for the statewide HICOMP (State Highway Congestion Monitoring Program) report. During the spring and fall season of 2004 and 2005, the HICOMP data were collected by consultants hired by Caltrans' regional partner, the Metropolitan Transportation Commission (MTC). The MTC's consultant, with Caltrans guidance and review, develops delay estimates. The HICOMP results were summarized in *Bay Area Transportation: State of the System 2005* and *Bay Area Transportation: State of the System 2006* by MTC and Caltrans District 4. High level of vehicle hours of delays (2,120 vehicle hours of daily delay during the morning peak period) are shown in the 2005 HICOMP data from Old Redwood Highway and Kastania Road.

For specific vehicle hours of delay for 2004 and 2005 within the MSN Project limits, please see the table below.

Weekday Daily Delay (Vehicle Hours) for 2004 and 2005		
Segment	2004	2005
Morning Peak Period		
US 101 Southbound: North of Route 37 to I-580 (Marin Co.)	3,110	4,490
US 101 Southbound: Old Redwood Highway to Kastania Road (Sonoma Co.)	990	2,120
Evening Peak Period		
US 101 Northbound: Atherton Avenue to north of beginning of expressway (Marin Co.)	550*	550*
US 101 Northbound: At Old Redwood Highway (Sonoma Co.)	100*	100*
Note: * Monitored in 2003. (Due to budget limitations in 2004 and 2005, congestion monitoring was performed for only the most congested portions of the region's freeway system. These segments were not monitored in 2004 and 2005.) Source: *Bay Area Transportation: State of the System 2005* and *Bay Area Transportation: State of the System 2006* by MTC and Caltrans District 4.		

Response to Comment RA5-16

Full right and left shoulders are used because the reversible lane carries one-way traffic in different directions at different times. This is a Caltrans standard as well as an American Association of State Highway and Transportation Officials (AASHTO) standard.

Response to Comment RA5-17

Our analysis is based on the projected traffic volumes and shows there would be backups in the southbound direction during the PM peak. However, bottleneck locations shown in Figure 1-5 in the DEIR/S are incorrect; bottleneck locations should be at south of South Petaluma Blvd. in the AM and PM peaks. For the northbound direction, bottleneck locations would occur at 2-lane sections north of Atherton Avenue in the 2010 AM, 2030 AM, and 2030 PM peaks. Figure 1-5 has been corrected in the FEIR/S.

The travel demand model used for this project shows greatly increased “reverse commute” traffic for the year 2020.This is due to projected land use changes north of the project area bringing increased employment there. Both in the Bay Area and nationwide this is a common phenomenon, with the off-peak commute traffic increasing faster than the peak direction traffic, causing the peak and off-peak traffic levels to grow far closer and

even sometimes reverse. Other travel demand models for this area also show this occurring on this section of US 101, although we are not aware of any operational analysis based upon the output of this model showing what bottlenecks would emerge.

The 2010 forecast also shows this trend, while presently the resulting off-peak direction bottleneck may not be occurring. To prepare the 2010 forecasts, the year 1999 and year 2020 trip tables were interpolated to generate the 2010 trip tables. It is probable that although the 2020 land use projections are realistic, the movement between 1999 and 2020 conditions has not been linear, so that linear interpolation between the two has forecast too much off-peak traffic in 2010.

Response to Comment RA5-18

The fixed HOV lanes would be available to mixed flow traffic during off-peak periods. The reversible HOV lanes would be available during the AM peak period for southbound HOV traffic and during the PM peak period for northbound HOV traffic, but would not be available for off-peak periods traffic. The reversible lane could also be available during non-peak periods to accommodate mixed flow traffic.

Response to Comment RA5-19

Caltrans and SMART will coordinate during final design to avoid conflicts with the proposed bicycle facilities.

Letter - RA5

Page 4

RA5-19 would tie into the SMART Class I path in Novato and Petaluma (also applies to Figure 2-4).

RA5-20 21) Table 3.1-15 appears to have a typo—shouldn't "per 1,000 miles" be, "in 1,000 miles"? Also, total vehicle hours would probably be more helpful here than total VMT (although it's understood that VMT is needed for air quality and energy analyses).

RA5-21 22) Page 3.1-56 (line 1354) says that there will be no impact on SMART from the proposed project. However, please note that according to SMART's FEIR analysis, the project would result in a rail transit ridership loss of 250 riders per day.

RA5-22 23) On page 3.1-56 (line 1334), the E. Washington Street/Payran Street Park-and-Ride lot is west of US 101, not east (as stated).

RA5-23 24) Regarding page 3.1-62 (lines 1538-1539), the SCTA Countywide Transportation Plan (CTP) serves a different function than the CMP. A CMP focuses on relatively short-range congestion relief tactics, whereas it is our understanding that the CTP serves as Sonoma County's long-range vision for its transportation system.

RA5-24 25) On page 3.1-70 (lines 1726-1731), with respect to the travel demand forecasting model noted here, did the model assume future rail service on the SMART/NWP tracks? If so, using what endpoints, what overall travel time between endpoints, and what frequency of service during peak hours?

RA5-25 28) On page 3.1-71 (lines 1756-1758), the DEIS/DEIR does not acknowledge or discuss the fact that Marin and Sonoma County HOV lanes are operated differently at present. Besides differences in operating hours, Marin HOV lanes operate in the peak (major flow) direction only, whereas the five mile HOV in south Santa Rosa operates in both directions. As the MSN project will eventually bridge the gap between the two county's HOV lanes, how does Caltrans intend to operate the lanes? The implication in the text is that the Marin County HOV lanes would be converted to operate in both directions during peak hours. Is that assumption correct?

RA5-26 29) On page 3.1-77, in Table 3.1-13: Why is the vehicle delay less for the reversible HOV lane (in both 2010 and 2030) than it is for the fixed HOV lane in the northbound direction in the PM peak? Since this is the peak direction, both alternatives would have three lanes operating northbound (1 HOV + 2 mixed flow). Shouldn't it be the same?

RA5-27 30) On page 3.1-78, the DEIR notes that total VMT would not increase substantially with the implementation of this project. However, there is no information about how VMT under the Build scenarios was calculated to support this claim. Was the VMT calculation based on a fixed trip table ? This project is clearly significant enough in its scope, budget and impact to warrant running the model with a redistributed trip table. This could give a more realistic look at what would happen in this roadway corridor over the long run, once people have adjusted their travel behavior in response to any travel time savings the project may have initially created.

4

Response to Comment RA5-20

The commenter is correct that "per 1,000 miles" is a typo; this is a reference to the units used in the table, so it should have said "thousands of miles." This has been corrected in this FEIR/S. There were also other errors in Table 3.1-15 in the DEIR/S that have been corrected; the corrected table can be seen in Volume 1, Section 3.1.10.3 of this FEIR/S and is reprinted below. As for total vehicle hours, travel demand models like the one used for this project do not produce reliable estimates for vehicle hours.

Table 3.1-15 Projected Increase in Vehicle Miles Traveled Countywide (in thousands of miles), Year 2030

Alternatives	Project Area		Marin County and Sonoma County	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
No Build	5,312	6,358	16,614	20,133
Build Alternatives	5,318	6,367	16,625	20,154
Difference	6	9	11	21
Percent Increase	0.11%	0.14%	0.07%	0.10%

Response to Comment RA5-21

The Petaluma River Bridge would be replaced as part of the MSN Project. To gain access to the bridge during construction, contractors will need to cross the SMART right-of-way between the roadway along the bank parallel to the railroad tracks. However, this crossing would not affect SMART's operations or ridership, as access would be used only when the railroad arm is open. This is disclosed in Section 3.1.9 in Volume 1 of this FEIR/S. In terms of SMART's claim that US 101 operations under the

MSN Project would result in impacts to rail, ridership is neither a socioeconomic nor natural resource that can be evaluated in the context of CEQA or NEPA.

Response to Comment RA5-22

This has been corrected in the FEIR/S.

Response to Comment RA5-23

The text in the FEIR/S has been clarified to state that the CMP is part of the Countywide Transportation Plan.

Response to Comment RA5-24

The model does not include future SMART rail service. The forecast was prepared before the SMART rail proposal was completed.

Response to Comment RA5-25

Our analyses assume that HOV lanes would operate in both directions during peak hours. This is a conservative approach to doing the analyses, because it shows worst-case scenarios for mixed flow lanes.

Response to Comment RA5-26

The indicated vehicle delays are almost the same in both alternatives; we consider both alternatives to have the same delays in the north direction during the PM peak. The minor differences are the results of the calculations conducted by the traffic computer model used in this analysis.

Response to Comment RA5-27

This forecast used a single trip table that was then assigned to the transportation network. The network speeds did assume congested travel speeds. Since the model used did not iterate back to the traffic assignment stage, this did not affect the trip lengths arrived at. As is discussed in the response to Comment LC11-92, most travel demand models do not iterate upon the traffic assignment phase because of practical difficulties arriving at a realistic model that does this.

Letter - RA5

Page 5

Response to Comment RA5-28

Please refer to the Master Responses on Cumulative Air Quality and Greenhouse Gas Emissions.

Response to Comment RA5-29

Caltrans is aware of the historical flooding near the Marin-Sonoma County line, and you are correct that the proposed project proposes to elevate the freeway above the 100-year flood elevation. Caltrans and FHWA have met the requirements under CEQA and NEPA pertaining to GHG emissions (please see Section 4.3.6 of Volume 1 and discussion of Mobile Source Air Toxics in Section 3.2.6). In addition, Table 4-4 in Volume 1 of the FEIR/S provides information regarding Caltrans' regional and statewide strategies, in conjunction with other agencies, to reduce greenhouse gas emissions and thus help reduce the potential for climate change impacts on the highway system. For more detailed information about each strategy, please see *Climate Action Program at Caltrans* (December 2006), which is available at http://www.dot.ca.gov/docs/ClimateReport.pdf.

Response to Comment RA5-30

The Graton Rancheria Casino was not originally included in the traffic projections for this project because when the projections were produced the Graton Rancheria Casino was only a conceptual proposal without the information needed for a traffic forecast.

The information from the casino project's Final Traffic Impact Study (dated Sept. 2007) indicates that the casino would generate a 10% increase in Average Daily Traffic (ADT) north of Old Redwood Hwy intersection. These additional 18,000 daily vehicle trips would mostly occur during off-peak hours, and therefore would not significantly alter the findings of the traffic study for the MSN Project, so the MSN Project would remain an effective way to relieve the congestion currently experienced at this location on Highway 101 even with the construction of the casino.

Please also see the Master Response on Cumulative Air Quality.

Air Quality and Climate Change

RA5-28 31) The DEIR makes only general statements about air quality trends and conditions in the Bay Area. It does not appear to have calculated the net change in the emissions from criteria pollutants or greenhouse gases from the implementation of this project.

RA5-29 32) On page 4-13, the document devotes only about half a page to discussing greenhouse gas issues and global climate change. Given that there is widespread agreement that a one meter sea level rise is a *possibility*, along with increased intensity and frequency of storm events, what are the impacts on flooding and hydrology on the project due to global climate change? Are the roadway elevations sufficient to eliminate the threat of flooding in such a scenario? This seems important because one of the major project objectives is to elevate the roadway above the 100-year flood plain; US 101 has been closed at the Marin-Sonoma line several times in the past 21 years, with the most recent event being just two years ago. ABAG has additional information that can be used to assess these impacts.

Miscellaneous

RA5-30 33) Last, is the proposed new casino in Rohnert Park assumed in the DEIR? If not it would appear that the travel demand and air quality analysis, in particular, does not adequately present future conditions.

Once again, thank you for the opportunity for the SMART staff to comment on this DEIR.

Sincerely,

Lillian Hames, General Manager

5

Letter - RA5

Page 6

Cc: SMART Board of Directors, Sally McGough, Greg Dion, Vicki Hill Steve Colman,

6

Letter: RA6.
Signatory: Sonoma County Water Agency (SCWA).

SONOMA COUNTY WATER AGENCY

FILE:FDR/TENT/MARIN-SONOMA NARROW HOV WIDENING PROJECT

December 14, 2007

Ms. Melanie Brent
Caltrans District 4
111 Grand Avenue
Oakland, CA 94612-3717

RE: MARIN-SONOMA NARROWS HOV WIDENING PROJECT

Dear Ms. Brent:

Sonoma County Water Agency (Agency) staff has reviewed the Notice of Preparation (NOP) for the subject project. In response, the Agency submits the following comments.

RA6-1 RA6-2

1. For site-specific improvements, Agency staff recommends that the drainage design for the project be in compliance with the Agency's *Flood Control Design Criteria*. However, compliance with the *Design Criteria* does not provide assurance that flooding will not occur and will not, by itself, mitigate all flooding risks. Additionally, Agency staff recommends that downstream storm drain systems be analyzed to determine the potential effects of increases to runoff due to this development.
2. The Agency requests the opportunity to review environmental documents and civil design plans for the above-mentioned project when they become available.

Thank you for the opportunity to comment. For questions regarding flooding and drainage issues, please contact Rem Scherzinger at 547-1978. For other questions please contact Connie Munger at 547-1905 or cmunger@scwa.ca.gov.

Sincerely,

Connie Munger

Connie Munger
Environmental Specialist

Enc

c Ken Goddard

RW\\fileserver\data\CL\PINKS\week121007\caltrans.doc

P.O. Box 11628 - Santa Rosa, CA 95406 - 404 Aviation Boulevard - Santa Rosa, CA 95403 - (707) 526-5370 - Fax (707) 544-6123

Response to Comment RA6-1

The culverts and drainage systems in this project were evaluated in accordance with Section 821.3 of the Highway Design Manual for 10-year and 100-year watershed flows. The proposed design alleviates the freeway flooding for a 100-year event.

Response to Comment RA6-2

Historical records indicate that, in general, the existing culverts and drainage systems function adequately for passage of both on-site and off-site flows. There are exceptions to this and some drainage facilities may require upgrades. Drainage systems proposed to discharge a higher peak flow either have been evaluated for significant downstream impacts, or should be during the design phase. In the Petaluma urban area, detention facilities are planned to maintain on-site highway peak flow discharge at or below current levels.

Letter: RA7.
Signatory: Sonoma County Regional Parks.

Response to Comment RA7-1

Options not shown in the DEIR/S do not include any proposals for a contiguous Class I bicycle path within Segment B. A Class I bikeway could be considered during final design. It could be accommodated within the environmental study area, though at a higher cost than the Class I and Class II network proposed.

Response to Comment RA7-2

The four most feasible access options were identified during the DEIR/S process. Caltrans will review this selection during its final selection and refinement of bicycle path alternatives to see if enhancements can be made for bicycle and pedestrian access in the corridor.

SONOMA COUNTY REGIONAL PARKS

MARY E. BURNS
DIRECTOR

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Fax: 707 579-8247
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Emailed to: melanie_brent@dot.ca.gov

December 14, 2007

Melanie Brent, Office Chief
Division of Environmental Planning & Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, Ca 94612

Re: Marin-Sonoma Narrows (MSN) HOV Widening Project
Draft Environmental Impact Report/Draft Environmental Impact Statement (October 2007)
SCH#2001042115

Dear Ms. Brent:

Thank you for the opportunity to review and comment on the Marin-Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement (October 2007). Our comment focuses on the proposed Class I bicycle/pedestrian pathway located within Sonoma County limits.

The DEIR Report discusses four Access Options out of 26 options considered by Caltrans. Do any of the options not shown in the DEIR Report include a proposal to construct a contiguous Class I bicycle/pedestrian pathway within the entire length of Segment B? RA7-1

The Sonoma County Bikeways Plan (April 1997) identifies a Class I bicycle/pedestrian pathway along the SMART (Sonoma Marin Area Rail Transit) line within Sonoma County limits. However, the SMART DEIR (November 2005) showed sections of the proposed Class I bicycle/pedestrian pathway located within the Highway 101 corridor instead of the SMART right of way because of insufficient right of way width and/or environmentally sensitive areas. Please refer to the attached Figure 2.5-8.

All four Access Options (4b, 12b, 14b, and 14d) do not include a contiguous Class I bicycle/pedestrian pathway, but rather a combination of Class I and Class II. The Sonoma County Regional Parks Department requests Caltrans to study and include a contiguous Class I bicycle/pedestrian pathway within Sonoma County limits of Segment B. By providing a contiguous Class I bicycle/pedestrian pathway, Caltrans can help Sonoma County satisfy the need for a Class I pathway that would otherwise be unattainable in the SMART right of way. RA7-2

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Page 1 of 2

Letter - RA7

Page 2

If you have any questions, please call me at 707-565-3348.

Sincerely,

Kenneth Tam

Kenneth Tam
Park Planner II

Enclosure: Figure 2.5-8 (SMART DEIR)

c: Mary E. Burns, Director Sonoma County Regional Parks Department
Sonoma County Regional Parks: Jim McCray, Mark Cleveland, Steve Ehret, Michelle Julene
Suzanne Smith, Executive Director SCTA
Sonoma County Transportation and Public Works: John Maitland, Ken Giovannetti
Steven Schmitz, Sonoma County Transit, SCBPAC, CBPAC
Gary Helfrich, Sonoma County Permit and Resource Management Depart.

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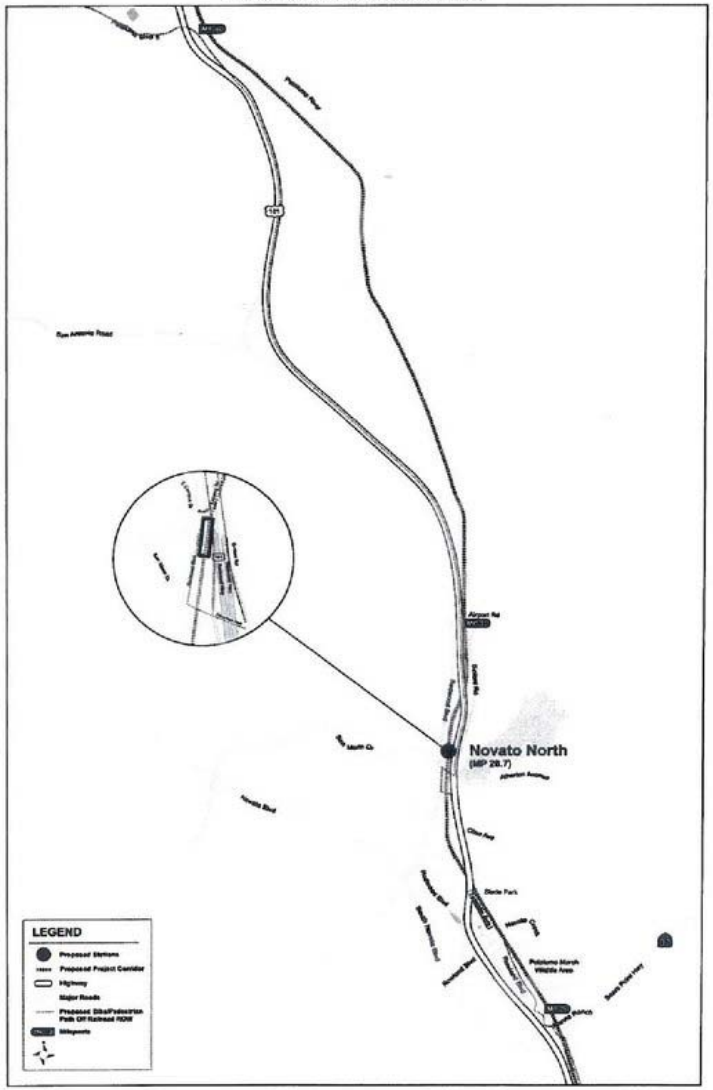
Page 2 of 2

Letter - RA7

Page 3

FIGURE 2.5-8
PROJECT CORRIDOR (MILEPOST 35.0 to 25.0)



Letter: RA8.
Signatory: Transportation Authority of Marin (TAM).

Response to Comment RA8-1

Please see the preferred alternative discussion in Volume 1, Chapter 2 of this FEIR/S.

Response to Comment RA8-2

The comment is in reference to Soundwall Nos. 1, 3, and 4. Support of these soundwalls by the Transportation Authority of Marin has been noted, and these soundwalls have been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment RA8-3

Your support for Supervisor Arnold's comments is noted. Supervisor Arnold's letter has been addressed separately in the Local Jurisdictions section; see Letter LJ-3 in Section 3.4 for those comments and responses.

Response to Comment RA8-4

Caltrans recognizes that the project will create a new southbound AM peak traffic queue in the vicinity of Miller Creek Road and Nave Drive. However, delays will be substantially reduced if we consider the entire study area (from Old Redwood Highway in Petaluma to Miller Creek Road). Consequently, Caltrans has evaluated this bottleneck as a less than significant impact, as stated in Volume 1, Chapter 4 of this FEIR/S.

TAM
Transportation Authority of Marin

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Dick Swanson

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Ross
Michael Skall

San Anselmo
Peter Breen

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Al Boro

Sausalito
Paul Albritton

Tiburon
Alice Fredericks

County of Marin
Susan L. Adams
Hal Brown
Steve Kinsey
Charles McGlashan
Judy Arnold

December 14, 2007

Ms. Melanie Brent
Chief, Office of Environmental Analysis
California Department of Transportation – District 4
111 Grand Avenue
Oakland, CA 94623

Re: Marin-Sonoma Narrow HOV Widening Project Draft EIR/EIS

Dear Ms. Brent:

Thank you for the opportunity comment on the Marin-Sonoma Narrows HOV Widening Project Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS). We have the following comments for consideration.

RA8-1

1. TAM prefers the Fixed HOV Lane alternative for the Project. We believe it provides the greatest benefit while minimizing operations and maintenance costs throughout the life of the facility.

RA8-2

2. TAM supports the desires of the City of Novato to include sound walls at three locations in Segment A: 1) SB DeLong Avenue on-ramp; 2) NB DeLong Avenue off-ramp; and 3) south of Rowland along Redwood Road. See their letter under separate transmittal.

RA8-3

3. TAM supports the comments provided by Marin County Supervisor Judy Arnold . See her comment letter attached.

RA8-4

4. Main line traffic impacts to local roads should be further studied with consideration of mitigation measures. Specifically, the traffic analysis prepared for the DEIR/DEIS indicates that the project will create a new southbound A.M. peak traffic queue in the vicinity of Miller Creek Road and Nave Drive. The DEIR/DEIS does not provide mitigation for this Project created impact. Specifically, efforts by the Department to address congestion at the off- and on-ramps to Miller Creek should be considered for inclusion as suitable mitigation for project impacts.

Making the Most of Marin County Transportation Dollars

Letter - RA8

Page 2

Response to Comment RA8-5

As noted in the DEIR/S, the operation of the southbound ramps/Atherton Avenue intersection is heavily influenced by the Redwood Boulevard/Atherton Avenue intersection. However, peak traffic to and from Olompali SHP would occur during weekends and non-commute hours. Consequently, further studies with additional traffic volumes are not warranted.

Letter to Melanie Brent
December 14, 2007
Page 2

5. RA8-5 The Atherton Avenue southbound and northbound on- and off-ramps and their connection to local intersections should be further studied with a traffic analysis of the additional traffic resulting from the revised Olompali State Park access along Redwood Boulevard as proposed by the Project. The DEIR/DEIS acknowledges that operation of the southbound ramps/Atherton Avenue intersection is heavily influenced by the Redwood Boulevard/Atherton Avenue intersection. Therefore, the Atherton Avenue intersections should be further studied with the additional traffic volumes.

Please contact Bill Gamlen, Project Delivery Manager, at (415) 507-2661 if you need further clarification of our comments.

Sincerely,

D. Steinhauser

Dianne Steinhauser
Executive Director
Transportation Authority of Marin (TAM)
(415) 507-2680
dsteinhauser@tam.ca.gov

Enclosure

C: Jit Pandher, Caltrans
Bill Gamlen
File

Making the Most of Marin County Transportation Dollars

Letter - RA8

Page 3

December 13, 2007

Melanie Brent
California Department of Transportation

Re. EIR Marin-Sonoma Narrows

I am pleased that this project is progressing. It is very important to me and to my supervisorial district that the congestion relief originally proposed and supported by the Marin Sonoma Narrows Committee (PAG) remains intact.

Also as noted at the CalTrans meeting with Novato City Council, Novato would like all of the sound walls proposed included in the project plus the additional ones mentioned at the meeting.

Lastly, I have real concerns with the ramp metering phase that was proposed by CalTrans but never discussed in the community meetings. I believe the funds needed for that could be better spent on the sound walls and the congestion relief through Novato. I also do not believe ramp metering is appropriate for a rural area such as the one along the Narrows project.

Thank you for your attention and consideration to these concerns.

Sincerely,
JUDY ARNOLD
Marin County Supervisor
District 5
415-499-7331

c Bijan Sartipi
Dianne Steinhauser

3.4 Comments and Responses for Local Jurisdictions

LETTER: LJ1. SIGNATORY: COUNTY OF MARIN DEPARTMENT OF PARKS AND OPEN SPACE. 3.4-2
LETTER: LJ2. SIGNATORY: COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS. 3.4-4
LETTER: LJ3. SIGNATORY: JUDY ARNOLD, MARIN COUNTY SUPERVISOR. 3.4-10
LETTER: LJ4. SIGNATORY: CITY OF NOVATO. 3.4-12
LETTER: LJ5. SIGNATORY: CITY OF PETALUMA. 3.4-18

Letter: LJ1.
Signatory: County of Marin Department of Parks and Open Space.

Response to Comment LJ1-1

Suggestions will be considered by Caltrans during its final selection and refinement of bicycle path alternatives. At this time, an equestrian trail is not being considered as part of the MSN Project.

Response to Comment LJ1-2

Your preference for Access Option 4b is acknowledged. However, the Preferred Alternative that has been identified is Fixed HOV Lane Access Option 12b. FHWA's and Caltrans' identification of the Preferred Alternative and the supporting rationale are presented in Chapter 2 in Volume 1 of this FEIR/S. Reasons that Access Option 4b was not identified as the Preferred Alternative include, but are not limited to, the following:

- It would be more visually intrusive than the Preferred Alternative.
- It would provide no direct access to Cloud (Gunn) Lane/Kastania Road.
- It would take less advantage of existing interchanges, resulting in increased project footprint and need for more right-of-way.
- It would not be the Least Environmentally Damaging Preferred Alternative (LEDPA).
- It would be the most expensive option to construct.

Response to Comment LJ1-3

Caltrans and FHWA will continue working with Marin County during the project design phase on refinements to the bicycle/pedestrian lanes where feasible.

COUNTY OF MARIN
DEPARTMENT OF PARKS AND OPEN SPACE
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415/499-6387 - FAX 415/499-3795

December 12, 2007

Melanie Brent, Office Chief
Division of Environmental Planning & Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612

RE: Marin-Sonoma Narrows High Occupancy Vehicle Lane Widening Project

Dear Ms. Brent:

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report and Draft Environmental Impact Statement (DEIR/EIS) for the above-referenced project. The California Department of Transportation (Caltrans) proposes to widen and realign highway 101 to add northbound and southbound High Occupancy Vehicle (HOV) lanes along a 16.1-mile stretch of the road in northern Marin and southern Sonoma Counties. The project would also include replacing and constructing bridges across San Antonio Creek and the Petaluma River, constructing soundwalls, building bicycle and pedestrian path, and upgrading drainage facilities.

LJ1-1 The Marin County Department of Parks and Open Space is primarily interested in the proposed bike and pedestrian path in Marin County. We strongly support the proposed facility, even though the Sonoma-Marin Area Rapid Transit (SMART) proposes a parallel trail in this area. Both the new highway 101 and the SMART bike paths are necessary, because of limited access across the highway and differences in these paths' destinations. The proposed trail is consistent with the Marin County Unincorporated Area Bicycle and Pedestrian Master Plan, which shows a class 2 bike path along the west side of the highway. The Department also notes that proposed highway 101 bike path follows the alignment of a shared-use trail identified in the trails element of the Marin Countywide Plan. In addition to addressing the needs of bicyclists, this general plan element considers trails for pedestrians and equestrians. Considering the fact that both Olompali State Historic Park and Mount Burdell Open Space Preserve are popular equestrian destinations, Caltrans should design the proposed bike path to accommodate horses. As proposed, the bike path does not adequately address these needs. Caltrans should widen these paths to include at least a five-foot wide unpaved shoulder to allow for equestrian uses.

LJ1-2 In considering the access alternatives, Caltrans reviewed four different options in its DEIR/EIS, but did not select a preferred project. The Department prefers Access Option 4b in that it would maximize the length of class 1 bike path. Specifically, this alternative would include a continuous class 1 bike path from Olompali State Historic Park to San Antonio Road, approximately 2.5 miles long.

LJ1-3 Finally, the Department is concerned about the long-term management of the class 1 bike path. It is likely that Caltrans will request that the Marin County Department of Parks and Open Space maintain and manage the facility. If this is the case, the Department would like to work closely

Letter - LJ1

Page 2

-2-

LJ1-3 with Caltrans on the design of this trail in order to address possible management and maintenance concerns. These possible concerns include surfacing, path width, striping, signing, lighting, and landscaping. In particular, the Department recommends that Caltrans use concrete decking for the class 1 bike path bridges and compacted decomposed granite or other equestrian-suitable material for the unpaved shoulders of the bike paths, and that the class 1 bike path has a minimum width of ten feet to improve access and maintenance capacity.

Thank you again for the opportunity to comment. If you have any questions about these comments, please call me at (415) 499-3745 or email me at jraives@co.marin.ca.us.

Sincerely

James R. Raives
Senior Open Space Planner

Letter: LJ2.
Signatory: County of Marin Department of Public Works.

Response to Comment LJ2-1

The total linear feet of bike path is 550 ft and new frontage road is 17,800 ft. The majority of the bike path in Marin County will be relinquished to State Parks.

Response to Comment LJ2-2

All new frontage roads will be relinquished to the Counties of Marin and Sonoma and an amended maintenance agreement will be required. A revised freeway agreement will be executed with Marin and Sonoma Counties.

Response to Comment LJ2-3

Caltrans analyzed a number of alternatives to meet the purpose and need of the project within the corridor. One of the criteria in the analysis was the extent of new right-of-way required. The four access options studied in the EIR/S required substantially less right-of way than other alternatives. Please refer to Appendix A in the Appendices volume for a comparison of these alternatives.

Response to Comment LJ2-4

Caltrans Design is coordinating with the City of Novato and Marin County in regard to the proposed bike path along the WB 37 to SB 101 connector. No impacts to the proposed Class 1 path are anticipated with the improvements proposed with the MSN Project.

COUNTY OF MARIN
www.co.marin.ca.us/pw

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DEPARTMENT OF PUBLIC WORKS
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Farhad Mansourian, RCE
Director

December 14, 2007

Ms. Melanie Brent
Caltrans District 4
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612-3717

Re: Proposed Marin-Sonoma Narrows HOV Widening Project DEIR/S
Marin County Department of Public Works Comments

Dear Ms. Brent:

The Marin County Department of Public Works (DPW) has completed our review of the subject DEIR/S and provide the following comments:

1) The DEIR/S describes future freeway access will be provided through existing local roads and new interchanges (Page S-3, line 45). The DEIR/S further describes that access roads would be transferred to county ownership (Page 3.1-20, line 505), although some roads possibly would be transferred to a fronting property owner (see December 7, 2006 State Department of Parks and Recreation letter). DPW estimates that between 18,000 to 24,500 linear feet of new roads and 5,200 to 10,900 linear feet of new Class 1 bike ways, depending on the alternative selected, are proposed by Caltrans to be transferred to the County of Marin following project completion. LJ2-1

The County currently has over $200 million in county roads rehabilitation and maintenance needs. The addition of more road mileage with unfunded maintenance costs would contribute to the funding deficit and likely result in these roads deteriorating. The DEIR/S should clearly describe which roads are proposed to be transferred to county government. The need to amend the freeway agreement with the County of Marin does not appear to have been evaluated and is subject to Marin County Board of Supervisors approval. LJ2-2 In addition, please analyze alternatives that would reduce the needs for county maintenance, such as creating private driveways (or public agency driveways in the case of the state park) instead of public roads, as most of the access is for low density, rural land uses. LJ2-3

2) The "Enfrente Connector" Class 1 path is not shown in the Segment A diagrams of the South Novato Blvd./WB Hwy 37 to SB Hwy 101 connector work. The proposed work does show a retaining wall which may interfere with the Class 1 path. The Nonmotorized Transportation Pilot Project (NTPP) LJ2-4

Letter - LJ2

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funded Class I path between South Novato Blvd and the Inn of Marin parking lot is currently in design phase. The environmental analysis should evaluate the impact to losing this bicycle connector or provide an equivalent mitigation. In addition, the ramp meter location for the South Novato Blvd to S.B. Hwy 101 may also impact the same bike connection project and does not appear to be discussed in the environmental document. Note that the City of Novato is the local lead on this project. LJ2-4

3) For alternatives 14b and 14d, please analyze the issue of waste hauling truck traffic, and the potential for increased roadside debris, with cyclists sharing the same road. LJ2-5

4) Figure 3.1-15 depicts regional bike/ped routes, including the proposed SMART route along the railroad right of way. The environmental document did not provide a description of the bike/ped connection between the Marin-Sonoma Narrows project and the proposed northern continuation of the SMART bike/ped route in the vicinity of South Petaluma Blvd. The environmental document should evaluate the impact to not providing a connection between this project and the SMART project in the vicinity of South Petaluma Blvd. In addition, there does not appear to be bike/ped connectivity between the south side of the Petaluma River Bridge and north side, where Figure 3.1-15 indicates pedestrian activity centers and bike routes exist, connecting to eastern Petaluma. LJ2-6

5) Pumps in the vicinity of the county airport discharge collected runoff over levees to the Petaluma River. The environmental document does not appear to evaluate impacts to this system due to the increased in impervious surface, increase in cross-freeway culvert sizing, or alteration of drainage paths, i.e. water may be directed to different drainage sub basins and pumps. This may increase the risk of flooding to the county airport or adjacent lands. LJ2-7

6) Throughout Segment A, there will be an increase in impervious area within the existing Caltrans right of way. Please address impacts this will have on cross culvert discharge and associated up stream flooding. Specifically address the larger facilities that serve larger tributary areas and experience recurrent flooding, including the following structures: LJ2-8

- Cheda Creek culvert under Hwy. 101 between southbound South Novato Blvd. off ramp and Marsh Drive.
- Lynwood Slough culvert under Hwy. 101 between Scottsdale Pond and Vintage Way.
- Dual culverts under Rowland Blvd. between Scottsdale Marsh and Scottsdale Pond.
- Culvert under Hwy. 101 between Armstrong Avenue and Rush Creek Place.
- Channel and culvert system from Rush Creek Place to Rush Creek marsh.

7) Many of the alternatives considered include bridge expansion for the Novato Creek Highway 101 crossing. The creek upstream of this crossing is designed to convey the 50 year flood. Please address flooding related impacts of the proposed bridge expansion modifications. LJ2-9

8) The DEIR/S proposes mitigation measures for impacts to water quality for both the Fixed HOV Lane Alternative and the Reversible HOV Lane Alternative. The proposed measures include implementation of permanent stormwater best management practices such as biofiltration strips and swales and detention devices LJ2-10

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Response to Comment LJ2-5

A similar situation exists along Embarcadero Road in Palo Alto, which provides both Class II bike lanes accessing the Baylands and vehicular access to the City of Palo Alto landfill. Periodic street sweeping, especially after the weekends, is important to help clear the road of spilled debris. The situation is not that different, however, from that of Class II bike lanes along any busy street. Marin County would be responsible for maintaining the access road, including the bike lanes.

Response to Comment LJ2-6

The Class II bike lanes provided as part of the MSN Project connect to the existing Class II bike lanes on Petaluma Boulevard South and do not cross the Petaluma River Bridge. The connection between the existing bike lanes on Petaluma Boulevard South and proposed bike path adjacent to the SMART right-of-way would need to be developed by the City of Petaluma, SMART, and Sonoma County. The SMART Final EIR (June 2006) designates SMART as the lead agency for the proposed bicycle/pedestrian pathway in the vicinity of the Petaluma River Bridge. Caltrans will coordinate with these agencies as appropriate. Given the limited right-of-way between SMART and Petaluma Boulevard South in the vicinity of the Petaluma River Bridge, any bicycle/pedestrian path that SMART would develop in this area would either be on Petaluma Boulevard South or immediately adjacent to it.

Response to Comment LJ2-7

The culverts and drainage systems in this project were evaluated in accordance with Section 821.3 of the Highway Design Manual for 10-year and 100-year watershed flows. Drainage systems proposed to discharge a higher peak flow either have been evaluated for significant downstream impacts or should be during the design phase. The exact location of cross culverts and spacing of on-site drainage facilities will also be verified during the project's design phase.

The existing highway between approximate Stations 380+00 and 385+00 (just north of Airport Road) has historically overtopped during larger storm events. The cause of this overtopping is rooted in off-site development of the adjacent watersheds, together with the resultant re-direction of some of the natural channels. These development activities, which have occurred during the past 40 to 50 years, have caused some of the culverts in this region to be overloaded, resulting in an ongoing maintenance problem. This project will upgrade the culverts to pass stormwater quantities that are calculated for the watersheds as they exist today.

Appendix G of the DEIR/S and this FEIR/S (see the Appendices volume) contains a Floodplain Evaluation Report Summary which states that risks associated with the project are not significant. The FEIR/S also states in Volume 1, Section 3.2.2.3 that the 100-year base flood elevation would not be increased and that existing hazards would be reduced or diminished. Consequently, impacts to nearby pumps due to increased impervious surface area would not be adverse.

Response to Comment LJ2-8

The culverts and drainage systems in this project were evaluated in accordance with Section 821.3 of the Highway Design Manual for 10-year and 100-year watershed flows. Hydraulic modeling software was used to generate the Culvert Calculator Reports contained in Attachment E of the January 2006 Preliminary Drainage Report. Each of these reports is identified by an associated watershed number and a station on the existing alignment. Drainage systems proposed to discharge a higher peak flow either have been evaluated for significant downstream impacts, or should be during the design phase. The exact location of cross culverts and spacing of on-site drainage facilities will also be verified during the design phase.

Cheda Creek: Sta 308+73. No work is planned on the existing double 54" reinforced concrete pipes (RCPs). It was determined that the system did not quite meet the current cross drainage guidelines, but there were no reported drainage problems at this location.

Lynwood Slough: Sta 320+61. Scottsdale Marsh and Scottsdale Lake abut US 101 to the west. Water level in the Scottsdale basins is regulated by a series of floodgates that release water downstream into the Novato Creek floodplain east of the highway. No work is planned on the existing 10' x 6' RCP. The culvert report indicated that the box meets the culvert drainage design criteria outlined in Section 821.3 of the Highway Design Manual.

Rowland Blvd: Sta 324+95. No work is planned to the existing double 54" (lined) culverts. They are to be replaced under a separate project.

US 101/Armstrong Ave: Sta 352+54. No work is proposed to the existing 48" RCP. This culvert conveys highway drainage along with a larger amount of off-site drainage.

Rush Creek at Atherton Ave: Sta 354+80. Two large box culverts (double 12'x8') pass the upstream flows of Rush Creek under US 101 at the Atherton Avenue overcrossing. Immediately east of the highway, Rush Creek drains into a large mud flat and subsequently drains into Black John Slough before reaching the Petaluma River. Water surface levels in Rush Creek are regulated by the tides and vary significantly. When periods of high storm runoff coincide with high tide levels, localized flooding has been reported in some streets in the City of Novato. However, information received from city officials indicates that such flooding is not typically serious and has not resulted in property damage. No modifications are deemed necessary to the box culverts carrying Rush Creek under US 101.

Response to Comment LJ2-9

With regard to Novato Creek, the proposed bridge modifications should not cause any significant flood-related impacts. The widening is proposed to be founded on 24-inch pile extensions, whereas the existing pile extensions are 18 inches. These will be aligned with the current bents for both existing structures, so there will be no additional hydraulic skew to contend with. The decrease in waterway area between the 18-inch and proposed 24-inch pile extensions will be minimal, and appears to be the only detail of the proposed widening to affect the water surface elevations, both upstream and at the structure.

Response to Comment LJ2-10

The selection of post-construction water quality treatment devices (Treatment Best Management Practices, or Treatment BMPs) for the MSN Project depends on the “targeted” pollutants to be removed.

Targeted Design Constituents (TDCs) are pollutants identified during Departmental runoff characterization studies to be discharging with a concentration that commonly exceeds allowable standards, and that are considered treatable by currently available Caltrans-approved Treatment BMPs. TDCs include phosphorus, nitrogen, total copper, dissolved copper, total lead, dissolved lead, total zinc, dissolved zinc, sediments, and general unspecified metals.

Caltrans-approved Treatment BMPs include biofiltration systems (vegetated strips and swales), infiltration devices, detention devices, dry weather flow diversions, gross solids removal devices, multi-chambered treatment trains, media filters, wet basins, and traction sand traps. These Treatment BMPs are ranked by preference based on load reduction (performance) for the listed constituents and lifetime cost for the device. Higher-ranked Treatment BMPs are considered first for water quality treatment of pavement runoff. They are analyzed at each phase as more design information becomes available and are ruled out if deemed infeasible during the design phase.

Since the Environmental Impact Report is prepared during the planning phase, treatment device selections are preliminary and are reevaluated during the design phase when more design information is available. The Storm Water Data Report (SWDR) documents the TDC process and Treatment BMP selection. The SWDR is prepared during the project scoping/ initiation phase, environmental/planning phase, and for a third time during the design phase.

Letter - LJ2

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designed to reduce runoff and erosion in order to mitigate increased pollutant loading due to an additional 105 acres of impervious surface areas. Please analyze the difference in effectiveness of mitigation between in-ground devices and above-ground landscape-based approaches to treating and detaining post-construction stormwater. More information is needed about the specific post-construction stormwater treatment and control plan in order to further evaluate the DEIR/S conclusion that this mitigation measure renders the project impact to less than significant. LJ2-10

9) The DEIR/S should analyze options to provide for additional riparian habitat mitigation measures to offset potential loss of riparian areas (such as along San Antonio Creek). LJ2-11

10) As a general comment, the Marin County Stormwater Pollution Prevention Program manger is available to coordinate locating suitable mitigation site for loss of wetland of other stormwater mitigation measures.

11) The plans indicate temporary encroachment on Binford Road in the vicinity of Atherton Blvd. Are road closures or traffic delays contemplated on Binford Road, that could affect the only access to the county airport? LJ2-12

12) Has the condition of both the San Antonio Road Bridge and the existing Hwy 101 Bridge proposed for used as a future frontage road been analyzed for any needed seismic upgrades, or remedial work needed due to scour? LJ2-13

13) The Caltrans Highway Design Manual, Section 1003.1 specifies that the minimum width of a two-way bike path (Class I) shall be 8 feet (2.5m) with a 2 foot minimum graded shoulder on either side of the path. The proposed path between Redwood Blvd in Novato and the landfill over crossing is shown with a 2.2 m width. LJ2-14

14) With the proposed use of Class II bike lanes for other segments of the project, it is not clear what improvements, if any, are proposed for existing bridges planned for reuse as frontage roads. It does not appear that there is sufficient width currently to utilize the existing bridges with two travel lanes and a bike lane in each direction which meet minimum standards. Please provide details on any required bridge widening. LJ2-15

Please contact me at (415) 507-2754 should you have any questions.

Very truly yours,

Eric Steger
Senior Civil Engineer

MarinSonomaNarrowsDEIRComments.doc
C: Farhad Mansourian, Director Public Works
Dianne Steinhauser, Executive Director, TAM
Craig Tackabery
Tim Haddad, CDA

3

Response to Comment LJ2-11

Riparian habitat mitigation measures will be implemented for the project. Caltrans will plant all slopes affected by the project with native grasses and shrubs to stabilize the slopes against erosion. Caltrans will install native plants appropriate for the locations. Caltrans may also plant site-adapted native tree species such as willows, oaks, California bay laurel, and California buckeye to compensate for tree removal along San Antonio Creek. These trees will provide shading for the creek once they have matured, lowering the water temperature for aquatic organisms, and further stabilizing the banks against erosion.

Response to Comment LJ2-12

Caltrans will maintain access through the project area throughout project construction. Road closures and detours, when required, will be planned and coordinated with Marin and Sonoma Counties and will involve input from stakeholders such as the Airport. The proposed improvements to the northbound Atherton on-ramp would, at most, require temporary one-way traffic control with flaggers directing vehicles through the work area.

Response to Comment LJ2-13

San Antonio Road Bridge: South San Antonio Creek Br. No. 27C0051 is under joint ownership and custodianship of Marin and Sonoma Counties. The latest Bridge Inspection Report (BIR) dated 07/18/2006 prepared by Caltrans has noted that the footing at abutment 3 is exposed about 12 feet long by 3 inches deep. The report did not recommend any scour remedial work at that time. This structure was removed from the seismic retrofit program in 1994. There was no seismic analysis done in the Advanced Planning Studies since no major work has been proposed for this structure.

San Antonio Creek, Bridge No. 20-0019R (NB 101): The latest Bridge Inspection Report dated 03/20/2007 has provided work recommendation for scour mitigation work at abutment 4. This recommendation has been

forwarded to the relevant parties in District 4 for further action. This structure was retrofitted in 1996 (Earthquake Retrofit Project No. 402). No seismic analysis was performed for this structure in the Advanced Planning Studies.

Response to Comment LJ2-14

All proposed Class I bicycle paths will be constructed in accordance with Caltrans Highway Design Standards.

Response to Comment LJ2-15

With the Preferred Alternative (Fixed HOV Access Option 12b), new and existing structures will meet county standard widths for a Class II bicycle facility except at the existing San Antonio Creek local bridge. This structure is a registered historic state structure and is protected from alteration. The structure will be used as a one-way bridge and bike path. A new creek crossing will be constructed for vehicle traffic upstream from the existing structure and will meet Class II bicycle standards.

Letter: LJ3.
Signatory: Judy Arnold, Marin County Supervisor.

December 13, 2007

Melanie Brent
California Department of Transportation

Re. EIR Marin-Sonoma Narrows

I am pleased that this project is progressing. It is very important to me and to my supervisorial district that the congestion relief originally proposed and supported by the Marin Sonoma Narrows Committee (PAG) remains intact.

LJ3-1 Also as noted at the CalTrans meeting with Novato City Council, Novato would like all of the sound walls proposed included in the project plus the additional ones mentioned at the meeting.

LJ3-2 Lastly, I have real concerns with the ramp metering phase that was proposed by CalTrans but never discussed in the community meetings. I believe the funds needed for that could be better spent on the sound walls and the congestion relief through Novato. I also do not believe ramp metering is appropriate for a rural area such as the one along the Narrows project.

Thank you for your attention and consideration to these concerns.

Sincerely,
JUDY ARNOLD
Marin County Supervisor
District 5
415-499-7331

c Bijan Sartipi
Dianne Steinhauser

Response to Comment LJ3-1

The comment is in reference to all of the proposed soundwalls within the Novato city limits. Support of these soundwalls by the Novato City Council has been noted. The determination of final reasonableness, which is the basis for which soundwalls have been approved, is discussed in Volume 1, Section 3.2.7.4.

The additional soundwalls proposed at the meeting were in areas where the predicted noise levels were not high enough to qualify for consideration of soundwalls under either FHWA or California Environmental Quality Act (CEQA) criteria. Caltrans and FHWA will propose noise abatement (i.e., soundwalls) in projects where the Traffic Noise Impact Report indicates that predicted noise levels will approach or exceed the FHWA noise abatement criteria (NAC) (CFR Title 23, Part 772). The federal NAC can be found in Table 3.2-12 in the DEIR/S (which is now Table 3.2-13 in Volume 1 of this FEIR/S). The criteria represent the upper limit of acceptable traffic noise for different types of land uses and human activities. The DEIR/S and FEIR/S also state in Section 3.2.7.1 that "Noise abatement measures are considered for this project when predicted future peak hour traffic levels are equal to or exceed 66 dBA."

Caltrans also considers noise impacts under CEQA. When the Traffic Noise Impact Report predicts that traffic noise following a proposed project will increase by 12 dBA or more over existing levels, noise abatement measures are proposed. Unfortunately, in all of the additional soundwall locations that the City of Novato recommended at the meeting, Caltrans has not been able to show that exceedances of these criteria levels currently exist or will exist after the MSN Project is completed.

Response to Comment LJ3-2

Ramp metering is an effective traffic management strategy and is an effective tool in reducing congestion on the freeway. All on-ramps within the MSN Project limits are listed in the 2006 Ramp Meter Development Plan and are planned to be metered within the next ten years. Besides installing the equipment for managing or metering on-ramp traffic, the equipment will be used for traffic monitoring purposes. Caltrans will work with the local cities and counties on a workable metering strategy for the corridor before implementing the ramp metering system.

Letter: LJ4.
Signatory: City of Novato.

Response to Comment LJ4-1

Thank you for your comments on the DEIR/S. Your preference for Fixed HOV Lane Alternatives is acknowledged. Fixed HOV Lane Access Option 12b has been identified as the Preferred Alternative. Please see the Preferred Alternative discussion in Chapter 2 in Volume 1 of this FEIR/S.

Response to Comment LJ4-2

The consistency of the MSN Project with the Novato General Plan and the Novato Bicycle Plan is noted.

Response to Comment LJ4-3

The travel demand model used for traffic forecasting for this project was the most advanced suitable model available at the time the project forecasts were prepared. This model was in conformance with the Metropolitan Transportation Commission's Baycast model which outlines the travel patterns for the Bay Area. Travel demand models used for state highway projects in the Bay Area are required to be in conformance to the Baycast model. As such, it is not constructive to compare the model used with other models used for different purposes that may or may not meet the requirements for a State Highway project.

Response to Comment LJ4-4

The study found that the improved speed of the mainline traffic on US 101 under the proposed improvements would cause a slight increase in growth pressures in the area only if land use constraints were not considered. When the constraining effect of the land use plans of Marin and Sonoma Counties was considered, the growth analysis projected no impact for the area. The expert panel, which included planners from the two counties and local cities, agreed with this conclusion, saying that the land use plans for this area would not change because of the project and that the time savings were too small to have an important effect on growth. Results of the

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City Manager
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December 13, 2007

Melanie Brent
Caltrans District 4
111 Grand Avenue
Oakland, CA 94612-3717

December 13, 2007

Subject: Review of DEIR/DEIS for the Draft EIR/EIS Marin Sonoma Narrows HOV Widening Project (MSN)

Dear Ms. Brent:

Thank you for the opportunity to comment on the Draft EIR/EIS for the Marin Sonoma Narrows HOV Widening Project (MSN). On December 10, 2007 the City Council of the City of Novato conducted a hearing on the proposed project and the City Council provides the following Comments:

1. Preferred Alternative: The Fixed HOV Lane Alternative is the preferred alternative for Novato. Given that the width of right-of-way is identical for both the Fixed and Reversible HOV Alternatives, the additional circulation benefits of the Fixed HOV Lane Alternative makes it the better project for Novato and the one most consistent with existing City plans and policies. LJ4-1

2. Local Plan Consistency: The proposed MSN project is generally consistent with the Novato General Plan. The project is also consistent with the City of Novato Bicycle Plan approved by the City Council on September 25, 2007, after the DEIR/DEIS was prepared and released for public comment. LJ4-2

3. Trip Distribution: The DEIR/EIs indicates that the 397-zone Marin/Sonoma Model was used to project future traffic conditions on Highway 101. In conjunction with that model vehicle trips from Sonoma were distributed to destinations in Marin County and to other areas to the east and south. It is important to validate which trips are destined for Marin County and which trip are going to areas beyond the County. Other EIRs have been prepared recently (e.g. SMART EIR) which also utilized projected trip distributions. The City requests that the trip distributions used in the MSN DEIR/EIS be compared to the other EIRs recently prepared and that any inconsistencies in trip distribution be reconciled. LJ4-3

4. Growth Inducing Impacts: The DEIR/EIS states that there will not be LJ4-4

growth inducement analyses for other actual or potential residential areas considered in the study were similar. The study concluded that the proposed project would support planned growth, but would not induce unplanned growth in the region.

Letter - LJ4

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Melanie Brent
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expansion is designed to accommodate existing vehicle trips and that there are other constraints to development that will prevent additional growth. One of the projected benefits of the project would be reduced travel times. Commuters often base commute decisions on the length of travel time and reduced travel times on the project roadway will potentially induce additional growth further from commute destinations. The City believes that therefore there may be growth-inducing effects from the project. An EIR may not depend on factors or constraints outside the control of the proponent to mitigate possible impacts. The DEIR/EIS needs to better analyze potential growth-inducing impacts and propose mitigation measures or include findings of overriding considerations. LJ4-4

5. Queuing at Nave/Alameda to Miller Creek: Figure 3.1-11 of the MSN DEIR/EIS indicates that the Build Fixed HOV Lanes and Build Reversible Lane Alternatives will create queuing on the freeway between Nave/Alameda and Miller Creek by 2030. The projections also indicate that no queuing will occur in this area under the No Build Alternative in either 2010 or 2030. Since queuing currently occurs in this area, an explanation should be provided of why there will not be any queuing under the No Build Alternative. Furthermore, since queuing will occur under the other two alternatives there needs to be an analysis of the significance of the impact of the queuing and any necessary mitigation measures to address these impacts should be proposed. LJ4-5

6. Olompali Access Modifications: The potential impacts resulting from the proposed modification of the vehicular access to Olompali SHP are not adequately analyzed in the MSN DEIR/DEIS. There is no information or analysis about existing or projected Olompali traffic or about the status of long-term planning for the SHP by the State Parks Department. Such information needs to be provided for the EIR/EIS to be consistent with the requirements of NEPA and CEQA. Since there is inadequate information about projected traffic to Olompali, the impacts of the additional traffic on Redwood Blvd. are not adequately discussed. LJ4-6

7. Atherton/101 LOS: The DEIR/DEIS finds that the intersections at the Atherton Avenue interchange will operate at unacceptable Levels of Service (LOS) in the future as a result of cumulative traffic. The new Olompali access directly affects those critical intersections. The DEIR/DEIS notes that there is no current formally proposed or endorsed improvement project or projects to rectify the future unacceptable levels of service at the Atherton/101 interchange. The future unacceptable LOS at the Atherton Avenue interchange will be worsened by the revised Olompali access and should be included in the EIR/EIS as a significantly adverse cumulative effect of the project. Mitigation measures should be explored, and the City consulted by FHWS and Caltrans. LJ4-7

Response to Comment LJ4-5

Our analyses assume that the Marin 101 HOV Lane Gap Closure Project (which will add HOV lanes in the northbound direction on US 101 from Lucky Drive in Corte Madera to San Pedro Avenue in San Rafael) will have been completed in 2010 and 2030. The additional capacities created by the Marin Gap Closure Project would eliminate existing queuing between Nave/Alameda Del Prado and Miller Creek Road under the No Build Alternatives. Under both Build Alternatives in 2030, additional southbound traffic in the AM peak hour from Sonoma County would create queuing between Nave/Alameda Del Prado and Miller Creek Road again. However, compared with the No Build Alternative, mixed flow traffic lane delay under the Build Alternative would be substantially reduced from Sonoma County to Marin County, and HOV lane traffic would bypass the congestion and expect little delay.

Response to Comment LJ4-6

Our analyses are based on the forecast data. Since we primarily analyze freeway mainline operation, the access modifications have little effect on overall freeway operations.

Response to Comment LJ4-7

Our analyses show that the US 101 Southbound Ramps/Atherton Avenue and US 101 Northbound Ramps/Atherton Avenue intersection would be able to accommodate additional traffic. However, the operation of the southbound ramps/Atherton Avenue intersection would be heavily influenced by the operation of the adjacent Redwood Boulevard/Atherton Avenue intersection under local jurisdiction to the west. Caltrans didn't include analyses for the Redwood Boulevard/Atherton Avenue intersection because it was not within the scope of our study.

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Melanie Brent
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December 13, 2007

8. Ramp Metering: It is the City's understanding that no traffic metering is currently proposed for off or on ramps at this time. Metering could have effects warranting further environmental review when proposed. The City requests the opportunity to comment on future proposals to meter traffic onto or off of the freeway, as such metering could have traffic impacts on local streets. LJ4-8

9. Sound Measurements: The City requests additional analysis of noise impacts from the project on neighborhoods near Highway 101. The extent of the sound measurements that were conducted and upon which the noise impacts are projected is inadequate. Measurements in additional locations and for more extended periods need to be provided to insure the accuracy of the noise projections. Additional areas for extended analysis include Clausing Court, Lamont Avenue, Orange Avenue, Cherry Street, and Armstrong Avenue. LJ4-9

10. Noise Impact Standards: The City of Novato General Plan states that the normally acceptable sound level in residential areas is 60 dB ldn. Caltrans should consider local noise standards in decisions regarding the necessity for and location of sound walls. LJ4-10

11. Proposed Sound walls: The City emphatically requests that all proposed sound walls protecting City residents be retained in the project. There are three such walls in the project; one south of Rowland between 101 and Redwood Road, and one each on the northbound off-ramp and southbound on-ramp at DeLong. Eliminating any of these walls is unacceptable to the City. In addition, eliminating one wall and not others can create new impacts by bouncing sound into other neighborhoods (the walls south of DeLong for example). LJ4-11

12. Additional Sound Walls: The City strongly believes that sound walls should be provided in those areas that are currently impacted by noise levels that exceed acceptable standards. Those areas include but are not limited to the streets and neighborhoods referenced in Item 9 above. LJ4-12

13. Additional Noise Mitigation Measures: Sound absorbing materials should be provided on the freeway side of the sound walls to prevent impacts from reflected noise. Also, the exterior of the walls may create impacts by reflecting noise from other sources such as trains. Sound absorbing material should be considered on the exterior of the walls as well. Caltrans testimony at the City Council hearing indicated that rubberized asphalt would be used for the roadway surface for all segments of Highway 101 within the City. The City requests confirmation of this information and that the project not be revised at a later date to delete this material. LJ4-13

14. Project design: The City requests the opportunity to be involved in the design phase of those portions of the MSN project within the City, especially the retaining and sound walls. Input LJ4-14

Response to Comment LJ4-8

Ramp metering is a Transportation Management System tool that has been studied under the MSN Project. Under either of the Build Alternatives, the MSN Project would widen US 101 on-ramps for High Occupancy Vehicle (HOV) bypass lanes and install ramp metering hardware at the Rowland Boulevard, DeLong Avenue and Atherton Avenue on-ramps in the city of Novato.

It is anticipated that Caltrans would activate ramp meters sometime after the completion of the project, when conditions warrant. Normal hours of operation are similar to HOV hours on the mainline during the peak periods. As is customary, Caltrans will work with the local cities and counties on a workable metering strategy for the corridor before implementing the ramp metering system.

Response to Comment LJ4-9

Title 23, Part 772 of the Code of Federal Regulations (23 CFR 772), titled "Procedures for Abatement for Highway Traffic Noise and Construction Noise," outlines procedures for noise studies that are required for approval of federal-aid highway projects. The Federal Highway Administration (FHWA) requires that state highway agencies prepare state-specific policies and procedures for applying 23 CFR 772. These policies have been defined in Caltrans' August 2006 *Traffic Noise Analysis Protocol* (the Protocol), which documents the specific steps for the determination of traffic noise impacts and abatement. The Protocol applies to Caltrans and local agency projects that receive federal funding or require FHWA approval.

In order to comply with 23 CFR 772, it is necessary to consistently apply the procedures in the Protocol. The Protocol gives specific noise levels that must be predicted in order for an area to be defined as noise-impacted and steps that must be followed for the selection of appropriate abatement (e.g., soundwalls). The noise

study for this project has defined all the areas within the project corridor that would receive these levels, and selection of appropriate abatement is documented within this environmental document in Volume 1, Section 3.2.7. Further noise level predictions on Clausing Court, Lamont Avenue, Orange Avenue, Cherry Street, and Armstrong Avenue are not required for compliance with the Protocol and would not change the results of the noise study.

Response to Comment LJ4-10

As noted above, Caltrans projects requiring federal action are subject to Title 23, Part 772 of the Code of Federal Regulations. These regulations set a criteria level of 67 dBA or higher in order to qualify for the consideration of soundwalls (see Table 3.2-13 in Volume 1 of this FEIR/S). The criteria levels were meant to be a “happy medium” that can be consistently applied to those communities with the most stringent standards, as well as those with no noise standards at all. The intent is to offer every community equal opportunity to noise abatement, even if some have stricter standards in their general plans.

Response to Comment LJ4-11

The comment is in reference to Soundwall Nos. 1, 3, and 4. Support of these soundwalls by the City of Novato has been noted, and these soundwalls have been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment LJ4-12

Please see the response to Comment LJ4-9 above.

Response to Comment LJ4-13

The reflected noise issue was taken into consideration in the noise study and was determined not to be a problem within the project corridor. This is because any increase in noise caused by the reflection off the soundwalls would be masked by the noise of the freeway itself. In addition, from the information we have regarding absorptive material, we do not believe the benefits would be noticeable and worth the additional project costs. With regard to noise emanating from trains, similar to reflected noise from the freeway, any reflected noise would be masked by the noise of the train itself. There would be no benefit to the addition of absorptive material on the side facing away from the freeway.

Installation of rubberized asphalt will be based on the maintenance and safety needs of the roadway surface, and cost. An analysis of the pavement condition will be done during design and rubberized asphalt will be included if it is called for. No commitment will be made within this environmental document.

Response to Comment LJ4-14

Thank you for your comments. Caltrans previously coordinated with City staff through the Policy Advisory Group, consisting of representatives of local jurisdictions, which no longer meets. However, Caltrans intends to coordinate with City staff to develop an aesthetic design process involving City staff and incorporating its design input and concerns, as called for in the visual/aesthetic mitigation measures in Volume 1 of this FEIR/S (Section 3.1.11.4).

Letter - LJ4

Page 4

Melanie Brent
Page 4
December 13, 2007

from the local jurisdiction should be obtained regarding color, finishes, artistic enhancements, landscaping, etc., as all are factors that will effect how the walls are perceived by travelers, residents, and visitors to Novato. Murals for the sound and/or retaining walls should be considered. Adequate lighting for safety and aesthetics should be provided at under-crossings. High quality landscaping consistent with other projects within Marin County will be essential. Landscaping quality and safety benefits should be carefully considered throughout the project and especially at park-and-ride lots. LJ4-14

Again, thank you for the opportunity to comment on the Draft EIR/EIS. If you have questions about these comments, please contact me at 415-899-8938.

Sincerely,

David Wallace
Community Development Director

CC: City Council
City Manager
City Clerk

Letter: LJ5.
Signatory: City of Petaluma.

Response to Comment LJ5-1

The reasonable allowances have been updated to 2007 base allowances for both the East Washington Interchange project and the MSN Project.

Response to Comment LJ5-2

Thank you for pointing out this discrepancy. The appropriate corrections have been made in the FEIR/S.

Response to Comment LJ5-3

The area located in the southeast quadrant of the East Washington Interchange will consist of a soundwall 3.7 meters (12 ft) high on the safety barrier with a length of 1,760 meters (5,770 ft). The wall does meet the reasonable allowance criteria for soundwalls and will be funded for this project.

Response to Comment LJ5-4

The Caltrans *Traffic Noise Analysis Protocol* and 23 CFR 772 require consideration of noise abatement for impacted receptors. Feasible soundwalls for Segment C are shown in the traffic noise study as Soundwalls Nos. 5, 6, 7, and 8. Support of these soundwalls by the City of Petaluma has been noted and was taken into consideration in reaching a final decision. Soundwalls 5, 6, and 8 have been approved for construction, while Soundwall 7 was deemed non-cost-effective. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

CITY OF PETALUMA
POST OFFICE BOX 61
PETALUMA, CA 94953-0061

Pamela Torliatt
Mayor

Teresa Barrett
Samantha Freitas
Mike Harris
Karen Nau
Mike O'Brien
David Rabbitt
Councilmembers

December 3, 2007

Melanie Brent
Chief, Office of Environmental Analysis
Caltrans
111 Grand Avenue
Oakland, CA 94612

Re: Marin-Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement - Comments

Dear Valerie:

Thank you for including the City of Petaluma in the environmental review process. We have reviewed the above referenced document and have the following comments:

Section 3.2.7.4 Avoidance, Minimization, and/or Mitigation Measures:

1. The City has reviewed both the subject document and the Traffic Noise Impact Report, revision – 1 for the MSN Project. The calculations for reasonable allowance for all soundwalls included in the project use a base allowance update for year 2004 which equates to $26,000 per residence. The East Washington Interchange Project uses a base allowance update for year 2006, or a base allowance of $32,000 per residence. Please revise the reasonable allowance in the MSN document. LJ5-1
2. The lengths and heights of the soundwalls shown in figure 2-3b and figure 3.2-9b need to match those described in numbers 5 through 8 on pages 3.2-104 and 105. LJ5-2
3. On page 3.1.131, the document states, "In the southeast interchange quadrant, concrete side-median barriers would be required for safety due to narrow, non-standard setbacks to the existing fence line following road widening and tree removal." What is the height and length of the barrier and will this improvement be funded and included as part of the project? LJ5-3
4. Table 3.2.15 (page 3.2.93-94) identifies existing and future worst-case traffic noise levels. The decibel levels for residences in Segment C, whether under the existing or no build project scenarios, clearly exceed an acceptable noise level allowed by federal regulation (Code of Federal Regulations Title 23, Section 772). The City of Petaluma requests Caltrans work with SCTA to secure funding for the actual cost of the soundwalls, and require installation of the Segment C soundwalls at the time the MSN Project is constructed. LJ5-4

Public Works

Administration
11 English Street
Petaluma, CA 94952

Phone (707) 778-4474
Fax (707) 776-3602
E-Mail: publicworks@ci.petaluma.ca.us

Airport
601 Sky Ranch Drive
Petaluma, CA 94954
Phone (707) 778-4404
Fax (707) 778-4405

Corporation Yard (Maintenance & Operations)
840 Hopper St. Ext.
Petaluma, CA 94952
Phone (707) 778-4303
Fax (707) 778-4437

Transit
555 N. McDowell Blvd.
Petaluma, CA 94954
Phone (707) 778-4421
Fax (707) 776-3799

S:\CIP Division\Projects\East Washington 101 Interchange C260107\MSN Environmental Document\Staff Report 12-3-07\MSN Review Comments 11-24-07\11-24-07 City comments MSN draft EIR.doc

Letter - LJ5

Page 2

5. The City of Petaluma is working with Caltrans to prepare a Project Study Report for Rainier Ave. under-crossing/interchange. The City requests Caltrans coordinate the design and construction efforts in Segment C with the City to accommodate this future under-crossing of US 101. LJ5-5

6. Volume 1, figures 2-3b and 3.2-9b and volume 2, page 2, both the fixed and reversible lane drawings, show a soundwall across the medical center property. This needs to be corrected to go across the Vintage Chateau property. LJ5-6

7. As noted in the document, the Reversible HOV Lane alternative does little to improve existing southbound queue lengths through Petaluma. Additionally, the impact to the local street system adjacent to Petaluma Boulevard was not identified for the Reversible HOV Lane alternative, as restricted access south of Petaluma Boulevard South would likely have the impact of drivers accessing the lane at that point. The City of Petaluma strongly rejects the Reversible HOV Lane alternative. LJ5-7

8. It is requested that Caltrans consider all previous correspondence and requests for soundwalls within the City of Petaluma. The City understands that Caltrans is reserving the final determination to include soundwalls until the close of the public review period. Confusion created in the document and Press led to a large majority of the Public assuming the walls were to be included in the project. Attached is a CD containing 15 years of correspondence. LJ5-8

9. Traffic projections for Hwy. 101, under the future scenario, should include the likelihood of impacts generated by the Graton Rancheria Casino Project. LJ5-9

We appreciate the opportunity to work with you on this project and wish to continue close correspondence on its development. Please call me at (707) 778-4467.

Sincerely,

V. Marengo

Vincent Marengo
Director of Public Works

Response to Comment LJ5-5

Caltrans has a policy of communicating with local agencies regarding proposals on the State Highways system.

Response to Comment LJ5-6

The referenced figures have been changed in response to the comment.

Response to Comment LJ5-7

Our study doesn't cover local street impact. It is true that the Reversible HOV lane Alternative does little to improve the southbound queue for mixed flow traffic through Petaluma, but HOV lane traffic will bypass congestion in the Petaluma area and experience little delay from Sonoma County to Marin County.

Response to Comment LJ5-8

Caltrans appreciates the additional information provided by the City of Petaluma.

Caltrans and FHWA will propose noise abatement (i.e., soundwalls) in projects where the Traffic Noise Impact Report indicates that predicted noise levels will approach or exceed the FWHA Noise Abatement Criteria (NAC) (23 CRF Part 772). The federal NAC can be found in Table 3.2-13 in Volume 1 of this FEIR/S.

Caltrans also considers noise impacts under CEQA. When the Traffic Noise Impact Report predicts that traffic noise will increase by 12 dBA or more over existing levels as the result of a project, noise abatement measures are proposed.

Noise barriers were considered for the MSN Project where the predicted worst-case noise will approach or exceed the federal NAC of 67 dBA and where at least 5 dBA noise reduction can be achieved. This is stated in the

DEIR/S on page. 3.2-103: “The actual determination of those soundwalls that will be constructed will be made prior to the final environmental document. Caltrans will consider a number of factors in making its determination, including whether the soundwalls would substantially reduce noise exposure (at least 5 decibels), they are cost-effective, they pose visual impacts or adversely affect environmental resources, and they are acceptable/desirable in the local jurisdictions.”

Based upon the background information as well as the information Caltrans has collected during the public comment period, the soundwalls would be desirable to a number of residents adjacent to the project. Caltrans has determined that all the proposed soundwalls in Petaluma are reasonable and feasible, except for Soundwall No. 7, whose construction was determined to be non-cost-effective, and thus to not be the best use of public funds.

Response to Comment LJ5-9

The Graton Rancheria Casino was not originally included in the traffic projections for this project because when the projections were produced the Graton Rancheria Casino was only a conceptual proposal without the information needed for a traffic forecast.

Based on the Casino's Draft EIR, the additional demand will total around 18,000 vehicle trips per day When factoring in an additional 18,000 vehicle trips, we have to take into account certain aspects of this additional traffic: 1) the vehicle trips are spread out over a 24-hour period with only a fraction traveling in one particular direction at any given time; 2) the casino peak hour occurs at a different time-usually later-than the commuter peak hour; and 3) the 18,000 additional vehicle trips will be spread out throughout the entire casino study area, not just specifically at the project site.

The information from the casino project's Final Traffic Impact Study (dated Sept. 2007) indicates that the casino would generate a 10% increase in Average Daily Traffic (ADT) north of Old Redwood Hwy intersection. Therefore, the additional 18,000 vehicle trips per day will not add an overwhelming amount of traffic to the project area, and the MSN Project would remain an effective way to relieve the congestion currently experienced at this location on Highway 101 even with the construction of the casino.

Letter - LJ5

Page 3

Resolution No. 2007-205 N.C.S.
of the City of Petaluma, California

REQUESTING CALTRANS WORK WITH THE SONOMA COUNTY TRANSPORTATION AUTHORITY (SCTA) TO SECURE FUNDING AND REQUIRE INSTALLATION OF THE SEGMENT C SOUNDWALLS WITH CONSTRUCTION OF THE MSN PROJECT

WHEREAS, the noise level experienced by residents adjacent to US 101, in the vicinity of Segment C of the Marin-Sonoma Narrows (MSN) Project, whether under existing or no build project scenarios, clearly exceeds an acceptable decibel level allowed by federal regulation (Code of Federal Regulations Title 23, Section 772); and,

WHEREAS, four of the eight soundwalls noted in the draft environmental document are located in the City of Petaluma; and,

WHEREAS, a majority of the residents affected by the those soundwalls have been requesting soundwalls for a number of years; and,

WHEREAS, Caltrans will consider a number of factors in making its determination, including whether the soundwalls would substantially reduce noise exposure (at least 5 decibels), they are cost effective, they pose visual impacts or adversely affect environment resources, and they are acceptable/desirable in the local jurisdictions; and,

WHEREAS, the environmental document has identified soundwall locations and heights that would reduce the noise exposure (at least 5 decibels); and,

WHEREAS, the environmental document has identified a reasonable allowance for the soundwalls located in the MSN Project Segment C; and,

WHEREAS, the actual determination of those soundwalls to be constructed will be made prior to the final environmental document.

Letter - LJ5

Page 4

NOW, THEREFORE, BE IT RESOLVED the City Council of the City of Petaluma strongly requests Caltrans work with the Sonoma County Transportation Authority (SCTA) to secure funding for the actual cost of the soundwalls and require installation of the Segment C soundwalls at the time the MSN Project is constructed.

Under the power and authority conferred upon this Council by the Charter of said City.

REFERENCE:	I hereby certify the foregoing Resolution was introduced and adopted by the Council of the City of Petaluma at a Regular meeting on the 3rd day of December, 2007, by the following vote:	Approved as to form: City Attorney
AYES:	Barrett, Harris, Vice Mayor Nau, O'Brien, Rabbitt, Mayor Torliatt	
NOES:	None	
ABSENT:	Freitas	
ABSTAIN:	None	
ATTEST:	Deborah Padovan/mm Deputy City Clerk	Pamela Torliatt Mayor

Resolution No. 2007-205 N.C.S.

Page 2

3.5 Comments and Responses for Local Community/Business Groups

LETTER: LC1. SIGNATORY: PETALUMA RIVER COUNCIL AND FRIENDS OF THE EEL RIVER. 3.5-2
LETTER: LC2. SIGNATORY: BIKESONOMA. 3.5-16
LETTER: LC3. SIGNATORY: SUSTAINABLE NOVATO. 3.5-19
LETTER: LC4. SIGNATORY: MARIN COUNTY BICYCLE COALITION. 3.5-24
LETTER: LC5. SIGNATORY: NORTH COAST RIVERS ALLIANCE. 3.5-27
LETTER: LC7. SIGNATORY: PETALUMA AREA CHAMBER OF COMMERCE. 3.5-30
LETTER: LC8. SIGNATORY: SIERRA CLUB MARIN GROUP. 3.5-37
LETTER: LC9. SIGNATORY: MARIN AUDUBON SOCIETY. 3.5-49
LETTER: LC10. SIGNATORY: MARIN CONSERVATION LEAGUE. 3.5-63
LETTER: LC11. SIGNATORY: TRANSPORTATION SOLUTIONS DEFENSE AND EDUCATION FUND (TRANSDEF). 3.5-70

Letter: LC1.
Signatory: Petaluma River Council and Friends of the Eel River.

Response to Comment LC1-1

Please see the responses to Comments SA2-1 and SA2-2 in Section 3.2 for discussion of the use of General Plans and of Rohnert Park Casino.

Melanie Brent/D04/Caltrans/CAGov
12/14/2007 03:17 PM

To yolanda_rivas@dot.ca.gov@DOT
cc
bcc
Subject Fw: Comments on MSN 101 Project DEIR/DEIS

Melanie Brent, Office Chief
District 4 Environmental Analysis
(510) 286-5231 Office
(510) 715-8492 Cell
----- Forwarded by Melanie Brent/D04/Caltrans/CAGov on 12/14/2007 03:17 PM -----

David Keller
<dkeller@eelriver.org>
12/14/2007 02:44 PM

To Melanie Brent <melanie_brent@dot.ca.gov>
cc Ellison Folk <folk@smwlaw.com>, Nadananda <nada@eelriver.org>, Jared Huffman <jaredhuffman@sbcglobal.net>, suzsmith@sctainfo.org, jit_s_pandher@dot.ca.gov, Seana Gause <sgause@sctainfo.org>, Doanh Nguyen <doanh_nguyen@dot.ca.gov>
Subject Comments on MSN 101 Project DEIR/DEIS

From: David Keller
Petaluma River Council
Friends of the Eel River
1327 I St.
Petaluma, CA 94952

To: Melanie Brent
Office Chief, Division of Environmental Planning and Engineering
California Dept. of Transportation
111 Grand Ave, Mail Station 8B
Oakland, CA 94612

Dec. 14, 2007
By email

Comments on Marin-Sonoma Narrows (MSN) Project DEIR/DEIS ("Project")

Dear CalTrans and Ms. Brent:

LC1-1 According to personal conversations at the CalTrans Public Meeting in Novato for this Project 11/14/07 with CalTrans employees John L. Martin PE (design engineer), Doanh Nguyen PE (Division Chief), and Jit Pandher (Project Manager), the current DEIR/DEIS for the MSN Project was based on modeling using traffic generation figures from 2005, and that the Project DEIR/DEIS does

Letter - LC1

Page 2

not include traffic generation from any of the following documents:

- the Rohnert Park Graton Rancheria/Station Casinos proposed Casino and EIR/EIS,
- the new Marin County Areawide Plan (just certified and adopted by the Marin County Board of Supervisors),
- the Final Draft Petaluma General Plan 2025 and EIR,
- the Final Draft Sonoma County General Plan Update 2020 and EIR.

All of these projects are 'reasonably foreseeable' developments within the Project area, and will individually and cumulatively affect traffic congestion and capacity capabilities of the Project.

The omission of this critical data is serious and unwarranted, and which will lead to seriously underestimation of traffic loads and congestion on the proposed new MSN 101 widening.

LC1-1 The data from the above EIR/EIS's must be incorporated in recalculating the vehicle trips and congestion levels for the Project. In addition, the following information is instructive as well.

LC1-2 Re: the Casino.
According to the County of Sonoma, "The proposed casino alternatives would generate 18,250 vehicle trips per day, traffic equivalent to an entire lane of Highway 101 all by itself." (County of Sonoma and Sonoma County Water Agency, "DRAFT Comments on the Graton Rancheria Casino and Hotel Project Draft Environmental Impact Statement (DEIS)", Attachment B, page 2)

It is unclear what criteria was used to determine this figure. However, in a 2005 Town Hall meeting sponsored by State Assemblywoman Loni Hancock, traffic engineers from KOA Corporation provided a formula used to determine how much traffic a casino will generate.

KOA does traffic studies for tribal casinos themselves. They estimate that each slot machine generates 13.6 vehicle trips per day. If Graton Casino has the 2,000 slots originally discussed, that would mean 27,200 vehicle trips per day. If the figure is 5,000 slot machine, the number of vehicle cold go as high as 68,000.

Even San Pablo Casino, which has only video bingo machines, generates enough traffic to bring I-80 to a standstill at the San Pablo exits.

Please see the attached document for the San Pablo Casino traffic generation and congestion.
"San Pablo Casino Traffic Analysis Preliminary Findings, Katz, Okitsu & Associates, Jan. 28, 2005"
also at: http://www.albanyca.org/archive/pdf/022205_6_2_Doc_SanPabloAveTrffAnalRpt.pdf

For clear understanding of the impacts, individual and cumulative, of the above projects, please produce a graph in the Response to Comments (FEIR/FEIS) addressing this:

1. Produce a graph of peak AM and PM hour traffic flows (with vehicle trips and LOS for each segment) in the Narrows, showing:

Response to Comment LC1-2

The number of trips generated quoted by Sonoma County correspond closely to the projections in the Draft Environmental Impact Statement for the Graton Rancheria Casino. This document estimated trips generated by studying trips generated by similar tribally owned casinos in California. Since they are derived from studies of very similar facilities these figures can be considered reasonably reliable. It is not clear where the 13.6 vehicle trips per day per slot machine estimate came from so we cannot comment on whether it is appropriate.

The San Pablo Casino certainly generates vehicle trips and contributes to congestion on I-80. However, given the highly developed characteristic of the I-80 corridor in the Casino area, it would be in error to attribute all or most of the congestion in the area to the San Pablo Casino. The document cited relates to the San Pablo Casino and is not directly applicable to the Graton Rancheria Casino.

The graphs requested are very detailed and would be very difficult or perhaps impossible to produce and they are not necessary to gain a realistic vision of how US 101 will function. The analysis presented gives the worst case for traffic congestion. At other times congestion would be less.

Letter - LC1

Page 3

> **Congestion levels**, as LOS for NB and SB segments between these interchanges:
> (A)Petaluma/Old Redwood Hwy --
> (B)Petaluma/Lakeville 116 --
> (C)Petaluma Blvd. S. --
> (D)San Antonio Rd --
> (E)Hwy. 37.
>
> **Plot these Congestion levels over time vs. the trip generation figures for**:
> 1 - Current (2007)
> 2 - At completion of Project (~2012)
> 3 - At 20-years (~2027) with *cumulative* growth as predicted at buildout of all of the following plans: the Rohnert Park Graton Rancheria/Station Casinos proposed Casino and EIR/EIS, the new Marin County Areawide Plan, Final Draft Petaluma General Plan 2025 and EIR, and the Final Draft Sonoma County General Plan Update 2020 and EIR.
> 4 - At end of CalTrans' assigned lifespan of the current project (30 years? 40 Years?)

LC1-2

LC1-3 **2. Produce a graph over the same time period indicating predicted Greenhouse Gas emissions within the Project extent**

LC1-4 **3. Indicate what CalTrans is incorporating within the Project to reduce GHG emissions over this period of time.**
Please show implementable projects and policies which will measurably reduce GHG emissions, with accounting for projected savings (or increases) over time, by project or policy.

LC1-5 **4. Please describe what CalTrans will incorporate within this project - or associated projects under its control - to maintain the capacity of this roadway segment for as long as possible.**
Since additional money or land to increase the size of the Project segment will unlikely be available for a very long period of time, CalTrans needs to show the taxpaying public and transportation corridor residents and businesses what it will do to preserve any congestion and air quality improvements for as long as possible, or at least for another 40 years.

LC1-6 How many years of service will the Project reduce congestion in the MSN segment, given the proposed growth of the region? What will CalTrans do to ensure the maximization and optimization of the value and benefits of this massive investment of public dollars?

LC1-7 What can CalTrans do to improve VMTs in this corridor served by the Project?

LC1-8 Is it less expensive for CalTrans to support SMART, regional and local bus service, or other alternative means of moving people and goods through the region than to have to pay for future projects to expand the capacity of the MSN Project?

LC1-9 What should other agencies not under CalTrans' control be doing to similarly extend the lifespan

Response to Comment LC1-3

Please refer to the Master Response on Greenhouse Gas Emissions.

Response to Comment LC1-4

Please refer to the Master Response on Greenhouse Gas Emissions.

Response to Comment LC1-5

Caltrans' traffic analysis considers up to twenty years in the future. Caltrans will update traffic analysis in preparation for future phases of construction.

The construction of an HOV lane helps to preserve mobility gains by encouraging carpooling and mass transit usage. Other means may be appropriate in the future, such as park-and-ride lots, but these would be separate projects that will need to be evaluated separately.

It is not possible to forecast the traffic or operations 40 years into the future. A host of land use, social and technological changes unforeseen today are likely to occur in the next 40 years. These changes would make such a forecast impossible.

Response to Comment LC1-6

See the response to Comment LC1-5 above.

Response to Comment LC1-7

Overall, the Build Alternatives would improve VMT in this corridor.

It is unclear what is meant by "improve VMT." Table 3.1-15 in Volume 1 of this FEIR/S (reprinted below) gives estimated design year vehicle miles traveled with and without the project. As you can see, the VMT is very slightly higher with than without the project. The construction of HOV

lanes can minimize the increase in VMT by encouraging carpooling. Other methods such as park-and-ride lots might prove to be appropriate, but these would be separate projects unrelated to this one.

Table 3.1-15 Projected Increase in Vehicle Miles Traveled Countywide (in thousands of miles), Year 2030

Alternatives	Project Area		Marin County and Sonoma County	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
No Build	5,312	6,358	16,614	20,133
Build Alternatives	5,318	6,367	16,625	20,154
Difference	6	9	11	21
Percent Increase	0.11%	0.14%	0.07%	0.10%

Response to Comment LC1-8

Please refer to the Master Response on Range of Alternatives.

Response to Comment LC1-9

Caltrans and FHWA do not have authority over local land-use planning.

Letter - LC1

Page 4

of this CalTrans Project?
LC1-9 Will CalTrans tell local agencies responsible for future developments that there will eventually be no more capacity on this MSN segment, and that CalTrans would strenuously and legally object to increasing those congestion loads on its Project?

LC1-10 **5. Relocated Utilities not adequately described**

At 3.1-49, under Relocated Utilities, the DEIR/DEIS states that this may apply to "Petaluma, PG&E, SBC, SCWA, and Comcast".
At 3.1.7.2, under Impacts/Utilities, it states that "final verifications would be performed during the project's design phase."
At 3.1.7.3, under Avoidance, Minimization and or Mitigation Measures.

Nowhere does the DEIR/DEIS disclose the potential movement or relocation of a major water supply pipeline to NMWD and MMWD.

There is clearly a proposal between CalTrans and North Marin Water District (and perhaps Marin Municipal Water District), confirmed with discussions with NMWD staff and MMWD directors, that would have CalTrans excavate and remove the existing water supply pipeline within its right-of-way south of the Kastania Tank, and relocate it (at partial expense to NMWD and MMWD) within the expanded r-o-w. The offer apparently includes the option to NMWD and MMWD of expanding the pipeline size significantly to carry a larger quantity of water.

This option is not disclosed in the DEIR/DEIS, and must be fully disclosed for public and agency scrutiny and comment.
This option is a significant environmental impact, and the DEIR/DEIS fails its mission in omitting it. Physical enlargement to the transmission capacity of this pipeline can have significant impacts on the water supplies delivered via Sonoma County Water Agency ("SCWA") produced from the Russian River, the Eel River and Santa Rosa Plain groundwaters, all of which are suffering from serious negative impacts and impairments now.

See, California Court of Appeals Decision, 5-16-03, Friends of the Eel River et al, v. SCWA, ruling that the FEIR for the Sonoma County Water Agency's Water Project "WSTSP" was inadequate:

The list of WSTSP facilities that SCWA is prohibited from constructing pending certification of a supplemental EIR includes, per the Peremptory Writ of Mandate
include:
1. any new diversion facilities at the Russian River (excluding Collector #6)
2. Mirabel-Cotati Pipeline
3. Cotati-Kastania Pipeline *
4. Kawana-Ralphine Pipeline (excluding Farmer's Lane Extension Project)
5. Annadel-Sonoma Pipeline (excluding Eldridge-Madrone pipeline)
6. any new Cotati Tank *
7. Kastania Tank #2 *

Response to Comment LC1-10

It is customary for Caltrans to enter into agreements with utility companies concerning relocations due to project construction. The environmental impacts associated with the areas, including right-of-way where the utilities will be relocated, are encompassed in this FEIR/S, which is undergoing CEQA review. Additional CEQA review may be required by the California Public Utilities Commission as part of their approval process for the relocations. It is Caltrans' policy to reimburse utilities for in-kind replacement of their facilities. Upgrades and improvements are a separate action by the utility companies.

Letter - LC1

Page 5

8. Cotati-Kastania Booster Pump Station *
9. Sonoma Booster Pump Station Modification
(* collectively, the South Transmission System Project)

LC1-10 It seems likely that this expanded pipeline along 101 may well fall into the list of prohibited construction. Its impacts, individually and cumulatively, must be disclosed and described in the Project FEIR/FEIS.

Thank you very much for the opportunity to comment on this important project.

Sincerely,

David Keller
Chairman, Petaluma River Council
Bay Area Director, Friends of the Eel River
1327 I St.
Petaluma, CA 94952

Casino-SanPabloTrafficAnalysisRpt 1-28-05.pdf

Letter - LC1

Page 6

San Pablo Casino Traffic Analysis Preliminary Findings

Prepared by: Katz, Okitsu & Associates

January 28, 2005

Letter - LC1

Page 7

Assumptions and Findings

With the potential introduction of a large number of slot machines at the San Pablo Casino, substantial effects could occur to circulation. Information that has been helpful in estimating the future number of trips is the "Proposition 68 Traffic Analysis" by Parsons Brinkerhoff, dated September 2, 2004. Below are a series of discussion points that can help focus one on the important issues. Following that, the technical study is presented.

The proposed introduction of between 2,500 and 5,000 slot machines at this location represents a very dramatic increase in the potential trip making concentrated in this already problematic area. For a sense of scale, the trip making associated with this project is equivalent of up to nearly 7,000 single-family homes or regional shopping center of 1.3 million square feet. It is also the amount of trip making that would normally be equivalent to the heavier volume carried by a 4-lane freeway (2 lanes each way) operating at an acceptable level of service.

Some of these points are as follows, and we shall begin by reviewing certain assumptions.

Assuming:

- Daily trip generation rate of 13.6 trips per gaming position/slot machine.
- Peak hour trip generation rates of 0.47 and 0.788 for AM and PM respectively for each gaming position/slot machine.
- Estimated average duration of visit of two hours per patron and an occupancy factor of approximately 1.18 persons per car.
- Each parked car required 350 square feet of space.

Points regarding the proposed slot machine expansion:

- Up to 2,500 slot machines are proposed, with the possibility of expansion in 2008 for the San Pablo Casino. The original plan called for 5,000 slot machines, so those numbers are analyzed as well.
- At 13.6 trips per weekday per machine, up to about 34,000 daily trips could result with 2,500 machines, and double that from 5,000 machines.
- A typical 4-lane roadway becomes congested above 30,000 vehicles per day.
- In the peak hour of the AM that could mean 1,175 trips and for the PM peak it could result in 1,970 trips with 2,500 machines. For 5,000 machines, those numbers would be doubled.
- Each lane of a roadway can typically handle up to 1,900 vehicles per hour if the signals were continuously indicating green and no red time.
- Parking for an estimated 1,687 extra vehicles would be needed for 2,500 machines, and double that number for 5,000 machines.
- The parked vehicles would consume 13.6 acres of space on one level or 3.4 acres of space on four levels at the 2,500-machine level.

Points regarding the circulation system accessing and the development patterns serving the existing San Pablo Casino:

- The nearest access point for regional traffic on the I-80 is at the San Pablo Dam Road interchange, which is an older, lower capacity diamond configuration.
- Peak hour traffic congestion measures at some of the intersections between the ramps and San Pablo Dam Road show it is presently failing.
- Even more intersections in the area are projected to be failing in the future without introducing any more traffic associated with the proposed new traffic to the Casino.

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The next interchange to the north on I-80 is out-of-direction and the next one to the south is approximately a mile away.

I-80 is carrying approximately 187,000 daily vehicles currently at San Pablo Dam Road, and the volume can be expected to grow in the future.

Traffic congestion on the I-80 is substantial.

The portion of San Pablo Dam Road leading from the Casino to I-80 is a four lane, urban roadway with intervening traffic signals serving local commercial development that constrains the ability to widen it.

The City and Caltrans have been working on preparing a Project Study Report to make improvements to the San Pablo Dam interchange with I-80, but the funding and timing are not completely known nor committed yet.

The Brookside Hospital/Doctors Medical Center is adjacent to the Casino and depends on the same roadway system for access for emergency vehicles and patients.

Therefore, the implication of these points is:

The slot machines alone create enough new daily traffic to demand the capacity of up to two completely brand new 4-lane major roads.

Even using all available roadways in the area, the congestion that will be introduced by the additional slot machines will overwhelm the capacity of the existing roadway system, and there is very limited opportunity to do anything to increase the capacity without tearing out existing development.

Congestion will be extreme on the portion of San Pablo Dam Road leading to I-80 and will potentially cause this area to completely fail operationally.

The impacts will not only occur in the worst commuting peak hours, but the impact will also be spread over the whole day and night as typically occurs with casino operations.

Operations on I-80 itself will be dramatically affected by this substantial increase in traffic since it represents a potential increase to freeway traffic of over 25% above existing I-80 traffic. There is little, if anything, that can alleviate it short of building an additional lane along I-80 and creating a new interchange just for the extra casino traffic.

Air quality and fuel consumption will degrade and increase respectively at the nearby surface intersections. There will be an estimated annual additional 53 thousand gallons of fuel consumed and 1.8 tons of CO released into the air just due to congestion at the nearby intersections.

The costs associated with mitigation of the Casino impacts include the following:

Arterial Widening: $3 million per lane per mile, including land acquisition costs. Assume one lane mile of widening would be required for a total cost of $3 million.

Freeway Widening: $6 million per lane per mile, not including land acquisition costs. Assume ten lane miles of widening would be required for a total cost of $60 million, plus additional land acquisition costs.

Bridge Overcrossing Widening: $500,000 per overcrossing. Assume five bridge overcrossings for a total cost of $2.5 million.

Interchange Reconstruction: $25 million per interchange. Assume one interchange reconstruction for a total cost of $25 million.

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The total costs for roadway improvements associated with the Casino would be $90 million, plus additional land acquisition costs for freeway improvements.

Technical Information

This section contains the results of the limited technical study we prepared to arrive at these conclusions.

Introduction

Casino San Pablo is currently operating at 13255 San Pablo Avenue in the City of San Pablo. The main entrance of the casino is the west leg of the intersection of San Pablo Avenue and San Pablo Dam Road. Casino San Pablo was established in 1995, and in 1999 the Lytton Band of Pomo Indians and the City negotiated the Municipal Services Agreement outlining details of taxation, facility expansion, security levels, and other operating and development procedures. The Casino is currently licensed to operate 100 gaming tables; it also has a live entertainment showroom, a full-service restaurant, a cocktail lounge, and entertainment facilities.

Casino San Pablo is considering expanding its operations. Because the magnitude of the expansion is unknown at this time, this study analyzes two scenarios: a) 2,500 additional gaming machines, and b) 5,000 additional gaming machines. This study examines the potential traffic impacts of the anticipated expansion. Existing and future analyses are performed to compare traffic conditions with and without the gaming expansion for both scenarios. The exact date of project completion is unknown at this time; however, Contra Costa County's long range traffic forecast model uses Year 2025 as its horizon year; therefore this study uses Year 2025 as the future year of analysis.

Trip Generation

Trip generation for the expansion of Casino San Pablo is based upon rates published in an article of the May 2002 issue of the ITE Journal. The article provides a trip generation rate for casinos based upon its number of gaming positions. A study prepared by Parsons Brinckerhoff titled, *Proposition 68 Traffic Impact Analysis*, also uses these published rates. Table 1 below outlines the trip generation rate as specified by ITE, and the trips for the expansion of Casino San Pablo for both scenarios.

Table 1 – Trip Generation

Land Use	AM Peak Hour			PM Peak Hour		
Casino	Total	In (57%)	Out (43%)	Total	In (52%)	Out (48%)
Trips/Gaming Position	0.470	0.2679	0.2021	0.788	0.40976	0.37824
2,500 Gaming Positions	**1175**	**670**	**505**	**1970**	**1024**	**946**
5,000 Gaming Positions	**2350**	**1340**	**1011**	**3940**	**2049**	**1891**

An expansion of 2,500 new gaming machines at Casino San Pablo is forecast to generate 1,175 trips in the AM peak hour, and 1,970 trips in the PM peak hour. The expansion of 5,000 additional gaming machines is forecast to generate 2,350 trips in the AM peak hour and 3,940 trips in the PM peak hour.

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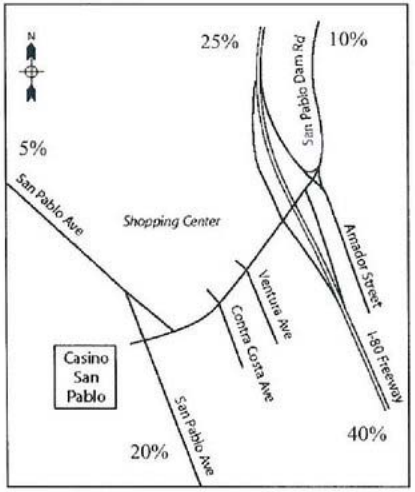
Trip Distribution

Casino San Pablo is anticipated to attract customers from the entire East Bay region and beyond. Therefore, a significant percentage of patrons are forecast to arrive on-site via the I-80 Freeway. Most are anticipated to use the San Pablo Dam Road ramps, while a portion might use San Pablo Avenue ramps, approximately one mile south of the project site. The Casino expansion will result in a considerable amount of traffic on I-80. However, the focus of this study is not traffic impacts on freeway segments. A small number of local customers currently access the Casino from San Pablo Avenue. It is assumed that this number will not increase significantly. An estimated 10% of project traffic will come from the Orinda/ Walnut Creek area via San Pablo Dam Road. Trip distribution forecasted for this study is shown in Figure 1.

Figure 1 – Trip Distribution



Existing Conditions

Existing turning movement volumes were collected in the AM and PM peak periods at all signalized intersections along San Pablo Dam Road between the main entrance of the Casino and I-80 Freeway ramps. Existing volumes were collected on Wednesday, October 27, 2004, by Baymetrics Traffic Resources, of El Cerrito, CA. These volumes were used for the existing conditions analyses.

Future Conditions (Year 2025)

Future traffic turning movement volumes were derived from model forecasts provided by the Contra Costa Transportation Authority. Existing traffic volumes were compared with Year 2000 Validation Model Runs to derive Model Calibration Correction (MCC) Volumes. Year 2000 volumes were used without adjustment to 2004 because regional land use and economic character have remained relatively unchanged since 2000. The MCC Volumes were added to

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2025 Model Output Volumes to generate Adjusted Model Output volumes. Adjusted output link volumes and existing turning movement volumes were used to calculate 2025 turning movement volumes by the Furness Method, as described in Contra Costa Transportation Authority's Technical Procedures manual. Where necessary, further manual adjustment and volume balancing were applied to ensure a reasonable forecast.

Three scenarios were analyzed in the Future Year (2025) condition: Without Project, and With 5,000 additional machines, and With 2,500 additional machines. A comparison between the analyses results of these scenarios would forecast the potential impact of the proposed casino expansion.

Analyses Results

Traffic performance was analyzed at six signalized locations. The analyzed locations represent the most probable ingress and egress route future and current casino patron use to the casino. The intersection of I-80 Eastbound off-ramp, San Pablo Dam Road, and Amador Street functions as one elongated intersection controlled by a single traffic signal controller in real life; the complex operation was simulated using Synchro signal timing analysis software to reflect the special signal phasing required to serve traffic movements. This intersection complex has been reported as separate intersections.

Tables 2 and 3 present the results of the 2,500 additional machine scenario analyzed. Tables 4 and 5 present forecast intersection performance for the 5,000 additional machine scenario.

Table 2 – Intersection Performance (2,500 Machines)
(AM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	15.6/B	0.577/A	129.0/F	1.171/G	172.4/F	1.412/H	43.4	0.214
Contra Costa Ave & San Pablo Dam Road	8.9/A	0.472/A	110.5/F	1.106/G	143.3/F	1.257/H	32.8	0.151
Town Center/Ventura & San Pablo Dam Road	10.1/B	0.524/A	113.6/F	1.178/G	133.1/F	1.296/H	19.5	0.118
I-80 WB Ramps & San Pablo Dam Road	17.6/B	1.104/F	207.4/F	2.906/H	213.1/F	2.984/H	5.7	0.078
I-80 EB Off Ramp & San Pablo Dam Road	27.0/C	0.544/A	221.6/F	1.063/F	229.0/F	1.166/G	7.4	0.103
Amador Street & I-80 EB On Ramp	37.1/D	0.937/E	249.3/F	1.824/H	251.2/F	1.899/H	1.9	0.075

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

In the existing AM peak hour, both ramps at San Pablo Dam Road currently operate at physical capacity limits of Level of Service E or F. Delays are within barely tolerable limits, and the ICU is approximately equal to 1.0, the physical limit to capacity. By 2025, all intersections are forecast to operate at Level of Service F. With the additional traffic anticipated from the expansion of the casino, all study intersections are forecast to experience severe congestion.

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Table 3 – Intersection Performance (2,500 Machines)
(PM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	37.1/D	0.827/D	136.4/F	1.191/G	198.6/F	1.595/H	62.2	0.404
Contra Costa Ave & San Pablo Dam Road	13.3/B	0.602/B	26.9/C	0.890/D	103.4/F	1.121/G	76.5	0.231
Town Center/Ventura & San Pablo Dam Road	14.4/B	0.726/C	36.5/D	0.965/E	131.2/F	1.195/G	94.7	0.23
I-80 WB Ramps & San Pablo Dam Road	19.7/B	0.988/E	119.4/F	1.942/H	156.9/F	2.116/H	37.5	0.174
I-80 EB Off Ramp & San Pablo Dam Road	22.0/C	0.688/B	116.9/F	0.735/C	175.1/F	0.834/D	58.2	0.099
Amador Street & I-80 EB On Ramp	21.6/C	0.955/E	166.4/F	1.526/H	198.4/F	1.659/H	32.0	0.133

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

In the 2,500-machine scenario, both AM and PM peak hours are forecast to experience severe congestion; although delay increases are not forecasted to be as substantial as the 5,000-machine scenario seen below. The intersection of San Pablo Dam Road and Town Center Avenue is forecast to experience to most significant increase in vehicle delay.

The ICU levels forecast are well above 1.0 and are as high as 3.2. A value of 3.2 can be interpreted to suggest that 3.2 intersections will be required where only one intersection is currently present. Delay values of 200 seconds or higher suggest that motorist will queue up excessively and wait for 4-6 green lights before finally getting through the intersection.

Table 4 – Intersection Performance (5,000 Machines)
(AM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	15.6/B	0.577/A	129.0/F	1.171/G	225.7/F	1.747/H	96.7	0.576
Contra Costa Ave & San Pablo Dam Road	8.9/A	0.472/A	110.5/F	1.106/G	170.6/F	1.408/H	60.1	0.302
Town Center/Ventura & San Pablo Dam Road	10.1/B	0.524/A	113.6/F	1.178/G	163.5/F	1.447/H	49.9	0.269
I-80 WB Ramps & San Pablo Dam Road	17.6/B	1.104/F	207.4/F	2.906/H	218.8/F	3.248/H	11.4	0.342
I-80 EB Off Ramp & San Pablo Dam Road	27.0/C	0.544/A	221.6/F	1.063/F	240.2/F	1.269/H	18.6	0.206
Amador Street & I-80 EB On Ramp	37.1/D	0.937/E	249.3/F	1.824/H	253.1/F	1.974/H	3.8	0.150

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

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Table 5 – Intersection Performance (5,000 Machines)
(PM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	37.1/D	0.827/D	136.4/F	1.191/G	262.2/F	2.043/H	125.8	0.852
Contra Costa Ave & San Pablo Dam Road	13.3/B	0.602/B	26.9/C	0.890/D	187.5/F	1.352/H	160.6	0.462
Town Center/Ventura & San Pablo Dam Road	14.4/B	0.726/C	36.5/D	0.965/E	214.4/F	1.426/H	177.9	0.461
I-80 WB Ramps & San Pablo Dam Road	19.7/B	0.988/E	119.4/F	1.942/H	189.6/F	2.541/H	70.2	0.599
I-80 EB Off Ramp & San Pablo Dam Road	22.0/C	0.688/B	116.9/F	0.735/C	211.1/F	0.963/E	94.2	0.228
Amador Street & I-80 EB On Ramp	21.6/C	0.955/E	166.4/F	1.526/H	215.4/F	1.793/H	49.0	0.267

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

The two freeway ramp intersections are operating at Level of Service E in the existing PM peak hour scenario. By 2025, the intersections of San Pablo Dam Road at San Pablo Avenue, and San Pablo Dam Road at Ventura Avenue are also forecast to operate at deficient levels. In the 2025 5000-machine scenario, all study intersections are forecast to experience extreme congestion.

J. Arnold Torma, PE
Principal Engineer

Letter: LC2.
Signatory: BikeSonoma.

Response to Comment LC2-1

Preference for Access Option 12b is noted.

Response to Comment LC2-2

Except for the bicycle lanes that will front Olompali State Historic Park, it is anticipated that the Class I bicycle lanes and frontage roads with Class II bicycle paths will be transferred to the Counties after project construction. Therefore, maintenance of the bicycle lanes will be under Marin and Sonoma Counties' purview.

Response to Comment LC2-3

Proposed Class I bicycle path in Segment B will be accessible 24 hours a day. However, lighting for the Class I bicycle path is currently not planned for and is not included in the FEIR/S.

Response to Comment LC2-4

Preference for construction of the Class I bicycle path at San Antonio Creek has been noted and will be considered during the project design phase. Caltrans and FHWA are addressing the drainage issues as part of the entire project, including San Antonio Creek.

Response to Comment LC2-5

Narrow traffic lanes for the frontage roads were considered but rejected. Twelve-foot lanes conform to county standards and provide a safer facility than 10.5-foot lanes. The proposed Class II bike lane widths are 5 feet in Marin County and 6 feet in Sonoma County.

BikeSonoma
PROMOTING BICYCLING FOR TRANSPORTATION & RECREATION
SONOMA COUNTY BICYCLE COALITION

PO Box 3088
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95402-3088
707-545-0153
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California Department of Transportation
Attention: Melanie Brent
Office of Environmental Analysis
P.O. Box 23660, Mail Station 6D
Oakland CA 94623

December 14, 2007

Re: Comments on Marin-Sonoma Narrows HOV Widening Project DEIR/DEIS

Dear Ms. Brent:

The Sonoma County Bicycle Coalition (SCBC) is a membership based organization with over 850 dues paying members. We thank you for this opportunity to voice our concerns regarding bicycle access through the Marin-Sonoma Narrows.

We believe Access Option 12b provides the safest and most direct route for bicyclists along Segment B of this project. The SCBC has a few concerns that we would like to see addressed in the project: LC2-1

- Maintance issues along the Class II bicycle lanes as well as the Class I bicycle paths must be considered and regular maintance by Caltrans and should be included in the regular maintance of the highway. LC2-2
- This corridor is the only reasonable access for bicyclists and pedestrians going to and from Petaluma and Novato. It is necessary that the Class I paths have 24 hour access and be lighted at night. LC2-3
- The Class I path at San Antonio Creek should be constructed to avoid flooding as bicyclists need access during all weather and conditions. LC2-4
- We ask that you reduce the frontage road widths to 10.5 feet or 11 feet and design the bicycle lanes to be five or six feet wide. Narrower travel lanes have shown to reduce vehicle speed. LC2-5

The SCBC supports the Marin County Bicycle Coalition's (MCBC) Proposed Modified Access for Option 12b. MCBC notes that a good portion of Access Option 12b contains a separated Class I pathway between discontinuous frontage roads. They suggest that this Class I pathway begin at the intersection of the Birkenstock warehouse and continue to the intersection of Olompali State Park, currently shown as a Class II bike lane facility. The Class I pathway in Option 12b currently exists between Olompali State Park to the Redwood Landfill overcrossing. LC2-6

At this point, the Class I path could then be separated from the frontage road between the Redwood Landfill overcrossing to the intersection of San Antonio Road (also currently shown as a Class II facility) and San Antonio Creek where the current proposal shows a Class I path along San Antonio Creek. They propose that this pathway be on the west side of the frontage road, so as to separate bicyclists and pedestrians from crossing vehicles. LC2-7

Response to Comment LC2-6

Working with our local partners, Marin County and regulatory agencies, Caltrans and FHWA will consider these and other suggestions for a modified Access Option 12b during the project design phase. Further modifications will also be discussed at public meetings with the Policy Advisory Group.

Response to Comment LC2-7

Please see the response to Comment LC2-6.

Letter - LC2

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Response to Comment LC2-8

Please see the response to Comment LC2-6.

Response to Comment LC2-9

Please see the response to Comment LC2-6.

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MCBC believes this proposed modification to Access Option 12b will remove cyclists from a significant portion of the motor vehicle roadway along the route to the Redwood Landfill thereby further reducing potential conflicts and increasing bicyclist and pedestrian comfort and safety. We support MCBC in their ask of Caltrans to analyze this modified proposal for public access as a modified version of 12b. LC2-8

MCBC has noted that the maps provided on Volume two of the DEIR/DEIS appear to show sufficient right of way to achieve this modified Access Option. SCBC requests that this modification for option 12b be studied and included in the project as it moves forward. LC2-9

Thank you again for this opportunity to address our concerns. We look forward to helping Caltrans transform Sonoma County into a bicycle friendly area. Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Christine Culver
Executive Director

Letter: LC3.
Signatory: Sustainable Novato.

Response to Comment LC3-1

Thank you for your comments. Sustainable Novato's concurrence with the comments submitted by the Marin Conservation League and the Marin Sierra Club is acknowledged.

Response to Comment LC3-2

Your preferences are noted. Access Option 12b has been identified as the Preferred Alternative. Please see the Preferred Alternative discussion in Chapter 2 in Volume 1 of this FEIR/S.

Response to Comment LC3-3

Please refer to the Master Response on Greenhouse Gas Emissions.

Response to Comment LC3-4

Please refer to the Master Responses for Greenhouse Gas Emissions and Induced Travel.

SUSTAINABLE NOVATO'S COMMENT ON NOVATO NARROWS DEIS

Caltrans
Attn: Melanie Brent
Office of Environmental Analysis
P.O. Box 23660, Mail Station 6D
Oakland, CA 94623

REF: Marin-Sonoma Narrows HOV Widening Project DEIR/DEIS

Dear Ms. Brent:

Sustainable Novato welcomes the chance to comment on this DEIR/DEIS. Sustainable Novato is a non-profit organization of citizens in Greater Novato (affiliated with Sustainable Marin) dedicated to creating a greener, healthier Novato. We reside in a community that will be directly impacted by however the Novato Narrows project is designed and constructed and we all have a direct, personal interest in seeing that Caltrans and associated agencies make the right decisions.

LC3-1
LC3-2

1. No Build or Option 12B. Sustainable Novato associates itself in general with the comments previously submitted by the Marin Conservation League (MCL) and Marin Group Sierra Club. We believe the comments by these two groups contain many excellent recommendations that Caltrans and project agencies would do well to consider seriously and adopt. We believe the "No Build" option is viable IF it were adequately shaped to include a continuous rapid transit bus lane/HOV the length of the subject freeway (see below) by conversion of an existing lane. Of the other options, only 12B is acceptable (see below). Choice of 12B allows for continued farm access, widening, improved safety features, and improved access to the Monte Mar Marina and Olompali State Historical Park, destinations that fit in with expanding Novato's eco-tourist economy.

LC3-3
LC3-4

2. Energy/Climate. The weakest element in the DEIR is energy consumption. There seems to be no protocol on air pollution or carbon emissions. In our view, no public works project should go forward in an era increasingly threatened by climate disruption without the most meticulous and thorough analysis of energy and climate impacts and real alternatives. Old protocols and outdated assumptions for such projects must give way to new ones. Energy and climate considerations must move front and center. Sustainable Novato recommends close heed be paid to Marin Conservation League's submission on "Energy and Greenhouse Emissions". The EIR should state emissions savings (or cost) against transit alternatives. We need to know the net greenhouse gas impact of building this new road. We believe it is important for the EIR to capture the data on the effect of vehicle miles traveled, air quality and carbon emissions for all

Letter - LC3

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LC3-4 alternatives so decision makers can begin their thinking with these elements foremost in mind. Now is the time to start encouraging officials to make decisions based on long-term impact on sustainability, not short-term attempts at congestion relief. Options such as congestion pricing, investment in transit, transit-oriented development and walkable communities, better land use planning, employee transportation, demand management programs all must be considered in this new world of climate change.

LC3-5

3. Rural Setting, Landscape Impacts. Another prime consideration must be preservation of the mostly rural setting and visual landscape through which the project winds. This means adopting NOT a "Cadillac" of superhighways with all the bells and whistles but rather a version that uses all the design exceptions Caltrans has at its disposal -- smaller footprint, narrower shoulders, less obtrusive configurations -- to keep impact at a minimum consistent with traffic safety. Reforestation and landscape regeneration along the highway must be built into the project design. We recommend, specifically, replanting oak trees and other native canopy trees wherever possible and appropriate, with a total ratio of 5:1 to those removed, damaged or destroyed in the process of construction. Oak saplings, free from the National Park Service, can be clustered between the bicycle pathway and the freeway. This can not only improve visuals but also air quality. We also recommend the use of retaining walls and smart design alternatives instead of orthodoxly deep cuts wherever possible to save existing oaks that otherwise would be lost to normal grading along the route. New trees should be irrigated at least for three years. Large-scale reforestation and restoration or the original oak woodlands that once covered most of the area is consistent with the state's increasing focus on carbon reduction and carbon sinks. The DEIS's assumption that "grazing lands" and dairy farms are less worthy than "prime farmland" for preservation is not well-founded and should be redrafted and corrected.

LC3-6

LC3-7

LC3-8

LC3-9

4. 12B Optimum. Sustainable Novato considers Option 12B is the least damaging of the options put forth. This option is optimum in respect to handling the South San Antonio crossing problem. Preservation of oaks threatened by this option could be achieved by replanting or retaining walls (see above). There should be no new San Antonio Creek interchange. The huge diamond interchange there in several alternatives would be, on its face, calculated to induce growth. Please see Marin Group Sierra Club's comments on this, particularly the way the Evaluation Criteria Matrix under-weights visual aesthetics and potential growth inducement. Sustainable Novato is concerned that induced or unplanned growth not be allowed by configuration of this or other intersections in other options, and that the growth consequences of unwise intersection placement and design be fully, adequately and realistically quantified, considered and ultimately avoided. Novato's hopes for an enhanced eco-tourist economy would be severely impaired by growth inducement in this rural landscape.

LC3-10

LC3-11

LC3-12

LC3-13

Response to Comment LC3-5

Please refer to the Master Response on Greenhouse Gas Emissions.

Response to Comment LC3-6

The project footprint was reduced to the maximum extent practicable while still meeting the project's need and purpose. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's need and purpose.

Reforestation and revegetation of all disturbed areas of native vegetation in the Narrows, in-kind with native species at a 5 to 1 ratio, is called for in both this FEIR/S (see Section 3.1.11.4 in Volume 1) and in the Visual Impacts Assessment (VIA) (pp. 144-145, and pp. 148 - 152). These measures are also expanded upon in the appendices of the VIA (pp. 148 - 152). In addition to general revegetation measures for the Narrows as a whole, site-specific revegetation treatments are described in the mitigation measures of the VIA to minimize visual change to the rural setting and address potential location- or condition-specific impacts to the existing landscape. All of the mitigation measures described in the FEIR/S and VIA would be implemented during project construction.

Response to Comment LC3-7

Caltrans is in the process of finalizing the mitigation for impacts to oak woodland in close coordination with CDFG.

Response to Comment LC3-8

The project footprint was reduced to the maximum extent practicable while still meeting the project's need and purpose. Retaining wall systems have been utilized where feasible. An alternative featuring additional

design exceptions was considered but rejected as it does not meet the project's need and purpose.

Response to Comment LC3-9

Prime farmland does not differentiate between actual uses of the farmland. It refers to land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, without intolerable soil erosion, as determined by the Secretary of Agriculture. Dairy farms are considered agricultural use. Only properties directly affected by the project were discussed. Only five of those properties were under Williamson Act contracts. Comment regarding Alternative 12b is noted. Because access already exists at San Antonio Road, however, there is no difference in the growth inducement potential of the alternatives. None is expected to induce growth. If access were the prime issue in growth inducement, the San Antonio Road area would already be subject to runaway growth due to its existing access.

Response to Comment LC3-10

Your support for Access Option 12b is noted. This option was identified as the Preferred Alternative. Please see the Preferred Alternative discussion in Volume 1, Chapter 2 of this FEIR/S.

Response to Comment LC3-11

Regarding preservation of oaks, please see the responses to Comments LC3-7 and LC3-8 above.

Response to Comment LC3-12

See the responses to Comments I50-4 and I50-5 in Section 3.6 regarding the expected effect of the proposed San Antonio interchange.

Response to Comment LC3-13

An alternative featuring non-standard mainline and frontage shoulder widths was considered but rejected as it does not meet the project's need and purpose. Impacts associated with this rejected alternative were not evaluated.

Letter - LC3

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LC3-13 Limiting access roads to a single, separated two-way pathway with reduced shoulders should be evaluated (there is no obvious need for the standard "big footprint" road).

LC3-14 **5. Scenic Highway.** Sustainable Novato believes the DEIS should explore "Scenic Highway" designation for this project and outline in detail what would need to be done to achieve that designation.

LC3-15 **6. Floods, Streambed.** Impacts of 200-year floods on portions of the highway -- not an unlikely prospect considering the impacts of coming global warming and extreme weather events -- should be evaluated and mitigation measures discussed. What are the impacts on San Antonio Creek and its stream valley ecosystem of major earth moving and construction and the physical and biological changes this will set in motion? What are the available means to mitigate these impacts?

LC3-16 **7. Study Other Impacts.** Sustainable Novato recommends the EIR evaluates other transit alternatives to construction of the Novato Narrows expansion in terms of affect on emissions, congestion, vehicle miles traveled and air quality as well as cost.

LC3-17 **8. Study Other Alternatives.** Sustainable Novato recommends the EIR evaluates other transit alternatives to construction of the Novato Narrows expansion in terms of affect on emissions, congestion, vehicle miles traveled and air quality as well as cost. Some examples of alternative transit projects might include an analysis and quantification of the costs and benefits of a guaranteed right-of-way Bus Rapid Transit Corridor from Santa Rosa to San Francisco, including raised platforms, turnstile toll collection, "minutes until arrival" signs, renewably powered, and bike friendly. The EIR needs to seriously scope the alternative of a reversible HOV/rapid transit lane down the center thus creating two added lanes of mixed flow southbound in the morning and northbound in the afternoon. It should also evaluate providing streetcar service for West and Southern Marin to link up to the SMART Rail and Trail corridor which may be approved prior to the completion of this project analysis, along with possible electrification of the rail system. Ditto for Skytrans BRT alternatives.

LC3-18 **9. General Growth.** Some more general observations: Study after study shows that highway expansion, even with car pool lanes, doesn't solve congestion. The level of traffic always rises to fill capacity within a few short years. Therefore, the EIS should state the level of service and congestion forecasted for five and ten years after project completion. The EIS is the place to set forth the effects of increased latent demand, induced growth (urban sprawl) and the increase in average miles driven owing to the incentive of more capacity. The evidence should be stated that highway expansion generally has an overall

Response to Comment LC3-14

Please refer to the response to Comment LC8-28.

Response to Comment LC3-15

The one-percent risk of exceedance (100-year) storm or flood is the design standard used to evaluate potential impacts from this project. Impacts to the physical and biological resources from the project are discussed in Sections 3.2, Physical Environment, and 3.3, Biological Environment, in Volume 1 of this FEIR/S.

Response to Comment LC3-16

Please refer to the Master Response for Greenhouse Gas Emissions.

Response to Comment LC3-17

Please see the Master Response on Range of Alternatives.

Response to Comment LC3-18

Please see the Master Response for Induced Travel. A 20-year traffic forecast was performed to predict future traffic. A 5- or 10-year forecast would of course be intermediate between present traffic and projected 20-year traffic. The traffic will most likely immediately increase once the project is completed and people begin taking advantage of it, so the commenter is likely correct that the growth in traffic will not be linear between the opening of the project and the design year. However, the design year is still an appropriate time to compare the alternatives.

For the comments on global warming, please refer to the Master Response for Greenhouse Gas Emissions.

Letter - LC3

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Response to Comment LC3-19

Please refer to the Master Response on Greenhouse Gas Emissions.

negative effect on air quality. The Urban Land Institute, for example, finds that projected growth in automobile use associated with sprawl will overwhelm efficiency gains, making it impossible to hit the goal of reducing global warming pollution by 80 percent by 2050, the accepted minimum objective. See, for example, http://www.sightline.org/daily_score/archive/2007/10/04/lanes-and-ghgs. LC3-18

10. **Conclusions.** Sustainable Novato strongly urges Caltrans and associated agencies to review this project against the background of global warming and the prime imperative to stop incentivizing people to use their cars. This prime imperative requires the EIR to consider other project alternatives (including "no build" conversion of existing lanes to HOV and rapid bus transit) in terms of air quality and emission impacts. We urge that protocols necessary to do that analysis be created. LC3-19

/s/ Leadership Team, Sustainable Novato
December 11, 2007
Novato, California

Contact: Edward A. Mainland, Secretary, 4150-902-6365.
www.sustainablenovato.org

CC: Dianne Steinhauser, TAM Board

Letter: LC4.
Signatory: Marin County Bicycle Coalition.

Response to Comment LC4-1

Your preference for Fixed HOV Access Option 12b is noted. This alternative has been identified as the Preferred Alternative.

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December 14, 2007

California Department of Transportation
Attention: Melanie Brent
Office of Environmental Analysis
P.O. Box 23660, Mail Station 6D
Oakland CA 94623

Re: Comments on Marin-Sonoma Narrows HOV Widening Project DEIR/DEIS

Dear Ms. Brent:

I'm writing on behalf of the Marin County Bicycle Coalition (MCBC), an organization with 1,400 dues-paying members, to present you with our comments on the Marin-Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS).

Our comments focus on the four alternatives presented in the DEIR/DEIS for Segment B. For each of the four alternatives, we reviewed the following considerations that relate to bicycle access along this segment of the project:

- Continuity for bicyclists along each of the proposed alternatives
- Number of potential conflict points with automobiles within each alternative
- Estimated traffic type and patterns on portions of each segment where bicyclists will share the road with other users
- Fixed versus reversible HOV lane configuration impact on bicyclists
- Connections to the planned SMART pathways north and south of this project area
- Overall impact on land use

The MCBC's analysis of the four alternatives resulted in **our support of Access Option 12b with some modifications** as it provides the safest and most direct route for bicyclists along Segment B of this project. Our reasoning is explained below.

Continuity, Safety, and Potential Points of Conflict

All options provide continuous access for bicyclists. Access Options 4b, 14b and 14d all contain an added interchange, which crosses the proposed bicycle paths. The interchange is designed to quickly move traffic in and out of the Redwood Landfill, whereas in Access Option 12b, traffic to the Redwood Landfill must use San Antonio Road. We feel that Access Options 4b, 14b, and 14d will pose an increased risk to cyclists due to larger blind spots inherent in larger industrial vehicles when making turns, and a potential drop in attention on the vehicle operator's part in an area where they only expect to see other industrial traffic. The new interchange in Access Options 4b, 14b, and 14d contains four new conflict points – two on each side of the interchange where traffic is entering or exiting the freeway, and we feel that this will severely degrade safety for bicyclists. LC4-1

Promoting Safe Bicycling for Everyday Transportation and Recreation

Letter - LC4

Page 2

Response to Comment LC4-2

Preference for Option 12b is noted. There's a trade-off between safety and land use impact; while reducing lane width would lessen impacts to land use, safety hazards would increase for bicycle riders on frontage roads without safe clearance for trucks and bicycles to coexist as well as for trucks meeting on narrow lanes.

Response to Comment LC4-3

Preference for Access Option 12b is noted.

Response to Comment LC4-4

Preference for a modified Access Option 12b will be considered by Caltrans on its final selection and refinement of bicycle path alternatives and options.

Fixed versus Reversible HOV Lanes

MCBC has reviewed all eight Access Options (each pair of fixed or reversible HOV lane options for Access Options 4b, 12b, 14b, and 14d). We could not find any differences on the impact of bicycle access and safety regardless of the type of HOV lane in use. Therefore, MCBC does not have a preference for the type of HOV lane used in our preferred Access Option 12b.

Land Use and Environment

The added interchange in Access Options 4b, 14b, and 14d will have a significant impact on the land that will be modified as part of this project, as well as adding significantly to project costs. Except for the no-build alternative, Access Option 12b appears to have the least significant impacts on land use. Further, narrowing travel lanes along frontage roads to a width less than 12 feet will reduce the potential impact on the environment and land use. LC4-2

MCBC Preferred Access Option

After careful analysis, MCBC feels that Access Option 12b provides the safest and most direct route for bicyclists along Segment B of this project. The facilities for bicyclists in this segment and option are almost exclusively Class I (traffic-separated paths) or Class II (on-street bike lanes), situated primarily on the west side of the project between Redwood Road and the San Antonio Road/San Antonio Creek crossing. Between the San Antonio Road/San Antonio Creek crossing, Class II bike lanes run along both sides of the project until the South Petaluma Boulevard overcrossing. This option aligns with the proposed SMART stations and access points. We wish to reiterate the following: LC4-3

- Option 12b provides the least number of potential conflict points as it is the only option which does not have an additional interchange proximal to the Redwood Landfill.
- Option 12b would benefit from 10.5 to 11-foot motor vehicle lane width on frontage roads where Class II facilities are present, as narrower lanes typically reduce vehicle speed that is critical to the safety of cyclists sharing the road facility.
- Option 12b would have the least amount of impact on the environment and cost less to build than other options.

MCBC Proposed Modified Access for Option 12b

MCBC feels that while Access Option 12b is the best of the currently proposed Access Options in the DEIR/DEIS, there is an even safer alternative that can be achieved by modifying the existing Access Option 12b. A good portion of Access Option 12b contains a separated Class I pathway between discontinuous frontage roads. MCBC suggests that this Class I pathway begin at the intersection of the Birkenstock warehouse and continue to the intersection of Olompali State Park, currently shown as a Class II bike lane facility. The Class I pathway in Option 12b currently exists between Olompali State Park to the Redwood Landfill overcrossing. At this point, a Class I path could then be added next to the proposed frontage road between the Redwood Landfill overcrossing to the intersection of San Antonio Road (currently shown as a Class II facility) and San Antonio Creek where the current proposal shows a Class I path along San Antonio Creek. We propose that this pathway be on the west side of the frontage road, so as to separate bicyclists and pedestrians from crossing vehicles. LC4-4

This proposed modification to Access Option 12b will remove cyclists from a significant portion of the motor vehicle roadway along the route to the Redwood Landfill thereby further reducing potential conflicts and increasing bicyclist and pedestrian comfort and safety. We

Letter - LC4

Page 3

ask for Caltrans to please analyze this modified proposal for public access as a modified version of 12b.

The maps provided on Volume two of the DEIR/DEIS appear to show sufficient right of way to achieve this modification to Access Option 12b. MCBC requests that this modification for Access Option 12b be studied and included in the project as it moves forward. LC4-4

We hope that you will find our comments both informative and useful. We look forward to working with Caltrans to ensure safe and accessible access for bicyclists.

Please do not hesitate to contact me if you have any questions or comments.

Regards,

David Hoffman, Director of Planning
Marin County Bicycle Coalition
(415) 456-3469 x4#
david@marinbike.org

cc: Supervisor Steve Kinsey, Chairman, Transportation Authority of Marin
Dianne Steinhauser, Executive Director, Transportation Authority of Marin
Congresswoman Lynn Woolsey
Senator Carole Migden
Assemblymember Jared Huffman
Patrick Seidler, Transportation Alternatives for Marin
Karen Nygren, Marin Conservation League
Christine Culver, Sonoma County Bicycle Coalition

Letter: LC5.
Signatory: North Coast Rivers Alliance.

NORTH COAST RIVERS ALLIANCE
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December 14, 2007

Melanie Brent
Office Chief
Division of Environmental Planning and Engineering
Department of Transportation
P.O. Box 23660 Oakland, CA 94623-0600

RE: Comments to the Cal Trans Draft EIR/EIS for the Proposed Marin-Sonoma Narrows HOV Widening Project

FROM: The North Coast Rivers Alliance

Dear Ms. Brent,

LC5-1 Please accept these comments from the North Coast Rivers Alliance concerning the Project's growth inducing impact on Marin County, the adverse impact on the Russian and Eel Rivers' threatened and endangered species due the North Marin Intertie/Pipeline relocation and expansion, the impact of the Project on the Central California Coast Steelhead and Chinook Salmon and California Red Legged Frog in San Antonio Creek, the growth inducing impact on Petaluma as a result of the increase in capacity of the pipeline in Sonoma County to and from Kastania Tank, etc..

LC5-2 Section 3.1.7 Utilities/Emergency Services, 3.1.7.1 Affected Environment and 3.1.7.2 Impacts. Utilities. The Draft EIR/EIS does not state the size of the current and proposed intertie, the source of water in the intertie and where in Marin it is distributed. Since Cal Trans and the M/S Narrows Project would be directly responsible for the relocation and the proposed upsizing by up to 74%, the Draft EIR/EIS must address all of the Project's impacts on Marin, Sonoma and Mendocino Counties' water resources.

LC5-3 According to the North Marin Water District and as a result of the meeting on November 21, 2007 with the affected parties, Cal Trans, NMWD and SCWA, Cal Trans advised "they will reimburse the NMWD for most, if not all pipeline relocation costs resulting from their project". The Draft EIR/EIS must be specific and address the impacts of relocation, including cost analysis and cost sharing of intertie improvements.

LC5-4 The Draft EIR/EIS should state under the No Build Alternative that no pipeline relocation or expansion would be necessary.

(1)

Response to Comment LC5-1

See the responses to Comments I50-4 and I50-5 concerning growth impacts in Marin County. The growth study summarized in Section 3.1.4, Growth, in Vol. 1 of this FEIR/S found that the build alternatives would increase growth pressures slightly in Petaluma. However, given the land use controls and the existing level of growth pressures, such a slight increase in growth pressure was judged unlikely to have an important effect on actual residential growth. The Petaluma planning representative on the expert panel agreed with the conclusions of the study and saw the proposed project as an operational improvement rather than a major capacity improvement, adding that the land use controls and the politics that control land use will not change due to the proposed project.

See the responses to Comment FA2-16 concerning the impact of the project to Central California coast steelhead and Chinook salmon, and Comment LC5-5 concerning impacts to California red-legged frog.

Response to Comment LC5-2

It is customary for Caltrans to enter into agreements with utility companies concerning relocations due to project construction. The environmental impacts associated with the areas, including right-of-way where the utilities will be relocated, are encompassed in this FEIR/S, which is undergoing CEQA review. Additional CEQA review may be required by the California Public Utilities Commission as part of their approval process for the relocations. It is Caltrans' policy to reimburse utilities for in-kind replacement of their facilities. Upgrades and improvements are a separate action by the utility companies.

Response to Comment LC5-3

Please see the response to Comment LC5-2 above.

Response to Comment LC5-4

While it is true that pipeline will have to be relocated as part of the MSN Project, upgrades or expansions are a separate action.

Letter - LC5

Page 2

NORTH COAST RIVERS ALLIANCE
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LC5-5
LC5-6 Section 3.3.6 Threatened and Endangered Species and 3.3.6.3 Impacts. The California Red Legged Frog, Central California Coast Steelhead (CCCS) and Chinook Salmon issues/findings need documentation and specificity and the Draft EIR/EIS does not sufficiently address the quality of the existing habitat and restoration efforts outside of the Project area but potentially impacted by the Project. The cumulative impacts on the species are not addressed.

LC5-7 The significant filling of the wetlands and floodplain of the San Antonio Creek , an area that currently records major flooding actually closing Highway 101 at the County line on a regular basis, must be defined and include the actual number of yards of fill the Project will require in and around San Antonio Road.

LC5-8 The Draft EIR/EIS states on page 3.3-39 that potential impacts would be limited to Novato Creek, San Antonio Creek, Lynch Creek and the Petaluma River and could impact the CCCS and Chinook Salmon. Those are the only four anadromous fishery waterways within the Project area and all four may be adversely impacted by the Project but it is impossible to determine impacts with such sketchy information reported in the Draft EIR/EIS.

Thank you for the opportunity to comment on the Draft EIR/EIS,

Frank Egger, for the North Coast Rivers Alliance

(2)

Response to Comment LC5-5

More detailed information regarding impacts to species with designated Essential Fish Habitat and federally listed species is provided in the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) Biological Opinions for the project. These documents have been submitted to the appropriate agencies. These documents comply with Section 7 of the Endangered Species Act.

Response to Comment LC5-6

Chapter 5 in Volume 1 of this FEIR/S includes a discussion on cumulative impacts. Additionally, cumulative impacts on federally listed species are discussed in the USFWS and NMFS Biological Opinions.

Response to Comment LC5-7

Earthwork quantities (extents of which are typically reported in alignment Station Limits) will be calculated in the project's design phase and will be reported on the Quantity Sheets within the Plan Set. Quantities are also reported on some environmental permits.

Response to Comment LC5-8

For more detailed discussion of effects of the project on CCCS and fall-run Central Valley Chinook salmon, see the USFWS and NMFS Biological Opinions in Appendices N and O, respectively, in the Appendices volume.

Letter: LC7.
Signatory: Petaluma Area Chamber of Commerce.

Response to Comment LC7-1

The number of homes that would benefit is defined in the Caltrans *Traffic Noise Analysis Protocol* as those that would receive a reduction of at least 5 A-weighted decibels (dBA) from the predicted noise levels. It is understood, however, that many more homes would receive a benefit, though not as much as 5 dBA. The reasonable allowance for the soundwall in question has been updated to 2007 construction costs and a comparison of costs has determined that the wall would be cost-effective. It should be noted that cost-effectiveness is only one factor that must be considered in the final decision and is not intended to be used by itself to guarantee or eliminate any particular wall.

Support of all the soundwalls within the limits of the City of Petaluma by the Petaluma Chamber of Commerce has been noted and will be taken into consideration in making our final decision. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment LC7-2

The proposed South Petaluma Blvd. interchange configuration should be able to accommodate more future traffic than the existing configuration.

PETALUMA AREA
CHAMBER OF COMMERCE

The Petaluma Area Chamber of Commerce is an association of businesses and professions working together with a commitment to support and improve a healthy business community in order to enhance the quality of life in the greater Petaluma area.

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December 10, 2007

Ms. Melanie Brent, Office Chief
Division of Environmental Planning & Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612

Re.: Comments on Marin-Sonoma Narrows DEIS/R

Dear Ms. Brent:

The Petaluma Area Chamber of Commerce has reviewed the draft Environmental Impact Statement / Environmental Impact Report for the Marin-Sonoma Narrows HOV Widening Project. Our overall comment on the draft EIS/R is that it is incredibly thorough and, for the most part, explores the alternatives in exhaustive detail. We do offer the following specific comments:

1. Soundwalls to Shield Residences in Petaluma. We note that the DEIR/S describes several potential soundwalls to shield existing residences adjacent to the freeway in Petaluma. DEIS/R at pp. 3.2-104 – 3.2-105. We believe that all of these soundwalls are essential and should be constructed as part of the project. We are concerned that the DEIS/R substantially understates the benefits to be achieved by these soundwalls. For instance, the soundwall on the west side of 101 immediately north of East Washington is estimated to benefit "approximately 34 homes." DEIS/R at 3.2-105 at line 2345. This grossly underestimates the number of homes that would benefit because it appears to only include those homes on Arlington Drive that directly abut 101. In fact, at a minimum the homes on both sides of Arlington Drive would benefit and should be so counted. This understatement is important because it directly impacts the calculation of the "reasonable allowance" for these soundwalls; in the case of the wall mentioned above, that figure is $1,428,000, which is far below any reasonable estimate of the likely cost of that wall, leaving a substantial shortfall in funding. We mention that particular soundwall only as an example; the same comment extends to each of the other proposed soundwall locations in Petaluma as well. LC7-1

2. Petaluma Blvd. South Interchange Configuration. We are disappointed that the only proposed configuration for the new Petaluma Blvd. South interchange is considerably less user-friendly than the configuration that currently exists. This will not be received warmly by citizens in Petaluma, once they realize what is being proposed. In particular, southbound traffic LC7-2

1

Letter - LC7

Page 2

along Petaluma Blvd. South will apparently have to get through two signalized intersections before entering the freeway, whereas now they do not have to pass through any signalized intersections. We strongly encourage Caltrans to consider a more user-friendly alternative. LC7-2

3. Elevation of Freeway Immediately South of Petaluma River Bridge. We understand that the freeway immediately south of the Petaluma River Bridge is expected to be raised in height by up to 30 feet, in order to address the existing vertical sight line deficiency. This segment adjoins a site where a subdivision has been approved, but not yet constructed. Raising the elevation of 101 here will bring it close to the level of the new homes, which are likely to be constructed before the highway is, raising the potential need for additional soundwalls. We would like to recommend, as an alternative, adding some curvature to the upper portion of the Petaluma River Bridge to eliminate or reduce the need for raising the elevation of the freeway so dramatically. LC7-3

4. Rohnert Park Casino. We understand that the traffic modeling contained in the DEIS/R did not include the impacts of the proposed Graton Rancheria casino in Rohnert Park. The traffic generation for that project has been separately estimated in its DEIS at 18,000 vehicle trips per day, many of which would use the 101 corridor. As Assemblymember Huffman points out in his comments, an estimate of 68,000 vehicle trips per day may be more reasonable. The impact of the proposed casino should be assessed. See *San Franciscans for Reasonable Growth v. City and County of San Francisco*,151 Cal.App.3d 61, 73-75 (1984) (cumulative impacts to be reviewed in EIR include impacts of public and private projects under environmental review, even if their ultimate construction is uncertain). Inclusion of that potential project's traffic into the analysis for the Marin Sonoma Narrows would likely merely worsen expected traffic flow for all scenarios and thereby underscore the urgency of completing this project as soon as possible. However, it would also highlight the degree to which the casino would degrade the traffic improvements expected from the Marin Sonoma Narrows project. Accordingly, we support additional model runs including the casino, at both the 18,000 and 68,000 vehicle trip levels, to test the sensitivity of the traffic modeling results. LC7-4

5. San Antonio Interchange Alternatives. Many of the emergency responders who service the San Antonio Road corridor approach it from the north. Of the four access options presented in the DEIS/R, three include a new interchange at San Antonio Road providing access to that corridor. One alternative, labeled access option 12b, does not include an interchange there and would require traffic from Petaluma trying to access San Antonio Road to travel to the Redwood Landfill Road interchange and then double back on a new access LC7-5

2

Response to Comment LC7-3

The proposed vertical alignment south of the Petaluma River Bridge improves existing stopping sight distance to meet current standards. Existing geometry north of the Petaluma River Bridge and U.S. Coast Guard vertical clearance requirements control the vertical profile of the Petaluma River Bridge, and it is not feasible to lower the profile south of the structure while meeting stopping sight distance standards.

Response to Comment LC7-4

Based on the casino project's draft environmental document, the additional demand will total around 18,000 vehicle trips per day. We agree with this estimate and feel that an estimate of 68,000 vehicle trips per day is unsubstantiated. When factoring the additional vehicle trips, we have to take into account certain aspects of this additional traffic: 1) the vehicle trips are spread over a 24-hour long period with only a fraction traveling in one particular direction at any given time; 2) the casino peak hour occurs at a different time- usually later - than the commuter peak hour; and 3) the additional vehicle trips will be spread out throughout the entire casino study area, not just specifically at the project site.

The information from the casino project's Final Traffic Impact Study (Sept. 2007) indicates that the casino would generate a ten percent increase in Average Daily Traffic (ADT) north of Old Redwood Hwy intersection. Therefore, the additional vehicle trips per day will not add an overwhelming amount of traffic to the project area, and the MSN Project would remain an effective way to relieve the congestion currently experienced at this location on Highway 101.

Response to Comment LC7-5

Your preference for options other than Access Option 12b is noted; however, this is the access option that Caltrans and FHWA have identified

as the Preferred Alternative. The identification of Access Option 12b was based upon a variety of factors, as discussed in Section 2.4 in Volume 1 of this FEIR/S. Although Access Option 12b would require more doubling back compared to the other access options, the MSN Project would enhance emergency access over existing conditions due to reduced congestion.

Letter - LC7

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road. This configuration would substantially degrade emergency vehicle response times to San Antonio Road, and we recommend that that alternative not be selected for that reason. LC7-5

6. HOV Lane Alternative. The DEIS/R does a good job of describing the two HOV lane alternatives, specifically the fixed HOV lane alternative and the reversible HOV lane alternative. We submit that the fixed HOV lane alternative is superior. The environmental impacts of the two are almost identical, while the fixed HOV alternative is operationally superior and is consistent with the existing and planned 101 segments adjoining the Marin Sonoma Narrows project in both counties.

Sincerely,

Onita Pellegrini

Onita Pellegrini, CEO
Petaluma Area Chamber of Commerce

Encl: PACC Board of Directors Roster

3

Letter - LC7

Page 4

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Letter - LC7

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"Alice Forsyth" <alicef@petalumachamber.com>
12/11/2007 12:49 PM
Please respond to <alicef@petalumachamber.com>

To <melanie_brent@dot.ca.gov>
cc
bcc
Subject Narrows DEIR letter

Dear Ms. Brent,

Attached is a letter from the Petaluma Area Chamber of Commerce Board of Directors with a review and comments on the Draft Environmental Impact Statement/Report for the Marin-Sonoma Narrows widening project for your consideration.

An original copy has been mailed to you.

Onita Pellegrini, CEO
onitap@petalumachamber.com

(Via) Alice Forsyth
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Narrows DEIR letter 12-10-07.doc

Letter: LC8.
Signatory: Sierra Club Marin Group.

Response to Comment LC8-1

Please refer to the Master Response for Range of Alternatives.

Response to Comment LC8-2

Please refer to the Preferred Alternative discussion in Chapter 2 in Volume 1 of this FEIR/S.

Response to Comment LC8-3

Your preference for Access Option 12b is noted. This option, without the San Antonio Road Interchange, has been identified as the Preferred Alternative.

Response to Comment LC8-4

In part as a result of the Evaluation Criteria Matrix referred to in the comment, Access Option 12b, which omits the San Antonio Road Interchange, was identified as the preferred access alternative.

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Melanie Brent, Office Chief
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November 15, 2007

RE: DEIR/DEIS Comments regarding Marin-Sonoma Narrows HOV Widening Project

Dear Ms. Brent,

LC8-1 The Sierra Club Marin Group is pleased to have the opportunity to submit comments and request answers to outstanding issues and concerns regarding the DEIR/DEIS for the Marin Sonoma Narrows (MSN) HOV Widening Project. The National Sierra Club transportation policy regarding new freeway expansion is:

"Highway Expansion: No limited access highways ("freeways") should be built or widened, especially in urban-suburban areas or near threatened natural areas. High occupancy vehicle (HOV) and high occupancy vehicle/toll (HOT) lanes should come from converting existing highway lanes rather than constructing new lanes. This avoids constructing new lanes which are mixed-flow much of the day, or are converted to full-time mixed-flow after construction."

LC8-2 In accordance with this policy, the Marin Group will be supporting the No Project alternative, and trusts that such an option will be seriously considered. The Marin Group, however, in recognition of the fact that the MSN Widening HOV Project appears to be moving forward since funding has already been designated for a portion of the project, nonetheless wishes to comment on the selection process. It appears from our analysis of the four (4) Segment B Alternatives, Fixed Lane, Access Alternative 12b would be the least objectionable. It's the only option which does not add an additional urban size diamond interchange to Segment B.

LC8-3 Page 3.1-105 states a San Antonio Creek "interchange would have strong visual contrast and dominance against the existing natural/pastoral setting, with a strong resulting decline in visual quality due to major grading, engineered fill embankments, a new over-crossing bridge, and associated ramps, access roads, signs and lighting." "…this would represent a substantial averse effect." "Access Option 12b, which would not introduce a new San Antonio Road Interchange, would be considered preferable to the other options from a visual perspective."

LC8-4 The Sierra Club Marin Group is very concerned with the growth inducement and visual impacts of the MSN project which will significantly alter the Narrows current rural

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Response to Comment LC8-5

Locations of major cuts and fills are listed in the following table:

Proposed Alignment Shift in Segment B

Approximate Location	Proposed Alignment
Begin to Olompali SHP	Maintain existing alignment
Olompali SHP to Redwood Landfill OC	Shifts easterly up to 27 m (90 ft)
Redwood Landfill OC to Silveira Dairy	Shifts westerly up to 21 m (70 ft)
Silveira Dairy to San Antonio Rd	Maintain existing alignment
San Antonio Rd to S. Kastania	Shifts westerly up to 79 m (260 ft)
S. Kastania to N. Kastania	Shifts easterly up to 21 m (70 ft)
N. Kastania to Petaluma River	Shifts westerly up to 34 m (110 ft)
Petaluma River to SR 116	Maintain existing alignment

Through these areas the proposed profile will shift the new roadway up to 8.5 m (28 ft) above or up to 7.3 m (24 ft) below the existing roadway. Segment 12b earthwork is balanced and a total of 1,140,000 cubic meters (equivalent of 45,600 haul trips) of material will be moved to complete the project. Also, commenter is referred to Volume 1, Section 3.1.11 for a discussion of Visual Impacts and Section 3.3 for a discussion of biological impacts.

setting and agricultural uses with the addition of an additional interchange at San Antonio Road. The Evaluation Criteria Matrix, in Appendix A, used to weight the importance of visual aesthetics was only weighted at 8% and potential growth inducement at 10%. We believe these two criteria used to determine the purpose and need of the project underestimated the importance of these two issues and should have been weighted more heavily. A higher weighting would have been in keeping with the General Plan policies of both Marin and Sonoma Counties and the cities of Petaluma and Novato. Page 3.1-101 states: "The increased dominance of the roadway would cause a pronounced qualitative change in the overall character of landscape to a more urban, highway-dominated setting, with a noticeable decline in visual intactness and vividness……these impacts would potentially be substantially adverse." LC8-4

In addition to our opening statement we ask for consideration and response to the following comments and questions of the MSN DEIR/DEIS.

LC8-5

1. Page 3.1-118: Adequate explanation, comprehensive discussion and diagrams of mainline freeway realignment of cut slopes and changes to natural contour of the land is noticeably lacking in the entire DEIR/S. Absent in the DEIR/S is any meaningful or substantial information regarding the amount of cut and fill or changes of contour or changes in elevations of the natural land formations which are required for the construction this project. Only one number is mentioned, a 43 foot cut between San Antonio Road and Gambini Road in the vicinity of Cloud Lane. On page 3.1-118 and 3.1-119 it states, "Mainline realignment and profile changes, as well as the construction of access roads and new interchanges, could involve major grading and alteration of existing landforms." "Cut slopes and fill embankments in various locations may result in prominent unnatural landforms that contrast with the existing topography." Etc. How much earth movement will be required by this project? Will there be balanced cut and fill? How many truck loads of earth will be moved? Will earth be required to be removed off site or brought on site? From what locations will the earth be taken or come from? What are the off site impacts of this earth movement? Please produce and share renderings of contour and change of elevation maps of Segment B and describe in the DEIR/S so the public and decision makers can understand the magnitude of the impacts from the massive cut and fill of this project. What are the biological, hydrological, visual, etc impacts related to the change in contours of the land and mainline realignment and access roads?

While attending the Caltrans Workshop for the MSN Widening project in Petaluma on November 6th, Robert Nixon, an engineer for Caltrans, briefly described when asked about the earth movement, that one million cubic meters of fill would be moved during Segment B of the project. He also stated the project would not have a balance of cut and fill and 2 or 3% of other soil would be required to be brought in, which could amount to 20,000 to 30,000 cubic meters or 1,200 truck loads of soil. Also, mentioned at this meeting by John Martin, Branch Chief of Design for Caltrans, was the mainline road would be raised or lowered in some locations as much as 25 to 28 feet. This was necessary due to the rolling terrain in sections of Segment B, which Caltrans plans to even out. The

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LC8-5 DEIR/S should confirm and explain this information and discuss its impacts to the environment. Not doing so in detail, leaves the DEIR/S inadequate.

LC8-6 2. Page 3.1-119: To understand the magnitude of this project, please explain how many truck loads of soil will be removed for the 43 foot cut between San Antonio Road and Gambini Road in the vicinity of Cloud Lane? Is there any Design Exception that can be used to reduce this degree of cut or movement of soil? How many truck loads of soil does the DEIR/S estimate will be moved for Segment B, for the various four (4) Access Road Option Alternatives?

LC8-7 LC8-8 3. What is the comparison of cost of construction for San Antonio Road Interchange for Alternative 4b, 14b and 14d verses the no interchange of Access Option 12b? Would a new San Antonio Road interchange increase the surrounding property values?

LC8-9 4. Would extra fill be required to construct the San Antonio Road Interchange? How much of the surrounding plain would need to be filled to accommodate the interchange? While attending the Petaluma Caltrans workshop for the HOV Widening Project on November 6, Robert Nixon, Caltrans project designer, said that 60,000 cubic meters of fill, equaling 2,400 truck loads of soil would be required to raise the land for the San Antonio Road Interchange by 16 ½ feet. He stated there also would be an additional 4 or 6 foot high concrete bridge required to span the freeway on top of this fill making the San Antonio Road Interchange 22 to 23 feet high. Please verify this information and describe in detail, produce a diagram and explain the environmental impacts of such amounts of fill to the land and habitat in this area from constructing an interchange of this magnitude in the middle of an unpopulated, rural, agricultural area.

LC8-10 LC8-11 LC8-12 5. Please explain the justification used for proposing the major interchange at San Antonio Road in Alternatives 4b, 14b, and 14d. Is this huge diamond interchange in this location an unreasonable size for the surrounding rural land use? Page 3.1-8 of the DEIR/S says that "Land in the vicinity of San Antonio Road, at the boarder of Marin and Sonoma Counties, is currently scarcely populated." Would construction of the interchange in Access Options 4b, 14b and 14d place strong pressure on the farmland owners to sell or develop the areas surrounding the new interchange? If so, would this not be growth inducing?

LC8-13 6. Page S-51 Summary: Under Biological Environment, Natural communities; please reconcile the number listed under 4b regarding the potential result in the removal of about 962 native and non-native trees. Should the correct number be 1,401 native and non-native trees? This number would then correspond with the numbers listed in Section 3.3 Biological Environment, Table 3.3-1 on page 3.3-10, Trees Potentially Impacted by the MSN Project. This will make it consistent with a difference of 305 trees removed between Access Options 4b and 12b.

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Response to Comment LC8-6

Segment 12b earthwork is balanced and a total of 1,140,000 cubic meters (equivalent of 45,600 haul trips) of material will be moved to complete the project. The location between San Antonio and Cloud Lane (Gunn Lane) will require the movement of 495,000 cubic meters (equivalent of 19,800 haul trips) of earth.

The project footprint was reduced to the maximum extent practicable, including increasing standard 4:1 slopes to 2:1 slopes, while still meeting the project's need and purpose. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's need and purpose.

Response to Comment LC8-7

Access Option 14b was the lowest-cost option. It required a new interchange at San Antonio Road but needed fewer new frontage roads. Fixed HOV Access Option 12b has been identified as the Preferred Alternative.

Response to Comment LC8-8

Because the Marin-Sonoma Narrows Project would affect the direct access some property owners have to US 101 but would not land-lock any property, Caltrans and FHWA would help restore access to local roads through appropriate, market-based compensation governed under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Therefore property values would not substantially change due to a change in access.

Response to Comment LC8-9

The fill quantity and heights are correct. The proposed interchange was sited to reduce impacts to environmentally sensitive areas. However, a new interchange would create a visual impact. Fixed HOV Access Option 12b has been identified as the Preferred Alternative.

Response to Comment LC8-10

Fixed HOV Access Option 12b has been identified as the Preferred Alternative.

Response to Comment LC8-11

Interchange options would not place any pressure on farmland owners to sell or develop areas surrounding the new interchange. Equivalent access is already provided by the existing interchange, so the development pressure will remain unchanged. See also response to Comment LC8-15.

Response to Comment LC8-12

See responses to Comments I50-4 and I50-5 regarding the expected effect of the proposed interchanges in Segment B.

Response to Comment LC8-13

Table S-3 in the Summary section of Volume 1 lists the impacts under Segment B only. The number of native and non-native trees impacted in Segment B for Access Option 4b is 962. The number of native and non-native trees impacted for all Segments using Access Option 4b is 1,401. The difference between Access Options 4b and 12b using the impacts for all Segments or for Segment B only is 305. Since the entire table lists impacts for Segment B only, no changes were made.

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LC8-14

7. Page 3.3-11: Is there a different configuration or design which could be used at the Redwood Landfill Interchange for access to the western frontage road which continues north, for Option 12b, that would involve the removal of fewer trees? Have other design alternatives been considered for Access 12b Alternative which would not require as deep a cut into the hillside and lessen the impact to the trees? Could Design Exceptions be used at the Redwood Landfill Interchange to reduce the deep cut and reduce the loss of trees? While attending the Caltrans workshop for the MSN HOV Widening project in Petaluma on November 6, John Martin, Branch Chief for Design said that it would be possible to design and construct the Redwood Landfill Interchange on the west side in a way which could reduce the loss of trees. He explained the access to the frontage road would be more in the shape of a "T" verses the existing "bulb" shape. He mentioned this type of interchange has been constructed in other locations, possibly more urban, but it is another option/alternative that could be used at the Redwood Landfill to reduce the loss of trees. Please explain and diagram this other interchange alternative and recalculate the impacts of Alternative 12b in regards to the other Access Alternatives in the DEIR/S. This revised design would significantly reduce impacts on the loss of trees.

Response to Comment LC8-14

The project footprint was reduced to the maximum extent practicable while still meeting the project's need and purpose. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's need and purpose. A retaining wall system has been utilized at this location to minimize the environmental impact.

LC8-15

8. Page 3.1-22: Please explain why "grazing lands", which are vital for local dairy farming, are less worthy of protection than "prime farmland". The DEIR/S states in the second paragraph "While the MSN Project area is agricultural in nature, there is relatively little land in the corridor that is designated prime farmland, unique farmland or lands of statewide or local importance, according to the NRCS definitions. Much of the project corridor is classified as grazing." Many of the dairy farm lands, used for grazing cattle, are under Williamson Act contracts. Are dairy farms not considered an agricultural use? Please explain. Are these 'grazing lands' less valuable than 'prime farmland' and thus potentially more susceptible to being built upon for freeways or other future development? If so, does this make the land around a proposed interchange at San Antonio Road in Alternatives 4b, 14b and 14d less worthy of preservation and protection from growth inducement? We note that Alternative 12b, where no interchange at San Antonio Road is contemplated, would serve this area as stated in the DEIR/S in most cases as excellent to good, with non-connecting frontage/access roads and bicycle/pedestrian paths.

Response to Comment LC8-15

Prime farmland does not differentiate between actual uses of the farmland. It refers to land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, without intolerable soil erosion, as determined by the Secretary of Agriculture. Dairy farms are considered agricultural use. Only properties directly affected by the project were discussed. Only five of those properties were under Williamson Act contracts. Comment regarding Alternative 12b is noted. Because access already exists at San Antonio Road, however, there is no difference in the growth inducement potential of the alternatives. None is expected to induce growth. If access were the prime issue in growth inducement, the San Antonio Road area would already be subject to runaway growth due to its existing access.

LC8-16

9. Page 3.1.5 and page 3.1-20: Caltrans plans to deed the right-of-way/access roads to Olompali and to the counties. Who will pay for the long term maintenance, monitoring, patrolling and liability for the new access roads and bike/ped paths once they are transferred to Olompali and to the counties? Have Olompali and the counties agreed to accept the transfer of ownership, maintenance, monitoring, patrolling and liability of these roads built by Caltrans? Is this deeding of the right-of-ways such a major issue that it may influence the decision as to which alternative is chosen?

Response to Comment LC8-16

Proposed frontage roads will be relinquished to Marin and Sonoma Counties who will provide long-term maintenance and enforcement. Olompali will take ownership of the proposed bike path running adjacent to the park and will maintain the bike path. Negotiations are ongoing with the Counties and California State Parks. The relinquishment process shall begin during the final design phase of the project and is considered during the alternative selection process. Deeding of right-of-way is required regardless of which alternative is selected.

LC8-17

10. Page 3.1-16: What is the percentage of commute trips by Marin residents to Sonoma and North? Only the Southern commute percentage is discussed in this section of the DEIR/S. How will a growing Northern commute pattern affect

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Response to Comment LC8-17

According to the 2000 Census, only three percent of Marin County residents commuted to Sonoma County, while 62 percent commuted to jobs within Marin County and 25 percent commuted to jobs in San Francisco. Six percent of Marin County residents commuted to jobs in the East Bay. While the job growth rate in Sonoma County is high, San Francisco and the Berkeley-Oakland area are each expected to add almost twice as many jobs as Sonoma County between 2000 and 2030. The rate of job growth in Novato and vicinity is also higher than that in Sonoma County. ABAG *Projections 2005* indicates that the numbers of new jobs will approximately match the numbers of new residents in Marin County between 2000 and 2030. These combined factors are expected to keep the future Marin out-commute patterns similar to the existing ones, although the numbers of trips will grow. For example, in the no-build condition in 2030, the northbound A.M. commute will have delays of about 3 minutes through the project area as compared with 15 minutes in the southbound direction (see Table 3.1-13, Maximum Northbound Vehicle Delays (minutes), in Volume 1 of this FEIR/S). This indicates that the northbound commute will remain minor in comparison to the southbound commute.

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LC8-17 growth patterns in Sonoma? What is the Marin to Sonoma commute projected for the future with the projected large growth of residences and jobs in Santa Rosa? Page 3.29 says that "Employment in Sonoma County and Petaluma is expected to grow respectively 48 to 39%."

LC8-18 11. Page 3.1-50: If utility lines are to be moved during project construction, is there consideration to placing them underground at the same time as the roadway improvements, to enhance the scenic and visual quality of Segment B? If so, would these be placed in the mainline or access roads? What would be the scenic and visual benefits of placing the utilities underground?

LC8-19 12. Page 3.54 states the completion of the HOV lanes will "not interfere" with the proposed SMART operations. Please clarify what is meant by "not interfere". Page 3.1-56 says, when referring to the HOV Widening project, "Not only would transit travel time be reduced, but transit schedule reliability would be improved. Carpools and vanpools also would have improved speeds and reduced travel times. The improved speeds and schedule reliability would work as incentives for commuters and other travelers to carpool and/or take advantage of local and express buses that would also use the HOV lanes". SMART will offer an alternative mode of transit in the corridor, but how will the completion of the MSN HOV Widening Project affect the ridership numbers projected by SMART? Would people more likely use the HOV Lanes for travel verses SMART? Please explain your travel and ridership analysis in relation to SMART verses completion of the MSN HOV Widening Project.

LC8-20 13. Page 3.1-71 & 3.1-72: A new southbound bottleneck is projected to develop between Miller Creek and Nave Drive by 2030 as a result of the completion of the Fixed or Reversible HOV Lane Alternative improvements in the MSN. Does Caltrans have any plans or recommendations as to how to mitigate this new queue/bottleneck as a result of the MSN HOV Project? If an impact is recognized prior to the beginning of a project, there should be some discussion as to how to mitigate the projected future impacts.

LC8-21 14. Page 3.1-138, Design Exceptions: The MSN HOV Widening Project will have unavoidable visual, land use (taking of lands), archeological loss, increase of impervious surface and storm water run off, increase of pollutants, hillside cuts, loss of vegetation and trees, major cuts and fill, etc. impacts. Design Exceptions could substantially reduce the expanse and cost of the project and have previously been implemented by Caltrans in many instances. The DEIR/S page 3.1-138 says that "Design Exceptions shall be implemented where feasible to avoid removal of significant existing vegetation. Design Exceptions may include reducing the width of the standard grading catch line to minimize vegetation removal, steeping of cut and fill slopes…or other measures as recommended in the VIA…" Caltrans has stated they are willing to work with the counties to reduce the impacts of the project to the greatest extent possible. One method to reduce many of the above impacts has not been entertained or discussed in the DEIR/S. This would be to apply for and use Design Exceptions. See the following for the Procedure Manual. http://www.dot.ca.gov/hq/oppd/pdpm/apdx_htm/apdx_bb/apdx_bb.htm

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Response to Comment LC8-18

Caltrans can only replace like utilities with like utilities. For example, if the overhead electrical line is to be relocated, Caltrans can only pay the cost to relocate the same line overhead to clear construction. As far as longitudinal encroachments are concerned, in some cases where circumstances don't allow for a practical relocation of facilities, and certain criteria are met, an exception can be made.

All longitudinal utilities will be removed from Caltrans right-of-way and relocated along the frontage roads.

Strong visual intrusion within the Marin-Sonoma Narrows Project segment due to existing utility lines was not observed during the assessment of the existing project setting and anticipated project impacts. A strong need for undergrounding of lines was thus not identified.

Response to Comment LC8-19

The proposed HOV lanes will not affect the SMART right-of-way. The ridership study for the SMART EIR (Appendix I) took into account the proposed HOV lanes. The SMART analysis was not an either/or analysis but rather assumed the completion of the HOV lanes as baseline for SMART.

Response to Comment LC8-20

It would appear that there is a causal connection between the bottleneck that the MSN Project is alleviating and the latent bottleneck south of Miller Creek. Unfortunately, there are no projects on the horizon to address this queue, and extending the MSN Project limits south to encompass this area would not address this congestion because, as indicated in Figure 3.1-12 in Volume 1, no delay for HOV users is projected in 2030.

Response to Comment LC8-21

Design exceptions for non-standard lane and shoulder widths throughout Segment B were considered but Caltrans Project Management did not recommend them for approval. Design exceptions are approved on a case-by-case basis. They are justified, in part, by excessive cost, right-of-way, or environmental impacts. Design exceptions for median width and side slope have been approved to reduce the project footprint while still providing a safe facility. Retaining walls have also been used to minimize impacts to trees and environmentally sensitive areas.

An alternative featuring non-standard frontage road lane widths, mainline median and shoulder widths was considered but rejected as it does not meet the project's need and purpose. Impacts associated with this rejected alternative were not evaluated.

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Response to Comment LC8-22

Design exceptions are prepared in cooperation with Caltrans headquarters geometricians, and are then reviewed and approved by the HQ Geometric Coordinator.

The project footprint was reduced to the maximum extent practicable while still meeting the project's need and purpose. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's need and purpose.

Response to Comment LC8-23

Yes, reduced shoulder widths would reduce earthwork, and an alternative featuring non-standard frontage shoulder widths, mainline median width, and mainline shoulder widths was considered but rejected as it does not meet the project's need and purpose. Impacts associated with this rejected alternative were not evaluated.

Response to Comment LC8-24

Yes, reduced shoulder widths would reduce environmental impacts, and an alternative featuring non-standard frontage shoulder widths, mainline median width, and mainline shoulder widths was considered but rejected as it does not meet the project's need and purpose. Impacts associated with this rejected alternative were not evaluated.

Response to Comment LC8-25

Reforestation and revegetation of all disturbed areas of native vegetation in the Narrows, in-kind with native species at a 5 to 1 ratio, is called for in both this FEIR/S (see Section 3.1.11.4 in Volume 1) and the Visual Impacts Assessment (VIA) (pp. 144-145, and pp. 148 - 152). These measures are also expanded upon in the appendices of the VIA (pp. 148 - 152).

Caltrans is in the process of finalizing the mitigation for impacts to oak woodland in close coordination with CDFG.

LC8-21 On page S-13, Figure S-4 shows Typical Cross Sections of the freeway mainline with 10 ft inside and outside shoulders, 12 foot lanes and 2 foot center barriers for the MSN HOV Widening Project. Page 2-21, Figure 2-5 shows Typical Cross Sections of two 12 foot = 24 foot wide lanes on Frontage Roads with Proposed Class 1 and Class 2 Bikeways (5 to 8 feet wide). In Berkeley, Contra Costa County, Santa Rosa, Novato, San Rafael and other locations in California, Caltrans has allowed Design Exceptions for reduced outside shoulders to 8 feet and inside shoulders to 5 feet. In Novato on U.S. 101 sections of the shoulders, inside and outside are less then what is proposed in the cross section for the MSN HOV Widening project; 8 feet for outside and 5 feet for inside shoulders on U.S. 101. In fact some inside shoulder widths are as narrow as 2 feet in Novato.

In addition, is it necessary to have 12 foot wide lanes on the frontage/access roads in this very rural setting? The speed of traffic on the access roads will be considerably lower than the freeway, particularly next to bike/ped paths and have minimal traffic. In Escondido, there is a project where the frontage road lanes are 10 feet rather then 12 feet wide. John Martin, Branch Chief of Design, at the Caltrans Workshop for the Narrows in Petaluma on November 6th said that Design Exceptions have been made in some cases for 11 foot wide lanes for frontage roads. Please discuss in the DEIR/S how 10 or 11 foot wide lanes for access roads would reduce the foot print, cost and the environmental impacts and improve the visual/scenic quality surrounding the frontage/access roads.

LC8-22 15. The DEIR/S should educate the public and decision makers as to how they can apply for and receive Design Exceptions for the MSN HOV Widening Project. This would benefit the community and help the Counties and Cities adhere to their General Plan policies to retain the rural and important scenic visual qualities of the MSN. It should relay how Design Exceptions would reduce the cost and footprint of the project and thus significantly reduce the impacts previously mentioned.

LC8-23 16. Would obtaining Design Exceptions for the mainline shoulders and frontage road widths minimize the amount of earth movement and cut slopes and cost of the project? Please explain.

LC8-24 17. Page 3.1-118: If a Design Exception is granted by Caltrans for inside and outside shoulder widths, as well as width of access/frontage roads, would the loss of trees in Access Option 12b be reduced? Would the overall cross section of the proposed roadway be reduced along with the impacts? By how much? Please explain and show a revised diagram.

LC8-25 18. In Access Option 12b, could the loss of trees be mitigated by the planting of replacement trees? Would this be at a 5 to 1 ratio? How long would Caltrans monitor and insure the survival of replacement trees? Long enough to insure their survival of at least 5 years?

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LC8-26 19. Page 3.1-121: Option 12b would have no interchange at San Antonio Road and thus avoid light and glare impacts. Would this be the same for other Access Options 4b, 14b or 14d? This was not mentioned in this section of the DEIR/S.

LC8-27 20. The newly adopted Marin County General Plan has language in the plan to "consider" the Marin Sonoma Narrows as a scenic highway. Has scenic highway designation been taken into consideration? What would be the benefits and impacts to the MSN HOV Widening Project if designated as a scenic highway? Would the current project, as currently designed, qualify as a scenic highway? If not, what would need to be done to accomplish this goal?

LC8-28 21. Page 3.2-15: The 100 year floodplains of San Antonio Creek and the Petaluma River cover expansive areas. During 100 year floods, water from the creek and river has been known to overflow U.S. Highway 101 and/or the frontage roads. California Gov. Arnold Schwarzenegger in October 2007 signed several bills that require, in the future, considering the impacts of 200 year floods. This is due to the realization of global warming and sea level rise. What will be the impacts of a 200 year flood on the MSN HOV Widening Project? Will the culverts, cuts, frontage roads and main line, etc be equipped and designed to withstand 200 year floods? Please evaluate and consider the impacts and mitigations needed to address this new future legislative requirement.

LC8-29 22. During the Caltrans MSN HOV Widening Project workshop in Petaluma on November 6th, it was mentioned Caltrans plans to rebuild a significant section of U.S. 101 around San Antonio Creek to avoid future flooding of the freeway. Please include in the DEIR/S explanation and diagrams of the proposed earth movement and other changes adjacent to the creek and their impacts to the biological resources and water quality from run off and from the addition of additional soil surrounding the creek. How are the impacts to be mitigated?

LC8-30 23. Adequate funds are currently unavailable to build the entire Segment B project at one time. A phased project is under consideration. What would be the best method or steps to take in phasing Segment B? What acquisitions, portions of the project should be accomplished first, second, third, etc, as money becomes available? Please offer suggestions of how to most effectively, environmentally and efficiently phase Segment B. What would be the construction related impacts of a phased project in regard to water quality, air quality, congestion, bike/ped access, resident's access, safety, costs, etc?

Thank you for your consideration of our concerns and comments.

Doug Wilson, Chair
Sierra Club Marin Group

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Response to Comment LC8-26

As discussed in the DEIR/S and this FEIR/S, light and glare impacts could potentially affect residences located near new interchanges, through interchange lighting or headlight glare. The number of potentially affected residences is few, however, and the likelihood, extent and degree of these impacts are anticipated to be very limited. This is particularly true in the vicinity of the proposed new interchanges within the Narrows segment, where the likelihood of such impacts is low. As called for in Volume 1 of this FEIR/S (Section 3.1.11.4), however, "where substantial headlight glare is anticipated to permanently affect residences near new interchanges, landscape screening shall be introduced to block such headlight glare in the shortest time feasible." Access Option 12b has been identified as the preferred access alternative.

Response to Comment LC8-27

Policy DES-4f of the Built Environment Element of the Marin Countywide Plan calls for the County to "consider participation in the [State] Scenic Highway Program in order to preserve and enhance Marin's scenic highway corridors."

The following is a general summary of the scenic highway designation process:

Participation in the State Scenic Highway Program requires that a state route be included on the list of highways eligible for scenic highway designation (Street and Highways Code, Sec. 263). US 101 within the project limits is not currently listed as an eligible state scenic highway, except for the US 101 portion of the SR 37 interchange. State routes not listed as eligible in Section 263 must be added through legislative action before they may be nominated for scenic highway status.

Once added to the list of eligible highways by the state legislature, a route or segment may be nominated by the local jurisdiction. An application to Caltrans is then prepared by the local jurisdiction, including preparation of a visual assessment and a Scenic Highway Proposal, including a letter of intent from the local jurisdiction, maps, and description of the proposed corridor's scenic qualities. Caltrans then reviews the application and if it is determined that the proposed route meets scenic highway criteria, the local jurisdiction is asked to prepare and adopt a Corridor Protection Program. This program must include five elements:

1) Regulation of land use and density of development within the corridor
2) Detailed land and site planning permit or design review requirements
3) Control of outdoor advertising
4) Controls of earthmoving and grading within the corridor
5) Review authority and regulation of the design and appearance of structures and equipment within the corridor

Following adoption of the Corridor Protection Program, the local government may submit a request for official designation to Caltrans. If the District and State Scenic Highway Coordinators determine that the requirements of the program are met, a recommendation for adoption is made to the Caltrans Director. If approved, the route becomes a designated State Scenic Highway.

Benefits of Scenic Highway Designation. A principal benefit of the scenic highway designation is to provide the impetus for the adoption by local government of land use controls protecting scenic values in the corridor. In the case of the Marin-Sonoma Narrows, such land use controls already exist to a great extent, although not in the explicit context of preserving scenic values. Scenic highway nomination would provide a means to ensure that all the requirements for scenic corridor protection are included and adopted into local land use controls. For example, minimum setbacks for residential development are generally required that prevent the need for soundwalls, and so on. In addition, Section 320 of the State Public Utilities Code requires undergrounding of all new or relocated electric and communication distribution facilities within 1,000 feet of a designated scenic highway. In some instances, enhancement projects on scenic highways have also qualified for funding assistance under Caltrans' Transportation Enhancements Program.

In general, Caltrans works with local agencies to ensure protection of scenic corridors to the maximum feasible extent, placing a high priority on protection of scenic quality in designated corridors. The type of scenic planning and design measures that would be applied in a designated scenic highway, however, would be essentially the same as those recommended for the Marin-Sonoma Narrows project, particularly as detailed in the mitigation measures of the Marin-Sonoma Narrows Project Visual Impact Assessment (VIA). Such measures include extensive re-vegetation, context-sensitive architectural design treatments developed in conjunction with local jurisdictions, and others included in the DEIR/S and VIA.

The Narrows portion of the US 101 corridor within Marin County would almost certainly qualify to be nominated as a state scenic highway, both in its current condition and with the project as proposed, if it were added to the state eligible highway list by the state legislature, and an application submitted then by Marin County.

Additional information about the State Scenic Highway Program may be found at:
http://www2.dot.ca.gov/hq/LandArch/scenic/guidelines/scenic_hwy_guidelines.pdf and http://www2.dot.ca.gov/hq/LandArch/scenic/faq.htm.

Response to Comment LC8-28

The Preliminary Drainage Report for this project was completed in January 2006. The culverts and drainage systems in this project were evaluated in accordance with Section 821.3 of the Highway Design Manual for 10-year and 100-year watershed flows. The proposed design alleviates the freeway flooding for a 100-year event.

Response to Comment LC8-29

At San Antonio Creek, a new highway bridge will be constructed to the west of the existing twin bridge structures, resulting in a significant westward realignment at this location. It is planned that portions of the existing roadway embankment north of the creek, as well as one of the existing bridge structures, will be left in place for use as a frontage road for adjoining farms and residences. Another new bridge is to be constructed over San Antonio Creek to the west of the freeway, near the location of the historic US 101 crossing. It is planned to incorporate the old highway alignment (currently a county road) into a westerly frontage road for the new freeway, and the existing bridge structure does not meet current safety standards.

Regarding earthwork, new bridges will be raised to reduce future flooding. Standard water quality best management practices (BMPs) will be implemented to avoid and minimize impacts to the creek and other biological resources. The BMPs under consideration and mitigation measures are described in Volume 1, Section 3.2.3 of this FEIR/S. Final selection of these measures will be made during final design and will comply with Regional Water Quality Control Board requirements.

Response to Comment LC8-30

The first phase of the project is planned for 2010. Other phases will be planned as funding becomes available. Please refer to the Summary in Volume 1 of this FEIR/S for a description of phase 1 and project funding.

The right-of-way process can proceed after project approval. Acquisitions for later phases of the project will be made based upon available funds. Caltrans and FHWA will take into consideration long-term traffic benefits and the life cycles of animal and plant species in conducting construction activities. Avoidance and minimization measures may include, but not be limited to, work windows at bridge crossings and compliance with the Migratory Bird Treaty Act for tree removal operations. Please see Section 3.3 in Volume 1 for discussion of biological avoidance, minimization and mitigation measures. As was noted in Section 3.1.10, Traffic and Transportation, measures will be taken to minimize disruptions to traffic or bicycle/pedestrian access.

Letter: LC9.
Signatory: Marin Audubon Society.

Response to Comment LC9-1

The alternatives and access options were developed during the environmental phase to avoid and minimize environmental impacts wherever feasible, and Caltrans will continue to apply this process through the design and construction phases.

Response to Comment LC9-2

The need to make improvements to US 101 has been documented in many transportation plans and studies by Marin and Sonoma Counties individually, and by regional and state agencies such as the Metropolitan Transportation Commission (MTC) and Caltrans. The support shown by Marin and Sonoma Counties, in part, resulted in the recommendation by the MTC to include this project as one of the improvements that would enhance connectivity.

Public and agency comments during public scoping have influenced the roadway design and led to adjustments in the width and alignment of the roadway to avoid or minimize impacts to sensitive natural resources. Impact avoidance and minimization with regard to natural resources was also an important consideration in the alternatives analysis process. In addition, Caltrans would continue to implement avoidance, minimization and mitigation measures throughout the design and construction process. Please refer to Appendix J, Section 3.3 for more information on these measures. Also, please refer to Chapter 4, CEQA Evaluation.

The current design meets minimum safety standards and meets the project purpose and need. Please also see the responses to comment letter SA1 for more information regarding impacts to wetlands and other Waters of the U.S.

Marin Audubon Society

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December 7, 2007

Maxine Brent, Office Chief
Division of Environmental Planning and Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 946123

RE: MARIN SONOMA NOVATO NARROWS HOV WIDENING DEIR

Dear Ms. Brent:

LC9-1 The Marin Audubon Society appreciates the opportunity to comment on the DEIR for the Novato Narrows project. Our primary concerns focus on the massive adverse environmental impacts that would result from most of the alternatives presented. In addition to our ongoing interest in maintaining wildlife habitats, we have a special interest in ensuring that environmental impacts are avoided because Marin Audubon owns property in the vicinity - adjacent to the north of Redwood Landfill property. As a matter of fact, Caltrans provided some funding for our recent restoration.

LC9-2 The project and all of its alternatives would have devastating impacts on habitats in the vicinity. None of the chosen alternatives are environmentally preferable because all would remove significant numbers of native trees and result in the loss of wetlands. Therefore, we strongly recommend that each component of the project be redesigned to avoid adverse impacts to natural resources.

LC9-3 We request that the following issues be addressed and alternatives evaluated. Please note that we are not opposed to the widening of the freeway, but we are opposed to the massive adverse environmental impacts that would result from the project as designed. Furthermore, the mitigation measures are poorly developed and inadequate. They will not compensate in anyway for the very significant impacts of the project.

Our specific questions and comments are as follows:

PROJECT NEED AND PURPOSE

LC9-4 Figure S-1, 1-2, 2-1 and many of the subsequent figures have a number of inaccuracies and should be revised as follows:
- There should be a key showing wetland areas.
- It appears that the areas colored blue are part of the Bay, however, they are not complete. All of the Petaluma Marsh is subject to tidal action and should be colored blue.
- There is a fully tidal channel that extends along the railroad right of way from San Antonio Creek and dead ends in a wide area of tidal marsh. This is not shown on the map

LC9-5 The EIR should address the traffic accident rate in Section b of the project area and compare it with high accident rate areas. Although presented in the local press as being dangerous , it is not at all clear that

A Chapter of the National Audubon Society

Response to Comment LC9-3

The commenter's objection to the environmental impacts of the proposed project is acknowledged. See the responses listed below for further details regarding mitigation to be implemented for jurisdictional wetlands (SA1-4), oak woodlands (SA1-5), riparian areas (LJ2-11), special-status fish (LC5-5, FA2-2, and FA2-3), and the salt marsh harvest mouse (FA2-14).

Response to Comment LC9-4

Figures S-1, 1-2 and 2-1 are project vicinity maps and project location maps and are meant only to show the project vicinity, location and/or location of segments. These maps are not intended to show any natural resources in the area and have not been changed. Figures S-5a-d and Figures 2-6a through 2-9b show the wetlands that are present within the project area. More detailed mapping of the wetlands and other Waters of the U.S., including tidal wetlands and waters, is shown in Volume 2 of this FEIR/S.

Response to Comment LC9-5

The safety aspect was previously considered in developing the purpose and need; however, the project does not qualify as a safety project because it does not exhibit the accident rate that meets or exceeds the State average for accidents on similar facilities monitored by the Traffic Accident Surveillance and Analysis System (TASAS). It is also true that the existing Redwood Overcrossing was constructed to mitigate for safety concerns related to landfill trucks crossing the expressway median to travel southbound through Segment B. The project would correct the deficiencies discussed in the section regarding the need and purpose of the project (see Chapter 1 in Volume 1), and would provide corollary safety benefits by bringing the roadway to standard and correcting the drainage issues.

Letter - LC9

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LC9-5 this area actually does have a high accident rate.

LC9-6 The DEIR discusses projected population growth and future congestion. The discussion fails to reflect current reductions in regional population growth in the area. This new trend should be presented and the potential for future congestion reevaluated.

LC9-7 Drainage problems could be addressed without such an immense project. From our experience, the blockage in the San Antonio Creek was, at least in part, due to inadequate maintenance that resulted in a build up of debris at drainage culverts under the rail line. If the drainage facilities are inadequate, this should be discussed. How are they /inadequate and where are they inadequate?

LC9-8 The Project Purpose should include a component "to protect the environmental resources."

PROJECT ALTERNATIVES

LC9-9 We are not opposed to a Novato Narrows project, but we are opposed to the significant adverse impacts that would be caused by the alternatives as presented in this DEIR. Our primary concern is for impacts to natural resources in Segment b. As currently configured and designed, none of the alternatives are acceptable because each would result in significant environmental and other impacts.

LC9-10 In order to reduce environmental impacts to acceptable levels, various approaches must be considered. Avoidance must be considered first. While the DEIR discusses that avoidance and minimization have been considered, this has apparently been unsuccessful as reflected in the number of trees that would be lost.

LC9-11 While Caltrans may have certain standards for construction of freeways, Segment b has particularly sensitive resources and, therefore, exceptions to the standard Caltrans designs musts be considered and made. Design exceptions must be used in all cases. This project simply cannot be allowed to remove anywhere near 1700 native trees.

LC9-12 A combination of components that would best accomplish the project purpose while avoiding or significantly minimizing environmental damage must be chosen. This would be one that significantly reduces the loss of trees, the filling of wetlands, and eliminates conversion of the area from a predominantly rural landscape to an urban one.

LC9-13 Problems with Figure 2 Section b and other similar figures throughout the DEIR should be resolved:

- Section 2 shows a "blind end channel" extending east-west from the end of the landfill access road. No such channel exists. This may be confused with the north-south tidal channel that ends to the north and off the map in a tidal wetland.
- Wetlands associated with Binford Road properties are inaccurately shown.

LC9-14
- The legend evaluates the habitat of the waterways as low, medium and high value. This has no relevance. In particular Novato Creek habitat is shown as Medium quality. Clapper Rail, a federally listed endangered species, inhabit sections of Novato Creek and, therefore, it should not be evaluated as anything but high value.

LC9-15 We request that the following questions be addressed and measures be adopted to avoid or significantly

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Response to Comment LC9-6

The traffic forecasts for this project were based upon Associated Bay Area Governments (ABAG) land use projections. These land use forecasts are the only region-wide land use forecasts available for the Bay Area and their use for state highway projects is required by regulation. The ABAG land use forecasts are long-term forecasts. The rate of growth in any area may vary widely on a year-to-year basis but average out to a forecast rate in the long run, so it would not be appropriate to modify the land use projections based upon a short-term trend. In addition, this section of highway is already congested, and the congestion would be expected to remain, even if population growth in the project area slowed or stopped.

Response to Comment LC9-7

Flooding that occurs during high-volume flows in San Antonio Creek is exacerbated by heavy riparian growth in the main channel, both upstream and downstream of the US 101 bridges. The channel is clogged with trees, shrubs and berry vines, forcing water into a broad floodplain on the north side of the creek. A further condition that impedes the flow of high water in the floodplain is a system of berms and levees that were constructed to keep water out of an old drive-in theater on the east side of the highway, just north of the creek. On the opposite side of the creek from the old theater, significant overbank flow is prevented by upward sloping foothills. The levee system creates a constriction in the natural floodplain, resulting in elevated backwater upstream from the constriction point.

Currently, a single culvert crosses US 101 between San Antonio Creek Bridge and the northerly intersection of Old San Antonio Road. This culvert passes flow from local watersheds during periods of relatively small runoff and also passes flood flows from San Antonio Creek during periods of high runoff. However, due to the size of this culvert (24"), it is doubtful that it has a significant effect on the water surface elevation in the floodplain during periods of high water. Portions of the existing roadway

embankment passing through the floodplain are to remain in place for use as a frontage road. In order to improve flow through the embankment and lessen the likelihood of overtopping the frontage road, the January 2006 Preliminary Drainage Report recommended replacing the single 24” cross culvert with two 36” cross culverts.

Flooding that occurs at the northerly intersection of old San Antonio Road is not, in general, the result of high flow in San Antonio Creek. This flooding is more directly the result of inadequate highway drainage facilities. Even when all the drainage openings are clean and functioning properly, it is unlikely that the culvert system at the San Antonio Road intersection is capable of passing much more than a 5-year rainfall event.

When flooding occurs at the northerly intersection of San Antonio Road, water spills over the highway and flows through the yard of a residence located on the east side of the highway. There are no records indicating that flood waters have damaged the structure, but significant erosion damage can be seen along the easterly shoulder of the highway. It is expected that flooding at this location can be easily corrected during project design.

Response to Comment LC9-8

Please refer to the Master Response on Need and Purpose.

Response to Comment LC9-9

Please see the response to Comment LC9-2.

Response to Comment LC9-10

Please see the response to Comment LC9-2.

Response to Comment LC9-11

Please see the response to Comment LC9-2.

Response to Comment LC9-12

Please see the response to Comment LC9-2. Construction of the Preferred Alternative will not alter the rural landscape of Segment B to an urban one.

Response to Comment LC9-13

We verified the location of the blind channel area and found it to be correctly placed on the map. This channel does indeed extend farther north than the extent of the map. The figures also correctly show all jurisdictional wetlands in the project area.

Response to Comment LC9-14

The quality of the waterways was evaluated for the project area only. While California clapper rails are known to occur in Novato Creek, they have been observed more than half a mile north of the project area in an area that is less urbanized. “Medium Quality Habitat” in the maps has been defined in the DEIR/S and this FEIR/S as “partially urbanized with portions/stretches of natural habitat.” The portion of Novato Creek located in the project area meets this definition. The definitions of habitat quality used in the FEIR/S are not intended to be used for requesting environmental permits or authorizations from regulatory agencies.

Response to Comment LC9-15

The proposed median width through Segment B has been reduced from the Caltrans standard to minimize impacts. The proposed median width accommodates a 10-foot shoulder in each direction. The shoulders provide space for breakdown vehicles as well as allowing emergency vehicles to bypass congestion. Non-standard width median shoulders require a disabled vehicle in the median lane to cross multiple lanes of traffic in order to safely leave the traffic lanes. An alternative featuring non-standard median and shoulder widths was considered but rejected as it does not meet the project's purpose and need. Impacts associated with this rejected alternative were not evaluated.

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reduce the environmental damage to the maximum extent possible:

LC9-15 • Reduce the width of the highway by eliminating or significantly reducing the size of the centerline. Figure S-4 (page S-13) shows wide areas in the median center for the three alternatives presented. There are other sections of 101, through San Rafael for example, where there is not this wide a centerline. The center area should be eliminated in order to reduce width and reduce loss of trees and wetlands. The discussion should indicate how many trees and of what species this design change would allow to remain.

LC9-16 • Leave the highway in its current alignment; allow non-standard roadway curves; and do not straighten. How many trees and wetlands would be lost if the highway were straightened? Provide specific information about why straightening is deemed to be necessary. . It is not justifiable for safety reasons because even under the current conditions, the accident rate is not substantial through this area.

LC9-17 • Retain the existing newly-constructed interchange at Redwood Landfill. Not constructing a new diamond interchange would have the benefit of avoiding many adverse impacts: tree loss, avoiding generating substantial solid waste, and growth inducing impacts. Why would the recently constructed interchange at Redwood Landfill need to be converted to a diamond interchange for alternatives 4b and 12b? Aside from the expense, such a project would be growth inducing, would be a waste of resources, and generate solid waste due to the demolition of the just-constructed overpass. How many trees would need to be removed for this option? The discussions indicate that the primary benefit is bike/pedestrian access. This is not a sufficient reason to reconstruct this interchange.

LC9-18 • Eliminate the major interchange at San Antonio Road. It would clearly be growth inducing, destroy resources, and speed the urbanization of this rural area. There is no reason in this rural area to have a standard interchange. How many trees and wetlands would be impacted by this major interchange?

• Eliminate one of the frontage roads adjacent to the Silveira ranch from San Antonia Road to San Antonio Creek. All access options except 12b have access roads and bike paths on both sides of highway 101 from San Antonio Road to San Antonio Creek. Why isn't one access sufficient? How many trees and how much wetland would be impacted by these two accesses? Which access would destroy the least amount of trees and wetlands? The lease environmentally damaging alternative should be chosen.

• Reduce the width of frontage roads, to 10 feet or 8 feet. There is no justification for having a full width access road in this rural area. How may trees and wetland would be saved by having more narrow frontage roads?

• Maintain narrow roadway shoulder widths (page 1-13) both on the frontage roads and 101. How many trees would this save? Would any wetlands be able to be protected?

LC9-19 • Eliminate the bikepaths. Bikers can ride on the frontage roads or on the side of the freeway. If SMART is constructed, they are planning to build a bikepath. Why would there need to be two? Further, there is no analysis of the environmental impacts of the bike path alternatives. How many trees would be lost for the bike path through Segment b and the other segments? How much wetlands would be lost? We note that SMART's bike path alignment is in a less environmentally damaging location.

LC9-20 • Locate all frontage accesses parallel and as close as possible to the highway and on the side of the road

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Response to Comment LC9-16

While the overall accident rate for the corridor is lower than state-wide averages, there are locations along the corridor, generally at the curve locations, that have high concentrations of accidents.

An alternative featuring non-standard vertical and horizontal curves was considered but rejected as it does not meet the project's purpose and need. Impacts associated with this rejected alternative were not evaluated.

Response to Comment LC9-17

Local traffic primarily consists of large refuse vehicles that accelerate at slower rates than passenger vehicles. The existing overcrossing will not be demolished but will be utilized for the proposed interchange. The existing interchange at the Redwood Landfill is non-standard and does not provide standard acceleration and weave length.

An alternative featuring a non-standard interchange was considered but rejected as it does not meet the project's purpose and need. Impacts associated with this rejected alternative were not evaluated.

Response to Comment LC9-18

Fixed HOV Lane with Access Option 12b was identified as the Preferred Alternative. The purpose of the access roads is to replace the existing direct access and open medians along the expressway. The Preferred Alternative is also the least environmentally damaging alternative. Standard-width lanes and shoulders provide a safer facility for motorists, bicyclists and pedestrians. An alternative featuring non-standard mainline and frontage lanes and shoulder widths was considered but rejected as it does not meet the project's purpose and need. Impacts associated with this rejected alternative were not evaluated.

Response to Comment LC9-19

Your support for eliminating the bike paths from the MSN Project is noted. All of the proposed Access Options include bicycle/pedestrian paths to replace the existing access along the expressway shoulder. The environmental impacts of the bike paths are included in the total impacts presented in the FEIR/S. Volume 1, Chapter 3 discloses the environmental impacts of the access options (including the bike paths); and Section 3.3 discloses the number of trees and wetlands impacted under each access option.

Response to Comment LC9-20

Caltrans and FHWA, along with our regulatory partners, evaluated shifting the mainline alignment toward Olompali SHP to avoid wetlands on the east side of US 101; however, this would require a wider footprint due to the existing hilly/mountainous topography in that direction. The wider footprint would cause further impacts by removing additional trees, require more extensive excavation, and create the added potential for erosion. In addition, potential visual impacts would increase in severity due to the manmade cuts through the natural rolling terrain. These visual impacts would be visible from many viewpoints, including those of motorists.

The local roads were not designed close to the highway due to the desire to minimize visual impacts and maintain the rural setting. Access roads are required at some locations on both sides of the mainline to provide access for individual property owners.

A design exception has been approved for steeper slopes to reduce environmental impacts.

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that would avoid or cause the least environmental damage. How was it decided to place the road on the east side of 101 and not west through Olompali? Identify acreage of wetlands that would be lost and number and species of trees for Segment b? Discuss the need for each frontage access proposed in Segment b. The access roads should be located on the side that has the least adverse impact on natural resources (trees, wetlands, etc.) The EIR should analyze which side would avoid or result in the loss of the fewest native trees and wetlands. The extremely wide separation of frontage road as shown in figure 3.1-30 and 3.1-34 must be avoided.

• Reduce width of standard grading catch line, and steepen the cut and fill slopes. How many trees and wetlands could be saved by these actions, and where would this occur?

LC9-20 • Design the proposed bridge over San Antonio Creek to better protect riparian resources. Describe the proposed bridge over San Antonio Creek (page 2-3)?

The discussion of the above will lead to a better understanding of how environmental damage can be avoided and still have a project that will meet the stated purposes.

AFFECTED ENVIRONMENT

LC9-21 The growth inducing analysis on page p. 3-1-17 only addresses local and regional growth policies, cost and availability of housing, amenities and reduced travel time as the aspects that would influence growth. While these aspects could certainly influence growth, the availability of new access roads and large interchanges would make it physically possible, and therefore more easily justified, to have more development. Growth policies can be changed relatively easily based on at political will. Once an access road and/or interchange is constructed, it can be very easy to justify further development.

LC9-22 The DEIR points out that noncontinuous access road would the serve rural community. Improvement of the access roads would still be growth inducing because it would be easier to connect them. Which alternative has the shortest and least continuous access roads? Currently, some access roads are unpaved. Would these roads be upgraded? Identify these sections and explain whether the proposed new access would be paved and otherwise improved over the existing conditions.

LC9-23 The DEIR (page 3.1-22) states that there is no Prime or unique Farmland in the area. Prime farmland applies only to the soil type. That classification has no bearing on the importance of dairy ranching to the local community, to local economy, to the sustainability of agriculture or importance of the product itself. Address these aspects.

LC9-24 Proposed farmland conversions discussion on 3.1-26 indicates that access ways would bisect ranches. This would certainly interrupt movement corridors for wildlife and bisect habitats. Wouldn't this make it more difficult for the ranchers to move about their properties and to continue operation? Wouldn't it be beneficial for agriculture operations to have all roads and paths close to the highway? How would public use of these access roads and bikepaths adversely impact dairy operations? Address the impact of public use, including litter and lose dogs, on dairy operations. Who would police these new areas?

LC9-25 Second Paragraph page 3.1-121 points out that the experience of bicyclists on a path paralleling high 101 would be compromised by the presence of the freeway. In our view, this assumption would be the lesser of the potential impacts compared with impacts of locating the path further away. More separated from

4

Response to Comment LC9-21

See the responses to Comments I50-4 and I50-5.

Response to Comment LC9-22

Alternative 4b has the fewest lane miles of access roads for the Narrows portion of the project. Access roads in all alternatives will be paved and will meet Class II bicycle facility standards for road width and shoulder width. Existing county roads are paved, and existing non-paved access points are private driveways. Property owners will be compensated for connecting their driveways to the proposed access roads.

Response to Comment LC9-23

Respectfully, the commenter's statement is incorrect. Page 3.1-22 states that there is no prime or unique farmland in Segment C. Table 3.1-2 provides information on the amount of farmland that would be impacted under the Build Alternatives, including prime, unique and Williamson Act lands. Chapter 5 of the MSN Project DEIR/S (and FEIR/S) discusses potential cumulative impacts to farmlands in Marin and Sonoma Counties. Both counties have successful private and public farmland conservation programs, and the MSN Project's impacts on farmlands would not undermine these counties' successful conservation programs. Caltrans has researched information from Sonoma and Marin County general plans and other local documents listed in Chapter 9. These documents discuss agricultural lands in the local context, and Caltrans has used this information to make an assessment of the project impacts to this resource. Please see Section 3.1.5 and Chapter 5 in Volume 1 of this FEIR/S for more information on this topic.

Response to Comment LC9-24

On the contrary, farmland conversions would not bisect ranches; the DEIR/S states on page 3.1-26, “Notably, the proposed farmland conversions would not bisect any parcels or sever existing owners from accessing their properties. Project-related construction would not interfere with the operations or functions of agricultural land uses.” Proposed access roads or interchanges would replace direct access to US 101 from several properties that currently have driveways that access US 101. Please also see response to Comment LC9-40 regarding impacts of people, noise and litter. The existing cattle crossings will remain in place under the Build Alternatives. For these reasons, the access roads should not substantially impact dairy operations. During construction, design plans will incorporate access to private lands and cattle crossings.

Because the access roads would become the jurisdiction of the local counties, enforcement would also fall under the jurisdiction of the counties.

Response to Comment LC9-25

Comments and suggestions have been considered by Caltrans on its final selection and refinement of bicycle path alternatives and options. Whether the bicycle option is a separate Class I bicycle path parallel to the freeway or Class II bicycle lane on the parallel access roadways (where available), the bicycle paths/lanes are contained in a relatively narrow corridor with the freeway and the impacts are described in the DEIR/S and this FEIR/S.

Letter - LC9

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the highway, pathways would , as discussed above, not only disrupt the agricultural operations but wildlife movement corridors habitats. These significant impacts is not even addressed in the DEIR.

The EIR should provide a more comprehensive and clear discussion of the options for the bike trail.

LC9-25 The EIR should address the adverse impacts of the alternative of moving the path further from the freeway to allow for trees to be retained or planted, as opposed to locating the path close but avoiding or reducing impacts to habitat and agriculture. What is the minimum distance the path need to be from 101 to accommodate trees?

LC9-26 The emphasis of the DEIR is on the adverse visual or aesthetic impacts of removing trees. While aesthetic/visual values are certainly important, our interest is in protecting native trees as habitat for native wildlife.

LC9-27 Figure 3.1-15 shows the class 1 and 2 bike path extending off to the east from Atherton Avenue following the railline route. Does this route propose to widen and share the existing railroad easement? Why was this alignment chosen? It is not even the preferred SMART alignment. The SMART trail hugs the freeway in order to avoid sensitive wetland impacts. This problem alignment would be immediately adjacent to MAS's property and would necessitate the filling of tidal and seasonal wetlands. This alignment is completely inappropriate for a bikepath and must be changed.

PHYSICAL ENVIRONMENT

LC9-28 The discussion on page 3.2-11 indicates that alternative 4b has the least amount of impervious surfaces (page 3.2-11). The reasons for this should be stated. Can these measures be utilized in the other alternatives?

LC9-29 To protect the road and motorists, MSN is proposing to realign the highway 70 m and raise it 1.5 m to avoid periodic overtopping (page 3.2-14). We can understand raising out of the floodplain, but why would the road have to be moved further west? Please explain. How may native trees would have to be removed to accomplish this? What other habitats would be impacted? impacted?

LC9-30 What plant species would be used to revegetate the newly graded slopes?

LC9-31 A more complete analysis of quantities of earth movement is needed. Describe the hillside cuts that would be required under all scenarios and show their location on a site plan. How much fill would have to be removed and how much placed to construct the raised highway, frontage roads, and proposed interchanges? Is the cut and fill balanced? Would fill have to be imported?

BIOLOGICAL ENVIRONMENT

LC9-32 The affected Environment discussion (page 3.3-7) should provide a more comprehensive analysis and evaluation of the oak woodland and oak savannah habitats in segment b. The current discussion is incomplete and generic.

Oak savannah habitat was historically much more extensive around the Bay. This oak savannah habitat that would be impacted by this project borders the Petaluma Marsh, the largest tidal marsh remaining in

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Response to Comment LC9-26

Please see the response to Comment LC9-1. Caltrans will avoid and minimize impacts to native trees wherever possible, even during construction. Those that cannot be avoided will be replaced in appropriate locations. Tree replanting is part of our mitigation plan (see Appendix J in the Appendices volume).

Response to Comment LC9-27

The rail alignment route was proposed by the Metropolitan Transportation Commission (MTC) based on their 2001 Regional Bicycle Plan. The purpose of the figure is to show that the proposed bicycle/pedestrian path does not conflict with existing or planned routes. Therefore, the figure does not show the entire SMART bike path.

Response to Comment LC9-28

Option 4b has the least amount of impervious area due to the interchanges (I/C) at Redwood Landfill and South San Antonio. The other three alternatives have a single I/C at either Redwood Landfill or South San Antonio, requiring additional access roads to provide access to all properties.

Response to Comment LC9-29

Mainline is being moved to the west to correct a non-standard horizontal curve through the floodplain. Moving the alignment to west is less environmentally damaging than moving the alignment to the east.

Response to Comment LC9-30

We will be using a variety of drought tolerant species. The final plant list will be developed in cooperation with the local City and County agencies. Public input into the process is possible through your local government.

Response to Comment LC9-31

Locations of major cuts and fills are presented on page 2-8 of the DEIS/R and page 2-10 of this FEIR/S. They are reprinted in the following table for your convenience:

Proposed Alignment Shift in Segment B

Approximate Location	Proposed Alignment
Begin to Olompali SHP	Maintain existing alignment
Olompali SHP to Redwood Landfill OC	Shifts easterly up to 27 m (90 ft)
Redwood Landfill OC to Silveira Dairy	Shifts westerly up to 21 m (70 ft)
Silveira Dairy to San Antonio Rd	Maintain existing alignment
San Antonio Rd to S. Kastania	Shifts westerly up to 79 m (260 ft)
S. Kastania to N. Kastania	Shifts easterly up to 21 m (70 ft)
N. Kastania to Petaluma River	Shifts westerly up to 34 m (110 ft)
Petaluma River to SR 116	Maintain existing alignment

Segment 12B earthwork is balanced and a total of 1,140,000 cubic meters of material will be moved to complete the project.

Response to Comment LC9-32

The commenter's concerns regarding impacts to oak woodlands are acknowledged. Caltrans is in the process of finalizing the appropriate mitigation for impacts to oak woodland in close coordination with CDFG. The cited reference to “continu(ing) to reduce impacts where practicable through the design process” refers to ongoing efforts to further reduce the project footprint to avoid biological resources as the project moves into the final design stage.

In accordance with the Migratory Bird Treaty Act, the contractor will conduct tree trimming and removal first and foremost outside of the nesting bird season of February 15-September 1. Under both of the Build Alternatives, Caltrans would conduct surveys for nesting birds prior to beginning construction on any of the culverts or bridge structures. A qualified biologist will conduct nesting surveys prior to vegetation removal to ensure that no active nests are impacted by the project. Trees may be identified for removal during the nesting season only if a qualified biologist has surveyed the trees and confirmed that there are no active nests present within the trees identified for removal or immediately adjacent. If any active nests are identified during this period, the trees cannot be disturbed for the duration of the nesting season.

Prior to the nesting season, Caltrans would use exclusionary netting where possible to prevent birds from nesting in or on structures that would be impacted by the project.

Letter - LC9

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the state that has never been diked, and together they form a rare ecotone. This landscape warrants the highest level of protection. In addition, Section b also contains seasonal and other tidal wetlands and riparian habitat communities, adding diversity and further contributing to the ecological value of this landscape.

The impacts of the project must be evaluated in the light of the existing types of habitats and broader landscape values, not just individual trees. Native trees not only provide important habitat for native species but a broad array of other services including air purification, and carbon sequestering that helps to counteract global warming.

The values of a woodlands and species that use woodlands are different than isolated trees on oak savannahs. Even though many of the tree habitats are on private lands, they still provide important habitat. There needs to be a discussion of the wildlife species that depend on these habitats. Particular note should be made of migratory species, raptors, neotropical songbirds, and species on the recently-released Audubon WatchList. To make matters worse, significant numbers of native oaks have been lost to sudden oak death.

We are appalled at the number of native trees that would be removed with the project as designed. Option 12b would require the removal of the largest number, 1,017 native trees in Segment B, the segment of our primary concern. However, with the other two options, the numbers are reduced by approximately 300, not low enough to make them acceptable.

While following CEQA guidelines and minimizing tree loss from approximately 2,217 native oaks and 978 native riparian trees and 9,026 Bay Laurel is an improvement, it by no means justifies the current significant projected loss. The DEIR states that CALTRANS "will continue to reduce impacts where practicable through the design process." How this would happen is unclear. Such a vague promise is not sufficient, the EIR needs to discuss specific measures to avoid this impact, and/or to achieve a significant reduction.

The mitigation measures suggested are completely inadequate. The measures recommended in SB 1334, planting of 2 trees for each one removed, paying into a fund and saving existing trees through conservation easements, are completely inadequate. Planting two trees to replace one mature oak would take many years to replace the values and services mature native oaks and other trees provide. Mitigation is not simply a matter of planting trees. Mitigations should replace the habitat type lost. Here there is no indication of even where such large numbers of trees could be planted LC9-32

The preferred mitigation is avoidance of the impact. It does not appear that the avoidance analysis has been sufficiently rigorous. As discussed under PROJECT ALTERNATIVES, there seem to be many more opportunities to reduce tree loss. Provide an analysis that enables the reader to evaluate how impacts can be reduced for each design component that causes tree loss and other environmental impacts. If all of the possible mitigation measurers (design exceptions) were implemented, how much tree loss could be avoided? LC9-33

LC9-34 There should be a comprehensive discussion about the tree loss that identifies the number of trees and species that would be removed for each component of the project. Where are the trees and what species are they? The trees should be shown on a plan with an overlay of the project. For example, the discussion on page 3.3-11 indicates that option 12b would impact more trees because of the westward

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Response to Comment LC9-33

The alternatives analysis (Appendix A) balanced the desire to preserve environmental resources with engineering and cost considerations within the context of the purpose and need of the project. The DEIR/S does present how the impacts to trees differ under each Build Alternative and Access Option and describes the differences between the various alternatives and options. The project footprint has been reduced and will continue to be reduced where feasible during the design process.

Response to Comment LC9-34

The specific number of trees by species will be part of the mitigation and monitoring plan. Tree mitigation measures will be determined by Caltrans, FHWA, and CDFG and are generally outlined in Section 3.3 in Volume 1 of this FEIR/S. The mitigation will be based upon the species and habitat of the trees removed for the project. The impacts to trees by access option are presented in Table 3.3-1. The impact on trees due to Access Option 12b relative to the other access options is shown overlaid on the project in Figure 3.3-2b and 3.3-2c in Volume 1 and in the Project Mapping in Volume 2. In addition, Caltrans will continue to implement avoidance, minimization, and mitigation measures where feasible during construction and in the field.

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LC9-34 alignment of the proposed frontage road and deeper cuts in to the hillside. What is the number of trees that would be removed for the frontage roads on the east and west sides? How many trees and of what species would have to be removed for the hillside cuts? How many trees could be protected if the frontage roads were immediately adjacent to 101?

Wetland Impacts:

LC9-35 The DEIR indicates that the project would result in the permanent loss of up to 5.41 acres of wetlands and 3.37 acres of other waters lost. For a total of almost 9 acres lost. Options 12b and 4b would adversely impact more wetlands than the other alter natives.

LC9-36 As addressed in the tree/woodland discussion above, the EIR should address each project component, at least in Section b, and identify how much wetland and of what type would be lost. The analysis should enable the reader to evaluate whether moving, eliminating or reducing the size of the component would allow for the wetland loss to be avoided. For example, would reducing the size of the fixed and reversible HOV lane avoid wetlands and/or SMHM or Redlegged Frog habitat?

Investigating in an Environmental Assessment is not sufficient mitigation. The recommended mitigation should be to avoid this impact and change the project to accomplish

LC9-37 Potential wetland mitigation alternatives should be discussed in the EIR, and not wait until some later time outside of the CEQA process. If complete avoidance of wetland impacts is truly impossible, which would on ly be in the case of wetlands immediately along the highway alignment, we suggest that Caltrans look to purchasing property and restoring wetlands on properties in the immediate vicinity. The seasonal wetlands south of the landfill access road and the Mira Monte Marina property are possibilities. Using the Mira Monte Marina property would have the benefit of eliminating the need for constructing an access road.

LC9-38 We have several questions about the SMHM discussion on page 3.3-33. We are unable to identify locations for SMHM on figure 3.3.1 as referenced. Please indicate these on that figure specifically. And, where is the "Unnamed bridge over a channel near San Antonio Creek on the east side of the SMART railway" ?

Recent surveys of Marin Audubon's property on Mud slough have found Clapper Rails near San Antonio Creek.

Bird Impacts:

LC9-39 The special status bird list should be included. The oak trees, woodlands and savannah habitats provide nesting and foraging habitats for special status species not addressed in the DEIR, specifically various species of raptors. No special status species that would use upland habitats are even mentioned The state Fish and Game code Section 3503.5 addresses protection of raptors. Black-shouldered Kite, Red-tailed Hawk, Coopers Hawk, and Golden Eagles are all in the vicinity. Nesting season must be avoided, but the project would result in permanent and long term loss of nesting, foraging and perching habitat for these species. This is an even more significant impact than loss of nesting for one season.

There are also state protections for nesting colonial birds. Demolition of the Novato Creek and San Antonio Creek bridges is not identified as a significant impact. It is not clear whether other bridges have been surveyed for nests. If they have not, they should be.

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Response to Comment LC9-35

Table 3.3-2 in the DEIR/S lists the impacts by Segment to potential jurisdictional wetlands and Waters of the U.S. Additionally, Section 3.3.3.3 discusses the impacts to potential jurisdictional wetlands and Waters of the U.S. in the project area by Segment. The Waters of the U.S. Project Mapping in Volume 2 shows the location of all potential jurisdictional wetlands and Waters of the U.S. in the project area in more detail.

Response to Comment LC9-36

Reducing the size of the footprint would not avoid red-legged frog habitat or wetlands.

Response to Comment LC9-37

Caltrans is still looking into appropriate wetland habitat to mitigate for any wetland losses. The Burdell Mitigation Bank, among others, is being considered. Any wetland mitigation credits purchased for the project will be in either Marin or Sonoma Counties.

Response to Comment LC9-38

The "P" symbols identified on the figures represent pickleweed, as noted in the figure Legend. As discussed in Section 3.3.6, pickleweed is associated with SMHM habitat, and the MSN Project will avoid impacting these areas. The "unnamed bridge over a channel near San Antonio Creek on the east side of the SMART railway" refers to the blind-ended tidal channel shown on Figures 3.3-1b and S-5b. The text in Section 3.3.6 has been revised for consistency with the figures.

While it is acknowledged that California clapper rails have been found near San Antonio Creek, recorded occurrences are almost ½ mile away

from the project area and are unlikely to be disturbed by construction associated with the project.

Response to Comment LC9-39

Appendix H of the FEIR/S (located in the Appendices volume) contains a Project Study Area Sensitive Species Table which lists all of the species, including birds, and whether they would be impacted by the project. The minimization measures included in the FEIR/S for nesting birds protected under the Migratory Bird Treaty Act would protect those birds protected under CDFG Code 3503.5. For more details on these minimization measures, please see response to Comment LC9-32.

Novato Creek and San Antonio Creek have been surveyed for nesting birds, and cliff swallow nests were identified on San Antonio Creek and Novato Creek. As stated in Section 3.3.5.4, Caltrans would conduct surveys for nesting birds, including great blue herons, prior to beginning construction on any of the culverts or bridge structures in the project area. Caltrans would conduct surveys for nesting birds prior to the trimming or removal of any trees in the project area.

Potential impacts on nesting birds could be considered adverse if construction occurs in the proximity of nesting birds. However, Caltrans will adhere to avoidance measures to ensure that there would be no adverse impacts to birds.

Letter - LC9

Page 8

Loss of he Cliff swallow colonial nest sites on bridges is not identified as a significant impact even though bridge replacement could result in many hundreds of migrating swallows not having a place to nest when they return from South America. This impact should be so identified and all construction work should be restricted to the non-nesting season, so that birds can return and use a new bridge. If this is impossible, a temporary nesting structure over the creek should be constricted for their use.

LC9-39 Loss of Great-blue Heron nests should also be considered significant because they are colonial nesters.

Other Impacts

LC9-40 A new bike trail and access road use would bring increased impacts. The DEIR should include a discussion of the impact of bike trails as proposed. Discuss potential adverse impacts including increase presence of people on wildlife and habitats, increased noise, dogs possibly off leash, people going off trails, and litter. Who will monitor activities and conditions and enforce restrictions on the new frontage roads and bikeways?

LC9-41 What design features could facilitate wildlife crossing the freeway or reduce mortality rates from their attempts to do so? Would the design include a median barrier that would block wildlife access?

In conclusion, we request that Marin Audubon Society be added to your distribution list. We are an interested organization and nearby property owner. Please address correspondence to Barbara Salzman, Marin Audubon Society, 48 Ardmore Road, Larkspur, CA 94939.

Thank you for responding to our comments.

Sincerely,

Barbara Salzman Co-chair
Conservation Committee

Phil Peterson, Co-chair
Conservation Committee

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Response to Comment LC9-40

Caltrans coordination with CDFG, USFWS, and NOAA Fisheries took into consideration potential project impacts on wildlife. Please refer to Section 3.2.7.3 in Volume 1 for a discussion of potential impacts of construction-related noise; avoidance, minimization and abatement measures for noise are discussed in Section 3.2.7.4. Impacts to animal species generally, and to threatened and endangered species, are discussed in Sections 3.3.5.3 and 3.3.6.3, respectively; for discussion of avoidance, minimization and mitigation measures for animals and listed species, see Sections 3.3.5.4 and 3.3.6.4, respectively. Measures will also be in place during construction to control litter and pet invasion.

Based upon input from bicyclists in Marin and Sonoma County, a bicycle/pedestrian path in the SMART corridor would be favored for use over the MSN paths. Less reliance on the MSN bicycle/pedestrian paths would also reduce impacts to wildlife.

Responsibilities of monitoring activities and conditions and enforcing restrictions would be deferred to the County after completion of access roads and bikeways.

Response to Comment LC9-41

The project will provide small and medium animal passage openings in the median. Cross-culverts will be sized to provide animal crossing where feasible.

Letter: LC10.
Signatory: Marin Conservation League.

Response to Comment LC10-1

The aesthetic importance and high visual quality of the Marin-Sonoma Narrows greenbelt is fully recognized in both the DEIR/S visual analysis and Visual Impact Assessment. The mitigation measures recommended in those documents are intended to address potential project impacts to the fullest feasible extent. Readers are referred to the Avoidance, Minimization and Mitigation Measures described in Section 3.1.11.4 in Volume 1 of this FEIR/S. In addition, mitigation of visual impacts was ranked high in the evaluation of access options in the Narrows, and was a factor contributing to the identification of Access Option 12b as the preferred project alternative.

Response to Comment LC10-2

The project footprint was reduced to the maximum extent practicable while still meeting the project's purpose and need. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's purpose and need.

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November 28, 2007

Caltrans
Attn: Melanie Brent
Office of Environmental Analysis
P.O. Box 23660, Mail Station 6D
Oakland CA 94623

REF: Marin-Sonoma Narrows HOV Widening Project DEIR/DEIS

Dear Ms. Brent:

The Marin Conservation League appreciates the opportunity to comment on this Environmental Document. Our members have been actively involved in the process that has led up to the release of the draft EIR/S. This submission consists of a discussion of what we feel are the critical major issues. Our comments primarily concern the accuracy and sufficiency/adequacy of the DEIR/S discussion of impacts and mitigations. Collectively, these comments also provide a rationale to support our preference for Option 12b within Segment B of the project. Also, our comments are tempered with the realization that currently there are not enough funds to complete the entire project immediately; thus it will be necessary to phase the project over many years.

VISUAL IMPACTS:

LC10-1 The Marin-Sonoma Narrows is a rare, pristine natural and rural setting. Between the Golden Gate Bridge and Healdsburg, the only remaining pristine view sheds along Highway 101 are the lands of St. Vincent's/Silveira Ranch, the Narrows, and the Cotati Grade. It is not until north of Healdsburg that the rural setting reappears. This unique natural resource is a treasure and extraordinary measures should be taken to preserve it. Mitigation of visual impacts must be ranked high in the overall Analysis.

The mitigation measures presented in the DEIR/S are not adequate to protect the visual resources of the Narrows. The following design changes must be evaluated in order to mitigate the severe negative visual impacts identified in the DEIR/S:

LC10-2 Reduce the project footprint through Segment B. This could be achieved by reducing the mainline cross-section and reducing the scale (shoulder, lane and median and right-of-way width) and width of access roads.

Marin County's Environmental Guardian
A nonprofit corporation founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

Letter - LC10

Page 2

LC10-3 The EIR/S must include an estimate the traffic counts of all access roads and pathways. Access road traffic volumes are very low. A single, separated two-way pathway parallel to an access road having reduced width lanes and shoulders should be evaluated in the EIR/S.

LC10-4 • The EIR/S should describe clusters of intense plantings located in the space between the mainline and bikeway/access road. As the clusters grow they will not block out the entire in-close vista.

LC10-5 • These actions would not only soften the visual expanse of the pavement but would also reduce the volume of soil for cuts and fills, reduce impervious surfaces and reduce tree loss.

LC10-6 • Implement Access Option 12b in order to avoid building the South San Antonio Road Interchange shown in other Access Options. Figure 3.1-30 shows the impact with this interchange as seen from the air but does not show the impacts from eye level. The EIR/S must have a photo view simulation of the South San Antonio Road Interchange as see by a traveler on Highway 101, showing it rising out of a relatively flat pasture. This photo should not show mature trees on the freshly filled areas. The new photo would be similar to 3.1-29 which shows the overpass at eye level. The visual impact of the Redwood Landfill Interchange is less severe because there are natural land forms at the ends of the bridge... (See Page 3.1-105, Line 2375)

LC10-7 • Figure 3.1-30 also shows mature trees throughout the San Antonio interchange. We question the accuracy of this depiction in that, even with replacement, this extent of tree cover would not likely occur until 20 years in the future (See also Biological Impacts below). The Figure 3.1-30 should be modified to eliminate newly planted trees.

LC10-8 • Further mitigation of the visual impacts should include a robust reforestation plan that provides 5 year maintenance and a 5:1 replacement rate and irrigation the first 24 months.

LC10-9 • All parties of the Memorandum of Understanding for the Marin-Sonoma Narrows should work towards creating a **scenic highway** for Segment B of the project in order to protect the views for an extended period of time.

LC10-10 • The EIR/S should evaluate specific design exceptions mentioned on DEIR/S Page 3.1-138, Line 2918 This would include tightening the standard for vertical curves. This would reduce the mass of the cut and fills which result in unnatural land forms, greater biological impacts and also reduce construction cost.

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Response to Comment LC10-3

Traffic counts were estimated to compare the Access Options in Segment B. We agree that the traffic expected is very low due to current and projected land uses. The purpose of the access roads is to replace access that adjacent property owners will lose under the Preferred Alternative. The scope of the project includes constructing the access roads to County design standards. A Class I Bikeway throughout instead of the combination of Class I and Class II could be considered during final design. The continuous Class I Bikeway could be accommodated within the current environmental study area, though at a higher cost than the proposed Class I and Class II network.

Response to Comment LC10-4

Visual mitigation measures for the Narrows project segment include the following: “Landscaping measures shall include specific tree and shrub plantings in areas between the mainline and proposed access road and bike paths to provide screening and reduce overall roadway dominance. . . .” This measure is elaborated further in Figures 90 - 92 of the Visual Resources Technical Report/Visual Impact Assessment (VIA), which depict how this measure would be applied and add design recommendations, specifications, objectives, and other detail. Interested readers are referred to Figures 90 - 92 of this document.

Response to Comment LC10-5

Avoidance, minimization, and mitigation measures have been incorporated into the project and will continue to be incorporated throughout the design and construction processes where feasible.

Response to Comment LC10-6

Access Option 12b, without the San Antonio Road Interchange, has been identified as the preferred access alternative.

Response to Comment LC10-7

The size of the trees depicted within the San Antonio interchange in the cited figure is accurate and reflects what the interchange would look like 20 years after construction. Tree pots that are one to three feet in height will be planted after construction to landscape the area. The large trees shown in the images outside the project footprint will not be affected by the project.

Response to Comment LC10-8

Project revegetation of disturbed native vegetation would be replaced at a 5 to 1 ratio in Project Segment B, as called for in the visual mitigation measures for tree/vegetation removal in Volume 1 of this FEIR/S (Section 3.1.11.4) and the Visual Resources Technical Report. Other areas, which are principally urbanized, will be revegetated according to a planting plan that has yet to be developed. We will be using a variety of drought-tolerant species. The final plant list will be developed in cooperation with the local City and County agencies. Under standard Caltrans plant establishment practices, these plantings would be maintained and irrigated for 3 years, monitored, and unsuccessful plantings replaced within that period.

Response to Comment LC10-9

Please refer to the response to Comment LC8-28.

Response to Comment LC10-10

Design exceptions were pursued to balance cost and environmental impacts while still providing a safe facility for the traveling public. Design exceptions have been approved to provide steeper cut/fill slopes and a reduced median width to minimize the environmental footprint. Retaining wall systems have been utilized to reduce impacts where feasible.

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Page 3

LC10-11 • The EIR/S should include substantive discussion regarding the vertical profile of the project alternatives and illustration/discussion of the magnitude of cut and fill, , and, if cut-fill quantities are not balanced within the project, the magnitude of the imbalance and where the excess will come from or be hauled to.

ENERGY AND GREENHOUSE EMISSIONS

LC10-12 The DEIR/S, Section 3.2.8 discusses the comparative direct energy requirements of the Alternatives. However this section lacks adequate presentation of the data that supports the conclusions in the text. The EIR/S must include tables that show Vehicle Miles Traveled (VMT), speeds of HOV and mainline vehicles, delay times, assumed fuel consumption for vehicles traveling at the speed limit, at the speed of the HOV vehicles and speed for vehicles in the mixed flow lanes. The EIR/S should then use these factors determine the relative operational energy requirements among the Alternatives.

LC10-13 The DEIR/S does not discuss any indirect energy demands associated with construction. To adequately compare the total energy requirements of the build-alternatives, it is necessary not only to compare post-construction operational use among alternatives but also to tabulate the direct construction energy of earth movements in cuts and fills, the energy involved in the preparation of the pavement materials and the energy cost of the structures. Given the current urgency of accounting for all energy expenditures, it is of more than academic interest to determine the full energy consumption of the build alternatives as well as the no project case.

LC10-14 Estimates of traffic counts over all access roads and traffic counts of bicycle and pedestrians should be included in the EIR/S so that judgments can be made as to whether certain project structures and features are cost effective.

LC10-15 The DEIR/S makes no mention of the impact of the project on Global Climate Change (GCC) or Green House Gas emissions (GHG). Summary conclusions of the Caltrans' *Standard Environmental Reference Guidelines* should be included in the FEIR/S. We recognize that the analysis of GHG Emission and GCC is an evolving science and that currently there are no federal or state regulations that require it. This DEIR/S should take the lead in developing an appropriate protocol[1].

[1] Association of Environmental Professionals, Alternative Approaches to Analyzing Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final June 29, 2007

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Response to Comment LC10-11

Locations of major cuts and fills are listed in the following table:

Proposed Alignment Shift in Segment B

Approximate Location	Proposed Alignment
Begin to Olompali SHP	Maintain existing alignment
Olompali SHP to Redwood Landfill OC	Shifts easterly up to 27 m (90 ft)
Redwood Landfill OC to Silveira Dairy	Shifts westerly up to 21 m (70 ft)
Silveira Dairy to San Antonio Rd	Maintain existing alignment
San Antonio Rd to S. Kastania	Shifts westerly up to 79 m (260 ft)
S. Kastania to N. Kastania	Shifts easterly up to 21 m (70 ft)
N. Kastania to Petaluma River	Shifts westerly up to 34 m (110 ft)
Petaluma River to SR 116	Maintain existing alignment

Through these areas the proposed profile will shift the new roadway up to 8.5 m (28 ft) above or up to 7.3 m (24 ft) below the existing roadway. Segment 12b earthwork is balanced and a total of 1,140,000 cubic meters of material will be moved to complete the project.

Response to Comment LC10-12

No federal regulations yet exist that require the quantification of direct and indirect energy usage from freeway projects. This document applies the guidance in FHWA Technical Advisory 6640.8A in order to comply with CEQA. Under the guidance only a qualitative analysis is required for projects with no potential for substantial energy impacts. The addition of two HOV lanes to an existing freeway would be considered one of these.

Response to Comment LC10-13

No federal regulations yet exist that require the quantification of direct and indirect energy usage from freeway projects. This document applies the guidance in FHWA Technical Advisory 6640.8A in order to comply with CEQA. Under the guidance only a qualitative analysis is required for projects with no potential for substantial energy impacts. The addition of two HOV lanes to an existing freeway would be considered one of these.

Response to Comment LC10-14

Caltrans estimated traffic counts and considered land use within Segment B in identifying Access Option 12b as the Preferred Alternative. This option would provide direct access to US 101 from Redwood Landfill, for instance, which generates more traffic compared to surrounding low density land uses.

Response to Comment LC10-15

Please see the Master Response on Greenhouse Gas Emissions.

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Response to Comment LC10-16

Local access was studied on the east side of the existing railroad at the Marina during the Evaluation Criteria Matrix performed in June of 2005, and was eliminated due to environmental impacts and because it would not be feasible to provide access for all properties in the area.

Response to Comment LC10-17

Fixed HOV Access Option 12b has been identified as the Preferred Alternative.

Response to Comment LC10-18

Retaining walls are being utilized to minimize tree impacts at this location.

Response to Comment LC10-19

The referenced growth study also found that the county planning officials had no intention of relaxing their land use controls in these sensitive areas. Consequently the proposed project was not projected to have an important effect on growth. Also see the responses to Comments I50-4 and I50-5.

PHYSICAL AND BIOLOGICAL IMPACTS

LC10-16 The DEIR/S shows the greatest wetlands impact as being the access road serving the Mira Monte Marina. The EIR/S should show an alternative that eliminates the present design of the access road between Landfill Road and the Mira Monte Marina. We propose that Caltrans assist Marina land owners to obtain an access agreement with Waste Management Inc. for the right to use the existing access road that is located to the east of the railroad tracks. This would eliminate the need for any road to traverse this wetlands area and would also eliminate one at-grade railroad crossing, which in the future may require very costly signalization required for protection of the passenger rail traffic. The EIR/S should evaluate this proposal.

LC10-17 Note that Access Options 14b and 14d includes an access road between the Landfill overpass and South San Antonio over crossing. This forces bikes and pedestrians to share the access road with the heavy truck traffic from the landfill operations.

LC10-18 The EIR/S states that Access Option 12b entails the greatest removal of oak woodland, due in part because of the grading done on the west end of the Landfill Interchange. The EIR/S should evaluate a design modification that shortens the penetration of the access road to the west and expands the use of retainer walls. Together this would reduce the tree removal substantially. The EIR/S should recognize that Access Option 12 b avoids a larger overall loss and fragmentation of grassland and oak savanna by the Silveira interchange than due the other options.

LC10-19 The EIR/S should include the findings stated in the *Marin Sonoma Narrows Project Growth Inducement Analysis*, Page 21 which states that the San Antonio Road area is very sensitive to any unplanned growth. The EIR/S should provide a range of expected growth at San Antonio Road if this were to occur through 2030. Section 2.1.1 of the Growth Inducement Analysis states that the study will investigate the potential for unplanned growth due to the project.

CONSTRUCTION STAGING

MCL believes that it is important that this project achieve its purpose and needs quickly. Delays will perpetuate lost productivity, mobility and personal safety/enjoyment caused by congestion and energy waste due to inefficient operation of vehicles on the existing expressway. Safety improvements will follow with the improvement in traffic flow and the closure of at-grade driveways entering the expressway.

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Letter - LC10

Page 5

LC10-20 Therefore, the EIR/S should present an analysis of how the overall project might be staged to best accomplish greater safety and reduce congestion as funds become available over time. The EIR/S should present an analysis of alternative staging/phasing of sub-projects within the overall project to accomplish the greatest safety and congestion reduction benefits as funds become available over time. Detailed microscopic traffic operations simulation of various phasing strategies needs to be completed and documented for the morning and afternoon peak periods to identify the most effective sub-project phasing sequence.

LC10-21 If the EIR/S analysis supports a scenario to phase the construction of Segment B first, we further recommend that infrastructure that eliminates the need to cross over lanes be built first. For example, opening the Landfill Overpass to the public and building an access road between Landfill road and San Antonio road would eliminate the greatest hazard on the current expressway.

LC10-22 The Narrows is unique in many ways. In terms of congestion, because there are no major highways or streets entering or leaving the freeway, through the Narrows, the congestion that enters the boundary of Segment B will continue through the balance of the Segment. The Segment B bottleneck will not be eliminated until the HOV land is completed through the entire Narrows. We believe that an operational analysis of building all Segment B first would confirm that it provides the greatest benefit to the public. The EIR/S should evaluate the impacts of this staging.

IN CONCLUSION

LC10-23 Throughout these comments there is reference to features that may require Design Exceptions but could achieve significant cost savings. The Final EIR/S must provide policy makers with information that will allow them to decide whether it is better to build a freeway now with available funds, but with cost saving exceptions, or wait for more funding and take the more expensive approach that adheres to their standard design. We believe that the public prefers congestion relief and improved safety as soon as possible.

We look forward to your response to our concerns.

Regards,

Roger Roberts

Roger Roberts, President, Marin Conservation League

Don Wilhelm

Don Wilhelm, Chair, Marin Conservation League Transportation Committee

cc: Dianne Steinhauser, Executive Director,
Transportation Authority of Marin (TAM)

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Response to Comment LC10-20

Caltrans, FHWA and the local partners Sonoma County Transportation Authority (SCTA) and Transportation Authority of Marin (TAM) have decided on the first construction phase. (See the Summary in Volume 1 of this FEIR/S for a description of Phase 1.) The above agencies will take into consideration safety and the most efficient congestion reduction benefits. The planning of future phases will likewise take these factors into consideration.

Response to Comment LC10-21

First phase construction will eliminate the majority of at-grade intersections by constructing the interchanges and associated frontage roads.

Response to Comment LC10-22

Caltrans, FHWA and the local partners SCTA and TAM have decided on the first construction phase. (See the Summary in Volume 1 of this FEIR/S for a description of Phase 1.) The above agencies will take into consideration safety and the most efficient congestion reduction benefits. The planning of future phases will likewise take these factors into consideration.

Response to Comment LC10-23

The purpose of the FEIR/S is to provide information to decision-makers on the environmental consequences of the alternatives under consideration. The Project Report contains the information regarding design exceptions and their justification. These two documents together are the basis for Caltrans' decision of whether to approve the Project or not. The MSN Project Preferred Alternative includes standardizing roadway features, which will result in enhanced safety.

Letter: LC11.
Signatory: Transportation Solutions Defense and Education Fund (TRANSDEF).

Response to Comment LC11-1

The commenter is inquiring about the role and availability of the Marin-Sonoma Counties Major Investment Study (MIS) Summary (Draft), prepared May 2000, as it relates to Caltrans' decisionmaking process. Caltrans District 4 (the District) prepared this document to satisfy a requirement of the ISTEA (Intermodal Surface Transportation Efficiency Act of 1991). As such, it was an internal informational document prepared for FHWA in anticipation of requests for federal funding. With the adoption of TEA-21 (Transportation Equity Act for the 21st Century, 1998), the MIS ceased to be a requirement, which is why the Marin-Sonoma Counties MIS was drafted but never finalized. By the time the Project Study Reports were approved (1999-2001), covering the approximate MSN project boundaries, there were planning documents by Sonoma County Transportation Authority, the Marin Congestion Management Agency, and the Metropolitan Transportation Commission's Regional Transportation Plan discussing plans to address congestion in the US 101 corridor. These plans are subject to public review, and they are discussed in Section S.6 and Section 3.1.2, Land Use Planning, of the DEIR/S (and in Volume 1 of this FEIR/S). The MIS does not add any new information to these documents that are publically available and already discussed in the EIR/S. Therefore, the recirculation of the DEIR/S is not required.

Although the District did not rely on the MIS for any project decisions, Caltrans is including it as part of the administrative record for the purposes of disclosure. The text in the FEIR/S Section 1.1 has been revised to state that the "MIS discusses a range of alternatives to relieve congestion in the US 101 North Bay corridor." Information has also been added to explain the role of the MIS, that public review of this document

LAW OFFICE OF MARC CHYTILO

ENVIRONMENTAL LAW

December 14, 2007

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RE: Comments to DEIR/DEIS, Marin-Sonoma Narrows Project

Dear Ms. Simpson and Mr. Clinton:

This office represents Transportation Solutions Defense and Education Fund (TRANSDEF) in this matter. TRANSDEF is a public interest organization dedicated to regional transportation planning in the San Francisco Bay Area.

LC11-1 TRANSDEF believes that your agency is proceeding down an inappropriate and potentially impermissible path in processing this project. Failure to properly describe the project objectives and truncating the analysis by focusing on a single mode has prejudiced the adequacy of the alternatives analysis and the adequacy of the CEQA and NEPA review processes. The absence of the MIS as part of the publicly available information constitutes omission of a fundamental element of the Project Description. We implore your agencies to recirculate the environmental review documents in light of our concerns – with the public release of the MIS, a complete description of Project Objectives, and a complete alternatives analysis – to both ensure that the requirements of these environmental review processes are met and this project is given the appropriate level and type of public review and comment.

LC11-2 For purposes of this comment letter, reference is made to both state and federal authority under CEQA and NEPA. Parallel state and federal legal authority generally exists for each legal and regulatory point made in this letter, even though only state or federal authority is cited. See, generally, *City of Carmel-by-the-Sea v. DOT*, 123 F.3d 1142, 1150 (9th Cir. 1997). We note, however, that NEPA does not preempt CEQA, and where CEQA's requirements are more extensive, they apply with equal vigor, albeit only to the state agency actions. The CEQA Guidelines and DOT's NEPA regulations, 23 C.F.R. Part 771, are similar in many ways and apply many of the same principles.

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was not required under ISTEA, and that the MIS ceased to be required with the passage of TEA-21. The MIS has also been listed in Chapter 9, Technical Studies and References, in Volume 1 of this FEIR/S; as with all references, it is available upon request to the District.

Please also see the Master Response on Range of Alternatives.

Response to Comment LC11-2

Please see the Master Response on Range of Alternatives.

Letter - LC11

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1. Absence of Project Objective Statement

LC11-3 An inadequate CEQA Project Description and Objective statement infects the DEIR's alternatives analysis. The CEQA Guidelines provide: "A clearly written statement of the objectives will help the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and will aid decisionmakers in preparing findings . . . The statement of objectives should include the underlying purpose of the project." Guidelines § 15124(b). See also, *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336. "An EIR may not define a purpose for a project and then remove from consideration those matters necessary to the assessment whether the purpose can be achieved." *County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1, 9.

LC11-4 In this case, the DEIR avoids any articulation of the project objectives, reverting to a self-justifying statement of "purpose and need." The purpose and need chapter fails to conform to CEQA's project objectives statement. This is an issue TRANSDEF has raised consistently through this project – the project objective is to address the capacity constraints in the corridor, not just to widen the highway. The capacity constraints may be addressed by an multimodal alternative that can reduce highway usage with numerous environmental benefits and thereby reduce congestion by reduced highway demand, rather than increased highway capacity. The project objectives can and presumably should include other objectives, including addressing safety, flooding, and the management of sensitive natural resources in the highway corridor. As discussed in the alternatives analysis comments, the failure to employ a proper project objectives methodology prevents fulfillment of one of CEQA's core functions – determining whether a feasible alternative may meet with project objectives. If it can, the principal project cannot be approved. It is evident to TRANSDEF that alternatives to the objective of increased corridor capacity do exist, and could achieve all of the putative project objectives with lesser impacts and at substantially lesser economic costs.

LC11-5 In recent years a number of project applicants have attempted to avoid or defeat CEQA's substantive alternatives analysis mandate by adopting an overly narrow project objective statement or contending that otherwise feasible alternatives are simply not appropriate. See, *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336; *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587.

2. Failure to Release and Make Available Adequate Project Information

LC11-6 As noted above, CEQA's requirement of disclosure of the project objectives was not properly provided, infecting the environmental review document. Instead, the DEIR/S contained various summary statements, constituting the entirety of Chapter 1, describing the "Project Need and Purpose." This information essentially provided numerous justifications and rationalizations for the proposed project. As noted, this biases the alternatives analysis.

Response to Comment LC11-3

Please see the Master Response on Need and Purpose.

Response to Comment LC11-4

Please see the Master Response on Need and Purpose.

Response to Comment LC11-5

Please see the Master Responses on Range of Alternatives and Need and Purpose.

Response to Comment LC11-6

Please see the Master Response on Need and Purpose.

Letter - LC11

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LC11-7 More importantly, the lead agencies have not released the Major Investment Study (MIS) that apparently is extensively (if not exclusively) relied upon in the environmental review process to drastically narrow the range of alternatives considered in the environmental review documents. The MIS has historically served a critical and central role in the transportation planning process. (See former 23 C.F.R. § 450.318). Although the MIS process has been streamlined for the purpose of avoiding the segmentation of corridor planning and environmental review processes that has plainly occurred in this case, SAFETEA-LU § 3005, 23 C.F.R. Part 450, App. A, it is abundantly evident that the MIS has, in this case, played a role in narrowing alternatives independently from the CEQA alternatives analysis process. Requests to review the MIS have been systematically denied. (Pers. Communication David Schonbrunn, TRANSDEF President.) Thus the MIS has served, through a secret process not involving public participation or even allowing public review, as a basic and fundamental screen eliminating many of the project alternatives that TRANSDEF and others believe are more appropriate to address the project objectives and which potentially involve substantially lesser environmental impacts.

LC11-8 As SAFETEA-LU and the revised MPO transportation planning process regulations establish, the transportation planning process (including the corridor planning study process) should be integrated into the NEPA (and CEQA) environmental review processes. SAFETEA-LU § 3005, 23 C.F.R. Part 450, App. A. Some jurisdictions have been doing this for many years, including during the entire term of this project's environmental review process. See, for example, 65 Fed. Reg. 35155, 6/1/2000 (MIS used as the scoping document and process for the I-75 Corridor MIS process).

LC11-9 The lead agencies' treatment of this issue is particularly troubling in light of the early identification of this issue by TRANSDEF and other members of the public. See Letter, LOMC to Ms. Susan Simpson, Caltrans and Mr. C. Glenn Clinton, Federal Highway Administration, June 15, 2001. ("Failure to properly describe the project and alternatives at this stage will prejudice the adequacy of the CEQA and NEPA review processes . . ." Attachment 3 to TRANSDEF comment letter.). Despite these early calls for an open and robust scoping, project objective definition and alternatives analysis process, the DEIR/S fails to include a robust set of meaningful alternatives and even fails to disclose many of the basic facts, assumptions and conclusions that underlie the environmental review process.

LC11-10 The public has a responsibility to participate in the environmental review process as part of contributing to preservation and enhancement of the environment. Pub. Res. Code § 21000(e). CEQA's environmental review process "protects not only the environment but also informed self-government." *Citizens for Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. Both the informational and the environmental protection goals are thwarted when information is not released and the public's concerns are not addressed in a public process. The refusal to release and distribute the MIS as part of the environmental review process has prejudiced CEQA's goals and tainted the adequacy of the DEIR/S, and has made meaningful public comment impossible. The DEIR/S is "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment [is] precluded." CEQA Guidelines § 15088.5(a)(4). Recirculation, including the essential MIS and related information, is necessary to cure this error. Pub. Res. Code § 21166.

Response to Comment LC11-7

Please see the response to Comment LC11-1.

Response to Comment LC11-8

The MSN Project is the result of a transportation planning process that is integrated into the NEPA/CEQA review processes. The planning process for transportation projects, like the MSN Project, that are anticipated to be programmed over the next 25 years are included in the regional plans. The MTC in the Bay Area prepared an EIR that included the MSN Project as part of its regional plan. This plan is subject to CEQA/NEPA review processes.

Please also see the response to Comment LC11-1.

Response to Comment LC11-9

FHWA and Caltrans submit that rather than freezing the initial project, the Caltrans/FHWA public involvement process has resulted in revisions which have made the alternatives more responsive to stakeholder concerns and reduced environmental impacts.

Volume 1, Chapter 6 of the DEIR/S (and this FEIR/S) discloses meetings and consultations with various stakeholders which led to revisions of the initial proposal. The Summary section of the FEIR/S discloses early comments and areas of controversy that Caltrans/FHWA took into consideration during the project development process.

The basic facts, assumptions and conclusions underlying the FEIR/S are disclosed in Volume 1 by topic based upon the technical studies and analysis.

Please see the Master Responses on Range of Alternatives and Need and Purpose.

Response to Comment LC11-10

Please refer to the response to Comment LC11-1.

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3. Public Resources Code § 21092.4 Consultation Issues

A. Duty to Notify and Consult

LC11-11 As a project of regional significance, Caltrans had the duty to consult with the affected transportation planning agencies as well as each public agency with transportation facilities within their jurisdiction which could be affected by the project. Public Resources Code § 21092.4(a). Affected transportation facilities is defined by the statute to include "major local arterials and public transit within 5 miles of the project site and freeways, highways and rail transit service within 10 miles of the project site." Pub. Res. Code § 21092.4(b).

LC11-12 The DEIR/S Consultation chapter offers no specific evidence that all affected transportation facilities subject to Pub. Res. Code § 21092.4 were identified (no maps showing the five and ten miles limits are included) and no reference to Pub. Res. Code § 21092.4 whatsoever. While there is reference to consultation, the public outreach to affected jurisdiction was not designed to address Pub. Res. Code § 21092.4 compliance, nor is there evidence that the consultation was intended to rise to a level of information and involvement in the same manner as would occur for responsible agencies.

B. Duty to Provide MIS During Pub. Res. Code § 21092.4 Consultation

LC11-13 As lead agency, Caltrans must provide all such affected agencies and jurisdictions with all "environmental documents pertaining to the project." Pub. Res. Code § 21092.4(a). This would necessarily include the MIS. Consultation is to be conducted in the same manner as for responsible agencies.

C. The Lead Agencies Have Failed To Meet Their Duties to Affected Agencies and Jurisdictions As If They Are Responsible Agencies

LC11-14 As a result of the defects identified above, the lead agencies have failed to met their responsibilities to the affected agencies and jurisdictions as established by Pub. Res. Code § 21092.4. CEQA requires these affected agencies and jurisdictions be treated as if they are responsible agencies. Guidelines § 15082 establishes that upon notification about the project (typically at the scoping phase), responsible agencies are expected to identify the key issues of concern, and lead agencies can be obligated to conduct the analysis of issues requested by those responsible agencies. *Save San Francisco Bay Ass'n v. San Francisco Bay Conservation and Development Commission* (1992) 10 Cal.App.4th 908. In this case, the failure to perform the mapping and thus identification of jurisdictions to which the lead agencies had duties of notice and issue analysis under CEQA prevented these agencies and jurisdictions from properly participating in the environmental review process. In the absence of notice,

LC11-15 the process cannot proceed. A fair argument exists that had these agencies and jurisdictions been properly notified at the scoping phase, they would have reasonably requested a detailed considerations of project alternatives based on the project objectives. The project will have a significant impact on a

Response to Comment LC11-11

A "Project of Statewide, Regional, or Areawide Significance" is defined under CEQA Guidelines section 15206(b). Caltrans staff has reviewed the criteria under this section and found that it does not apply to the MSN Project. Therefore, the project does not qualify as one of regional, areawide or statewide significance. However, appropriate consultations have taken place with affected transportation planning agencies. As documented in Chapter 6 in Volume 1 of this FEIR/S, Caltrans and FHWA conducted consultations with responsible agencies to gather information on the project's effect on major arterial, public transit, freeways, highways and rail service within the consulted agency's jurisdiction.

Response to Comment LC11-12

Please see the response to Comment LC11-11 above.

Response to Comment LC11-13

Please see the responses to Comments LC11-1 and LC11-11.

Response to Comment LC11-14

Please see the response to Comment LC11-11.

Response to Comment LC11-15

Please see the responses to Comments LC11-1 and LC11-11.

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number of sensitive biological resources or considerable community importance, as well as causing impacts to the entire regional transportation network, and as such, it is probable that the environmental review documents would address other issues and specifically examine more openly and effectively the issue of alternatives. This environmental review process failure establishes an independent duty of recirculation, after public disclosure of the MIS and the identification and notification of affected agencies and jurisdictions under Pub. Res. Code § 21092.4. LC11-15

4. Improper Segmentation of Project Review and Decisionmaking

The DEIR/S displays improper segmentation and segregation of basic transportation planning process, decisions and priorities from the environmental review process and documents. This taints the adequacy of the environmental review documents.

In amending the transportation planning guidelines, the Department of Transportation specifically noted the "culture" of separating NEPA's environmental review process from both regional transportation planning processes as well as in planning level corridor studies. 23 C.F.R. § 450, App. A. Congress specifically outlawed this practice. SAFETEA-LU § 5003. Unfortunately, this is exactly what transpired in this instant case, and is precisely what TRANSDEF urged should not happen. Law Office of Marc Chytilo Letter, *supra*, June 15, 2001. (Attachment 3 to TRANSDEF comment letter). The legal, technical, environmental and practical flaws and defects associated with this environmental review document necessitate that the lead agencies re-initiate and re-conduct this process, including the alternatives analysis screening process purportedly embodied in the MIS, followed by recirculation of the Draft EIR/S environmental review documents. LC11-16

5. Use of Current Information

The DEIR/S fails to utilize current information pertaining to land use planning assumptions and regional priorities embracing smart growth. The DEIR/S relies on year 1998 land use projections, despite the availability of year 2003 data with dramatically different land use priorities, assumptions and projections. The effect of this more current information is a substantially different impact analysis. NEPA insists on the circulation of a supplemental EIS (23 C.F.R. § 771.130(a)(2) whereas CEQA requires recirculation. Pub. Res. Code § 21166. LC11-17

6. Alternatives Analysis - CEQA

The requirement that less impactful alternatives be identified through the alternatives analysis process in every DEIR/S is one of CEQA's most substantial mandates to ensure environmental protection. The California Supreme Court has opined: "[t]he core of an EIR is the mitigation and alternatives sections. The Legislature has declared it the policy of the State to "consider alternatives to proposed actions affecting the environment." Pub. Resources Code § 21001(g); *Laurel Heights*, 47 Cal.3d at 400. Section 21002.1(a) of the Public Resources Code provides: "The purpose of an environmental impact report is to identify the significant effects of a project on the environment, *to identify alternatives to the* LC11-18

Response to Comment LC11-16

Please refer to the Master Response on Need and Purpose. Also, as stated in the DEIR/S (Volume 1, pages S-3 and 1-4), the MSN Project can be described as three independent projects; however, the environmental document encompasses all three segments to discuss relevant environmental impacts. Therefore, segmentation has not occurred.

Response to Comment LC11-17

Please see the Master Response on Use of Current Information.

Response to Comment LC11-18

Please see the Master Response on Range of Alternatives.

Letter - LC11

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Response to Comment LC11-19

Please refer to the Master Response on Range of Alternatives. The integration of Transportation System Management (TSM) strategies combined with the enhancement of alternative and transit modes would fail to meet the need and purpose in ways similar to the express bus or commuter rail services alone. Text has been added to the FEIR/S to clarify why the SMART's proposed goods movement and commuter rail service alone would not adequately address commuter and goods movement needs in the US 101 corridor. As noted in the DEIR/S (Vol. 1, pg. 2-33 and 2-36), the existing conditions of US 101 impose limitations on fully utilizing TSM strategies, such as ramp metering. As stated under the Express Bus Alternative, the utilization of this service will be enhanced by availability of HOV lanes in the corridor.

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project, and to indicate the manner in which those significant effects can be mitigated or avoided." *Citizens for Goleta Valley* 52 Cal.3d at 564 (so in original). Where feasible alternatives exist, the project cannot be approved. ""[I]t is the policy of the state that public agencies should not approve projects as proposed if there are *feasible alternatives* or *feasible mitigation measures* available which would substantially lessen the significant environmental effects of such projects." *Id.* (so in original).

Regardless of who prepared the DEIR, and who controlled its development, "the duty of identifying and evaluating potentially feasible project alternatives lies with the proponent and the lead agency, not the public." *Citizens for Goleta Valley* 52 Cal.3d at 568. The lead agencies bear this responsibility.

LC11-18 The alternatives analysis contained in the DEIR/S is woefully inadequate. Infeasibility of alternatives must be established by substantial evidence that is specific and concrete. *Citizens for Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1180-1183 (mandating comparative data and analysis). Conclusory statements are inadequate. *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1034-1035. In this case, the analysis and explanation of "Alternatives Considered and Withdrawn" is entirely conclusory and inadequate.

LC11-19 In the case of the Commuter Rail Service alternative, p. 2-36, the DEIR/S admits that this could have a beneficial impact on the corridor's operations "as an adjunct." There is no analysis or explanation of the assumptions of the fraction of trip diversions that the lead agencies concluded could be achieved by the Commuter Rail alternative, so the implicit conclusion that it is infeasible (since it is listed as an alternative that was "withdrawn") is entirely unsupported. As TRANSDEF has noted, some elements of the project objectives can be achieved in Segment B and elsewhere (ramp improvements, flood control, etc) without the highway widening. Combining these functional and operational improvements to address these elements of the project objectives with commuter rail to meet the needed capacity increases and a substantial fraction of the congestion relief could serve as a viable, feasible project alternative. Yet, it is simply "withdrawn" from further consideration based on a single paragraph of narrative describing the unsupported "beliefs" and "expectations" of the lead agencies that has no real explanation of why the alternative cannot address a significant element of the project objectives. This reflects the type of superficial "conclusory statements" rejected in other settings. TRANSDEF implores the lead agencies to expand their thinking and work pro-actively to develop a feasible alternative that builds on the momentum that the SMART program has generated.

Significantly, the alternatives analysis fails to integrate the TSM strategies with the enhancement of alternative and transit modes, which could likely, in combination, serve as a comparable and feasible project alternative. The analysis again appears designed to rationalize rejection, rather than engaging in a good faith effort to find the preferable solution.

7. Alternatives Analysis - NEPA

NEPA imposes a similar set of duties upon federal agencies in examining alternatives. As previously stated to the lead agencies:

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Response to Comment LC11-20

Please refer to the response to Comment LC11-8 and the Master Response on Range of Alternatives.

Response to Comment LC11-21

Please refer to the Master Response on Range of Alternatives.

On the surface, the commenter's assertion seems reasonable. Presently, US 101 is operating at capacity during the peak periods. It seems the removal of a relatively small number of vehicles from the highway would bring the volumes below capacity and greatly improve the operation of the highway.

However, even today, there is a greater demand for travel upon US 101 than there is capacity to accommodate this demand. This excess demand manifests itself as, for example, travelers queued on the freeway, travelers who have shifted their travel times to less desired times to avoid the peak period, and travelers who have shifted their routes to avoid US 101. The present traffic counts often represent the capacity of the highway, not the true traveler demand. Therefore, it is incorrect to assume that if the small percentage of travelers stop using US 101 the operation of the highway would improve greatly. Most likely, their place would be largely filled with travelers shifting their routes or travel times to the peak hours on US 101. The result would be a small reduction in traffic on parallel routes, a slight reduction of off-peak traffic on US 101, and a small reduction in peak period congestion. To eliminate congestion on US 101 it would be necessary to make the demand on US 101 less than the capacity. This could be accomplished by reducing the demand, increasing the capacity, or both. This does not mean that any increase in capacity or reduction in demand that that is not large enough to bring capacity over demand is futile. Any increase in capacity or reduction in demand will result in decreased congestion, both on US 101and other parallel routes, as well as allowing travelers to make their trips closer to their preferred time. It just means that the benefit will be roughly proportional to the increase in capacity or decrease in demand and that a small decrease in demand will not cure congestion.

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"When a federal agency prepares an Environmental Impact Statement (EIS), it must consider "all reasonable alternatives" in depth. 40 C.F.R. § 1502.14. No decision is more important than delimiting what these "reasonable alternatives" are. That choice, and the ensuing analysis, forms "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. To make that decision, the first thing an agency must define is the project's purpose. See *Citizens Against Burlington, Inc. v. Busey,* 290 U.S. App. D.C. 371, 938 F.2d 190, 195-96 (D.C. Cir. 1991). The broader the purpose, the wider the range of alternatives; and vice versa. The "purpose" of a project is a slippery concept, susceptible of no hard-and-fast definition. One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence). The federal courts cannot condone an agency's frustration of Congressional will. If the agency constricts the definition of the project's purpose and thereby excludes what truly are reasonable alternatives, the EIS cannot fulfill its role. Nor can the agency satisfy the Act. 42 U.S.C. § 4332(2)(E)."

Simmons v. Army Corps of Engineers, 120 F.3d 664, 666 (7th Cir. 1997), from Law Office of Marc Chytilo letter, June 15, 2001, supra.

LC11-20 The project is ostensibly intended to address commute hour congestion from capacity deficiencies in the Highway 101 corridor in the project reach. Capacity inadequacies are manifested during peak commuting hours. A substantial majority of commuters employ a single occupancy vehicle and commute from established and developing residential areas into defined employment centers. Federal law directs specific monitoring programs and evaluation of congestion management strategies, and conditions the addition of system capacity upon a demonstration of necessity, unlike other forms of system improvements, including, notably, "public transportation improvements." 23 C.F.R. § 450.320.(c)(3)(iii). Federal law and policy, as well as local and regional priorities, require a more complete evaluation of multimodal alternatives than the cursory analysis contained in the DEIR/S. The Department of Transportation's regulations prohibit of the use of federal funds on any project that will result in a significant increase in the carrying capacity for single occupancy vehicles (SOV) unless the project is addressed in the pertinent congestion management process. 23 C.F.R. § 450.320(d). Again, the DEIR/S lacks sufficient analysis to demonstrate that this process has been satisfied, and in particular, whether an multimodal or public transportation-based alternative can address any substantial portion of the stated project need.

LC11-21 The DEIR/S fails to acknowledge that elimination of a relatively small percentage of the current and future commuters during peak hours through alternative transportation strategies, such as a rail-based public transit system, would alleviate traffic congestion and restore the highway's use to below capacity. Importantly, a rail-based alternative would be capable of accommodating future increased needs, and reduce adverse induced and cumulative environmental impacts associated with sprawling land use patterns. In short, it has many advantages over the proposed project.

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LC11-22 As noted in 2001, the 1997 Sonoma/Marin Multimodal Transportation and Land Use Study, funded by Caltrans, determined that a rail system was more cost-effective than the project proposed in the NOP/NOI. For the same cost as the highway segment capacity expansion, a sub-regional rail system can be built, with broad and long-term benefits. TRANSDEF previously requested that an alternative be studied using the Calthorpe land use assumptions with the smart rail, but that request was summarily rejected. A rail program alternative must be included and studied in a recirculated environmental review document.

8. Impact Analysis

LC11-23 TRANSDEF previously commented that the environmental review documents should address the issues of induced growth, construction delays versus congestion relief, cumulative impacts and identify the term of any congestion relief benefit from the proposed highway widening project. These analyses were not properly completed.

A. Induced VMT

LC11-24 "A growing body of research has shown that widening highways is only a temporary solution at best to the complex problem of traffic congestion. Indeed, research has pointed to a phenomenon known as "induced traffic" that suggests new and wider highways actually create additional traffic, above and beyond what can be attributed to rapid population increases and economic growth." http://www.transact.org/Ca/congestion2.htm. See *Sierra Club v. DOT*, 962 F.Supp. 1037 (N.D. Ill., 1997).

B. Construction Delays

LC11-25 Studies show that gains in congestion relief from highway expansion may not always exceed the additional congestion associated with construction delays. See http://www.transact.org/Reports/woes/default.htm.

C. Cumulative Impacts

LC11-26 The environmental review document must comprehensively address the cumulative effect of this project, including the impacts associated with expanding the region where sprawl is induced as a result of additional long-distance SOV commuting. The beneficial effect that traffic congestion has upon public transit ridership must be examined. As a more environmentally-benign transit system is in development in this same corridor (SMART), the DEIR/S has improperly failed to examine the effect that the no build project would have on SMART ridership (increased ridership due to delays in the comparable single occupancy vehicle highway mode) and the effect of the highway widening (reduced SMART ridership from the increased viability of the single occupancy vehicle alternative due to at least temporarily reduced highway congestion). Given the priority assigned to intermodal and public-

LC11-27

Response to Comment LC11-22

Please refer to the Master Response on Range of Alternatives.

Response to Comment LC11-23

The DEIR/S and FEIR/S summarize the results of a growth study which found that when taking land use constraints into consideration, the project would support planned growth and not induce unplanned growth or cause secondary impacts to environmental resources. During project construction, roadway capacities would be maintained at levels similar to existing conditions through construction staging. Therefore, construction-related delays would be minimized. Cumulative impacts are disclosed in Chapter 5 in Volume 1 of this FEIR/S. The studies and analysis in the DEIR/S and FEIR/S have been properly conducted in compliance with CEQA and NEPA.

Please also see the Master Response on Induced Travel.

Response to Comment LC11-24

Please see the response to Comment LC11-23 above.

Response to Comment LC11-25

Please see the response to Comment LC11-23.

Response to Comment LC11-26

Please see the Master Response on Induced Travel.

Response to Comment LC11-27

Please see the Master Response for Need and Purpose.

It is also important to remember that taking the SMART rail line or US 101 would not be a simple either/or decision. Travelers on US 101 are coming from and going to a wide variety of locations. Many of these locations could not be conveniently accessed from the SMART rail line, even with the help of feeder bus routes. Therefore, much of the traffic on US 101 could not be diverted to the SMART rail line, regardless of the levels of congestion on US 101.

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Response to Comment LC11-28

Since construction activities would take place in non-peak hours and roadway capacities would be maintained at levels similar to existing conditions through construction staging, construction related delays would be minimized.

Response to Comment LC11-29

This comment appears as the last paragraph of a lengthy letter and is basically a compilation and summary of previous comments. Please refer to the response to Comment LC11-1. All pertinent information and documents relevant to the transportation planning and environmental process have been disclosed in the FEIR/S.

The technical studies have been conducted under appropriate, widely-accepted principles and methodologies, and furthermore support the findings in the FEIR/S.

Ms. Brent and Mr. Perez
December 14, 2007
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LC11-27 transit based commute systems, and the status of the SMART system, these project impacts may be quite significant over time as commute and land use patterns are established in reliance upon continually expanding highway capacity.

D. Term of Benefits

LC11-28 Studies show that the benefits gained from highway capacity expansion are often short in duration, and necessitate further future expansion to meet additional demand. The environmental review document fails to identify how long this project will benefit the congestion issue and when diminishing returns will be encountered.

Conclusion

LC11-29 TRANSDEF is discouraged that the lead agencies ignored the effort to articulate the fundamental problems associated with the proposed project six years ago. A considerable amount of money and opportunity has been lost. As circulated, the draft environmental review documents suffer from significant and fatal flaws that appear to stem from a continuing "old school" approach to transportation planning and a process, while creating many opportunities for public input, denied the release of the really important documents and analysis. Applicable laws do not condone defiance of the critical issues that should have been addressed and mandate the full disclosure of the documents and processes that underlie the draft environmental review documents. TRANSDEF implores your agencies to recognize and correct this problem by releasing the withheld documentation, notifying and receiving input from all affected agencies and jurisdictions, redrafting the environmental review documents to contain a robust, complete and unbiased alternatives analysis, and recirculating the DEIR/S to enable more informed public involvement and the best possible decisionmaking concerning this important transportation corridor.

Sincerely,

LAW OFFICE OF MARC CHYTILO

Marc Chytilo

By: Marc Chytilo
For Transportation Solutions Defense and Education Fund

CC: David Schonbrunn, President, TRANSDEF

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Response to Comment LC11-30

The Preferred Alternative of the project would meet the need and purpose to reduce congestion through the project area. Caltrans/FHWA conducted a growth study that concluded that the project would support planned growth and not induce unplanned growth in Sonoma and Marin Counties. Please refer to the Master Response on Greenhouse Gas Emissions.

The primary goal of the proposed project is to construct an HOV lane through the Marin-Sonoma Narrows. HOV lanes give priority to transit and carpools, making these alternative modes more attractive for those who would otherwise drive alone. Providing the HOV lane is, however, only one step toward more sustainable transportation. Other actions, such as providing increased transit service and higher density land use to support transit, would be complementary. While these are beyond the scope of this project, they are not precluded by it.

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-460-5260

December 14, 2007
By U.S. Mail & E-Mail

Melanie Brent, Office Chief
Division of Environmental Planning & Engineering
California Department of Transportation
111 Grand Street, Mail Station 8B
Oakland, CA 94612

Re: Comments on Marin-Sonoma Narrows HOV Widening Project DEIR/S

Dear Ms. Brent:

The Transportation Solutions Defense and Education Fund (TRANSDEF) is pleased to be able to comment on the Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/S) for the Marin-Sonoma Narrows HOV Widening Project (Project). Our organization is an environmental non-profit advocating for the comprehensive regional planning of transportation, land use and air quality in the San Francisco Bay Area.

LC11-30 This project offers an opportunity to fundamentally change how California accommodates growth. The challenges of climate change, coupled with sharply rising oil prices, have brought attention to the unsustainability of the conventional pattern of auto-dependent suburban sprawl. It is now recognized that to move towards a sustainable future for the Bay Area, residents will need to drive less and use alternative modes more.[1] However, the Project, as currently constituted, would cause more driving, more greenhouse gas emissions, more sprawl and more auto-dependency.

In the interest of changing that pattern, TRANSDEF has actively participated in the scoping of this project, as well as sending follow-up letters to the Director of the Department. (see Attachments 3, 4 and 5.) In those letters, TRANSDEF requested the evaluation of multimodal alternatives, asserting that the Project Purpose and Need was illegally constrained to limit the Project to only highway solutions.

[1] See Strategy Element 4, Bay Area Regional Agency Climate Protection Program, page 7, http://www.abag.ca.gov/jointpolicy/JPC%20Action%20on%20Climate%20Protection.pdf

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LC11-31 TRANSDEF believes that the Project's focus on congestion relief is misplaced, and opposes the Project Purpose "Reduce congestion along US 101" (1-17:367)[2] as overly simplistic. The Project's tremendous expenditure of public resources would result in, at best, short-term congestion relief, but would result in long-term environmental harm. While the goal of congestion relief is understandable on a human level, it is outmoded in the professional practice of transportation and land use planning. See Attachment 7, "Why Are the Roads So Congested," which makes the case that congestion is the result of the spatial pattern of development, not the increase in population, so it cannot be remedied long-term by highway widening.

LC11-32 A lack of understanding of the issue of induced demand leads to the flawed modeling of travel demand, which then underestimates future demand. This results in building very expensive facilities that provide congestion relief for a limited number of years, only to clog up again. Worse yet, these facilities then encourage the continued development of dispersed suburban land uses, whose residents then become locked in, forever dependent on the personal auto for mobility. This would be inconsistent with current trends in Bay Area regional planning.[3]

LC11-33 TRANSDEF supports two of the four Project Purposes as stated in the DEIR/S: 2). to correct operational deficiencies, including the upgrade from expressway to freeway status, and 4). to correct existing drainage and flood hazards. We believe an Alternative needs to be considered that contains these features, but funds the development of the 70+ mile SMART passenger rail system instead of 16 miles of HOV lanes, consistent with the recommendations of the Calthorpe Study (see Attachment 6). This would expand capacity in the corridor without encouraging more driving. The SMART project is currently unfunded, while the Project is currently funded for hundreds of millions of dollars. Project funding could make a SMART sales tax unnecessary. SMART would qualify as a candidate for Interregional Transportation Improvement Program funding, as it would provide an inter-county link.

LC11-34 TRANSDEF finds the DEIR/S wholly inadequate as a resource for 21st century decision-making. It fails to consider feasible alternatives; it fails to characterize impacts as to their significance, using proper CEQA terminology, except in Chapter 4; it fails to use state-of-the-practice travel demand modelling methodology, resulting in fallacious conclusions; it fails to analyze ozone precursor and greenhouse gas emissions; it fails to quantitatively analyze energy consumption and it fails to provide any traffic volume and V/C information from the travel demand model. Under both NEPA and CEQA, this draft needs to be rewritten and recirculated.

LC11-35 Project Merits

It is very revealing that, after years of promotion of this Project as the means for providing continuous HOV lanes for express buses, there is no mention of transit what-

[2] Parenthetical numbers here and below are page and line references to the DEIR/S text.

[3] See footnote 1.

Response to Comment LC11-31

Please refer to the Master Response on Need and Purpose.

Response to Comment LC11-32

See the Master Responses for Induced Travel and Range of Alternatives.

Response to Comment LC11-33

Please see Master Response on Range of Alternatives.

Response to Comment LC11-34

Please see the Master Response on Greenhouse Gas Emissions. The DEIR/S and FEIR/S use a template approved by Caltrans and FHWA for joint NEPA/CEQA documents, and meets the requirements of these statutes.

Response to Comment LC11-35

It is understood that the HOV lanes proposed under the Build Alternatives would serve express buses. The Preferred Alternative will provide HOV lanes which will serve all users, including transit.

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LC11-35 soever in the Project Purpose. (1-17:365-373). Clearly, despite all the rhetoric, this project, and dozens like it, are about increasing highway capacity, period. The mention of multimodalism is still only window dressing.

LC11-36 It is also revealing that the Purpose and Need statement unquestioningly assumes the existence of a duty to facilitate any and all driving trips. This fundamental supply-side philosophy is so embedded in the practice of Caltrans project development that the question never arose as to whether it makes any sense for our society to spend $600 - 800 million for a claimed travel time savings of 12 minutes a day for the HOV user. (3.1-78:1843). The non-obvious fact that the Project claims to save a solo driver 17 minutes a day (3.1-77:1833-1834) over 2030 No Build conditions hints that the real purpose of the Project is to serve solo drivers.

LC11-37 To TRANSDEF, this Project appears to be the very height of self-destructive folly, given that the Human Race is on notice that it needs to dramatically decrease its emissions of greenhouse gases. This Project is out of touch with its regional and global context. Instead of promoting features to discourage driving, it does the opposite: it facilitates longer-distance trips and increased greenhouse gas emissions. The subject of transportation demand management (TDM) is left entirely unexplored. No programs are proposed to encourage a shift to HOV modes. TRANSDEF urges the funds set aside for this Project be spent in implementing the Multimodal Alternative, described below.

Project Description

LC11-38 The description of the northern terminus of the Project leaves unanswered the question of how the Project will integrate with Sonoma County's overall HOV lane program. (1-4 (footnote 3) & 2-3). As described, the Project would simply end near Corona Road. It would appear from the description of the 2030 No Build roadway network that the nearest HOV lane would start at Old Redwood Highway and go north. (3.1-71:1753) This doesn't answer the question of what is planned for the gap between the northern terminus of the Project, and the southern terminus of the other project. Text is needed to explain exactly what is being planned for that gap, especially because it shows up as a bottleneck in 2010 in Figure 3.1-14 (3.1-76).

LC11-39 The Reversible Lane Alternative, with its four full-size shoulders, is a tremendously inefficient use of cross-sectional space. Analyzing it makes a mockery of the alternatives analysis process.

LC11-40 The Project Description in Sections 2.1, 2.2, and 2.3 make no mention of auxiliary lanes. Figure A6 of the Traffic Operational Analysis Report, the Year 2030 Build Northbound & Southbound HOV Lane Alternative Configuration, did not include auxiliary lanes either. So clearly, auxiliary lanes were not modeled in the Operations Report. However, new auxiliary lanes are proposed on pages 3.1-125 & 126. Because the Project Description does not contain auxiliary lanes, this DEIR/S cannot be used to clear a project that contains auxiliary lanes. These latter descriptions of new auxiliary lanes must be deleted.

Response to Comment LC11-36

While Caltrans and FHWA are supportive of HOVs and MTC's transportation control measures, many of which have been incorporated into the MSN Project, our agencies serve all users of the system.

The commenter has evidently calculated total travel time savings by extrapolating from data presented in the cited tables in DEIR/S Section 3.1 (Tables 3.1-12, 3.1-13 and 3.1-14) using an unknown methodology. The time savings depicted in these tables is maximum travel time delays or savings for an individual vehicle in a peak hour. Expected HOV travel time savings shown in Table 3.1-14 are travel time savings HOV drivers would experience compared with solo drivers for the same alternative. For example, HOV drivers would expect an additional 5 to 7 minutes saved compared with solo drivers in the Fixed HOV lane Alternative.

Response to Comment LC11-37

Please refer to the Master Response for Greenhouse Gas Emissions.

Response to Comment LC11-38

The HOV project from Old Redwood Highway to Rohnert Park Expressway has addressed this bottleneck in that project's EIR/EA. There is no causal link between the MSN Project and the bottleneck that begins at Old Redwood Highway Interchange during the northbound PM peak.

Response to Comment LC11-39

The Reversible HOV Lane Alternative was studied because it meets the purpose and need of the project. It is one of many alternatives considered during the scoping process.

Response to Comment LC11-40

It's true that auxiliary lanes were not included in the operational analysis. However, including them would have had little effect on the analyses. The auxiliary lanes included in the proposed project layout are more precisely referred to as “speed change lanes,” which are defined in the Caltrans Design Manual as “an auxiliary lane, including tapered areas, primarily for the acceleration and deceleration of vehicles entering or leaving the through traffic lanes.” To reduce confusion, all references to “auxiliary lanes” have been changed to “speed change lanes” in the pertinent sections of this FEIR/S.

As noted above, the omission of auxiliary lanes from the traffic study would not add new information or circumstances relevant to environmental concerns and bearings on the MSN Project or its impacts that would result in significant environmental impacts not evaluated in the DEIR/S or FEIR/S.

Likewise, not stating auxiliary lanes in the project description does not invalidate the environmental documents.

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Major Investment Study

The DEIR/S states that "The Fixed HOV Lane Alternative would not interfere with proposed commuter rail service on the SMART line." (3.1-56:1354-1355). "Interference" is much too limited a criterion for an environmental evaluation. What's needed instead is a comparison of the costs, benefits and overall environmental impacts of the two projects (see below for a full description of TRANSDEF's proposal for a Multimodal Alternative), since they are competing for funds.[4]

No such Major Investment Study has ever been done for this corridor. While Caltrans claims to have performed one (S-10:229-230), this was only an internal draft process--one that never received public review or comment. The Caltrans Office Chief of the Division of Environmental Planning & Engineering stated that "the MIS existed only in draft, and that it had not been cleared for release to the public." (Melanie Brent, personal communication, December 13, 2007). The fact that no MIS is referenced in the listing of Key Transportation Plans (3.1-4 - 6) or in the Technical Studies and References (9-1 & 2) is very telling. As a study of "alternatives to relieve congestion" (S-10:231) it seems near-certain that the full environmental impacts were not studied. (see below). LC11-41

Implementation of the HOV Lane Alternatives would harm SMART by encouraging the expansion of the practice of solo long-distance driving. While the Fixed Lane HOV Lane Alternative may not expressly interfere with SMART,

> it may still have that effect. Typically the level of ridership on public transportation systems depends on a number of factors, including the levels of service provided by highways. When highways are congested, rail ridership increases. Increasing the capacity of Highway 101 may adversely affect the success of the competing SMART system. This impact must be evaluated in the EIR. (Attachment 5, 2006 letter from TRANSDEF's attorney to Will Kempton, page 1.)

LC11-42 TRANSDEF has repeatedly made good faith requests for analysis to Caltrans, yet the DEIR/S offers no response. (see Attachments 3, 4, & 5).

The closest thing the North Bay has had to a Major Investment Study was the 1997 Calthorpe Study. (see Attachment 6). It evaluated the costs and benefits of rail and highway investments, using a very public process and nationally respected planners. (The MIS supposedly prepared by Caltrans had neither of these qualities.) The Calthorpe Study determined that public funds were better spent on commuter rail

[4] While the Project has secured hundreds of millions of dollars in funding, the SMART project has been left waiting at the altar. It is sophistry to assert that two projects that serve the same function are proceeding, when only one has significant committed funding.

Response to Comment LC11-41

Please refer to the response to Comment LC11-1 and the Master Response on Range of Alternatives.

Caltrans and FHWA sought input from many entities during the scoping process and did not rely exclusively on one entity (see Chapter 6 in Volume 1). As part of the need and purpose, reducing congestion on the highway does not preclude other multi-modal entities from implementing their initiatives in the corridor. Neither does it deny the potential benefits from other modes operating in the corridor in conjunction with or apart from the MSN Project. Please see the response to Comment RA5-5 regarding consistency with the Calthorpe study. The DEIR/S never claims that the MSN Project will solve all the ills in the corridor. The DEIR/S states that the Calthorpe study acknowledges the need for a multi-modal approach. The use of the term "adjunct" refers to the use of rail interdependently with other modes, just as highway or express bus service may be used independently or in conjunction with other modes. Caltrans and FHWA is not placing value or ranking rail against other modes. Caltrans and FHWA have acknowledged the controversial issues raised by the proposed project, including favoring rail over highway expansion, and has conscientiously addressed concerns raised by this commenter and others.

In terms of SMART ridership, as stated in the response to Comment RA5-21, ridership is not a socioeconomic or natural resource that can be evaluated in the context of CEQA or NEPA. The congestion reduction benefits of the project represented by a reduction in minutes of delay have been disclosed in the DEIR/S and this FEIR/S, in Section 3.1.10 in Volume 1.

Response to Comment LC11-42

Please refer to the Master Response on Range of Alternatives.

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than on building HOV lanes between Highway 37 and SR 116. (Attachment 6, pages 159-161).

The DEIR/S completely misrepresented the findings of the Calthorpe Study. It claimed "the Fixed HOV Land (sic) Alternative would be consistent with: ... The Calthorpe Study." (3.1-12:289-300). Nothing could be farther from the truth:

> The Preferred Scenario does not include the improvement of Highway 101 to freeway status between Petaluma and Novato. [It had excluded HOV widening earlier.] This was not included because the analysis of the various scenarios did not indicate significant level of service improvements for commuters during the peak period. It was also determined that improvements in this area would be prohibitively expensive; costing about $125 million. Therefore, because of relatively little benefit and high costs, it was determined that this project should not be included in the Preferred Scenario, and that funding instead be directed to higher priority projects. (Attachment 6, page 161: Calthorpe Study, "Preferred Scenario Final Report").

LC11-43 Nothing has changed since that was written, other than the full funding of all the other HOV projects in the corridor. At a minimum, a DEIR/S for this HOV Project needs to document why a different conclusion should be reached, especially when many hundreds of millions of dollars are at stake. Rather than undertaking the intellectual challenge of demonstrating how the Project has somehow become worthwhile, the DEIR/S instead took the easy way out and dissembled:

> The Calthorpe Study advocated the creation of a balanced transportation network throughout Marin and Sonoma Counties. The Final Preferred Scenario included transit improvements as well as improvements to US 101 and local roads. It did not, however, call for the improvement of US 101 to freeway status between Novato and Petaluma. The Calthorpe Study failed to demonstrate that such an improvement would significantly improve levels of service for commuters within the segment. The relatively high cost of the upgrading ($125 million) was another reason for its exclusion from the Final Preferred Scenario. (3.1-4:110-118).

LC11-44 One would never know from reading that description that the Preferred Scenario found that HOV lanes from Novato to Petaluma weren't worth the cost. The DEIR/S never even hinted that the Preferred Scenario recommended the development of a commuter rail system instead of those HOV projects. The DEIR/S hid that fact be-

Response to Comment LC11-43

Although the Calthorpe study did not include upgrading Segment B to freeway status as part of its "preferred scenario," it did not discount this alternative from being viable. It states on pg. 116 of the study, "However, should state or federal funds become available to upgrade this area to freeway status (addressing several safety issues with the introduction of new interchanges, on/off ramps, frontage roads, modified shoulder conditions etc.) both counties may wish to consider its implementation." Therefore the MSN Project is consistent with the study.

Response to Comment LC11-44

Please refer to the Master Response on Range of Alternatives.

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Response to Comment LC11-45

Please refer to the Master Response on Range of Alternatives.

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hind the bland description "The Final Preferred Scenario included transit improvements ...." (3.1-4:111-112). Could these just be oversights, or are there forces within the Transportation Agencies that are unwilling to let the merits of the Marin-Sonoma Narrows HOV Widening Project be compared again to a commuter rail alternative?

"Caltrans believes commuter rail service would be a valuable adjunct to the corridor, joining the list of other available modes (e.g., ferry service, transit, and highway)." (2-36:535-537) However, Caltrans, in conjunction with the Metropolitan Transportation Commission and the Federal Highway Administration, actively intervened to prevent the Project Purpose and Need Statement from being made mode-neutral. As described in Attachment 3, page 2, the Policy Advisory Group adopted a Purpose statement "to increase the capacity of the corridor." Caltrans staff came back at the next meeting and demanded that statement be dropped, in favor of one directed at reducing congestion on the highway. It is clear that Caltrans (and fellow agencies) have acted to prevent commuter rail from becoming anything more than an "adjunct."

In a separate comment letter, TRANSDEF's attorney Marc Chytilo asserts that Caltrans has the legal duty to evaluate a Multimodal Alternative. TRANSDEF proposes the following Alternative definition:

Multimodal Alternative

During the scoping process for the Project, TRANSDEF submitted the following request for the study of a multimodal alternative:

> The 1997 Sonoma/Marin Multimodal Transportation and Land Use Study, funded by Caltrans, determined that a rail system was more cost-effective than the project proposed in the NOP/NOI. For the same cost as the highway segment capacity expansion, a sub regional rail system can be built, with broad and long-term benefits. TRANSDEF requests that an alternative be studied using the Calthorpe land use assumptions with the smart rail plan in a manner similar to Portland, Oregon's LUTRAQ (land use, transportation and air quality) study. A rail program alternative must be allowed to compete for funds on equal (or preferential, see 23 C.F.R. Part 450.320) footing with the highway project. (Attachment 3, page 4).

LC11-44

LC11-45

Since the DEIR/S did not respond to this request, TRANSDEF repeats its request for the evaluation of the impacts of a Multimodal Alternative upon the entire two county sub-region. We suggest it should be composed of the following elements:

- Caltrans would provide the shortfall in construction funding to enable SMART to build a commuter rail and bicycle/pedestrian path system from Cloverdale to Larkspur Landing.

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Response to Comment LC11-46

Please refer to the Master Response for Range of Alternatives.

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- Caltrans would fund the annual operations subsidy of SMART, making whatever funds swaps are necessary to obtain the proper "color of money."
- SMART would operate with the schedule on page ES-4 of the SMART DEIR.
- For the modeling's land use base assumptions, use the pattern of densification of land use opportunity sites created by the Calthorpe Study, scaled appropriately for Year 2030.
- Caltrans would conduct further design studies on the potential to convert the existing auxiliary lane from Highway 37 to Rowland into a mixed flow lane, and convert a mixed flow lane there into an HOV lane, without generating more backup. Caltrans would design queue jump access for HOVs passing from the northernmost HOV point on NB 101 in Sonoma to the 2 lane section of the Narrows.
- Caltrans would construct HOV lanes in Segment C consistent with the Calthorpe study recommendations: From the northern Project limits to the Highway 116 East IC. Caltrans would design queue jump access for HOVs passing from the southernmost HOV point on SB 101 in Sonoma to the 2 lane section of the Narrows.
- Caltrans would upgrade Segment B to freeway status, correcting operational deficiencies, as well as drainage and flooding problems. No HOV lanes would be built.
- Caltrans would look for feasible mitigations to preserve substantial numbers of Redwood trees when constructing the new North Petaluma Overhead.
- Caltrans would construct Access Option 12b, after optimally locating access roads to reduce tree removal and minimizing their cross-section, consistent with context-sensitive design for rural roads.
- In fulfilling its obligation to provide pedestrian and bicycle facilities in the Project Study Area, Caltrans would fund SMART to build the Bicycle and Pedestrian Pathway wherever it is feasible adjacent to the tracks.

LC11-45 This Alternative has not been rejected as infeasible. (2-36). Because the SMART project is not yet fully funded, it must be considered in this Project review as an alternative use of the massive funding proposed for HOV lanes. "Any construction would also require a substantial one-time expenditure of both state and federal funds, which are not retrievable." (3.4-1:16-17). That irretrievable commitment of resources must not be made before a potentially more beneficial alternative is evaluated, especially given the funding shortages faced by the State, and the multiple challenges posed by climate change.

LC11-46 Please note that the SMART FEIR travel demand modeling was based on *ABAG Projections 2002*, which was a trends-based projection done at a time when the trend was for sprawl. Later *Projections* have moved to a Smart Growth policy orientation. As a result, SMART's ridership projections were anemic, compared to what would result from the higher density land use pattern that SMART could support. In

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addition, the model itself was unacceptably insensitive to congestion. Ridership predictions changed only slightly when the number of lanes in the network assumptions changed the highway conditions in the Narrows from LOS A to F. (see SMART DEIR, 2005, 3-102; SMART FEIR, 2006, 3.3-102.) TRANSDEF believes the rail ridership will be much stronger than the EIR predicted, if the highway is seriously congested.

LC11-46 This Alternative should also be tested against the Build Alternatives under a scenario where 2030 gas prices are the equivalent of $6.00 per gallon gas in 2007. This scenario will evaluate the resilience of the transport system in a climate of radically higher gas prices.

LC11-47 Potential Benefits of Multimodal Alternative
The biggest benefit of funding this Alternative would be the creation of a long-term reliable alternative to longer-distance driving. For less than the cost of 16 miles of HOV lanes, the region could have a 70+ commuter rail system. Benefits of the HOV Lane Alternatives will be short-term, while benefits of the Multimodal Alternative would be long-term. By selecting the HOV Lane Alternatives over the Multimodal Alternative, the Project would have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. This would prevent the adoption of a Mandatory CEQA Finding of Significance. (4.3:68-69)

LC11-48 The DEIR/S predicts congestion in 2030 in several locations, even with the Project. (3.1-73 & 76). TRANSDEF is sure that induced demand will bring this congestion earlier than that, as well as cause it to appear in other locations, such as at the NB lane-drop north of the Atherton IC. Growth beyond 2030 will certainly bring more highway congestion to Marin and Sonoma counties. However, once the medians are paved, there is no feasible way to continue to add more highway capacity, due to the massive cost of right-of-way acquisition. Passenger rail is the only reasonable long-term expansion strategy for this corridor.

LC11-49 The Multimodal Alternative would not cause new congestion in Central Marin (3.1-71:1777- 1781), as it would not bring more cars south from Sonoma County, unlike the HOV Lane Alternatives.

LC11-50 Given that it will inevitably be needed, it makes far more sense to build this Alternative now, especially given the considerations of climate change. The creation of convenient, comfortable commuter rail service would encourage drivers to switch their trips to transit, thereby reducing greenhouse gas emissions. The Alternative would not provide any additional highway capacity, and therefore could not lead to an increase in single-occupant driving. As a result, the rate of increase in VMT and greenhouse gas emissions in the two counties would be lower, and VMT could possibly even decrease.

LC11-51 The DEIR/S's discussion of growth inducement (Section 3.1.3.3, starting on 3.1-17) misses half the story by concentrating on the amount of growth. More important to

Response to Comment LC11-47

Please see the Master Response on Range of Alternatives.

Response to Comment LC11-48

Please see the Master Response on Induced Travel. It is Caltrans policy to analyze the highway performance for capacity-increasing projects for 20 years after the expected completion of project construction date. The commenter is correct that traffic may well continue to expand into the future and that accommodating it may pose a challenge. However, the additional lanes that this project will construct will still be a valuable transportation asset and the system will function better with them than without them.

Response to Comment LC11-49

See the Master Response for Induced Travel.

A minor amount of traffic should truly be “induced” by this project. However, this project will allow more traffic to pass through the project area during peak period congestion. Since some of this traffic will be either headed for or coming from central Marin County, this project could increase the amount of traffic in these areas. However, a group of projects are in various stages of development that will likely construct both a north and southbound HOV lane on US 101 from the SR 1 interchange all the way to Windsor in Sonoma County. Taken together, these projects will do much to reduce congestion along US 101, including in central Marin County.

Response to Comment LC11-50

Please refer to the Master Response for Range of Alternatives.

Response to Comment LC11-51

The growth inducement analysis considered growth in the context of accepted local and regional plans and regional growth projections. While one can argue that there are more efficient and sustainable land use plans than those currently adopted within the region, under CEQA these plans and projections are the required reference point for both the amount and spatial distribution of growth. To look at the potential impact of the proposed project on the spatial distribution of growth, the growth analysis selected six sample growth study areas between south Novato and Rohnert Park. Considerations on selection of these analysis zones included potential effects from improved accessibility to jobs, perceived concerns of growth inducement potential, and remaining build-out potential. In this context, the growth study found that the proposed project would support planned growth, but would not induce unplanned growth in the region.

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LC11-51 the long-term environmental health of the region is the spatial distribution of that growth.

LC11-52 Besides its immediate utility as a transportation facility, commuter rail would provide the additional benefit of being the infrastructure needed to enable a shift in development practices, leading to transit-oriented developments in station areas, built with higher densities than are currently planned. This shift to Smart Growth would implement current regional planning initiatives, including those directed at climate protection. (see footnote 1, above).

A proliferation of mixed-use pedestrian-friendly communities, in which many daily trips can be conveniently made by walking or biking, will result in a reduction in the environmental impacts of future land use development in the North Bay counties. With transit conveniently available, the resulting lower auto ownership rates will lead to lower vehicle trip generation, which in turn will lead to less highway congestion and lower overall emissions of ozone precursors and greenhouse gases. In addition, higher density living leads to lower per-capita water consumption, lower energy consumption for domestic heating, less water pollution caused by urban run-off and better personal health, resulting from regular walking.

Given that "Nearly half of the households that will be added from 2000 to 2030 will be in Santa Rosa, north of the MSN Project area" (3.1-8:219-220), implementing the Multimodal Alternative would enable many of those households to live with lower environmental impacts, thus providing benefits to a far greater number of North Bay residents than the HOV Lane Alternatives. In the absence of a vibrant SMART system, development would instead continue in its conventional suburban pattern, resulting in ever-increasing per capita VMT, regional VMT and regional greenhouse gas emissions, and--of particular relevance to this Project--congestion. See Attachment 7, "Why Are the Roads So Congested."

LC11-53 This Alternative would implement State Clean Air Plan TCM 4, Upgrade and Expand Local and Regional Rail Service. The SMART commuter rail project is listed in the Bay Area 2005 Ozone Strategy as part of Phase 2, for implementation after 2006. The air quality benefits of rail transit exceed those of HOV lanes where the occupancy requirement is only 2+, because fewer cars are being driven.

The Alternative would implement State Clean Air Plan TCM 8 by building HOV lanes and/or converting mixed flow lanes to HOV use, for the purpose of providing direct HOV access to the two lane section, which would not be widened. These HOV lanes function as a queue-jump, enabling HOVs to 'get ahead' of the SOVs waiting to get. The decision to build or convert to HOV-function is a delicate one, and needs to be made on the basis of the location of the resulting queue.

The Alternative would implement State Clean Air Plan TCM 9: Improve Bicycle Access and Facilities.

Response to Comment LC11-52

Please refer to the Master Response for Range of Alternatives.

Response to Comment LC11-53

Caltrans considered several alternatives to meet the purpose and need of the Project. Please refer to the Master Response for Range of Alternatives.

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LC11-53 The Alternative would implement State Clean Air Plan TCM 19: Improve Pedestrian Access and Facilities.

LC11-54 The Alternative would provide the highway safety benefits of upgrading an expressway into a freeway, and fix long-standing drainage and flooding problems.

LC11-55

Modeling Assumptions

The travel demand modeling was based on obsolete land use assumptions, especially as to the spatial distribution of growth. It is simply unacceptable for a 2007 document to use 9 year old data (3.1-70:1726-1728) when newer projections are readily available. *ABAG Projections* changed in 2003 from a trends-based series to a policy-based series. The *Projections 2000* data is known to reflect substantially more sprawl growth than more recent *Projections*, which are more consistent with regional land use policies resulting from the Smart Growth process. This would be especially relevant in making multimodal comparisons between HOV lanes and passenger rail. (Please note that SMART's EIR modeling was based on *Projections 2002* data, and therefore also failed to reflect Smart Growth land use policies.)

The description of travel demand modeling needs to clarify whether or not it includes ramp metering. Constraining on-ramp volumes should have significant implications for the mainline queue analysis.

The HOV volume forecasting in the Traffic Operational Analysis Report is flawed. The Report states "Assume the existing HOV percentages on the segment between Atherton Ave and Petaluma Blvd apply to the future years. ("Traffic Operational Analysis Report," 2005, pp. 10 - 11). HOV percentages should be the output of a calibrated mode choice model step, not an assumption based on existing conditions. The decision to use this methodology implies that Caltrans does not expect the completion of a multi-billion dollar continuous HOV lane system to increase HOV utilization.

LC11-56

Modeling and Induced Demand--Expert Analysis

Either the numbers in Table 3.1-15, Projected Vehicle Miles Traveled (3.1-78) are grossly erroneous, or the column labels are. While it should be clear that the Project Area VMT is a subset of Marin-Sonoma VMT, the former contains numbers that are three times the size of the latter. On top of that, TRANSDEF's expert on modeling asserts that the model used by Caltrans fails to properly account for induced demand, making the VMT numbers in this table substantially lower than they should be. As a result of an additional 100 million annual VMT, the DEIR/S underestimates traffic impacts, energy consumption, ozone precursor emissions and greenhouse gas emissions, while overestimating congestion relief. See Attachment 1, "Review of Marin Sonoma Narrows (MSN) HOV Widening Project DEIR/DEIS" by Smart Mobility, Inc.

Response to Comment LC11-54

Caltrans' goals include providing the safest transportation system in the nation and maximizing transportation system performance and accessibility. This is being done in coordination with local agencies and the Sonoma-Marin Area Rail Transit. Drainage systems will be upgraded where needed to pass a one-percent risk of exceedance (100-year) flow. Some areas of the project include proposed detention to mitigate potential downstream impacts.

Response to Comment LC11-55

The travel demand model used was the most up-to-date model available when the forecasts were produced early in the environmental process. As is almost always the case, during the preliminary engineering and environmental analysis for this project, newer models were produced. However, if the traffic forecast were redone whenever a more up-to-date travel demand model is produced, it would be virtually impossible to complete the environmental process for any large project. After the traffic forecast is produced, the results are used in the highway operation analysis, the preliminary design and the air quality analysis, and then the results of these efforts are incorporated into the environmental document. It is very likely that before the environmental document is completed yet another more up-to-date model would be completed, requiring the forecast to be redone and the entire process begun again. Therefore, as long as the environmental process is proceeding, Caltrans policy is to use the original forecast.

The travel demand modeling for this project did not include ramp metering. Usually, the effects of ramp metering are included in the operational analysis, not the travel demand forecast.

The factors that influence travelers' mode choices are complex and very difficult to model. This is especially true concerning the decision to drive alone or take part in a car or van pool.

Unfortunately, the model used to forecast traffic for this project consistently produced unrealistically low HOV volumes. Therefore, the decision was made to assume HOV percentages were unchanged from today. The commenter is correct that this procedure does not take into account any increased HOV use due to the HOV lane. However, increased HOV usage would improve the operation of the project and lessen the environmental effects, so this approach was conservative.

Response to Comment LC11-56

The commenter is correct that there were typographic errors in Table 3.1-15 in the DEIR/S. The table has been corrected in this FEIR/S. The corrected table is shown below.

Table 3.1-15 Projected Increase in Vehicle Miles Traveled Countywide (in thousands of miles), Year 2030

Alternatives	Project Area		Marin County and Sonoma County	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
No Build	5,312	6,358	16,614	20,133
Build Alternatives	5,318	6,367	16,625	20,154
Difference	6	9	11	21
Percent Increase	0.11%	0.14%	0.07%	0.10%

Please also refer to the Master Response on Induced Travel and the Master Response on the Smart Mobility Report.

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Response to Comment LC11-57

The methodology for the operational analysis is described in the US 101 MSN Widening Project Traffic Operational Analysis Report (February 2005). No traffic volumes are disclosed. Reduced delay is more meaningful than gross traffic volumes because it is correlated with congestion, and also defines the need for the project.

Response to Comment LC11-58

Our analysis is based on the projected traffic volumes.

The travel demand model used for this project shows increased "reverse commute" traffic for the year 2020. A number of factors account for this. Employment opportunities north of the project area are projected to expand, causing more people to commute in the off-peak direction. Also, increased population north of the project may be making more evening southbound shopping and social recreational trips. Both in the Bay Area and nationwide this is a common phenomenon, with the off-peak commute traffic increasing faster than the peak direction traffic causing the peak and off-peak traffic level to grow far closer and even sometimes reverse. The prior Sonoma County model also shows this occurring on this section of US 101, although we are not aware of any operational analysis based upon the output of this model showing what bottlenecks would emerge.

The 2010 forecast also shows this trend, while presently the resulting off-peak direction bottleneck may not be occurring. To prepare the 2010 forecasts, the year 1999 and year 2020 trip tables were interpolated. It is probable that although the 2020 land use projections are realistic the movement between 2000 and 2020 conditions has not been linear, so that linear interpolation between the two has forecast too much off-peak traffic in 2010.

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Other Modeling Anomalies

LC11-57 Some of the results of the modeling seem entirely unreasonable and contrary to common sense. Evaluating the validity of the modeling is made impossible by the decision to not publish any travel volumes or V/C ratios in the DEIR/S. This is the first time TRANSDEF has ever seen a transportation project environmental document without travel volumes. A $600+ million dollar project should warrant something more than an EIR Lite.

LC11-58 Reverse commute queuing is the most immediate surprise to come out of this EIR's modeling. (1-10). No traffic study TRANSDEF is aware of has ever shown congestion in the reverse commute direction. Please identify any other study that shows future queues in the off-peak direction. Where are these reverse commuters coming from? Where are they now? Please identify origin-destination pairs that make up significant components of this reverse commute.

LC11-59 The operations studies that produced the delay tables 3.1-12 and 3.1-13 are methodologically flawed. They failed to appropriately limit the operating conditions of the HOV lanes. An HOV lane, by definition, needs to be free-flowing. If it has delay, it stops working as a proper HOV lane, and won't succeed in attracting single-occupant drivers into carpooling or transit. Non-zero delays in HOV lanes in these tables indicates failure to compute delays properly.

LC11-60 Perhaps even more troubling is the question of where all those HOVs are coming from. Again, the absence of any volume numbers makes it impossible to critique the validity of this work. After reviewing the Draft Project Report, these delay numbers are even more certainly in error. Forecasted Traffic Volume, Table 4-2, indicates that no HOV lane is projected to have more than 1152 peak hour trips.

LC11-61 Closely related to the point raised immediately above is the question of why there is no queue indicated at the NB mixed flow lane-drop north of the Atherton IC in the Build Alternatives in Figure 3.1-14. (3.1-76). Without any planned increase in mixed flow capacity other than the space made available by the shift of HOVs into the new HOV lane, future growth will eventually result in queues.

LC11-62 This lane-drop is a current bottleneck that causes significant queues now. Its location should be called out with a screenline or legend of its own, to help readers less familiar with the terrain to understand the source of the bottleneck.

LC11-63 Because of the failure to properly treat induced demand (see discussion, above), higher traffic levels than those predicted by the model will cause the return of the queue at this lane-drop bottleneck. This must be identified as a significant impact. Clearly this would eliminate one of the major benefits asserted for the Project. After reviewing the Draft Project Report, it is clear that the failure to predict a queue there is an error. Forecasted Traffic Volume, Table 4-2, indicates 3945 PM NB peak hour

Response to Comment LC11-59

It is true that HOV lanes should operate near free-flowing or free-flowing. However, in our study, HOV lane delays also include delays in mixed-flow lanes if there is no HOV lane in place. For the No Build alternatives, delays between SR 37 and Old Redwood Highway in 2010 and between SR 37 and East Washington interchange in 2030 are included in the HOV lane delays in Tables 3.1-12 and 3-1-13 in Volume 1 of this FEIR/S. For the Build alternatives, delays between E. Washington interchange and Old Redwood Highway are included in the tables.

Response to Comment LC11-60

Traffic volumes are included in the US 101 MSN Widening Project Traffic Operational Analysis Report (February 2005). In our study, HOV lane delays also include delays in mixed-flow lanes if there is no HOV lane in place.

Response to Comment LC11-61

There is no queue indicated at the segment north of the Atherton interchange in the Build Alternatives because the additional HOV lanes in the Build alternatives in the PM peak hour would increase overall capacities north of the Atherton interchange, and two-lane mixed flow lanes in a three-lane freeway segment would have higher capacities than a two-lane roadway segment alone. Figures 3.1-10 through 3.1-14 in Volume 1 of the FEIR/S have been revised to clarify this information. Corrections to the figures included removal of the diamond symbols in the reversible HOV segment for Figures 3.11-12 and 3.11-13, since this lane would only be available in one direction, southbound in the AM and northbound in the PM. The “Note” next to the legend for these figures has also been corrected to reflect this information.

Response to Comment LC11-62

Caltrans agrees with this comment. Figure 3.1-14 has been revised to show the location of the current bottleneck.

Response to Comment LC11-63

The bottleneck north of Nave Drive would constrain traffic entering the proposed project area. The 3,945 PM mixed-flow trips at the segment north of the Atherton interchange would be constrained to 3,680 trips. Two mixed-flow lanes at this segment should have enough capacity to accommodate these peak hour trips.

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LC11-63 mixed flow trips[5] in Year 2030, a volume which would ensure a queue, after correction for latent demand.

Project Impacts

LC11-64 The queueing identified as Southbound Bottlenecks (3.1-71:1777-1781) in Central Marin will be a substantial increase in traffic congestion over the free-flow conditions (see Build vs. No Build diagrams in Figure 3.1-11, page 3.1-73) that will prevail following the completion of the San Rafael Gap Closure Project. No mitigation was proposed. (3.1-85:2030-2033), due to the failure to recognize this as an impact. Therefore, this must be identified as a Significant Unavoidable Impact of the Project.

Unanswered Scoping Questions

LC11-65 A series of impact issues were raised in our 2001 scoping letter (Attachment 3, page 5) that were not addressed in the DEIR/S. We restate them here:

LC11-66 Induced VMT: "A growing body of research has shown that widening highways is only a temporary solution at best to the complex problem of traffic congestion. Indeed, research has pointed to a phenomenon known as "induced traffic" that suggests new and wider highways actually create additional traffic, above and beyond what can be attributed to rapid population increases and economic growth."
see Sierra Club v. DOT, 962 F.Supp. 1037 (N.D. Ill.,1997)
see http://www.transact.org/Ca/congestion2.htm

LC11-67 Construction Delays: Studies show that gains in congestion relief from highway expansion may not always exceed the additional congestion associated with construction delays. see http://www.transact.org/report.asp?id=177

LC11-68 Cumulative Impacts: The environmental review document must comprehensively address the cumulative effect of this project, including the impacts associated with expanding the region where sprawl is induced as a result of additional long-distance SOV commuting.

Term of Benefits: Studies show that the benefits gained from highway capacity expansion are often short in duration, and necessitate further future expansion to meet additional demand. The environmental review document must identify how long this project will benefit the congestion issue and when diminishing returns are expected to be encountered.

Access Options

Access Option 12b has lower overall impacts than the other access options, due to it not including a San Antonio Road Interchange. Option 12b has lower visual impacts (3.1-105:2387-2389; 3.1-119:2563-2565), lower archaeological impacts (3.1-149:3277-3279), less land acquisition (S-45), less farmland conversion (S-46), and would cost considerably less.

[5] This volume was computed by subtracting 843 HOV trips from 4788 total trips.

Response to Comment LC11-64

The bottleneck is disclosed in the DEIR/S and Volume 1 of this FEIR/S in Section 3.1.9 and in Figure 3.1-14. It would appear that there is a causal connection between the bottleneck that the MSN Project is alleviating and the latent bottleneck south of Miller Creek. Unfortunately, there are no projects on the horizon to address this queue, and extending the MSN Project limits south to encompass this area would not address this congestion because no delay for HOV users is projected in 2030.

The commenter seems to be saying that the mere failure to recognize the impact renders it a significant unavoidable impact. However, "significant unavoidable impacts" describes impacts that would be significant but cannot be mitigated to less than significant.

Chapter 4 in Volume 1 of the FEIR/S identifies this bottleneck as a less than significant impact because the MSN Project would substantially reduce congestion and increase productivity in the study area from Old Redwood Highway to Miller Creek Road.

Response to Comment LC11-65

The impact issues raised in the commenter's 2001 scoping letter are addressed in the responses to Comments LC11-66 through LC11-68.

Response to Comment LC11-66

The existence of conflicting studies or inconsistent test results does not in itself render an agency's selection of alternatives and mitigation measures defective. Please also see the Master Response on Induced Travel.

Response to Comment LC11-67

Since construction activities would take place in non-peak hours and roadway capacities would be maintained at levels similar to existing

conditions through construction staging, construction related delays would be minimized.

Response to Comment LC11-68

Cumulative impacts are addressed in Chapter 5 of the DEIR/S and FEIR/S. See also the Master Response on Cumulative Air Quality.

The 2030 forecasts and operational analysis are credible and should reflect the conditions then. Although conditions will not be congestion-free, the highway operations will be better if the HOV lanes are built. Similarly, traffic levels may continue to increase after 2030, but congestion will still be reduced by the HOV lanes.

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LC11-69 All of the Access Options propose the construction of new interchanges(s) and access roads. These features are usually considered to be growth inducing. (3.1-19:494-496)

By building less infrastructure for direct freeway access, Option 12b is by definition less growth-inducing than the other access options.

LC11-70 Given the proximity of the Redwood Landfill Interchange (approximately 1.5 miles), it is unreasonable to characterize Option 12b as "poor for local access to the uses around San Antonio Creek." (3.1-79:1872-1876). At worst, the Option is somewhat less convenient for those users. No hardship would be imposed if this Option were implemented.

LC11-71 The DEIR/S did not predict the travel demand for a San Antonio Creek interchange. Given the rural land uses in the immediate vicinity and the lack of people there, it is obvious that the very expensive interchange would receive a tiny amount of use. No good reason has been advanced for why future local users should receive the benefit of such a monumental cost per trip. At what price point does providing convenience become unreasonable to the taxpayers of the State of California? Doesn't Caltrans have a systematic decision-making process similar to traffic signal warrants for determining whether to provide an interchange? What were the results?

LC11-72 Because Option 12b would result in the greatest amount of tree removal (3.1-118:2498-2500), feasible mitigations should be studied to see if the new access roadway could be relocated, so as to reduce or eliminate tree removal. It would be useful to provide a photo-montage and map in the Response to Comments to evaluate the possibility of alternative routes.

LC11-73 Consideration should be given to State acquisition of parcels adjacent to the highway, in lieu of building access roads. Not only could it prove less expensive, it would entirely eliminate the issue of growth-inducement for those parcels.

Air Quality

LC11-74 The Air Quality section of this DEIR/S was especially shoddily done. It is apparent from the Existing Air Quality section's reference to only Sonoma County (3.2-74: 1550) that Sections 3.2.6.1 and 3.2.6.2 were lifted wholesale out of an earlier environmental document for a Sonoma HOV project. Further analysis and presentation of data will be required to demonstrate that these sections are pertinent to the Marin County portion of the Study Area. Numerous textual errors were left uncorrected in this section (see below).

LC11-75 But worst of all was the complete failure to analyze ozone precursors, despite the Study Area being designated nonattainment for ozone. At a recent Open House, a Caltrans staff member told TRANSDEF personnel that because the Study Area was

Response to Comment LC11-69

See responses to Comments I50-4 and I50-5 regarding the expected impacts of the proposed interchanges in Segment B.

Response to Comment LC11-70

The discussion provides a relative comparison of the access options and not a value-laden alternative. On balance, Caltrans and FHWA have identified Access Option 12b as the Preferred Alternative.

Response to Comment LC11-71

Due to the loss of direct access from the expressway to freeway upgrade, Caltrans must replace access to US 101. The alternatives analysis took the low density land uses into consideration, on balance with the environmental impacts and access issues.

Response to Comment LC11-72

The project footprint was reduced to the maximum extent practicable while still meeting the project's need and purpose. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's need and purpose.

Response to Comment LC11-73

Buying up adjacent land is one way of restricting growth, but current land use controls have also prevented growth in these areas whose access would not change much over existing conditions. See responses to Comments I50-4 and I50-5 regarding the expected effect of the proposed interchanges in Segment B. Note that these areas currently have access via at-grade intersections with US 101.

Response to Comment LC11-74

The text will be has been revised to include information on Marin County. Textual errors have been corrected where necessary.

Response to Comment LC11-75

For mobile sources of ozone precursors, there are no project level CEQA thresholds of significance that are applicable. Hence, ozone and ozone precursors are not analyzed for individual projects. If a project is consistent with the Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP), with conformity findings in federal non-attainment areas (which includes the Bay Area), and with an Environmental Impact Report (EIR) for the RTP that considers regional air quality issues, it has no significant adverse impact in operation for ozone or its precursors, either by itself or cumulatively.

To demonstrate conformity with the federal ozone and carbon monoxide (CO) standards, the Bay Area has to meet a motor vehicle emission "budget" test for ozone precursors, volatile organic compounds (VOCs) and nitrogen oxides (NO_X); and CO. A positive conformity finding means that the Metropolitan Transportation Commission (MTC) has demonstrated that the sum total of all calculated motor vehicle emissions contributed by all of the projects planned for the region (all projects in the RTP) is lower than the approved budgets.

For the ozone precursor emissions VOC and NO_X, the applicable motor vehicle emissions budget was developed for the 2006 attainment year as part of the 2001 Ozone Attainment Plan and was subsequently approved by the U.S. Environmental Protection Agency (USEPA).

The motor vehicle emissions of VOC and NO_X in the Transportation 2030 Plan (the Bay Area RTP) and 2005 Transportation Improvement Program/Amendment #05-05 are also lower than the applicable motor vehicle emission budgets which the USEPA has agreed will bring the Bay Area into compliance with the national 1-hour ozone standards.

In addition to the 2001 Ozone Attainment Plan, the Bay Area Air Quality Management District (BAAQMD) has prepared the Bay Area 2005 Ozone Strategy in cooperation with the MTC and the Association of Bay Area Governments (ABAG). The Ozone Strategy is a roadmap showing how the San Francisco Bay Area will achieve compliance with the state one-hour air quality standard for ozone as expeditiously as practicable, and how the region will reduce transport of ozone and ozone precursors to neighboring air basins. Because the project is included in the Transportation 2030 Plan, it is in conformance with the Bay Area Ozone Strategy.

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Response to Comment LC11-76

See the Master Response for Induced Travel.

As you can see in Table 3.1-15 in Volume 1 of this FEIR/S (reprinted below), the VMT in the project area and county-wide are not projected to significantly increase because of this project.

Table 3.1-15 Projected Increase in Vehicle Miles Traveled Countywide (in thousands of miles), Year 2030

Alternatives	Project Area		Marin County and Sonoma County	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
No Build	5,312	6,358	16,614	20,133
Build Alternatives	5,318	6,367	16,625	20,154
Difference	6	9	11	21
Percent Increase	0.11%	0.14%	0.07%	0.10%

Response to Comment LC11-77

According to the FHWA guidance on Mobile Source Air Toxics (<http://www.fhwa.dot.gov/environment/airtoxic/020306guidmem.htm>), projects must meet certain criteria to be considered "projects with higher potential MSAT effects," which would require a quantitative analysis of MSAT emissions. To be considered a "project with higher potential MSAT effects," a project must:

- Create or significantly alter a major intermodal freight facility that has the potential to concentrate high levels of diesel

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LC11-75 evaluated as part of Bay Area regional ozone plans, that it was not necessary to do so at the project level. This assertion has no validity in CEQA or NEPA.

LC11-76 Every assertion in the following sentence is incorrect, for reasons already stated above:

> Moreover, the Fixed HOV Lane Alternative would alleviate the vehicle hours of delay and the congestion that is particularly acute in the Novato Narrows without substantially increasing vehicle miles travelled. (3.2-80:1710-1712).

LC11-77 For the same reasons, the following sentence must also be revised:

> The FHWA's MSAT guidance considers projects like MSN to have low potential MSAT effects because it is intended to improve highway operations without adding substantial new capacity and without creating a facility that is likely to increase emissions. (3.2-81:1745-1748).

This is not a minor highway operations improvement project. It is fraudulent to claim that a project that increases capacity by 50% can be considered to not add "substantial new capacity." As demonstrated by our expert in Attachment 1, the HOV lanes would add 100,000 VMT per weekday, even before correcting for the failure to consider induced demand. That volume of travel is certain to increase emissions. The HOV lanes cannot possibly have low potential MSAT effects.

LC11-78 Consistent with recent Caltrans practice in Sacramento, construction air quality mitigation measures should include the requirement to use only construction equipment that meets the latest CARB off-road diesel standards. This is a feasible method of reducing PM emissions.

LC11-79 The cumulative impact analysis for air quality is flawed:

> Although air quality has improved over the years, the area continues to be in non-attainment of the state ozone and PM_{10} ambient air quality standards and in non-attainment of the federal ozone standard. The approved and pending land development projects, in combination with large transportation improvements that increase capacity, would continue to emit air pollutants that would contribute to cumulative air quality impacts without the MSN Project. (5-21:399-405)

LC11-80 This analysis is backwards and must be revised. It assumes the region will remain in non-attainment status, instead of determining whether the Project will help or hinder

particulate matter in a single location; or

- Create new or add significant capacity to urban highways such as interstates, urban arterials, or urban collector-distributor routes with traffic volumes where the AADT is projected to be in the range of 140,000 to 150,000, or greater, by the design year;

And also:

- Be proposed to be located in proximity to populated areas or in rural areas, in proximity to concentrations of vulnerable populations (i.e., schools, nursing homes, hospitals).

Projects that do not meet these criteria are defined as "projects of low potential MSAT effects" or "projects with no meaningful potential MSAT effects." Furthermore, this project cannot be considered a "project with no meaningful potential MSAT effects" because it does not meet the following criteria:

- Projects qualifying as a categorical exclusion under 23 CFR 771.117(c);
- Projects exempt under the Clean Air Act conformity rule under 40 CFR 93.126; or
- Other projects with no meaningful impacts on traffic volumes or vehicle mix

From Caltrans' traffic forecast and traffic analysis, the maximum AADT in the section from the US 101/SR 37 Interchange to the Rowland Road Interchange, the segment within the project boundaries with the highest 24-hour volume, would be 128,300 for the No Build Alternative and 136,200 for the Fixed HOV Lane Alternative. Therefore, under the FHWA guidance the project is defined as a "project of low potential MSAT effects," and a qualitative analysis is required for this project. This is the type of analysis that was done for this project. The validity of the predicted volumes that TRANSDEF has provided has been addressed in the other responses within this document, and using them as a basis for compliance with federal guidelines is not appropriate.

Response to Comment LC11-78

Caltrans is required to comply with all air quality regulations that are applicable to its construction projects. Any measures beyond those required by the regulations cannot be committed to.

Response to Comment LC11-79

The State is in non-attainment for the federal and state ozone standards and is in non-attainment for state PM_{10} (fine particulate matter less than 10 microns in diameter) and unclassified for the federal PM_{10} standard. The California Clean Air Act (CCAA) must be addressed in CEQA documents for transportation projects. Although state air standards for some pollutants are more stringent than federal standards, currently there is no conformity process under the state law. Until such time that the State codifies its own conformity process, the State will apply the federal standards only. Any project of this size will cause an increase in pollutants; however, the increases from this project have been accounted for in the emissions budgets approved through the federal conformity process.

Response to Comment LC11-80

Please see the Master Response on Cumulative Air Quality.

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LC11-80 attainment. Since the DEIR/S has no analysis of ozone precursor emissions, either those from the Project or cumulatively, the air quality analysis is incomplete. It is clear to TRANSDEF, however, that the Project will increase VMT, thereby leading to an increase in ozone precursors.

LC11-81 Greenhouse Gas Emissions
Instead of providing a competent greenhouse gas (GHG) analysis based on VMT projections, the DEIR/S instead offers a conclusory paragraph with false premises and faulty conclusions. The following statements are both unsupported and unsupportable:

> The MSN Project would relieve congestion by enhancing operations and improving travel times in a high congestion travel corridor and, thus, lead to an overall reduction in GHG emissions. Accordingly, the contribution of the Build Alternatives and the Access Options would be less than cumulatively considerable so that the overall cumulative impact would be **less than significant**. (4-13 & 14:415-420, emphasis in original).

This is far too simplistic to qualify as an analysis for an environmental document. The primary determinant of vehicular GHG emissions is VMT. Those emissions are affected by speed and the prevalence of acceleration/deceleration cycles (which is experienced as congestion). After reviewing the science in Attachment 2, it should be clear that vehicles at steady state speeds from 35 to 50 mph emit roughly the same amount of CO_2. (Barth & Boriboonsomsin, "Real-World CO2 Impacts of Traffic Congestion," page 10, (Attachment 2)). Enabling vehicles to go faster than 50 mph **increases** their GHG emissions. (*Id.*, page 9). Stop and go driving **increases** GHG emissions. (*Id.*) Increasing the capacity of the facility increases VMT and **increases** GHG emissions. (Attachment 1)

LC11-82 Three factors need to be considered in the evaluation of the cumulative impact of GHG emissions: the proportion of annual Project VMT that occurs in each 5 mph speed bucket (*Id.*, page 14), so as to more accurately calculate emissions; the degree that the Project has induced growth in the region, leading to higher regional VMT; and the correction of the Project VMT numbers for induced demand. as discussed above. It is clear that the higher levels of VMT will produce both increased congestion and increased GHG emissions. The DEIR/S statement cited above must be revised, after due quantitative consideration of the factors described here, which then will lead to the identification of a Significant Impact.

LC11-83 The cumulative impacts analysis also needs to be revised, for the same reasons:

> Accordingly, the contribution of the MSN Project would contribute to cumulative air quality impacts with past, present, and future foreseeable projects. However, while

Response to Comment LC11-81

Please refer to the Master Response for Greenhouse Gas Emissions.

It is impossible to accurately break down VMT into "5 mph buckets." Indeed speeds will vary on a day-to-day basis both because of different traffic levels and operational conditions. Please see the Master Responses for Induced Travel and Greenhouse Gas Emissions. As was discussed in the Master Response on Induced Travel, although all of the induced demand factors have not been accounted for in the traffic forecast, the resulting discrepancy should be small. The subject of induced growth has been covered in Section 3.1.4 of the DEIR/S and in Volume 1 of this FEIR/S.

Response to Comment LC11-82

Please refer to the Master Response for Greenhouse Gas Emissions.

It is impossible to accurately break down VMT into "5 mph buckets." Indeed speeds will vary on a day-to-day basis both because of different traffic levels and operational conditions. As was discussed in the Master Response for Induced Travel, although all of the induced demand factors have not been accounted for in the traffic forecast, the resulting discrepancy should be small. The subject of induced growth has been covered in the growth inducement study.

Response to Comment LC11-83

Please see the Master Response on Cumulative Air Quality. The Cumulative Impact Assessment is discussed in Volume 1, Chapter 5 of this FEIR/S.

Region-wide VMTs have been calculated as follows:

._____

Mrn/Son Narrow HOV Widening Project:
Vehicle Mile Travel (VMT)

	AM Peak Hour		PM Peak Hour	
	No Build	Build	No Build	Build
Project Area	5,312,409	5,317,891	6,357,601	6,366,778
Marin & Sonoma County Wide	16,613,607	16,624,547	20,133,319	20,153,656

For the project area and county-wide VMTs, the change is less than 1% between the Build and No Build scenarios. This would not be considered significant. In regard to congestion vs. emissions analysis, all projects in a conforming Regional Transportation Plan and Transportation Improvement Program have been analyzed for total criteria pollutant (as defined by the Clean Air Act) emissions on a region-wide basis. This project is included in the latest Regional Transportation Plan (the Transportation 2030 Plan) and latest Transportation Improvement Program (the 2007 TIP). The Transportation 2030 Plan was adopted by MTC on February 23, 2005 and the 2007 TIP was adopted by the MTC on July 26, 2006. The FHWA made its conformity determination for the Transportation 2030 Plan and the 2007 TIP in October 2006.

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> AADT and VMT increase over the No Build conditions, the Build Alternatives would alleviate the vehicle hours of delay and the congestion that is particularly acute in the Novato Narrows without substantially increasing vehicle miles traveled. As a result, it is reasonable to expect that emissions of carbon and ozone precursors would be reduced compared to No Build conditions. (5-21:412-418).

LC11-83 The first sentence, above, is entirely meaningless. The second asserts conclusions about congestion relief that are unwarranted, given the failure to consider induced demand. The conclusion about not substantially increasing VMT is unwarranted for the same reason. Without quantitative analysis of congestion vs. emissions, there is no basis upon which to assert the final conclusions. Being "reasonable" isn't enough. These conclusions too need to be revised.

Energy

LC11-84 For the reasons stated above in the greenhouse gas section, the premises of the following sentence are incorrect:

> This reduction in delays would result in more efficient energy consumption. Due to all the above-mentioned advantages, the long-term impacts of the FIxed HOV Lane Alternative on transportation, and vehicular traffic energy use would generally be beneficial. (3.2-108:2425-2428).

Higher VMT and higher speeds (especially those above the speed limit) will consume more energy. This conclusion is incorrect and must be revised. Lower speeds will result in lower energy consumption, especially if the speeds are steady, without much acceleration.

> Such congested traffic conditions contribute to inefficient energy consumption as vehicles use extra fuel while idling in stop-and-go traffic or moving at slow speeds on a congested roadway. (3.2-109:2462-2464).

LC11-85 Conclusory statements like the one above, completely lacking in data and analysis, are inadequate in the evaluation of energy use. It must be revised, for the same reasons as must this overall conclusion for the energy section:

> Since the Build Alternatives would have generally beneficial energy effects, avoidance, minimization, and mitigation measures would be unnecessary. (3.2-111:2522-2524).

Response to Comment LC11-84

Vehicles will reach their optimum fuel efficiencies at different speeds, but in general, fuel economy increases up to 60 mph then drops off. In the most congested hours of the day, in the commute direction (i.e., southbound in the morning, northbound in the evening), the average vehicle speeds in the design year will be well below 60 mph, and will increase due to the project. We estimate the average vehicle speeds will increase from 41 mph to 51 mph in the morning commute, and the average speeds will increase from 38 mph to 45 mph in the evening commute. Since these speeds are lower than 60 mph there will be an increase in fuel economy overall for the vehicle fleet. It is true that there may be vehicles traveling above 60 mph in the non-commute direction; however, these would be free-flow conditions, and there is no way of slowing these drivers down without strict enforcement. The loss in fuel efficiency for these vehicles in the non-commute direction is far outweighed by the increases for the majority of vehicles traveling in the commute direction.

Response to Comment LC11-85

A measure of the amount of congestion is the predicted average vehicle speeds on the mainline freeway within the project limits. Higher average vehicle speeds indicate less congestion and greater fuel efficiency. Under the fixed HOV lane alternative, average vehicle speeds are predicted to increase. We estimate the average vehicle speeds will increase from 41 mph to 51 mph in the morning commute, and the average speeds will increase from 38 mph to 45 mph in the evening commute. As described in the response to Comment LC11-84 above, fuel efficiency will decrease after 60 mph, but for the commute directions (southbound in the morning, northbound in the evening), which represent the majority of vehicles, average speeds will stay below 60 mph and fuel economy will increase.

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Response to Comment LC11-86

Thank you for your comments. This conclusion paragraph summarizes the comments previously stated in greater detail in the main body of this letter, to which we have responded above; please refer to the preceding responses in this letter for our detailed responses to TRANSDEF's comments.

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Conclusion

LC11-86 TRANSDEF firmly believes that the choice between building HOV lanes between Marin and Sonoma counties and building passenger rail service will significantly affect the spatial distribution of future land uses in the two counties. This in turn will affect how well or how poorly residents are able to adapt to the challenges of climate change and escalating oil prices. These are issues that must be addressed in the environmental review documents to inform the public and decisionmakers. We are pleased to offer these comments, in the hope that they assist in describing the significant impacts from the proposed project and ensuring the lead agencies fully disclose the environmental consequences from highway building and consider the benefits from considering a far-more sustainable future. We look forward to the recirculation of the environmental review documents and the ability to examine the policy choices once the environmental review process is properly completed. Please feel free to contact us.

Sincerely,

David Schonbrunn,
President

Attachments

1. "Review of Marin Sonoma Narrows (MSN) HOV Widening Project DEIR/DEIS", Smart Mobility, Inc., December 2007
2. "Real-World CO_2 Impacts of Traffic Congestion", Barth & Boriboonsomsin, November 2007
3. Letter from TRANSDEF's Attorney to Caltrans' Susan Simpson, June 15, 2001
4. Letter from TRANSDEF's Attorney to Caltrans' Will Kempton, October 19, 2006
5. Letter from TRANSDEF's Attorney to Caltrans' Will Kempton, December 18, 2006
6. Calthorpe Study "Preferred Scenario Final Report", June 1997
7. "Why Are the Roads So Congested", Surface Transportation Policy Project, November 1999
8. List of Suggested Text Corrections

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Attachment 8

Suggested Text Corrections (with page number references)

1-10: In Figure 1-5, the two little tables are titled "Delay (in Minutes for mixed flow traffic) in Peak Period." According to the text on page 1-9, it should say "Peak Hour."

2-19: In Figure 2-4, the access road from San Antonio Creek to Redwood Landfill OC in Access Option 12b is the wrong color. It should have been represented as a Feature Unique to Option.

2-36: Delete "of" on line 561.

3.1-12: Should be "Lane" on line 290.

3.1-71: Is the Rohnert Park Expressway really in Santa Rosa?

3.1-71: All the references to Figure 3.1-10 need to be changed to 3.1-11.

3.1-73 - 76: The depiction of the queue locations is unnecessarily opaque. Where the bottleneck is caused by an on-ramp such as South Petaluma Blvd. adding traffic to an already full freeway, the queue should be depicted as starting right at the interchange screenline. Otherwise, the source of the bottleneck is obscured.

LC11-87 3.1-77: Why do Tables 3.1-12 & 13 have a row for "HOV Traffic" in the No Build sections? Obviously the delay for these rows should be zero, as there are no HOV lanes in that Alternative. Yet the delay in these rows is different from the Mixed Flow rows. At a minimum, this needs to be explained. Eliminating the rows would be better.

3.1-80: Should be "along" on line 1915.

3.1-94: The North Petaluma bridge over the railroad is an Overhead, not an Overcrossing. (line 2202)

3.1-100: The photos need to be swapped. The top one has less sunlight below it, so it must be the "After" picture, not the "Before."

3.2-68: Footnote 4 should only pertain to ozone, not other pollutants.

3.2-69: Footnote 4 is incorrect. The Bay Area is designated as being in marginal nonattainment of the national 8-hour ozone standard.

3.2-69: In Footnote 10, the second sentence fails to describe what "39" refers to.

3.2-74: Three typos: "... buildup of air pollution ...", "... when temperature increases", "...even among healthy people."

LC11-88 3.2-108: What does the percent refer to in this sentence on line 2417: "The Fixed HOV Lane Alternative would improve average travel speeds to a 62 to 80 percent on northbound lanes and 80 to 82 percent on south bound lanes and thereby reduce average travel times during both peak hours."

Response to Comment LC11-87

Thank you for your identification of these errors in the DEIR/S. Individual responses to each particular item are presented below.

- 1-10: The commenter is correct; this has been corrected in Volume 1 of this FEIR/S.
- 2-19: The figure has been corrected in the FEIR/S.
- 2-36: This typo has been corrected in the FEIR/S.
- 3.1-12: This typo has been corrected in the FEIR/S.
- 3.1-71, Rohnert Park Expressway: "Santa Rosa" has been changed to "Rohnert Park."
- 3.1-71, Figure 3.1-10 references: This has been corrected in the FEIR/S.
- 3.1-73 - 76: The queue is not depicted as starting right at the interchange screen line because that bottleneck occurs after the on-ramp, which is downstream of the screen line.
- 3.1-77: Our study area is from south of Miller Creek Road to north of Old Redwood Highway. The No Build alternatives assume that existing HOV lanes are in place south of Route 37 in 2010 and 2030, and HOV lanes would be in place north of Old Redwood Highway in 2030. HOV traffic will bypass congestion area if there is an HOV operating; consequently, HOV lane traffic would experience less delay than mixed flow lane traffic.
- 3.1-80: This typo has been corrected in the FEIR/S.
- 3.1-94: This typo has been corrected in the FEIR/S.

- 3.1-100: The commenter is correct; the photos have been swapped in the FEIR/S.
- 3.2-68: The table has been corrected in the FEIR/S.
- 3.2-69, Footnote 4: The footnote has been corrected in the FEIR/S.
- 3.2-69, Footnote 10: The footnote has been corrected in the FEIR/S.
- 3.2-74: These typos have been corrected in the FEIR/S.

Response to Comment LC11-88

The percentages refer to average vehicle speeds. For the Fixed HOV Lane Alternative the average vehicle speeds at the worst bottlenecks in the southbound direction will improve from as low as 9 mph to the posted speed limit (65 mph) from the Build to the No Build condition during peak hours (*Traffic Operational Analysis Report, Route 101 Marin-Sonoma Narrows Widening Project*, Caltrans Office of Highway Operations, February 2005). The sentence in question has been clarified in Section 3.2.8 of Volume 1 of the FEIR/S; however, the findings are unchanged.

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smart mobility

Review of Marin Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement

Prepared for:
Transportation Solutions Defense and Education Fund

Prepared by:
Smart Mobility, Inc.

December 2007

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Summary

LC11-89 Cars and trucks emit over 35% of all greenhouse gases produced in California. Increasing roadway capacity increases vehicle miles traveled (VMT), and this causes higher greenhouse gas emissions. The Marin Sonoma Narrows (MSN) HOV Widening Project Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) fails to accurately disclose the increases in VMT that will result from the project. It is estimated that the project will increase traffic by 100 million vehicle miles per year, and result in a large increase in greenhouse gas emissions.

LC11-90 The traffic analysis in the DEIR/DEIS is also deeply flawed. Excluding induced travel from the analysis causes the benefits of the project to be overestimated because congestion relief appears to be greater than it really will be. It also fails to account for indirect traffic impacts on other roadways because not all of the additional VMT will be on the widened roadway.

With increased road capacity, jobs and housing disperse. Traffic metering points like the existing Marin-Sonoma Narrows area act as a brake on the decentralization of land use (a.k.a. "sprawl). Less sprawl and better jobs housing balances are planning goals in the Bay Area. Expanding roadway capacity as in this proposed project is contrary to these goals, and would undermine other planning initiatives aimed at improving the jobs/housing balance, increasing transit ridership, and preserving open space.

Greenhouse Gas Emissions and Vehicle Miles Traveled

California AB 32 requires the California Air Resources Board (CARB) to develop regulations and market mechanisms that will ultimately reduce California's greenhouse gas emissions by 25 percent by 2020. Mandatory caps will begin in 2012 for significant sources and ratchet down to meet the 2020 goals.[1] Cars and trucks are the source for the largest share of greenhouse gas emissions in California and the emissions are roughly proportional to vehicle miles traveled (VMT).

> Light duty vehicles and on-road diesel vehicles accounts for over 35% of all anthropogenic greenhouse gases (GHG) produced in California. Annual net greenhouse gas emissions from surface transportation are roughly equal to the product of the number of vehicles, the average number of miles traveled by each vehicle (vehicle miles traveled, or VMT), and the average net emissions of GHG per vehicle mile traveled. (California Climate Action Team, State Agency Work Plans Draft, p. 34 December 8, 2005).

Expanding highway capacity causes "induced traffic", increasing VMT and increasing greenhouse gas emissions. DeCorla-Souza (of the Federal Highway Administration) and Cohen define "induced demand" as an: "increase in daily vehicle miles of travel (VMT), with reference

[1] http://gov.ca.gov/index.php?/press-release/4111/

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Response to Comment LC11-89

Please see the Master Responses for Induced Travel and the Smart Mobility Report.

The commenter does not state the basis for the 100,000,000 vehicles mile per year estimate for increase in VMT so it is not possible to remark upon the methods used to reach it nor comment on whether it is a reasonable estimate. The travel demand model used for this project is a peak hour model only and cannot estimate on the VMT. However, it is it is worth mentioning that this model showed a 0.10% to 0.14% increase in peak hour VMT in the project area caused by the construction of this project. The percent increase in peak hour traffic should be greater than the percent increase over 24 hours. During the peak hour, decreased congestion will make travel on US 101 quicker and therefore increase the number of travelers using it. However, during non-congested off-peak period the travel times will change little, so increased travel on US 101 would not be expected. In fact, the off-peak travel might decrease because travelers have shifted their travel times to the peak period because of reduced congestion. The most important result from the modeling is that the change is small and is well within the margin of error for the transportation demand model, so that a significant increase should not be expected.

Response to Comment LC11-90

Please see the Master Responses on Induced Travel and the Smart Mobility Report.

Projected VMT for the MSN Project is shown in Table 3.1-15 in Volume 1 of this FEIR/S (which is also reprinted in the response to Comment LC11-76 above). The Project Area columns cover US 101 and nearby road and streets while the Marin County and Sonoma County Columns cover Marin and Sonoma Counties.

The growth analysis evaluated the effects on growth of relative change in accessibility to jobs compared with land use plans. The overall conclusion is that the proposed highway improvement is a minor factor in the accepted plans for area growth. See response to Comment LC11-92 regarding the effect of travel time changes. The growth study looked at the susceptibility of specific neighborhoods to have induced residential growth as a result of the proposed project and found a very minor influence. On the other hand, Association of Bay Area Government (ABAG) Projections 2005 show that Novato and San Rafael, the two largest cities in Marin County, together plan to add almost 26,000 jobs between 2000 and 2030 while adding about 9,800 households. Given that most of Marin County's growth capacity is in these two communities, the current plan would import jobs from other counties. It appears that land use planning, not the provision of HOV lanes, is the major factor in the commuting trends. Please also see the response to Comment LC11-27 regarding transit.

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Response to Comment LC11-91

Please refer to the Master Response for Induced Travel.

to a specific geographic context, resulting from expansion of highway capacity."[2] This definition includes both short-term effects and long-term effects. The short-term effects include more trips, longer trips, shifts from other travel modes to auto, and auto trips with lower occupancies. The long-term effects result from land development brought on by increased roadway capacity.

Induced demand effects are well known both to planners and laypeople, and there is a large and growing research literature quantifying the effects of induced demand. This process was kicked off in the United States with a 1997 study by Hansen and Huang that demonstrated large growth in VMT in California that resulted from increased freeway capacity.[3] Since then, there have been many other studies that have confirmed the importance of induced travel. These studies have become increasingly sophisticated in their use of statistical techniques. Robert Cevero of the University of California, Berkeley revisited the California freeway case in a major study that is particularly relevant to the DEIR/DEIS.[4] Cervero writes:

> The longer-run relationship appears fairly strong – every 10% increase in travel speeds is associated with a 6.4% increase in VMT. (p. 157)

Most regional transportation modeling does an incomplete job of accounting for induced travel. Cevero writes:

> In many parts of the United States, travel-forecasting models used by planning agencies are not up to the task of adequately accounting for induced travel and induced growth (Transportation Research Board, 1995). Long-range forecasting models are needed that are robust and sophisticated enough to capture both short-run behavioral shifts and long-run land use shifts triggered by road improvements. Indeed, the general consensus of attendees at a recent conference convened by the Eno Transportation Foundation Policy Forum on induced demand was that the greatest value added of research in this area is to inform the calibration of long-range travel forecasting and urban simulation models, such as MEPLAN, TRANUS, and TRANSIMS (Hunt, 2002). (p. 160)

LC11-91 The DEIR/DEIS purports to analyze the effects of the project on future VMT. In fact the modeling used is incapable of forecasting increases in VMT that would result from the proposed project, and the numbers given in the DEIR/DEIS are wrong. The actual impact on VMT from the project would be several times greater than that which has been disclosed.

Complete induced demand modeling requires accounting for each of the separate components of induced demand including:

1) shifts to longer routes
2) changes in destinations causing longer trips,

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[2]. DeCorla-Souza, P. and H. Cohen. *Accounting for Induced Travel in Evaluation of Metropolitan Highway Expansion*. TRB 77th Annual Meeting Preprint CD-ROM. TRB, National Research Council, Washington D.C., January 1998.

[3] Hansen, M. and Y. Huang. *Road Supply in California*. Transportation Research A, Vol. 31, No. 3, 1997, pp. 205-218.

[4] Cevero, Robert. Road Expansion Urban Growth, and Induced Travel: A Path Analysis. In Journal of the American Planning Association 69(2), p. 145-163, 2003.

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3) changing travel mode to auto, and

4) changing home or work locations resulting in longer trips.

The DEIR/DEIS provides little information concerning how the modeling was done, but in the documentation, only one of the four components was accounted for – shifts to longer routes. The Marin/Sonoma model uses the four-step modeling process used in most regions in the United States. The four steps include:

1) trip generation – calculating the numbers of originals and destinations for each small geographic area,

2) trip distribution – linking the origins and destinations to form complete one-way trips,

3) mode choice – determining whether the trips are made by walking, biking, using transit, or in autos and if in autos, the number of people in the vehicle, and

4) assignment – assigning the autos to particular roadways.

LC11-92 The four step modeling process splits people's unified travel planning processes into four steps to facilitate computing. Good modeling practice requires feedback between the modeling steps until an equilibrium between the four steps is reached. If the sequence is computed only once, significant errors result. Both the trip distribution and mode choice stages depend on information on travel times. In the first model sequence, the roadway network appears to be uncongested, and longer trips will be chosen in the model. When these trips are assigned to the network, there appears to be severe congestion. The congested travel times are fed back into the trip distribution and mode choice steps, and resulting trip lengths are much shorter – too short in fact, and another feedback step is required. After several feedback stages, equilibrium values are achieved that properly replicate behavior. Modeling feedback is required by Federal regulations in air quality nonattainment areas.

If modeling is done with feedback, three of the four components of induced travel are accounted for – longer routes in the assignment stage, changes in destination in the distribution stage, and mode changes in mode choice. Therefore, it is good modeling practice to do modeling with feedback for each separate alternative.

LC11-93 The DEIR/DEIS documentation of the modeling process used is incomplete, but it indicates that Caltrans has taken a shortcut that makes VMT estimates invalid. It describes "2020 future year trip tables" and that "2010 and 2030 trip tables were developed by modifying the year 2020 trip tables" (p. 3.1-70). These appear to be references to the auto trip tables that are the output of the third stage of the four step modeling process. It is implied that these same trip tables were used for both the No Build and Build alternatives. In this case, the modeling does not account for either destination changes or mode choice changes. It can account only for routing changes.

The fourth effect, induced travel from land use changes cannot be accounted for in a four step model unless the model is coupled with a land use allocation model that results in different future land use projections for different transportation alternatives.

LC11-94 The state of the practice in transportation modeling is to include model feedback. As this was not done in the modeling relied on in the DEIR/DEIS, statistical results from the research literature on induced travel will be used to estimate the induced travel that will result from the proposed project. Two different approaches will be used. First, the model results will be adjusted based our

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Response to Comment LC11-92

The commenter is correct that, like most travel demand models in present use, this model uses a "four step" travel demand modeling approach, and the outline of the four step modeling approach is a good synopsis of this approach. However, the commenter is not correct that the best current modeling practice iterates on the trip distribution phase.

The model used for this project, again like most models, iterates during the mode split and trip assignment phase. This allows it to take into account the travel mode and routes travelers use.

This commenter states that the model used should iterate not only upon the mode split and trip assignment phase but upon the trip distribution phase as well. Theoretically, this would provide better results by allowing trip destinations to respond to congestion levels. However, this is not common practice because it has proven to be very difficult to produce a model that iterates upon the trip distribution stage, yet still can reproduce existing traffic flows when using current conditions. A model that cannot reproduce existing conditions cannot be relied upon to accurately predict future conditions. Therefore, standard modeling practice is to iterate only on the trip assignment and sometimes the mode split phase.

It should also be noted that although the model does not iterate upon the trip assignment phase, it does assume that the highways will be experiencing congesting with the increased travel times that go with it during the assignment phase.

Response to Comment LC11-93

Please refer to the Master Response for Induced Travel and the response to Comment LC11-92 above.

The trip tables used were traveler trip tables, not vehicle trip tables, so as was explained in the response to Comment LC11-92, the model iterates in

the mode choice and trip assignment steps so both mode chosen and route taken could change in response to changing conditions.

Response to Comment LC11-94

See Master Response on “Induced Travel Demand”

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Response to Comment LC11-95

Comment regarding title is correct; "(per 1,000 miles)" should have been written as "(thousands of miles)" because these are the units used in the table. The table also contained other errors, which have all been corrected in the FEIR/S (see the next response below).

See the Master Response for Induced Travel.

The commenter asserts that the only factor that may cause induced traffic that was taken into account when forecasting project traffic is Route Choice. This is not true; the traffic forecast model also took into account mode choice. The forecast did not take into account land use changes, additional trips or destination changes. As was outlined in the Master Response for Induced Travel, the importance of these factors has been the subject of much research and considerable controversy. However, much recent research affirms that the effect of these factors is relatively small. The effect of land use changes is likely to be especially low for the already developed and heavily regulated project area. Zoning and other land use regulation is likely to be a far bigger factor in development patterns than a change in accessibility brought about by an additional HOV lane.

The commenter then presents research stating that route choice is only responsible for 1/5 to 1/3 of induced traffic. This is only one researcher's opinion of typical values, and is not specifically applicable to this project. Also, it does not take into account that mode split was also covered by the forecasts. However, even if this assertion is true, induced traffic would increase the total VMT for the Marin-Sonoma County area by, at most, 0.35% in the morning peak period and 0.50% during the afternoon peak period, a small percentage. In addition, the 24-hour percentage increase will be smaller. During the peak hour, drivers may be making considerable changes to their behavior to avoid congestion. Relieving this congestion may cause their behavior to revert to what it would have been without the congestion. However, during the non-congested off-peak period, US 101

research with models. Second, statistical relationships from observed growth in VMT will be applied.

Carolyn Rodier of the Mineta Institute and the University of California has researched how well land use models and transportation models with feedback account for induced travel. She concludes:

> The body of literature on the ability of existing travel and land use models to represent induced travel indicates that when travel times are fed back to a land use model and/or the trip distribution step, then (1) models can represent induced travel within the range documented in the empirical literature and (2) the effect of new highway capacity on land use and trip distribution significantly contributes to the models' representation of induced travel. If induced travel is not represented in travel and land use models, then the need for, and the benefit of, the project will be overstated (e.g., 16% to 236% of VHT [vehicle hours of travel]), and negative environmental effects will be understated (e.g., 72% to 192% of NOx emissions).[5]

Rodier also reports on the share of induced travel caused by each of the four components of induced travel. Changes in destination produced the largest share of the total induced travel. In a Sacramento region case study with an integrated land use allocation model (MEPLAN), the land use component produced the second highest amount of induced travel. Changes in routing, the only one of the four components modeled in the DEIR/DEIS was the third highest factor.

The relative proportions of the components varied depending on the study. However, Rodier's research results suggest that routing changes alone represent probably represent only about 1/5 to 1/3 of total induced travel , especially in cases like the one considered in the DEIR/DEIS where the project is in a bottleneck area with few parallel routes.

LC11-95 Therefore, the DEIR/DEIS VMT estimates will be multiplied by a factor of 3 to 5 to correct for the missing modeling factors. DEIR/DEIS Table 3.1-15 (p. 3.1-78) is labeled "Projected Vehicle Miles Traveled (per 1,000 miles) Year 2030. This title is meaningless due to the inclusion of the word "per." The units in Table 3.1-15 really are thousands of VMT per peak hour per weekday.

LC11-96 The right hand side of Table 3.1-15 gives values for Marin County and Sonoma County and the left hand side gives values for the "Project Area." It is unclear what is meant by "Project Area" It would be expected that the project area would be smaller than the two-county area, but the VMT numbers are larger. Therefore, it is either a very large project area or the numbers are wrong. Unless this is clarified and/or corrected, the left-hand side of Table 3.1-15 should be ignored.

LC11-97 The values given on the right-hand side of the table give 4,000 additional VMT per weekday in the morning peak hour and 12,000 additional VMT per weekday in the afternoon peak hour, or 16,000 for the total of the two hours. The table makes these appear small by showing them as "4" and "12" and then emphasizing that it represents a small fraction of a very large number – total VMT for Marin and Sonoma Counties.

[5] Rodier, Carolyn J. A Review of the Representation of Induced Highway Travel in Current Travel and Land Use Models, p. 8.

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would not be congested and drivers would not need to change their behavior. The addition of extra HOV lanes will not have a large effect on the highway's operation and should not affect driver behavior. Induced traffic should be very small or non-existent in the off-peak hours.

Response to Comment LC11-96

The commenter is correct; the actual projected VMT numbers for Marin and Sonoma Counties were far higher than the incorrect numbers shown in those columns in the table in the DEIR/S. The correct values are shown below. Table 3.1-15 has been corrected in the FEIR/S.

Table 3.1-15 Projected Increase in Vehicle Miles Traveled Countywide (in thousands of miles), Year 2030

Alternatives	Project Area		Marin County and Sonoma County	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
No Build	5,312	6,358	16,614	20,133
Build Alternatives	5,318	6,367	16,625	20,154
Difference	6	9	11	21
Percent Increase	0.11%	0.14%	0.07%	0.10%

Response to Comment LC11-97

See the response to Comment LC11-96 above for the corrected projected VMT values. The actual Percent Increase projected as a result of the project are 0.07% for AM Peak and 0.10% for PM Peak, both of which are very small percentages of the total VMT.

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LC11-98 Induced travel demand does not affect just the peak hours, but all 24 hours in the day. The morning and afternoon peak hours combined represent about 16% of daily weekday travel. Therefore, the Difference numbers in Table 3.1-15 for Marin and Sonoma Counties (16,000) translate into about 100,000 VMT per weekday. As discussed above, these estimates include only one of four different components of induced travel and total induced travel is likely to be about 3-5 times as great, i.e. 300,000 - 500,000 additional VMT per weekday.

Statistical relationships from the induced travel literature can be applied as an independent check on this estimate. Induced travel is commonly represented as the elasticity of VMT with respect to lane miles (the length of added roadway capacity times the number of lanes added). Hansen estimated this as 0.9 for freeways in California. Cervero calculates a total long-term elasticity of about 0.8 but concludes that some of the increases are due to other factors such as employment growth and rising incomes. Therefore, he recommends using a value of 0.39.

LC11-99 In this case of the proposed project, two HOV lanes would be added for a length of 16.1 miles, so there would be 32.2 additional lane miles. This is a conservative indicator of increased capacity because it does not include the additional capacity that would result from expanding the general purpose lane capacity by converting an expressway into a freeway. A lower end for daily traffic volumes on congested freeways in California is 20,000 vehicles per lane per day. An elasticity of 1.0 would result in 640,000 VMT per weekday (32.2 x 20,000 x 1.0). With an elasticity of 0.9, the calculated increase is 580,000 VMT per weekday. Using the lower value of 0.39, the result is 250,000 VMT per weekday. These estimates are consistent with the estimates calculated independently based on Rodier's research.

LC11-100 In order to be conservative, a value on the lower end of the estimates will be used, 300,000 additional VMT per weekday. To get total annual VMT, a factor of 330 -340 is typically used because there is somewhat less travel on the weekend days, on average, than on weekdays. A value of 333 will be used because it leads to a round number estimate of 100 million additional VMT per year with the project than without. This would result in a large increase in greenhouse gas emissions between the No Build and Build alternatives.

TRAFFIC ANALYSIS

LC11-101 The traffic analysis in the DEIR/DEIS is poorly documented and also appears to be deeply flawed. The largest problem is again the failure to account for induced travel. As was pointed out above in an excerpt from Cervero, excluding induced travel from the analysis causes the benefits of the project to be overestimated because congestion relief appears to be greater than it really will be.

LC11-102 In addition, failure to account for induced traffic hides indirect traffic impacts on other roadways because not all of the additional VMT is on the widened roadway. No trip begins or ends on a freeway. If freeway volumes are higher, there also are higher volumes on connecting roadways. Impacts on connecting roadways have not been modeled, they have not been examined, and they have not been disclosed. In many cases, these impacts are great and lead to future construction projects that are expensive and inflict additional construction delays on area residents.

LC11-103 Instead, the DEIR/DEIS purports that these effects are minimal based on incorrect modeling. It states:

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Response to Comment LC11-98

See Master Response on "Induced Travel Demand"

Response to Comment LC11-99

See the Master Response for Induced Travel; also see the corrected Table 3.1-15, Projected Increase in Vehicle Miles Traveled Countywide, Year 2030, in the response to Comment LC11-96 above.

The commenter is using the concept of "price elasticity" to estimate the VMT added by this project. In economics, the price elasticity of a good is given by the following equation:

Price Elasticity = % change in quantity demanded for a good /

% change in price for a good

If a good has a high elasticity, a small decrease in the price will cause a large increase in the demand. Conversely, if a good has a low elasticity, a large decrease in price will cause only a small increase in demand.

The relationship the commenter is using can be represented by the following formula:

Elasticity = % change in travel / % change in highway capacity

This is a flawed relationship. The numerator, percent change in VMT, does represent a change in the demand for travel. However, the denominator, percent change in highway capacity, does not represent a change in price. The largest part of the price paid by drivers on a congested highway is the time it takes them to reach their destination. While this is related to the percent change in highway capacity, it is not a direct relationship and there is no reason to expect that drivers will change their behavior solely because of added capacity. Drivers will respond to changes in delay time. The price they pay in time will vary throughout the day, being highest

during peak periods and lowest during uncongested periods. When the highway is not congested, the additional capacity should have no effect on the traveler's demand. The theoretically correct formula for elasticity would be:

Elasticity = % change in travel / % change in travel time

While this formula is theoretically valid, it is difficult to apply because travel times vary throughout the day.

Even if we accept the commenter's calculations, the added VMT arrived at are similar to those he computed using the previous method given in Comment LC11-95. As was demonstrated in the response to that comment, this would still be a small increase.

Response to Comment LC11-100

Commenter does not provide enough detail regarding how he arrived at his VMT estimates, so it is not possible to comment meaningfully on them. Our VMT estimates are shown in the corrected Table 3.1-15 in Volume 1 of this FEIR/S (reprinted in the response to Comment LC11-96 above).

Response to Comment LC11-101

See the Master Response on Induced Travel.

Response to Comment LC11-102

See the Master Response on Induced Travel.

The commenter is correct that the construction of this project may increase the traffic on some roads connecting to US 101. However, the project will also allow US 101 to carry more travelers in the project area, which should reduce the traffic on many local roads paralleling US 101. In sum, the project should reduce the traffic on local streets and roads in the project area.

Response to Comment LC11-103

Please refer to Master Response on Smart Mobility Report.

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The Traffic Operational Analysis Report (February 2005) for future years of 2010 and 2030 indicates that traffic impacts at nearby intersections would be minimal. Most intersections would experience a less than 5 percent difference in future predicted traffic volumes between the Build and No Build conditions. This difference is not significant given the accuracy of the prediction methodology. (DEIR/DEIS p. 3.2-78)

LC11-103 The DEIR/DEIS says only that "most" would increase less than 5 percent, and does not describe what the worst cases are. The decreases calculated are without induced travel. With induced travel accounted for properly, the increases would be much greater. Even 5 percent increases are significant. Traffic delay increases exponentially with traffic volume, so that 5 percent increases in traffic can result in 10-20 percent or even higher increases in delay. The comparison of a 5 percent threshold with the "accuracy of the prediction methodology" is confusing apples with oranges. There is uncertainty concerning the exact magnitude of future traffic, but there is certainty that traffic volumes will be higher with the proposed project than with the No Build alternative.

LC11-104 Most of the 8-page traffic impacts section in the DEIR/DEIS (p. 3.1-69 - 3.1-78) is devoted to "bottlenecks and queues." The Marin/Sonoma Model is the only transportation model referenced in the DEIR/DEIS and it cannot calculate queues. A queue is traffic that backs up behind a bottleneck. Similar to the narrow part of a funnel, the bottleneck meters traffic so that there is a maximum flow through the bottleneck. As with a funnel, the flow through the bottleneck itself is fast. The problem is that traffic behind the bottleneck moves slowly. With extreme congestion, the queues can get very long. Static assignment models like the Marin/Sonoma Model show delays at the bottleneck location and smooth flows upstream of the bottlenecks. This is completely backwards.

LC11-105 There are several references in the DEIR/DEIS to the "Caltrans Traffic Operational Analysis Report, February 2005" which does include a reference to FREQ12, which is a macroscopic traffic simulation model. It estimates queue lengths based on volume-to-capacity ratios, and is an improvement over the regional model. However, it is an old model whose description includes "over 30 years of practical real-life application." As computers have become faster and more powerful, macroscopic models like FREQ12 have generally been supplanted by microsimulation models. Microsimulation models account for bottlenecks and queues accurately – showing smooth flow in the bottleneck and queues upstream. Microsimulation likely would give more accurate queue estimates than the macroscopic FREQ12 model. However, there is a larger problem than the difference between models. The modeled queues with either type of model would be higher if induced travel were properly accounted for. The DEIR/DEIS failed to do this so its analyses of "queues" are invalid.

LC11-106 The discussion of bottlenecks in the DEIR/DEIS identifies some indirect traffic impacts, i.e. roadway sections that would be bottlenecks in the Build alternative that are not bottlenecks in the No Build alternative.

> … a new queue [actually a new bottleneck] would appear between Miller Creek and Nave Drive (south of the project limits) in the southbound direction during the A.M. peak period with the implementation of either the Fixed HOV Lane Alternative of the Reversible HOV Lane Alternative. However, this queue would not develop under the NO Build alternative (p. 3.1-71)

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Response to Comment LC11-104

The bottlenecks and queues are depicted in Figures 3.1-11 to Figure 3.11-14, which show smooth flow downstream of the bottlenecks and delays upstream of the bottlenecks.

Response to Comment LC11-105

Most results for traffic operations in the DEIR/S are based on the FREQ12 outputs. Choosing another model may have different outputs and would require rewriting the traffic operational report. In general, extensive data collection and longer study times would be required to complete traffic studies by using a microsimulation model.

Response to Comment LC11-106

See the Master Response for Induced Travel. The "Hillside Strangler" story referenced concerns a case in Illinois where a highway bottleneck was cleared but another was a short distance downstream of the bottleneck that had been cleared remained. This is not the situation for this project.

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Response to Comment LC11-107

Please see the response to Comment LC11-90.

This certainly underestimates the severity of the new bottleneck because induced traffic is underestimated. Large amounts of money are commonly spent to improve bottlenecks with little increase in traffic speeds. Here is an example from the Chicago region:

Hillside Strangler: $140 Million To What End?

The "Hillside Strangler"—the point at which the East-West Tollway and the Tri-State Tollway converge with the Eisenhower Expressway—was long a notorious traffic bottleneck. After a $140 million construction project to "fix" the problem, the Daily Herald posed this question: "Many millions have been spent to change that evil Hillside Strangler. So, has it been rehabilitated?" This was the answer:

1. Getting through the Strangler is now about 15 minutes faster.
2. But the bottleneck has merely been pushed further up the road to a point where the Eisenhower funnels into three lanes.
3. And more motorists are now using the expressway since the Strangler work was completed.

The net effect? The Daily Herald concluded: "Overall, then, the commute time from the suburbs to the Loop, via the Eisenhower and its extension, is one hour—exactly what it was before the Hillside Strangler was repaired." (*More Costly Roadwork, and Travel Still Tough*, Daily Herald, October 3, 2002)[6]

LC11-106 Without accounting for induced travel, the DEIR/DEIS greatly overestimates any traffic benefits from the proposed project.

Regional Context

Expanding roadway capacity encourages land use decentralization as described by Boarnet and Haughwout:

> New highways that link the outlying residential areas to the CBD lower the cost of commuting into the employment concentration in the center of the city. This increases land values in the suburban fringe while reducing the "accessibility premium" that central locations had previously enjoyed. The urban area will grow geographically as commuters can live farther from work without increasing their travel budgets. Densities will fall as the premium for the densely developed locations near the CBD is reduced.[7] (p. 4)

LC11-107 Traffic metering points like the existing Marin-Sonoma Narrows area act as a brake on land decentralization (a.k.a. "sprawl) and support better jobs/housing balances. Less sprawl and better jobs housing balances are planning goals in the Bay Area. Expanding roadway capacity as in this proposed project is contrary to these goals, and would undermine other planning initiatives aimed at increasing transit ridership and preserving open space. Land use decentralization causes a wide range of environmental problems

[6] Chicago Metropolis 2020: The Metropolis Plan: Choices for the Chicago Region, p. 10. Chicago, IL: 2003.

[7] , Marlon and Andrew Houghwout. *Do Highways Matter? Evidence and Policy Implications of Highways Influence on Metropolitan Development*, p. 4. The Brookings Institution Center on Urban and Metropolitan Policy, 2000.

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LC11-107 including more water use, more impervious surface, runoff and water pollution, conflicts with agriculture, and habitat fragmentation.

LC11-108 The DEIR/DEIS fails to consider this broader regional planning context and a broader range of alternatives. Rail transit with medium- to high-density mixed walkable land use at stations can serve as a powerful force for shaping future growth towards a desired land use vision. Increasing roadway capacity would reduce potential rail ridership, thereby reducing the potential benefits of rail transit on shaping future land use. It should be noted, though, that high capacity rail transit can result in some of the same negative forces (although to a lesser extent) if the service is focused on serving suburban households with large park-and-ride lots at stations.

Response to Comment LC11-108

Please see the Master Response on Range of Alternatives.

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Resume

NORMAN L. MARSHALL, PRINCIPAL

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EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE:

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at Resource Systems Group, Inc. for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior, and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies. Chicago Metropolis 2020 was awarded the Daniel Burnham Award for regional planning in 2004 by the American Planning Association, based in part on this work.

Envision Central Texas Vision (5-countyregion)—implemented many enhancements in regional model including multiple time periods, feedback from congestion to trip distribution and mode choice, new life style trip production rates, auto availability model sensitive to urban design variables, non-motorized trip model sensitive to urban design variables, and mode choice model sensitive to urban design variables and with higher values of time (more accurate for "choice" riders). Analyzed set land use/transportation scenarios including developing transit concepts to match the different land use scenarios.

Mid-Ohio Regional Planning Commission Regional Growth Strategy (7-county Columbus region)—developed alternative future land use scenarios and calculated performance measures for use in a large public regional visioning project.

Baltimore Vision 2030—working with the Baltimore Metropolitan Council and the Baltimore Regional Partnership, increased regional travel demand model's sensitivity to land use and transportation infrastructure. Enhanced model was used to test alternative land use and transportation scenarios including different levels of public transit.

Burlington (Vermont) Transportation Plan – led team that developed Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluating alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

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Central Ohio Transportation Authority (Columbus) – analyzed the regional effects of implementing a rail vision plan on transit-oriented development potential and possible regional benefits that would result.

Essex (VT) Commuter Rail Environmental Assessment (Vermont Agency of Transportation and Chittenden County Metropolitan Planning Organization)—estimated transit ridership for commuter rail and enhanced bus scenarios, as well as traffic volumes.

Georgia Intercity Rail Plan (Georgia DOT)—developed statewide travel demand model for the Georgia Department of Transportation including auto, air, bus and rail modes. Work included estimating travel demand and mode split models, and building the Departments ARC/INFO database for a model running with a GIS user interface.

Roadway Corridor Planning

Working with the Capital District Transportation Committee (the Albany regions Metropolitan Planning Organization) and the New York State Department of Transportation to analyze future needs and operations of the I-90 crossing over the Hudson River, including effects on other roadways.

Developing Regional Transportation Model

Pease Area Transportation and Air Quality Planning (New Hampshire DOT)—developed an integrated land use allocation, transportation, and air quality model for a three-county New Hampshire and Maine seacoast region that covers two New Hampshire MPOs, the Seacoast MPO and the Salem-Plaistow MPO.

Chittenden County, Vermont (Chittenden County Metropolitan Planning Organization)—developed a land use allocation model and a set of performance measures for Chittenden County (Burlington) for use in metropolitan planning.

Research

Obesity and the Built Environment (National Institutes of Health and Robert Wood Johnston Foundation) – Working with the Dartmouth Medical School to study the influence of local land use on middle school students in Vermont and New Hampshire, with a focus on physical activity and obesity.

The Future of Transportation Modeling (New Jersey DOT)—Member of Advisory Board on project for State of New Jersey researching trends and directions, and making recommendations for future practice.

Trip Generation Characteristics of Multi-Use Development (Florida DOT)—estimated internal vehicle trips, internal pedestrian trips, and trip-making characteristics of residents at large multi-use developments in Fort Lauderdale, Florida.

Improved Transportation Models for the Future—assisted Sandia National Laboratories in developing a prototype model of the future linking ARC/INFO to the EMME/2 Albuquerque model and adding a land use allocation model and auto ownership model including alternative vehicle types.

Critiques

C-470 (Denver region) – Reviewed express toll lane proposal for Douglas County, Colorado and prepared reports on operations, safety, finances, and alternatives.

Intercounty Connector (Maryland) – Reviewed proposed toll road and modeled alternatives with different combinations of roadway capacity, transit capacity (both on and off Intercounty Connector) and pricing.

Foothills South Toll Road (Orange County, CA) – Reviewed modeling of proposed toll road.

I-93 Widening (New Hampshire) – Reviewed Environment Impact Statement and modeling, with a particular focus on induced travel and secondary impacts, and also a detailed look at transit potential in the corridor.

Stillwater Bridge – Participated in 4-person expert panel assembled by Minnesota DOT to review modeling of proposed replacement bridge in Stillwater, with special attention to land use, induced travel, pricing, and transit use.

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PUBLICATIONS AND PRESENTATIONS (partial list)

Understanding the Transportation Models and Asking the Right Questions. Lead presenter on national Webinar put on by the Surface Policy Planning Partnership (STTP) and the Center for Neighborhood Technologies (CNT) with partial funding by the Federal Transit Administration, 2007.

Sketch Transit Modeling Based on 2000 Census Data with Brian Grady. Presented at the Annual Meeting of the Transportation Research Board, Washington DC, January 2006, and *Transportation Research Record*, No. 1986, "Transit Management, Maintenance, Technology and Planning", p. 182-189, 2006.

Travel Demand Modeling for Regional Visioning and Scenario Analysis with Brian Grady. Presented at the Annual Meeting of the Transportation Research Board, Washington DC, January 2005, and *Transportation Research Record*, No. 1921, "Travel Demand 2005", p. 55-63, 2006.

Chicago Metropolis 2020: the Business Community Develops an Integrated Land Use/Transportation Plan with Brian Grady, Frank Beal and John Fregonese, presented at the Transportation Research Board's Conference on Planning Applications, Baton Rouge LA, April 2003.

Evidence of Induced Travel with Bill Cowart, presented in association with the Ninth Session of the Commission on Sustainable Development, United Nations, New York City, April 2001.

Induced Demand at the Metropolitan Level – Regulatory Disputes in Conformity Determinations and Environmental Impact Statement Approvals, Transportation Research Forum, Annapolis MD, November 2000.

Evidence of Induced Demand in the Texas Transportation Institute's Urban Roadway Congestion Study Data Set, Transportation Research Board Annual Meeting, Washington DC: January 2000.

Subarea Modeling with a Regional Model and CORSIM with K. Kaliski, presented at Seventh National Transportation Research Board Conference on the Application of Transportation Planning Methods, Boston MA, May 1999.

New Distribution and Mode Choice Models for Chicago with K. Ballard, Transportation Research Board Annual Meeting, Washington DC: January 1998.

Land Use Allocation Modeling in Uni-Centric and Multi-Centric Regions with S. Lawe, Transportation Research Board Annual Meeting, Washington DC: January 1996.

MEMBERSHIPS/AFFILIATIONS

Member, Institute of Transportation Engineers
Individual Affiliate, Transportation Research Board
Member, American Planning Association
Member, Congress for the New Urbanism

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Real-World CO_2 Impacts of Traffic Congestion

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ABSTRACT

Transportation plays a significant role in carbon dioxide (CO_2) emissions, accounting for approximately a third of the United States' inventory. In order to reduce CO_2 emissions in the future, transportation policy makers are looking to make vehicles more efficient and increasing the use of carbon-neutral alternative fuels. In addition, CO_2 emissions can be lowered by improving traffic operations, specifically through the reduction of traffic congestion. This paper examines traffic congestion and its impact on CO_2 emissions using detailed energy and emission models and linking them to real-world driving patterns and traffic conditions. Using a typical traffic condition in Southern California as example, it has been found that CO_2 emissions can be reduced by up to almost 20% through three different strategies: 1) congestion mitigation strategies that reduce severe congestion, allowing traffic to flow at better speeds; 2) speed management techniques that reduce excessively high free-flow speeds to more moderate conditions; and 3) shock wave suppression techniques that eliminate the acceleration/deceleration events associated with stop-and-go traffic that exists during congested conditions.

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1. INTRODUCTION

In recent years, planning has begun to stabilize greenhouse gas emissions at levels far below today's emissions rate, while still meeting our long-term energy needs. Goals are being set to stabilize these greenhouse gas emissions in order to avoid global climate change. As one of key greenhouse gases to control, particular focus has been placed on carbon dioxide (CO_2), generated from various sectors. In 2004, transportation as a whole accounted for approximately 33% of CO_2 emissions in the United States, of which 80% are from cars and trucks traveling on our roadway system *(1)*.

In order to reduce CO_2 emissions from the transportation sector, policy makers are primarily pushing for more efficient vehicles and the use of alternative fuels (see, e.g., *(2)*). In terms of vehicle improvements, it is thought that:

- vehicles can be made lighter and smaller (while maintaining safety);
- further improvements can be made in terms of powertrain efficiency; and
- alternative technologies can be developed, such as hybrid and fuel-cell vehicles.

In terms of alternative fuels, many carbon-neutral options exist such as biofuels (e.g., ethanol, biodiesel) and synthetic fuels (coupled with carbon capture and storage).

Although these options look very promising, they are unlikely to make a great impact in the near term. Some of them (e.g. fuel-cell vehicles) are still in their early stages of technology development and probably will need a dramatic breakthrough before they can be fully implemented. For those that are technology-ready and have started to enter the market (e.g. hybrid vehicles and alternative fuels), it will still probably take several years for a majority of the existing fleet to be turned over before a significant impact on CO_2 can be seen. With all that being said, it can be pointed out that comparatively less attention has been given to CO_2 emissions associated with *traffic congestion* and possible short-term CO_2 reductions as a result of improved traffic operations. Traffic congestion can be considered as a supply management problem. The transportation infrastructure (i.e., roadways) can be considered as supply for use by drivers (demand). If these supplies are limited in terms of capacity and demand is high, congestion is likely to occur.

Several studies have shown that roadway congestion is continuing to get worse. For example, the Texas Transportation Institute (TTI) conducts an Urban Mobility Study that includes estimates of traffic congestion in many large cities and the impact on society *(3)*. The study defines congestion as "slow speeds caused by heavy traffic and/or narrow roadways due to construction, incidents, or too few lanes for the demand." Because traffic volume has increased faster than road capacity, congestion has gotten progressively worse, despite the push toward alternative modes of transportation, new technologies, innovative land-use patterns, and demand-management techniques.

It is commonly known that as traffic congestion increases, CO_2 emissions (and in parallel, fuel consumption) also increase. In general, CO_2 emissions and fuel consumption are very sensitive

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to the type of driving that occurs. As highlighted as part of many "eco-driving" strategies, traveling at a steady-state velocity will give much lower emissions and fuel consumption compared to a stop-and-go driving pattern. By decreasing stop-and-go driving that is associated with congested traffic, CO_2 emissions can be reduced. However, it is not clear to what degree various congestion mitigation programs will impact CO_2 emissions.

In this paper, we examine CO_2 emissions as a function of traffic congestion. Section 2 of the paper provides background information on our modeling tools and traffic information data used for analysis. Section 3 develops the basis of the congestion analysis, followed by real-world congestion analyses described in Section 4. These sections are followed by a discussion and conclusions.

2. BACKGROUND

2.1. Comprehensive Modal Emissions Model

In order to carry out a variety of vehicle emissions and energy studies, the authors began the development of a Comprehensive Modal Emission Model (CMEM, see *(4)*) in 1996, sponsored by the National Cooperative Highway Research Program and the U.S. Environmental Protection Agency (EPA). The need for this type of microscale model that can predict second-by-second vehicle fuel consumption and emissions based on different traffic operations was and remains critical for developing and evaluating transportation policy. In the past, large regional emissions inventory models were being applied for these types of microscale evaluations with little success. The majority of the CMEM modeling effort was completed in 2000 and the model has been updated and maintained since then under sponsorship from the U.S. EPA. CMEM is a public-domain model and has several hundred registered users worldwide. CMEM was designed so that it can interface with a wide variety of transportation models and/or transportation data sets in order to perform detailed fuel consumption analyses and to produce a localized emissions inventory. CMEM has been developed primarily for microscale transportation models that typically produce second-by-second vehicle trajectories (location, speed, acceleration). These vehicle trajectories can be applied directly to the model, resulting in both individual and aggregate energy/emissions estimates. Further, CMEM also accounts for road grade effects. It has been shown that road grade has a significant effect on fuel consumption and emissions (e.g., *(5)*, *(6)*). Over the past several years, CMEM has been integrated into various transportation modeling frameworks, with a focus on corridor-level analysis and intelligent transportation system implementations (e.g., CORSIM, TRANSIMS, PARAMICS, SHIFT, etc.). Using these combined tools, various projects have been evaluated.

CMEM is comprehensive in the sense that it covers essentially all types of vehicles found on the road today. It consists of nearly 30 vehicle/technology categories from the smallest light-duty vehicles to Class-8 heavy-duty diesel trucks. With CMEM, it is possible to predict energy and emissions from individual vehicles or from an entire fleet of vehicles, operating under a variety of conditions. One of the most important features of CMEM (and other related models) is that it uses a physical, power-demand approach based on a parameterized analytical representation of fuel consumption and emissions production. In this type of model, the entire fuel consumption and emissions process is broken down into components that correspond to physical phenomena associated with vehicle operation and emissions production. Each component is modeled as an

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analytical representation consisting of various parameters that are characteristic of the process. These parameters vary according to the vehicle type, engine, emission technology, and level of deterioration. One distinct advantage of this physical approach is that it is possible to adjust many of these physical parameters to predict energy consumption and emissions of future vehicle models and applications of new technology (e.g., aftertreatment devices). For further information on the CMEM effort, please refer to *(4, 7, 8, 9)*.

2.2. Traffic Performance Measurement Systems

As part of the congestion research, we have worked closely with the California Department of Transportation (Caltrans) Freeway Performance Measurement System (PeMS). The PeMS system collects real-time speed, flow, and density data from loop detectors embedded in California's freeways and makes it available for transportation management, research, and commercial use. The system provides real-time 30-second (and five-minute), per-loop averages of lane occupancy, flow, speed, and delay for various links in the roadway network. All the data is available over the Internet. Although the data from PeMS includes a certain amount of uncertainty (e.g., when loop sensors are broken down), it is still considered one of the most comprehensive and reliable data sources currently available in California. For more information on PeMS, see *(10, 11, 12)* and the PeMS web-site: http://pems.eecs.berkeley.edu/Public/index.phtml.

3. CONGESTION AS A FUNCTION OF AVERAGE TRAFFIC SPEED

One way to estimate the energy and emissions impacts of congestion is to examine velocity patterns of vehicles operating under different levels of congestion. On a freeway for example, a driver typically wants to drive at relatively high speed with very few changes to their speed. However, as more and more vehicles join the flow, average traffic speed tends to be reduced and individual vehicle velocity patterns tend to exhibit fluctuating speeds.

Roadway congestion is often categorized by the "level-of-service" (LOS) it provides to travelers *(13)*. For freeways (i.e., uninterrupted flow), LOS is represented by the density of traffic (i.e. number of vehicles per mile of roadway), which is a function of speed and flow. Emission rates are highly dependent on speed; flow is a surrogate for vehicle miles traveled (VMT); and both emission rates and VMT are two major factors contributing to emissions. Therefore, LOS is a measure that can be rationally related to emissions. There are several different LOS values represented by letters A through F. For each LOS, a typical vehicle velocity trajectory will have different characteristics. Examples of these velocity trajectories are shown in Figure 1 *(14)*. Under LOS A, vehicles typically travel near the highway's free-flow speed, with few acceleration/deceleration perturbations. As LOS conditions get progressively worse (i.e., LOS B, C, D, E, and F), vehicles travel at lower average speeds with more acceleration/deceleration events. For each representative vehicle-velocity trajectory (such as those shown in Figure 1), it is possible to estimate fuel consumption as well as CO_2 and pollutant emissions using a modal model as described in Section 2. This allows us to make comparisons between velocity trajectories and their impact on CO_2 emissions.

Depending on the trip velocity pattern, CO_2 emissions can vary significantly. To illustrate this, we have obtained a vehicle activity database representing typical trips in Southern California.

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This database contains numerous GPS-based vehicle velocity trip patterns collected as a post-census travel survey in 2001 by the Southern California Association of Governments (SCAG). This data set represents approximately 467 households with 626 vehicles. The total miles driven in this data set is approximately 28,000. For more information regarding this data set, please refer to *(15)*. These representative trips were then applied to CMEM, calibrated for a typical modern light-duty passenger vehicle. Based on all the trips, it was possible to develop a histogram of the CO_2 emissions for each trip in the database. This histogram is shown in Figure 2. It can be seen that most trips had approximate 330 grams per mile (g/mi) CO_2 emissions (corresponding to approximately 26 miles-per-gallon of fuel economy). However, other trips had far less and far more CO_2 emissions, depending on the specific driving pattern. Similarly, other vehicle types have quite different CO_2 emissions depending on their weight, power, and other factors. It should be noted that the estimated CO_2 emissions are for typical trips, which can be comprised of traveling on various roadway facility types (i.e. freeways, arterials, and local streets).

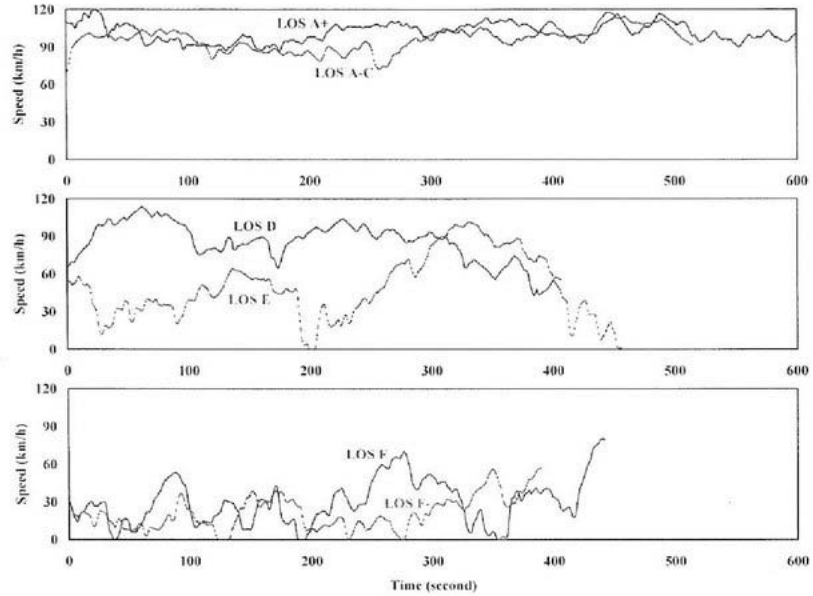

Figure 1. Typical vehicle velocity patterns for different congestion levels-of-service on a freeway

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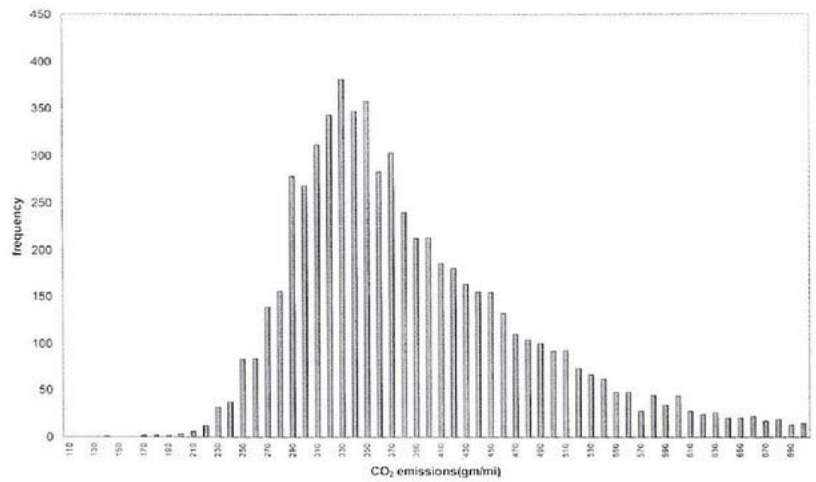

Figure 2. CO_2 emissions histogram for a representative database of trip in Southern California

It is also possible to evaluate CO_2 emissions (in terms of grams per mile) based on the average speed of the trip or trip segment. To illustrate this, we have applied a database of vehicle activity on freeway (consisting of second-by-second velocity trajectories) to the CMEM model, examining a wide range of vehicle types (i.e. 28 light-duty vehicle/technology categories in CMEM). This set of vehicle activity data was collected by probe vehicles (2004 Honda Civic) running specifically on freeway mainlines in Southern California during September 2005, May 2006 and March 2007. In addition to the probe vehicle data, macroscopic traffic data (i.e. LOS) from PeMS were gathered. Using information about latitude, longitude, and time stamp, probe vehicle data were spatially and temporally matched with the PeMS data. Typically, vehicle detector stations (VDS) in the PeMS network are located around 0.6-1.0 miles apart from each other. The spatial coverage of each VDS is from the mid point between itself and the VDS to its left to the mid point between itself and the VDS to its right. LOS for each loop detector at each VDS is updated every 30 seconds. Therefore, for every 30-second period the second-by-second driving trajectories were spatially mapped with the corresponding VDS. A vehicle running in lane l within the coverage of VDS i at time t is considered to experience the LOS reported by the loop detector in lane l at VDS i during period p. Note that the lane information was simultaneously collected by the driver when the probe vehicle runs were taken place. The LOS of the lane the driving trajectory is in was then assigned to each second of driving data. This process started at the beginning of the driving trace and was repeated until the end of the driving trace was reached. The database contains 15,096 data records. This is equivalent to more than four hours worth of driving for a total distance of greater than 180 miles. This data set of vehicle activity covers a variety of freeway congestion levels from LOS A to F.

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Before being applied to the CMEM model, the velocity trajectories in the database were split into snippets with consistent LOS. The length of these snippets ranges from a few seconds to several hundred seconds, with a majority of them being 30 seconds or shorter. Snippets with the activity of 10 seconds or less were excluded. At the end, there were 241 remaining snippets that were used to estimate the corresponding CO_2 emissions. Note that we have weighted the results of the different vehicle types based on a typical light-duty fleet found in Southern California based on the fleet mix of 2005 *(16)*. The purpose is to evaluate the impact of fleet-wide average rather than of specific vehicle categories. In Figure 3, the estimated CO_2 emissions are plotted as a function of average running speed for the fleet mix. A fourth-order polynomial is then used to fit the data points, shown as a solid line in Figure 3. This polynomial has the form:

$$\ln(y) = b_0 + b_1 \cdot x + b_2 \cdot x^2 + b_3 \cdot x^3 + b_4 \cdot x^4 \quad (1)$$

where y is CO_2 emission in g/mi; x is average trip speed in mph. The coefficients for each fitted curve are given in Table 1.

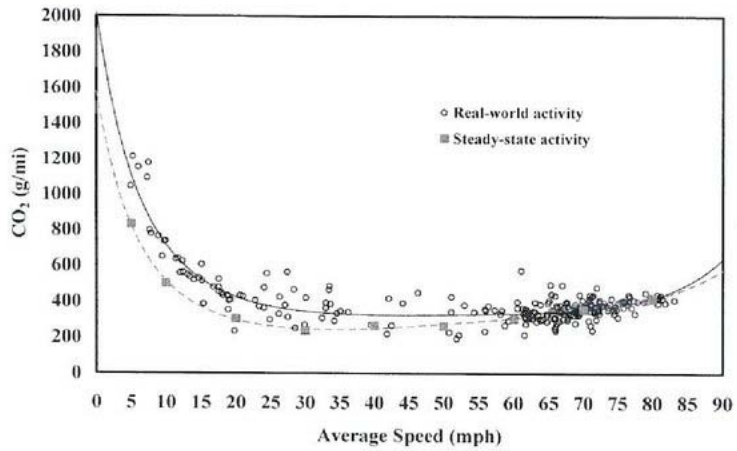

Figure 3. CO_2 emissions (grams/mile) as a function of average trip speed (mph)

Table 1. Derived line-fit parameters for Eqn. (1), using data illustrated in Figure 3

	Real-World	Steady-State
N	241	9
R^2	0.668	0.992
b_0	7.613534994965560	7.362867270508520
b_1	- 0.138565467462594	- 0.149814315838651
b_2	0.003915102063854	0.004214810510200
b_3	- 0.000049451361017	- 0.000049253951464
b_4	0.000000238630156	0.000000217166574

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This equation can then be used to estimate CO_2 emissions given an average running speed. Figure 3 also illustrates CO_2 emissions for perfectly constant, steady-state speeds. Of course, vehicles moving in traffic must experience some amount of "stop-and-go" driving, and the associated accelerations lead to higher CO_2 emissions. The constant, steady-state speed curve in Figure 3 shows the approximate lower bound of CO_2 emissions for any vehicle traveling at that particular speed. It is noticed that some CO_2 estimates of the real-world activity fall below this steady-state speed curve. This is because the vehicle activity of these snippets consists mostly of a series of mild deceleration events, which usually produce low emissions. However, across all the speed ranges, the real-world activity curve never falls below the steady-state speed curve.

When average speeds are very low, vehicles experience frequent acceleration/deceleration events. They also do not travel very far. Therefore, grams per mile emission rates are quite high. In fact, when a car is not moving, a distance-normalized emission rate reaches infinity. Conversely, when vehicles travel at higher speeds, they experience higher engine load requirements and, therefore, have higher CO_2 emission rates. As a result, this type of speed-based CO_2 emission-factor curve has a distinctive parabolic shape, with high emission rates on both ends and a minimum rate at moderate speeds of around 45 to 50 mph.

Several important results can be derived from this information, as illustrated in Figure 4:

- In general, whenever congestion brings the average vehicle speed below 45 mph (for a freeway scenario), there is a negative net impact on CO_2 emissions. Vehicles spend more time on the road, which results in higher CO_2 emissions. Therefore, in this scenario, reducing congestion will reduce CO_2 emissions.

- If moderate congestion brings average speeds down from a free-flow speed of about 65 mph to a slower speed of 45 to 50 mph, this moderate congestion can actually *lower* CO_2 emissions. If relieving congestion increases average traffic speed to the free-flow level, CO_2 emissions levels will go up.

- Extremely high speeds beyond 65 mph can cause adverse impact on CO_2 emissions. If these excessive speeds can be controlled, there will not only be direct safety benefits but also indirect benefits of CO_2 reduction.

- If the real-world, stop-and-go velocity pattern of vehicles could somehow be smoothed out so an average speed could be maintained, significant CO_2 emissions reductions could be achieved.

Figure 4 shows the potential effect of improved traffic operations on CO_2. All of these strategies are important to consider when attempting to reduce CO_2 emissions. They can be grouped into three categories as described below:

1) *Congestion mitigation strategies*: These strategies are focused on increasing average traffic speeds from slower, heavily-congested speeds. Examples include ramp metering and incident management.

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2) *Speed management techniques*: These techniques aim at reducing excessively high speeds to safe speeds. An example includes direct enforcement by police, radar, camera, aircraft, etc. In addition, there have been emerging technologies such as active accelerator pedal *(17)* and Intelligent Speed Adaptation (ISA) where top speeds are capped based on specific traffic conditions *(18)*.

3) *Traffic flow smoothing techniques*: These techniques attempt to eliminate the stop-and-go effect, regarded as shock wave suppression, which also help reduce the number and severity of individual accelerations and decelerations. This can be achieved through the use of variable speed limits *(19)*. Also, it has been shown that ISA can eliminate much of the stop-and-go effect during congested conditions, which results in 12% of CO_2 reduction *(18)*.

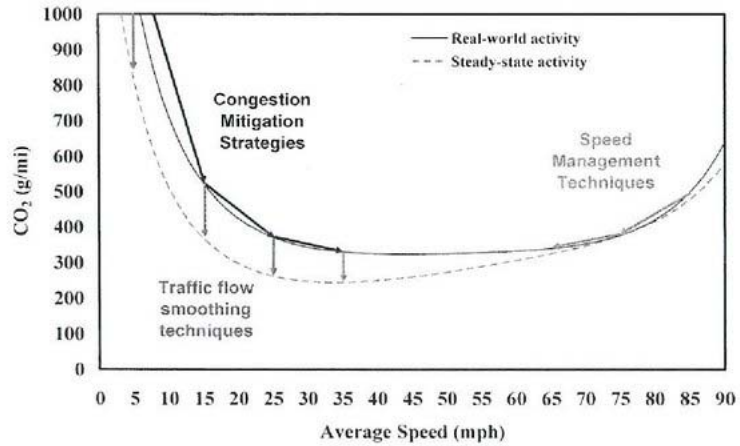

Figure 4. Possible use of traffic operation strategies in reducing on-road CO_2 emission

Figure 5 shows potential CO_2 reduction from each of the categories discussed above. Figure 5(a) illustrates that even a small change in average traffic speeds (e.g. 2.5 mph) can result in a strong change in CO_2 emissions, particularly at the lower and higher speed regions. The greater CO_2 reduction could be gained if the traffic operation improvements lead to a greater speed change (e.g. 10 mph). Overall, the speed changes of 2.5 mph, 5 mph, and 10 mph can provide CO_2 benefits up to 25%, 45%, and 70%, respectively. By subtracting the steady-state CO_2 emissions curve from the curve of real-world driving in Figure 3, it is possible to see where the greatest CO_2 benefits due to traffic flow smoothing will occur: primarily when freeway congestion results in average speeds around 10 – 30 mph, as illustrated in Figure 5(b). Ideally, CO_2 emission can be reduced as much as almost 45% if traffic flow is smoothed to a steady-state condition. Although such perfectly smooth traffic flow may seem idealistic, it should be noted that moderately smoother traffic flow, even with some reasonable fluctuation in speed, can still result in

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significant CO_2 reduction. An example is the application of ISA which reduces CO_2 by 12% as compared to a normal driving under congestion *(18)*.

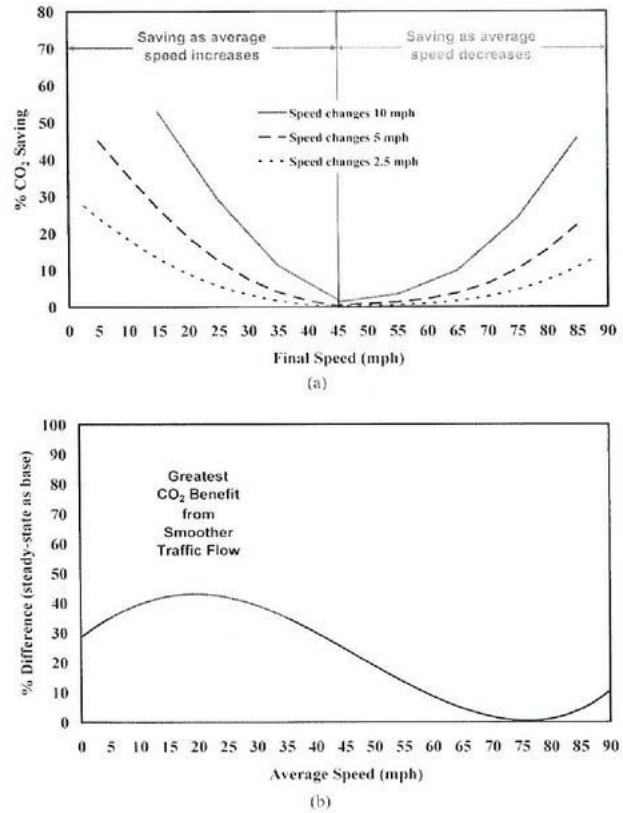

Figure 5. Potential CO_2 reduction: (a) as a result of speed changes, and (b) as a result of smoother traffic flow

A similar analysis can be performed for travel activities on arterials and residential roads (i.e., interrupted flow patterns). These analyses are relatively more complicated, but they too can be shown that any measure that keeps traffic flowing smoothly for longer periods of time (e.g., operational measures, such as synchronization of traffic signals) can lower CO_2 emissions significantly. Also, it is important to note that, although not in the scope of this paper, the CO_2 congestion effects will be much more pronounced for heavy-duty trucks, which tend to have much lower power-to-weight ratios than cars.

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4. REAL-WORLD CONGESTION

In Section 3 it was shown that CO_2 emissions vary greatly depending on average vehicle speed for a variety of vehicle trajectories. Heavy congestion results in slower speeds and greater speed fluctuation, resulting in higher CO_2 emissions. On the other hand, traveling at very high speeds also increases CO_2 emissions. The best scenario is when traffic as a whole moves at smooth, moderate speeds.

It is of interest to evaluate how often we have congested traffic in order to determine how much CO_2 savings can potentially be gained. For this, we have primarily focused on Southern California traffic. As an initial case study, we have chosen the SR-60 corridor that connects Los Angeles to the Inland Empire of Southern California. Using the Freeway Performance Measurement System described in Section 2, we have collected average traffic speed eastbound on this corridor for weekdays over a three-week period in June 2007. This corridor is known to be very congested in the afternoon, as shown in Figure 6, where the average traffic speed is plotted as a function of time-of-day and distance. The Postmile 0 is referred to the starting of this freeway near the Downtown Los Angeles area. In this figure, the darker colors represent lower speeds and lighter colors represent faster speeds.

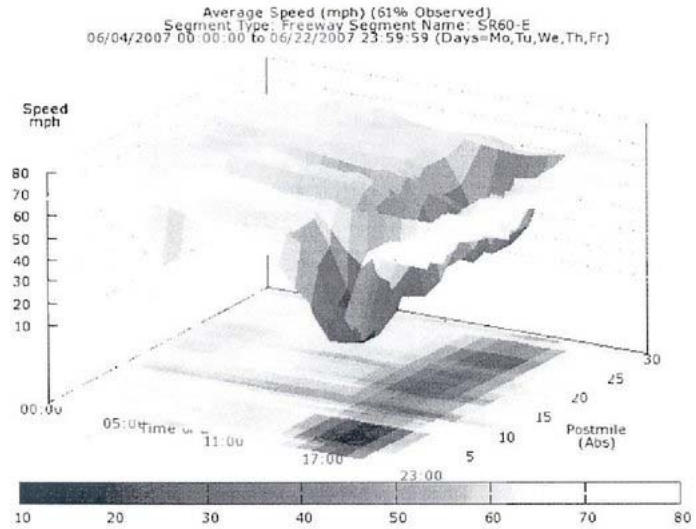

Figure 6. Average traffic speed along the SR-60 eastbound corridor by time-of-day (x-axis) and distance (y-axis).

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Figure 6 shows that the traffic conditions on this corridor vary greatly across different times of the day. Examining the afternoon peak hour only (5-6 p.m.), the VMT-normalized histogram of speeds is shown in Figure 7(a). In this figure, it can be seen that approximately 41% of the VMT that occur during this hour travel at an average speed of 30 mph or lower. It is interesting to see what the impact on CO_2 emissions would be if the congestion during this peak hour is relieved. There are different speed thresholds for congestion being used. For example, Caltrans defines congested freeway locations as those where average speeds are 35 mph or less during peak commute periods on a typical incident-free weekday *(20)*. In the TTI's Urban Mobility Study *(3)*, the congested delay is calculated based on the assumed free-flow speed of 60 mph. In order to provide flexibility in the definition of congestion, PeMS reports several delay numbers, which are calculated based on different threshold values of 35, 40, 45, 50, 55, and 60 mph. For the purpose of estimating potential CO_2 reduction in this paper, the congested speed threshold of 60 mph is selected. For this simple case study of Figure 7(a), if this congestion during the peak hour were eliminated so that all VMT were at the average speed of 60 mph, CO_2 emissions could be reduced by approximately 7%. Note that the congested speed threshold of 60 mph is intentionally chosen in such a way that the estimated CO_2 benefits will be the lower bound. That is, if the threshold is lowered, the CO_2 reduction due to congestion mitigation will be even higher. In addition to this particular case study, there are many other freeway corridors throughout Southern California that have similar recurring heavy congestion patterns. Thus, similar CO_2 savings could be achieved by moving the average speed distribution towards the distribution with higher speeds.

Looking from an opposing direction, CO_2 savings could also be obtained by eliminating extremely high speeds on freeways. These excessive speeds usually occur during off-peak periods, especially at night. Figure 7(b) shows the %VMT-speed histogram of the same corridor during a late night hour (11 p.m. – 12 a.m.). It can be seen that about one-third of the VMT during this hour travel at an average speed of 75 mph or higher. This speeding behavior does not only pose traffic safety concerns but also adversely impacts the environment. Again, assuming that these excessive driving speeds were controlled so that all VMT were at the average speed of 60 mph, CO_2 emissions could be reduced by approximately 8%.

It is interesting to point out that when examining the %VMT-speed distribution for the entire freeway network in Los Angeles County for an entire average day, it is found that speeds around 65 to 70 mph dominate, as shown in Figure 8(a). This implies that the freeway system is still operating at a reasonably good condition in overall. However, congestion still occurs, which is relatively small in the distribution compared to the dominant free-flow conditions. This is because the VMT during the peak period (afternoon peak for this case study) account for only a quarter of the total daily VMT, as shown in Figure 8(b). Still, if the traffic flow were managed so that all VMT in Figure 8(a) were at the average speed of 60 mph, CO_2 emission from traffic in the Los Angeles freeway network across 24 hours for the month of June 2007 would be almost 5,000 metric tons.

It should be noted that although the presentation in this paper uses traffic in the Los Angeles area as example, the presented concept and methodology are applicable elsewhere. In other areas, the CO_2 impact of traffic can be different depending on the following factors:

- *Local fleet mix*: Different fleet composition will cause different fleet-wide average CO_2

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emission factors. Therefore, the CO_2-versus-speed curves are expected to have different magnitude, and possibly different shape.

- *Amount of VMT at congested speed*: As presented in the TTI's Urban Mobility Report, different metropolitan areas have experienced different levels of congestion and delay. Thus, the reduction in CO_2 emission that could be achieved may be less in an area where congestion has not been much of a concern.

- *Amount of VMT at excessive speed*: The amount of driving occurring at excessive speeds is also area-specific. This depends on several factors such as speed limit and enforcement. An area with a lower freeway speed limit is likely to have less CO_2 emission due to driving at high speed.

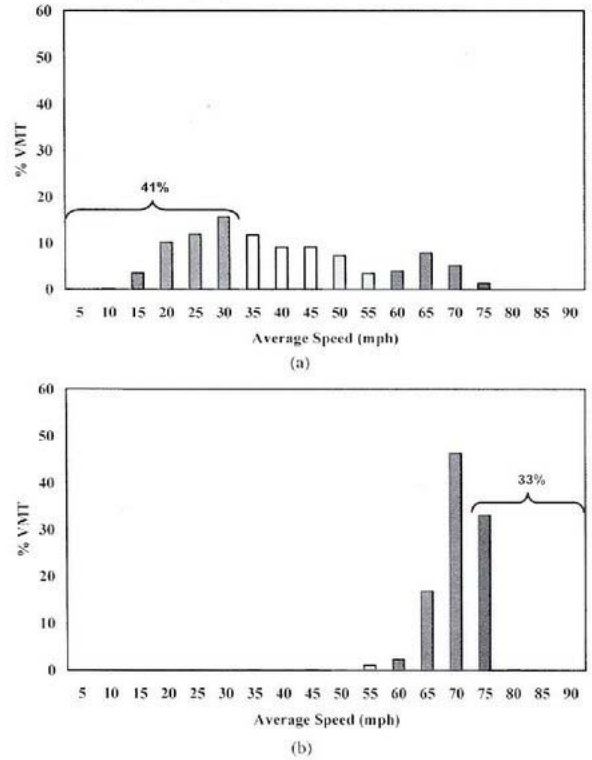

Figure 7. %VMT-speed distribution for SR-60 E for the month of June 2007: (a) during the PM peak hour, and (b) during a late night hour

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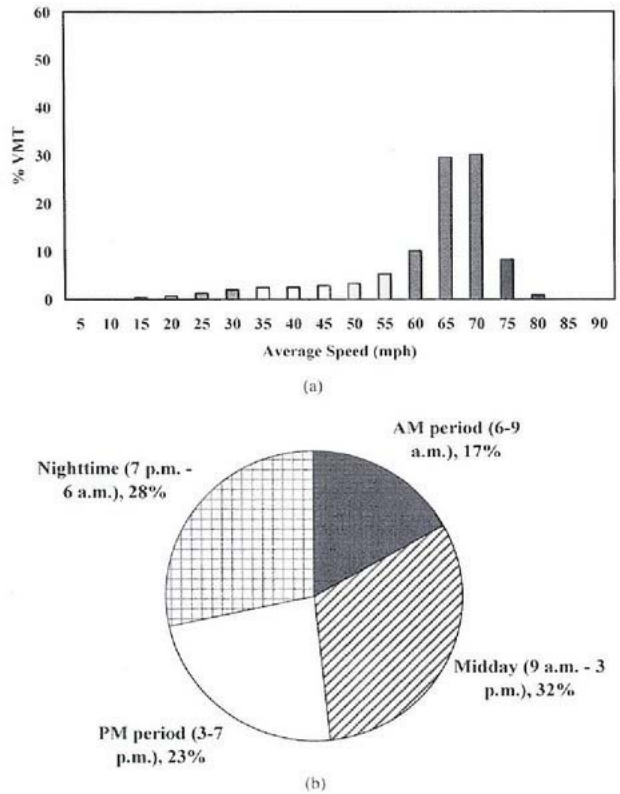

Figure 8. (a) %VMT-speed distribution for Los Angeles freeway network across 24 hours for the month of June 2007, and (b) fraction of total daily VMT for different time periods

6. CONCLUSIONS

It is clear that traffic congestion has a significant impact on CO_2 emissions. Overall, even small changes in traffic speed can have significant effect on CO_2 emissions. This paper has examined several methods that CO_2 can be reduced by improved traffic operations (with particular emphasis on freeway operations). These include:

1) congestion mitigation strategies that reduce severe congestion such that higher average traffic speeds are achieved (e.g. ramp metering, incident management);

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2) speed management techniques that can bring down excessive speeds to more moderate speeds of approximately 55 mph (e.g. enforcement, active accelerator pedal); and

3) traffic flow smoothing techniques that can suppress shock waves, and thus, reduce the number of acceleration and deceleration events (e.g. variable speed limits, ISA).

Using a typical traffic condition in Southern California as example, this paper has shown that each of the three methods above could potentially lower CO_2 by 7-12%. Although the individual effects may not be that large, the synergistic effect of the three methods combined could add up to a greater amount. Again, these results are considered as a lower bound because they are estimated based on the congested speed threshold of 60 mph. If this threshold was lower, the CO_2 reduction could be higher.

While progress in vehicle efficiency improvements and carbon-neutral fuels are underway, innovative traffic operations improvements (i.e. mitigating congestion, reducing excessive speeds, and smoothing traffic flow) can have a significant impact on vehicle CO_2 emissions and this impact can be realized in the near-term. In addition to improving traffic operations as a means of reducing vehicle CO_2 emissions, other transportation measures can also be simultaneously promoted to reduce VMT, and thus vehicle CO_2 emissions. These measures include alternative modes of transportation, innovative land-use patterns, and travel demand-management strategies.

ACKNOWLEDGEMENTS

The authors would like to gratefully acknowledge several students that have been involved in this analysis. Helpful insight has also been provided by David Schonbrunn from the Transportation Solutions Defense and Education fund. This research has partially been funded by a University of California Transportation Center research grant. The contents of this paper reflect the views of the authors and do not necessarily indicate acceptance by the sponsors.

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June 15, 2001

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Mr. C. Glenn Clinton
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RE: NOP/NOI, Marin-Sonoma Narrows Project

Dear Ms. Simpson and Mr. Clinton:

This office represents Transportation Solutions Defense and Education Fund (TRANSDEF) in this matter. TRANSDEF is a public interest organization dedicated to regional transportation planning in the San Francisco Bay Area. TRANSDEF has been requested by Marin Advocates for Transit (MAT), an active participant in the Marin-Sonoma Narrows Policy Advisory group, to provide its legal and technical expertise in this regional issue.

TRANSDEF believes that your agency is proceeding down an inappropriate and potentially impermissible path in processing this project. Failure to properly describe the project and alternatives at this stage will prejudice the adequacy of the CEQA and NEPA review processes and could lead to legal action. We implore your agency to carefully consider our concerns and ensure that the requirements of these environmental review processes are met and this project is given adequate scrutiny. You are required to consider TRANSDEF's comments at this point in the CEQA process. Public Resources Code § 21082.1.

For purposes of this scoping comment letter, reference is made to both state and federal authority under CEQA and NEPA. Parallel state and federal legal authority generally exists for each legal and regulatory point made in this letter, even though only state or federal authority it cited. See, generally, *City of Carmel-by-the-Sea v. DOT*, 123 F.3d 1142, 1150 (9th Cir. 1997).

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Adequacy of NOP

The CEQA Guidelines § 15082(a)(1) mandates that a NOP include a statement of the project's probable environmental effects. The NOP lacks this information. The state clearinghouse lists project issues, but this does not qualify as a statement of the project's "probable environmental effects." This information must be provided and the scoping/NOP process re-initiated.

Project Purpose and Need

TRANSDEF is concerned that the failure to accurately and completely identify the project's purpose and need will cause the disclosure of project impacts and consideration of alternatives to be incomplete. The Guidelines provide: "A clearly written statement of the objectives will help the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and will aid decisionmakers in preparing findings . . . The statement of objectives should include the underlying purpose of the project." Guidelines § 15124(b). "An EIR may not define a purpose for a project and then remove from consideration those matters necessary to the assessment whether the purpose can be achieved." *County of Inyo v. City of Los Angeles* (3d Dist. 1981) 124 Cal.App.3d 1,9.

Marin Advocates for Transit has introduced evidence that a rail alternative would be comparable, if not superior, to achieving the project purpose and objective, yet the lead agency appears intent on excluding that alternative through manipulation of the project's purpose. On December 15, 2000, in response to a request by Marin Advocates for Transit, the Policy Advisory Group (PAG) added the phrase "increase capacity in the corridor" to the purpose and need statement. On March 16, 2001, Caltrans reported to the PAG that this language had been deleted, allegedly because Caltrans, Federal Highway Administration and Metropolitan Transportation Commission did not support increasing the capacity in the corridor. Since these agencies have historically and in this instance supported expansion of the highway's capacity, the action forcing deleting reference to generically "increased capacity" has the effect of precluding consideration and environmental analysis of other modes, such as rail, which could provide the desired transportation capacity, potentially with lesser adverse environmental effects. This affects the adequacy of any future alternatives analysis. "[A]n 'impermissibly truncated' project description severely distorted not only the critical project *but the alternatives to the project*" (emphasis in original), *id.*, citing *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185. The attempts to constrain the project's environmental review through manipulation of the project's purpose and need is plainly inappropriate and taints the legitimacy and adequacy of the environmental review document under both CEQA and NEPA.

Further, TEA-21 itself proscribes prejudicing a project's analysis and comparative review at this stage through an overt modal preference. Federal transportation planning regulations establish specific processes which prevent avoidance of alternative strategies for congestion management, require analysis and management of projects that increase single occupancy vehicle carrying capacity, and interfere with the development and implementation of an integrated intermodal transportation system.

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See generally 23 C.F.R. Part 450. Governing federal authority requires that the capacity language be re-inserted in the purpose and need statement.

Inadequate Identification of Alternatives

"When a federal agency prepares an Environmental Impact Statement (EIS), it must consider "all reasonable alternatives" in depth. 40 C.F.R. § 1502.14. No decision is more important than delimiting what these "reasonable alternatives" are. That choice, and the ensuing analysis, forms "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. To make that decision, the first thing an agency must define is the project's purpose. See *Citizens Against Burlington, Inc. v. Busey*, 290 U.S. App. D.C. 371, 938 F.2d 190, 195-96 (D.C. Cir. 1991). The broader the purpose, the wider the range of alternatives; and vice versa. The "purpose" of a project is a slippery concept, susceptible of no hard-and-fast definition. One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence). The federal courts cannot condone an agency's frustration of Congressional will. If the agency constricts the definition of the project's purpose and thereby excludes what truly are reasonable alternatives, the EIS cannot fulfill its role. Nor can the agency satisfy the Act. 42 U.S.C. § 4332(2)(E)." *Simmons v. Army Corps of Engineers*, 120 F.3d 664, 666 (7th Cir. 1997)

Project alternatives derive from an EIS' "Purpose and Need" section, which briefly defines "the underlying purpose and need to which the agency is responding in proposing the alternatives to the proposed action." *City of Carmel-by-the-Sea, infra*, 123 F.3d at 1155. Review of the discussion and minutes of the Marin-Sonoma Narrows Policy Advisory Group (PAG) meetings between November 2000 to early in 2001 discloses considerable discussion of the project purpose issue. The state clearinghouse project description evidences that the project is "an important component of a comprehensive multi-modal transportation plan." This language is ignored in several other elements of the NOP/NOI process, leading TRANSDEF and MAT to contend that the purpose and need statement has been intentionally manipulated to avoid evaluation of rail improvements as an alternative to increasing capacity in the corridor and thereby defeating any consideration and evaluation of a multi-modal approach.

During the debate on adoption of TEA-21, a number of proposals to amend the purpose and need element of NEPA for transportation projects were considered by Congress, yet none of these amendments were adopted into law. FHWA and Caltrans are bound by the current rule of law and must carefully and fully address the issue of the project's stated purpose and need and not seek to bias the outcome of the environmental review process through manipulation of the project need and purpose.

The project is intended to address commute hour congestion and a resultant lack of capacity in the Highway 101 corridor in the project reach. Capacity inadequacies are manifested during peak commuting hours. A substantial majority of commuters employ a single occupancy vehicle and commute from established and developing residential areas into defined employment centers. Federal

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law directs that congestion, public transportation and intermodal management systems must be part of the metropolitan transportation planning process, with a prohibition of the use of federal funds on any project that will result in a significant increase in the carrying capacity for single occupancy vehicles (SOV) unless the project incorporates all reasonably available strategies to manage the SOV facility effectively. 23 C.F.R. Part 450.320. TRANSDEF advises that these prohibitions were intended to prevent the type of mode manipulation that has been attempted in this matter.

Additionally, eliminating a relatively small percentage of the current and future commuters during peak hours through alternative transportation strategies, such as a rail-based public transit system, would alleviate traffic congestion and restore the highway's use to below capacity. Importantly, a rail-based alternative would be capable of accommodating future increased needs, and reduce adverse induced and cumulative environmental impacts associated with sprawling land use patterns. In short, it has many advantages over the proposed project.

While the rail alternative may not comport with Caltrans' and the Federal Highway Administration's principal purposes of building and maintaining highways and is not currently in favor with the management of the Metropolitan Transportation Commission, this nevertheless is a viable alternative approach to meeting the purpose and need. The agencies involved have plainly sought to avoid an environmental review process and alternatives analysis that would compete with favored, highway-based solutions. NEPA, CEQA and TEA-21 do not sanction the narrow view sought by the agencies, and any attempts to evade the requirements of law and thwart the public's ability to demonstrate a preferable approach to decisionmakers will not be tolerated.

The 1997 Sonoma/Marin Multimodal Transportation and Land Use Study, funded by Caltrans, determined that a rail system was more cost-effective than the project proposed in the NOP/NOI. For the same cost as the highway segment capacity expansion, a sub regional rail system can be built, with broad and long-term benefits. TRANSDEF requests that an alternative be studied using the Calthorpe land use assumptions with the smart rail plan in a manner similar to Portland, Oregon's LUTRAQ (land use, transportation and air quality) study. A rail program alternative must be allowed to compete for funds on equal (or preferential, see 23 C.F.R. Part 450.320) footing with the highway project.

Environmental Setting

The environmental setting requires consideration of applicable laws and policy determinations in addition to physical environmental factors. A cornerstone of TEA-21 and its predecessor ISTEA was elevation of multi-modal strategies in transportation planning and implementation. While the project description acknowledges this requirement, the environmental review process is directed away from the rail alternative. TEA-21, the Clean Air Act, CEQA and NEPA all demand that the lead agencies consider a range of modal options and different modal choices. This is not the direction that this process is going, and it is clear that now is the time for the agencies to recognize their responsibilities to affected communities not only in project design but also through the conduct of a fair and non-

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biased environmental review process that fully considers issues of transportation equities and environmental justice.

Impact Issues

The environmental review document(s) must address the issue of induced growth, construction delays versus congestion relief, cumulative impacts and identify the term of any congestion relief benefit from the proposed highway widening project.

Induced VMT

"A growing body of research has shown that widening highways is only a temporary solution at best to the complex problem of traffic congestion. Indeed, research has pointed to a phenomenon known as "induced traffic" that suggests new and wider highways actually create additional traffic, above and beyond what can be attributed to rapid population increases and economic growth." http://www.transact.org/Ca/congestion2.htm. See *Sierra Club v. DOT*, 962 F.Supp. 1037 (N.D. Ill., 1997)

Construction Delays

Studies show that gains in congestion relief from highway expansion may not always exceed the additional congestion associated with construction delays. See http://www.transact.org/Reports/woes/default.htm.

Cumulative Impacts

The environmental review document must comprehensively address the cumulative effect of this project, including the impacts associated with expanding the region where sprawl is induced as a result of additional long-distance SOV commuting.

Term of Benefits

Studies show that the benefits gained from highway capacity expansion are often short in duration, and necessitate further future expansion to meet additional demand. The environmental review document must identify how long this project will benefit the congestion issue and when diminishing returns are expected to be encountered.

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Conclusion

TRANSDEF recognizes that this scoping stage is early in the environmental review process, but is gravely concerned that recent efforts to manipulate the purpose and need aspect of the project description will infect the entire environmental review process and lead the process to court rather than to construction. TRANSDEF implores your agencies to recognize and correct this problem immediately.

Sincerely,

Marc Chytilo

CC: Jeff Morales, Caltrans Director
Harry Yahata, Caltrans District 4 Director
David Schonbrunn, President, TRANSDEF

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LAW OFFICE OF MARC CHYTILO

ENVIRONMENTAL LAW

October 19, 2006

Mr. Will Kempton, Director
California Department of Transportation
Post Office Box 942873
Sacramento, California 94273-0001

RE: Marin-Sonoma Narrows Project, Highway 101

Dear Director Kempton:

This office represents Transportation Solutions Defense and Education Fund (TRANSDEF). TRANSDEF is a public interest organization dedicated to regional transportation planning in the San Francisco Bay Area. TRANSDEF has participated in virtually all major transportation planning processes in the Bay Area for over a decade, including the Marin-Sonoma Narrows Project located on Highway 101.

We recognize that your senior management team was not involved in the early stages of environmental review for this project, and are writing to make sure you are aware of the problematic way this project was scoped over five years ago. We understand that your office is preparing to release a Draft environmental impact report/environmental impact statement for this project pursuant to the California Environmental Quality Act and National Environmental Policy Act, California Public Resources Code § 21,000 et seq. and 42 U.S.C. § 4321, et seq. We are gravely concerned that the way this project is described (the alternatives are listed at http://www.dot.ca.gov/dist4/msn/alt.html) will result in environmental review documents that fail to meet the minimal legal requirements of these two statutes and preclude Caltrans and the United States Department of Transportation from acting legally concerning the underlying project. We suggest that your office investigate the issues identified herein and direct that the environmental review processes ensure that current conditions and policy directives are given full consideration through either recommencement of the scoping process or integrating specific changes to the draft document prior to circulation. The three minimum changes are: 1) redefine the range of potentially feasible alternatives; 2) update the baseline/existing conditions analyses to reflect the current policy context; and 3) expand the scope of impact areas studied to include greenhouse gas emissions.

The scoping process is integral to CEQA's alternatives analysis, and flawed scoping, such as relying on stale project information and baseline conditions, can infect the adequacy of the entire environmental review process. Public Resources Code § 21080.4; Guidelines § 15082; see also *Citizens for Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 552, 569. Scoping was previously commenced nearly five and one-half years ago, when both the baseline environmental conditions and regional policy priorities were much different.

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The adequacy of CEQA's environmental review process depends upon a fair definition of the project's objectives to frame the alternatives analysis. *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1353. The lead agency cannot rely on unsupported statements of a project applicant's desires and their internal rejection of alternatives. *Id.*, 141 Cal.App.4th at 1356-58. The lead agency bears the duty of ensuring that the environmental review document's evaluation of alternatives is complete and unbiased, despite the preferences of parties to the application process. *Id.*

Our greatest issue of concern is founded upon the very narrow manner that this project was scoped and described, which eliminated consideration of viable alternatives in violation of CEQA and NEPA. We raised this concern early in the environmental review process (see NOP/NOI letter, Marc Chytilo to Susan Simpson and C. Glenn Clinton, June 15, 2001, attached) and believe that this issue has been ignored throughout the process. The objective of the Marin-Sonoma Narrows project is obviously to relieve recurring traffic congestion on the roadway, but the project purpose identified in scoping appears to be improperly constrained by exclusively calling for a continuous HOV lane. Modern transportation and land use planning do not presume solutions, but seek to use the environmental review process and consideration of alternatives to identify them. CEQA and NEPA's environmental review process are informational procedures, requiring the flexibility to find the best solution. We are gravely concerned that this EIR/EIS will improperly attempt to embed a preferred alternative through a narrow project purpose.

Environmental review documents and approvals that improperly limit evaluation by excluding transit and other alternative strategies for providing expanded transportation capacity in specific corridors are vulnerable to rejection. It is vitally important that current information be used, including consideration of impending actions affecting transportation choices. *Utahns for Better Transportation v. United States Department of Transportation*, 305 F.3d 1152, 1170, (10th Cir., 2002) (observing that "the regional transit choices that are at issue here are not ones 'that may be made in the future,' but are being made."). In this case, absentee voting has begun, including a local measure proposing to fund regional commuter services under the auspices of the Sonoma Marin Area Rail Transit District (SMART). SMART planners have proposed a specific service with railway access, equipment and service parameters already identified, and have completed their own environmental review process. As SMART's service is designed to address the same commuters that are creating congestion purportedly addressed in the instant Narrows project, and the two projects may create more capacity than necessary and even compete with each other, it is essential that the environmental review document provide a robust examination and consideration of SMART as an alternative to the proposed project.

We believe several SMART alternatives should be studied as alternatives to this project: 1) the one studied in the SMART FEIR; 2) one that provides SMART with the same dollar amount as is determined to be needed by the Narrows highway Build option; and 3) one that provides SMART with all of its capital funds. These last two alternatives would test the impact of additional funding on the SMART project. This funding would allow SMART's sales tax

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revenues to be dedicated to operations, supporting a dramatic increase in train service over the currently planned operational schedule, which would result in a very substantial increase in projected ridership. With the extremely high estimated cost of the 17 mile Marin-Sonoma Narrows project, comparing its benefits to the benefits of that level of investment in an entire two-county 72 mile rail transit system that is designed to alleviate the same commuter-based congestion problem is the responsible thing to do, and an action which addresses the agencies' duties to consider a reasonable range of alternatives under CEQA and NEPA.

We believe it significant that the Sonoma Marin Multimodal Land Use and Transportation Study (Calthorpe Assoc., 1997), substantially funded by Caltrans, identified the use of the existing railroad right of way as a superior alternative to highway capacity increases in the Marin-Sonoma Narrows to meet congestion problems in this corridor. With frequent service, the train developed a very high level of projected ridership. This study is the closest thing the 101 Corridor has had to an objective Major Investment Study and must be integrated in the environmental impact analysis, including the alternatives analysis, for the proposed project.

The Metropolitan Transportation Commission has adopted policies favoring transit oriented development (see, for example, Resolution 3434) and the region has undertaken several land use planning exercises demonstrating both the community desire for, and regional commitment to practices that enhance the effectiveness of public transportation systems rather than the automobile as the primary commuter transportation vehicle. This project was previously scoped in 2001 during a time when the Regional Transportation Plan and transportation priorities were considerably different than they are today.

In 2003, ABAG released its first policy-based Projections, a set of demographic projections identifying where the next two decades of growth <u>should</u> go. It was a major departure from its Projections 2002, which, along with its predecessors, were extrapolations from past trends and current general plans. By placing much more of the region's future population and jobs near transit stations, Projections 2003 created a Smart Growth context where investment in transit will be significantly more effective than in the past. MTC's 2005 Regional Transportation Plan was based on Projections 2003. The Project Objectives and Description require updating to reflect the rapidly changing focus of transportation planning in the Bay Area that seeks to integrate land use principles into public transportation design and recognizes the confounding effect that additional highway capacity can have on transit system success.

We implore Caltrans to ensure that the recently expressed desires and intentions of the Bay Area populace in promoting a regional public transportation system to address future transportation needs be considered and integrated into the instant project and planning process. Given that the 2001 project description and scoping process is over five years old and thus is "stale" due to significant regional policy changes, we request that the environmental review process for this Project include some form of "re-scoping" before any environmental review document is circulated.

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We note there are other changes since the 2001 scoping that necessitate renewed agency review of potential impacts. There is growing governmental acknowledgement of global climate change impacts from transportation sources, necessitating consideration of this issue in any environmental review document of a project that would induce or facilitate increased automobile transportation use, including this project. The California Attorney General's office has recently submitted comments on an DEIR circulated by the Orange County Transportation Authority. See Comment Letter, California Attorney General Bill Lockyer to Glenn Campbell, OCTA, March 30, 2006, attached. Even more recently, the enactment of AB 32 identifies the release of global greenhouse gas emissions as a matter of statewide concern, and thus triggers the need for consideration of greenhouse gas emissions in CEQA environmental review documents. The project will induce automobile travel by relieving congestion and increasing highway capacity, and the cumulative effects of this action must be considered for the environmental review document to fulfill its informational purpose.

The efficiency and form of the Bay Area's transportation system requires integrated and strategic planning. The Marin-Sonoma Narrows project conflicts with the current direction of transportation planning and priorities in the Bay Area, and will result in substantial future adverse environmental effects that can be avoided through a viable alternative currently undergoing development and funding approval. As currently scoped, the environmental review process is not responsive to either community need or the applicable legal requirements.

We request that the scoping of this project be reevaluated to address the numerous changes in regional transportation planning and current environmental conditions before a draft environmental review document is publicly circulated.

Thank you for your consideration of our views in this important matter.

Sincerely,

Marc Chytilo

CC: Gene Fong, Division Administrator, Federal Highway Administration
Bijan Sartipi, Caltrans District 4 Director
LTC Craig Kiley, US Army Corps of Engineers
David Schonbrunn, President, TRANSDEF

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LAW OFFICE OF MARC CHYTILO

ENVIRONMENTAL LAW

December 18, 2006

Mr. Will Kempton, Director
California Department of Transportation
Post Office Box 942873
Sacramento, California 94273-0001

RE: Marin-Sonoma Narrows Project, Highway 101

Dear Director Kempton:

We are in receipt of the Caltrans response to our letter concerning this project signed by District Director Sartipi dated November 9, 2006. Thank you for considering our concerns.

In this response, Caltrans identifies several "physical deficiencies" that the project would address, including flooding and safety concerns and additional access points. TRANSDEF of course supports the safety improvements and flooding mitigation elements of the project, but recognizes those elements are not dependent upon the highway widening element of the project. Alleviating access concerns may be a legitimate project purpose arising from the safety-driven conversion of the highway to freeway status. However, because it may well cost more to construct access points to pastures than the value of the land, public open space acquisition of the lands that justify and/or necessitate these improvements should be considered as an alternative to providing interchanges and frontage road access.

The Caltrans response asserts that the MSN highway project does not preclude a future rail component. While it may not do so expressly, it may still have that effect. Typically the level of ridership on public transportation systems depends on a number of factors, including the levels of service provided by highways. When highways are congested, rail ridership increases. Increasing the capacity of Highway 101 may adversely affect the success of the competing SMART system. This impact must be evaluated in the EIR.

It is also important that the EIR examine the long-term environmental impacts of the various project alternatives. Experience in other urbanizing areas has shown that there is a practical limit to the amount of highway capacity that can be added to a corridor to meet increasing travel demand. Eventually, the highway corridor cannot accommodate the number of lanes required, the lane maximum is reached, and/or community opposition to incremental highway widening prevents further expansion. The rail alternative provides a more robust long-term alternative since incrementally increased transportation capacity in the corridor may be more appropriately scaled to meet population growth and transportation demand over longer periods of time. Rail is most successful when land use development patterns are designed around rail service, rather than highway services. The decision to blindly pursue highway widening will prejudice future transportation efficiencies by impairing commuter rail startup success and enabling sprawling

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transportation efficiencies by impairing commuter rail startup success and enabling sprawling permanent land use patterns of development that rely on automobiles to provide basic mobility needs.

As noted in our prior letter, MTC has embraced Resolution 3434 and other policy directives that recognize the need for integrated planning of regional transportation systems and land use growth patterns. These policy goals are typically not stated as "regulations" as recited in the Caltrans response. Policies identify longer-range objectives and strategies that are currently in the process of being embraced by the Bay Area's multitude of individual municipal jurisdictions. It would be a tragedy if the Association of Bay Area Governments and Metropolitan Transportation Commission successfully convinced the Bay Area's 101 cities and 9 counties to embrace transit-oriented development goals and a world class transit system, only to have Caltrans thwart the effectiveness of those forward-thinking programs by 1950's era highway expansion planning. The fact that this project is contained within the Regional Transportation Plan (MTC's Transportation 2030 Plan) does not mandate its approval. All Regional Transportation Plan projects are subject to modification and even removal from the RTP, and many RTP projects are never actually constructed.

We remain convinced that this project's alternatives analysis must include a rail alternative, which should include the appropriate highway flood control improvements and safety elements so as to be comparable in benefit to the principal project.

There is extensive evidence that excessive automobile use is a significant contributor to greenhouse gas emissions increases and thus global climate change. Adding highway capacity, even as HOV lanes, has the effect of promoting automotive use as opposed to alternatives such as public transit. We look forward to a complete evaluation of comparative greenhouse gas emissions inventories for the project and each of the alternatives including a time frame of at least 50 years. The direct effect that transportation system planning has upon community design and thus the greenhouse gas emissions from sprawling versus compact "smart" growth patterns is well established, and should be integrated into the project impact assessment.

CEQA requires that its environmental impact disclosure and avoidance processes occur early enough in the process to ensure the project will be guided by the environmental review document, and not have the environmental review document constitute a post-hoc rationalization for the project. CEQA Guidelines § 15004(b)(2) specifically requires that agencies pursuing public projects not "take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be a part of CEQA review of that public project."

TRANSDEF implores Caltrans to obey the spirit and letter of CEQA and ensure that the environmental review process for the Marin-Sonoma Narrows Project integrates a robust evaluation of different strategies that can achieve the purpose of increased corridor transportation

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capacity while addressing the ancillary highway safety and flood control elements Caltrans has identified.

Thank you for your consideration of our views in this important matter.

Sincerely,

Marc Chytilo

CC: Gene Fong, Division Administrator, Federal Highway Administration
Bijan Sartipi, Caltrans District 4 Director
LTC Craig Kiley, US Army Corps of Engineers
David Schonbrunn, President, TRANSDEF

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DESCRIPTION OF THE FINAL PREFERRED SCENARIO

The analysis of the Draft Preferred Scenario shows that it was generally successful in including the most effective elements of the earlier scenarios. By creating a balanced transportation network with improvements to Highway 101 and other regional roads, and the creation of a rail transit system with complementary regional and feeder bus service. The Preferred Scenario also includes a recommended compact and mixed-use, transit-supportive land use policy which would implement TODs at several rail stations throughout the North Bay.

After the analysis of the Preferred Scenario was completed, the Consultant Team and the Joint Executive Committee (JEC) reviewed and finalized the land use and transportation elements of the plan. This section describes the final transportation elements and their associated capital and operating costs. A two part phasing of these improvements is also outlined. No further revisions were made to the recommended TOD land use policies, because a sensitivity analysis indicated that the proposed rail transit system would be viable with or without the implementation of the land use pattern. Still, the implementation of the land use policies will improve ridership of the transit system.

Description of the Transportation Network

This section outlines the individual components and costs associated with improvements on Highway 101, other state highways, arterial roadways, capital and operating costs for commute rail to begin operation on the Northwestern Pacific Railroad corridor, capital and operating costs for bus service, and costs for new pedestrian and bicycle paths. It also describes the two implementation phases from 1999 to 2007 and 2008 to 2015.

Highway 101 Improvements

The Preferred Scenario includes several improvements to Highway 101 between Windsor and Larkspur: new HOV lanes, climbing lanes, reconfigured and new interchanges, and new overcrossings. The installation of these would be divided into two primary construction phases. Improvements of the highest priority would be developed in Phase 1, while other improvements in Phase 2. Phase 1 improvements include those for areas that are currently the most adversely affected by inadequate highway facilities and those improvements that are already in the funding pipeline. The preliminary cost estimates for these improvements, presented in *Chapter* 2, have been revised and reviewed by Caltrans, the Sonoma County TAC, and Marin CMA, and shown in Tables 1A and 1B on the following two pages.

Phase 1 improvements in Sonoma County include the installation of HOV lanes and associated improvements between Windsor River Road in Windsor and State Highway 116 in Cotati, totaling 13 individual projects. In Petaluma, the Rainier Road and East

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Washington Avenue interchanges would be installed. Phase 1 projects in Sonoma County would have an unfunded cost of $184.4 million. Phase 2 projects would include adding HOV lanes through Petaluma, between Old Redwood Highway and State Route 116 and a new interchange at Old Redwood Highway, with an unfunded cost of $143.3 million.

Table 1A
Highway 101

Highway 101 Segment or Location (assumes HOV or Auxiliary Lane)	Phase 1	Phase2	Total	Status	Capital Cost
Windsor to Petaluma					
Construct Arata Lane Interchange	X		X	funded	$9.3
Windsor River Rd. to Steele Lane					
Widen to 6 lanes - Windsor River Road to River Road	X		X		$30.8
Widen to 6 lanes - River Road to Steele Lane	X		X		$26.8
Construct New River Road Interchange	X		X		$6.2
Construct New Hopper Road Interchange					$3.3
Construct New Mendocino Road Interchange					$3.3
Construct New Steele Lane Interchange	X		X		$10.7
Steele Lane to Route 12 in Santa Rosa					
Widen to 6 lanes from Steele Lane to College Ave	X		X		$11.9
Widen to 6 lanes - College Avenue to S.R. 12	X		X		$35.6
Route 12 In to Wilfred Ave. in Rohnert Park					
Widen to 6 Lanes - S.R. 12 to Santa Rosa Ave/Wilfred Ave	X		X	funded	$23.1
Widen to 6 Lanes - Wilfred Ave. to South of Wilfred	X		X		$26.1
Santa Rosa Ave. Interchange					$3.7
Todd Road Interchange		X	X		$27.0
Bellevue Ave. Interchange	X		X		$11.3
Hearn Ave. Interchange	X		X		$17.5
Baker Ave. Interchange					$7.9
Wilfred Ave. to Route 116W in Cotati					
Widen to 6 Lanes - South of Wilfred to S.R. 116W	X		X		$19.4
Construct Rohnert Park Interchange	X		X	u.c.	$7.7
Northbound Climbing Lane (add new lane in median)	X		X		$2.8
Route 116W to Old Redwood Hwy. in Petaluma					
Widen to 6 Lanes - S.R. 116 to W. Sierra Avenue					$21.4
Construct W en Sierra Interchange					$10.2
Widen to 6 Lanes - W. Sierra Avenue to Railroad Avenue					$16.4
Widen to 6 Lanes - Railroad Avenue to Old Redwood Highway					$33.3
Construct Railroad Avenue Interchange					$8.4
Construct Old Redwood Highway Interchange		X	X		$19.7
Old Redwood Hwy. to 116E in Petaluma					
Consvuct Corona Road Interchange					$3.9
Construct Rainier Road Interchange	X		X	part. fund	$23.9
Widen to 6 Lanes - Old Redwood Highway to S.R. 116		X	X		$46.3
Construct E. Washington Avenue Interchange	X		X		$23.8
Subtotal - Windsor to Petaluma:	$236.5	$143.3	$379.8		
Portion Funded:	$52.0	$0.0	$52.0		
Portion Not Funded:	$184.4	$143.3	$327.8		

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Table 1B

Highway 101

Highway 101 Segment or Location (assumes HOV or Auxiliary Lane)	Phase 1	Phase 2	Total	Status	Capital Cost
Petaluma to Novato					
HOV widening of Petaluma Bridge (not including seismic)					
HOV widening end of Petaluma Bridge to Marin County Line					$23.1
HOV widening from Atherton to Sonoma Co. Line					$57.9
					543.3
Improve S.R. 116 to Atherton to Freeway Status			—X		$85.8
Subtotal - Petaluma to Novato:			$0.0		
Portion Funded:			$0.0		
Portion Not Funded:			$0.0		
Novato to Corte Madera					
HOV widening from Route 37 to Atherton					
Widen *Atherton Ave.* to *Highway 37 - add NB/SB HOV Lanes*					
Construct Rowland Blvd. Interchange*	X	X	const'd	$0.0	$35.2
Revise Interchanges Between San Pedro Road to Route 37			partial	partial	$12.2
Freitas Interchange Improvements at Highway 101					$14.1
Construct Lucas Valley Road Interchange					$6.9
Widen Lucas Valley Rd. to N. San Pedro Rd. - SB Aux. Lane					$6.3
Construct Ignacio Interchange	X		X	priv. fund	$2.2
HOV widening from Lucky Drive to N. San Pedro					
Construct Southbound HOV Lane	X		X	funded	543.0
Construct Southbound HOV bne	X		X		$7.0
Construct Northbound HOV Lane & associated improvements[1]		X	X		$63.1
Construct Bellam Blvd WB Ramps 1-580 to Northbound Hwy. 101		X	X		$4.6
Widen Mission Valley to 1-580 - HOV and Aun Lanes	X		X		$5.9
South of Lucky Drive					
Nellen Drive Undercross Improvements at Highway 101	X		X	constr'd	$0.0
Industrial Way - Channelize and Signalize at Highway 101	X		X	u.c.	$0.0
Subtotal - Marin County	$58.1	$67.7	$125.8		
Portion Funded:	$45.2	$0.0	$45.2		
Portion Not Funded:	$12.9	$67.7	$80.6		
Subtotal - Sonoma County	$236.5	$143.3	$379.8		
Portion Funded:	$52.0	$0.0	$52.0		
Portion Not Funded:	$184.4	$143.3	$327.8		
Total	$294.6	$211.0	$505.6		
Portion Funded	$97.2	$0.0	$97.2		
Portion Not Funded:	$197.3	$211.0	$408.4		

* includes park-and-ride lot

** auxiliary lane costs included in HOV lane costs

[1] Assumes reversible lane. If not feasible costs would increase by $58.5 million to $1 196 for the Northbound HOV.

Source: Cost Estimates* Caltrans District 4 and Marin County Dept of Public Works

The most prominent Phase 1 improvement in Marin County is south bound gap closure through San Rafael. This would be accomplished through the installation of a southbound HOV lane, generally between the Civic Center and Sir Francis Drake Boulevard interchange. Phase 1 projects in Marin County would have an unfunded cost of $12.9 million. Phase 2 projects in Marin County would include northbound gap closure. As currently described by the Marin County Public Works Department, this would be accomplished with a reversible

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center lane, at the cost of $63.1 million. Should this approach not be implemented, a standard HOV lane could be installed, with an added cost of $56.5 million.

The Preferred Scenario does not include the improvement of Highway 101 to freeway status between Petaluma and Novato. This was not included because the analysis of the various scenarios did not indicate significant level of service improvements for commuters during the peak period. It was also determined that improvements in this area would be prohibitively expensive; costing about $125 million. Therefore, because of relatively little benefit and high costs, it was determined that this project should not be included in the Preferred Scenario, and that funding instead be directed to higher priority projects. However, should state or federal funds become available to upgrade this area to freeway status (addressing several safety issues with the introduction of new interchanges, on/off ramps, frontage roads, modified shoulder conditions etc.), both counties may wish to consider its implementation.

In summary, the improvements described in the Preferred Scenario for Highway 101 in both counties include those which offer the most benefit while being the most cost effective. Improvements in Marin County would include gap closure, while in Sonoma County, HOV lanes and other improvements would be installed in key urban areas including Windsor, Santa Rosa, Rohnert Park, Cotati, and Petaluma. The unfunded cost of the Preferred Scenario has increased slightly (less than 2%) since the preliminary Draft Scenario was presented. This increase actually represents a balance of trade-offs. Several originally proposed elements of the Scenario were dropped or modified (freeway status between Novato and Petaluma, northbound HOV lane in San Rafael changed to reversible lane) lowering costs, while cost estimates were refined for some elements with increases of up to 25%.

Other State Highway Improvements

The Preferred Scenario includes two "Other State Highway" improvements which were not found in the Draft Preferred Scenario. Upon consultation with Marin County staff, it was determined that the I-580 Bellam Interchange be included, as it would improve circulation near the I-580/101 interchange. In Sonoma County several improvements such as left turn lanes and intersection modifications to Highway 116 between Cotati and Sebastopol were also added.

These changes increased the unfunded cost of "Other State Highways" almost six times, from $6.1 million to $35.74 million, as shown in Table 2. However, the "new" improvements would occur in Phase 2, allowing the installation of higher priority items first.

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Why Are the Roads So Congested?

A Companion Analysis of the Texas Transportation Institute's Data On Metropolitan Congestion

November 1999
Surface Transportation Policy Project
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For the last 16 years, the Texas Transportation Institute (TTI) has reported on traffic congestion in the country's major metropolitan areas. This year's TTI study reports that in 1997, congestion levels continued to increase in almost all of the 68 cities for which they reported data. In some areas, traffic congestion has become a daily topic as officials and citizens seek ways out of the jams. But in order to effectively fight congestion, we need to first know why it is occurring.

The Surface Transportation Policy Project (STPP) has produced the following companion analysis of TTI's data to begin to answer the question: "Why are the roads so congested?" Using TTI's new data, we performed several analyses to illuminate the true causes of congestion while dispelling some myths.

It is commonly felt that congestion is a natural and unavoidable consequence of 'growth.' But what kind of growth are we talking about? Our analysis centers on several growth factors measured by the Texas Transportation Institute.

The Role Of Population Growth

TTI's data show that population growth is only a minor factor in the recent rise in congestion. Population in the metro areas studied grew by 22% during the study years (1982-1997). By contrast, the delay experienced by drivers grew by 235% in the same period. This was in large part due to the increase in driving in these areas. Actual population growth in these areas totaled almost 22 million people over this period, but STPP calculates that the increase in driving by each resident makes it feel as if about 70 million more drivers have been added to the highways. This 'perceived population growth' experienced by motorists helps explain the widespread feeling that our metro areas are "growing too fast" or "bursting at the seams."

The Growth in Driving

Only 13% of the growth in driving between 1983 and 1990 is attributed to population growth. In other words, most of the growth in driving comes not from new drivers, but from more driving by the people already on the road. Why are Americans driving so much more each year? U.S. Department of Transportation data show that 69% of the growth in driving in this period was due to 3 factors: longer average trips, less carpooling, and a switch from biking, walking, or transit to driving. Each of these factors is at least partially related to changing development patterns. Americans are each driving more every year in large part because of the increasingly spread out nature of our metro areas. As growth sprawls outward, jobs, housing and services grow farther apart. Development patterns that require an automobile trip for every errand force us to drive more every year to accomplish the same things. This is confirmed in STPP's analysis of TTI's data, which found that the spread of our metro areas is directly contributing to the increase in driving.

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The Role Of Roadbuilding

One commonly cited cause of congestion is a failure to provide more road space. Our analysis shows that on average, the highway networks in the cities studied by TTI have expanded faster than population. The amount of highway per person in these metro areas grew by 10% over the last 16 years. We are adding highways faster than we are adding people to drive on them.

In addition, our analysis found that road building seemed to have little impact on congestion. Between 1982 and 1997, metro areas that were aggressive in expanding the amount of road space per person fared no better in terms of rush-hour congestion than those that did the least to add new road space; in fact, they did slightly worse. This is due in part to what is known among transportation planners as 'induced travel,' a phenomenon in which newly available road space encourages additional car travel. Our analysis of TTI's data confirms previous research on induced travel; in the metro areas studied, a 10% increase in the size of the highway network is associated with a 5.3% increase in the amount of driving.

This analysis indicates that our current traffic congestion problems are not an inevitable consequence of the healthy growth of our metro areas. These problems appear to be more closely linked to the sprawling development patterns that require so much driving. In addition, our analysis shows that congestion is not easily alleviated through adding road space. These results indicate that the traditional, road-based approach to fighting congestion is not working very well, and transportation officials might have greater success if they focus their efforts on other, more innovative congestion-fighting techniques.

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I. Population Growth and Congestion: Perception vs. Reality

As shown by the TexasTransportation Institute, drivers are experiencing increasingly congested road conditions. This crowding on the roads is often attributed to a region's growth. Yet TTI's data shows that population in the metro areas studied has grown by an average of 22% in the 16 years since 1982, while the average traffic delay experienced by individuals has increased 235% in the same period. Obviously, something else is going on.

That something else is the increase in driving, most of it necessitated by our sprawling pattern of development. According to TTI, the amount Americans drive every day has grown by about 70% since 1982. This makes it feel as if the roads are bursting at the seams with new drivers. In fact, the roads are mostly filled with the original residents, who are simply driving farther and more often.

The chart below shows how the increase in driving per person magnifies population growth and affects the crowding on the roads in the metro areas with the worst rush-hour congestion. For example, in Los Angeles, California, the population grew by 2.4 million since 1982. But the 56% increase in driving made it seem as if 5.5 million additional drivers were on the road. This 'perceived population growth' on the roads helps explain why our highways are so congested.

Table 1. Actual and Perceived Population Growth (1982 to 1997)

TRI Rank[1]	Metro Area[2]	Percent Change in Population	Percent Change in Driving	Actual Population Growth	Perceived Population Growth
1	Los Angeles CA	24.2%	56.0%	2,400,000	5,544,978
2	Seattle-Everett WA	36.1%	68.9%	520,000	992,230
3	San Francisco-Oakland CA	18.5%	43.1%	610,000	1,419,150
4	Washington DC-MD-VA	28.3%	77.4%	765,000	2,088,576
5	Chicago IL-Northwestern IN	12.7%	87.9%	900,000	6,220,291
6	Atlanta GA	60.2%	138.6%	970,000	2,231,840
6	Miami-Hialeah FL	19.7%	67.2%	340,000	1,163,042
8	Boston MA	5.8%	32.3%	165,000	919,836
9	Detroit MI	5.4%	46.0%	205,000	1,753,198
9	Las Vegas NV	155.6%	182.9%	700,000	823,256
9	San Diego CA	46.6%	84.1%	830,000	1,496,694

Overall since 1982, population in the 68 metro areas studied has grown by 22 million people. However, because of the huge increase in driving, it feels as though about 70 million more drivers are on the highways in these metro areas. This is more than three times the actual population growth. The next page shows the perceived population growth for the rest of the cities studied by the Texas Transportation Institute, as ranked by TTI's measure of rush-hour congestion, the Travel Rate Index.

1. The TRI Ranking is based on TTI's Travel Rate Index. Where numbers are repeated, those Metro Areas had identical Travel Rate Indices.

2. The term 'Metro Areas' refers to Urbanized Areas which the U.S. Census Bureau defines as developed land with a density of greater than 1,000 persons per square mile.

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Table 1. Continued

TRI Rank	Metro Area[1]	Percent Change in Population	Percent Change in Driving	Actual Population Growth	Perceived Population Growth
12	Houston TX	29%	72%	700,000	1,721,493
12	New York NY-Northeastern NJ	3%	43%	500,000	7,106,903
12	Portland-Vancouver OR-WA	33%	108%	330,000	1,085,780
15	San Jose CA	35%	60%	420,000	719,081
16	Denver CO	33%	65%	450,000	872,117
16	Phoenix AZ	68%	131%	970,000	1,868,916
16	San Bernardino-Riverside CA	44%	78%	415,000	738,362
19	Minneapolis-St. Paul MN	31%	106%	540,000	1,849,919
19	Tacoma WA	40%	70%	170,000	293,002
21	Dallas TX	28%	82%	510,000	1,488,533
21	Ft. Lauderdale-Hollywood-Pompano Bch FL	41%	96%	435,000	1,022,901
21	Sacramento CA	49%	83%	405,000	686,090
21	St. Louis MO-IL	10%	73%	180,000	1,356,168
25	Austin TX	66%	174%	250,000	662,531
25	Baltimore MD	26%	68%	450,000	1,148,363
25	Charlotte NC	64%	161%	225,000	562,689
28	Cincinnati OH-KY	12%	67%	140,000	754,807
28	Honolulu HI	24%	56%	135,000	319,898
28	Indianapolis IN	17%	103%	150,000	889,524
28	Philadelphia PA-NJ	29%	46%	1,200,000	1,869,502
28	Salt Lake City UT	32%	101%	220,000	683,568
33	Columbus OH	22%	93%	180,000	775,729
33	Milwaukee WI	4%	55%	45,000	664,338
35	Orlando FL	75%	185%	460,000	1,125,589
36	Albuquerque NM	26%	101%	125,000	443,003
36	Louisville KY-IN	10%	106%	75,000	815,917
36	New Orleans LA	4%	54%	40,000	578,682
36	Tampa FL	54%	140%	290,000	754,898
36	Tucson AZ	44%	184%	200,000	826,550
41	Cleveland OH	7%	59%	120,000	1,031,649
41	Norfolk VA	32%	73%	250,000	561,863
43	Memphis TN-AR-MS	28%	92%	210,000	697,376
44	Fort Worth TX	20%	80%	215,000	868,177
44	Omaha NE-IA	12%	83%	60,000	416,021
46	San Antonio TX	29%	67%	280,000	634,044
47	Jacksonville FL	34%	73%	210,000	451,137
48	Fresno CA	57%	44%	195,000	150,612
48	Nashville TN	26%	130%	130,000	652,206
48	Providence-Pawtucket RI-MA	9%	62%	75,000	512,225
51	Colorado Springs CO	48%	65%	135,000	182,519
52	Hartford-Middletown CT	13%	47%	75,000	264,288
52	Kansas City MO-KS	24%	86%	265,000	935,290
52	Oklahoma City OK	58%	72%	370,000	458,411
55	El Paso TX-NM	36%	70%	160,000	315,680
55	Pittsburgh PA	4%	41%	65,000	740,998
55	Salem OR	16%	76%	25,000	121,905
58	Eugene-Springfield OR	13%	66%	25,000	125,043
58	Rochester NY	-3%	93%	-20,000	592,628
58	Spokane WA	20%	45%	55,000	123,311
61	Bakersfield CA	63%	96%	145,000	220,914
61	Beaumont TX	22%	46%	25,000	52,405
61	Boulder CO	38%	83%	30,000	66,182
61	Laredo TX	74%	206%	70,000	196,013
65	Brownsville TX	61%	88%	55,000	78,750
65	Buffalo-Niagara Falls NY	0%	33%	0	359,651
67	Albany-Schenectady-Troy NY	0%	77%	0	382,796
67	Corpus Christi TX	24%	60%	60,000	150,472
	All	**22%**	**69%**	**21,900,000**	**70,644,075**

1. The term 'Metro Areas' refers to Urbanized Areas which the U.S. Census Bureau defines as developed land with a density of greater than 1,000 persons per square mile.

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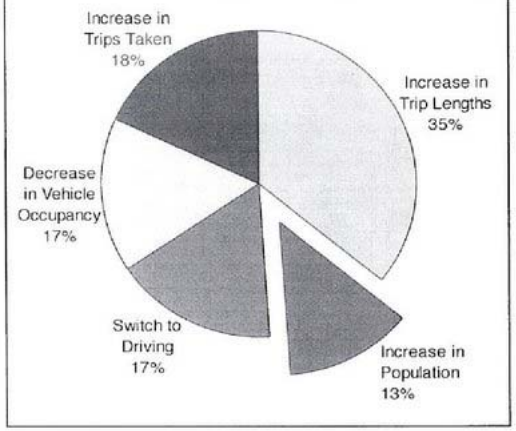
II. Sprawl as a Primary Cause of Congestion

The Texas Transportation Institute's data indicates that the almost 70% increase in driving in the last 16 years is a primary cause of congestion. The factors that contribute the most to that increase are at least partially related to sprawling development patterns. According to the figure (right) published in a U.S. Department of Transportation study, as much as 69% of the growth in driving between 1983 and 1990 was caused by factors influenced by sprawl. These factors include the same people driving farther, as well as a decrease in carpooling and a switch from biking, walking, or transit to driving. These changes are in part necessitated by the spread of subdivisions and office parks isolated from stores and schools. Residents are often left with no real alternative to driving. One of the unintended consequences of this growth pattern has been a steadily growing number of vehicle trips that has served to clog local streets and freeways with traffic and increasingly frustrate residents and workers. At the same time, the chart shows that population growth accounted for only 13% of the growth in driving.

Factors Contributing to the Growth in Driving



Source: *Travel Behavior Issues in the 90's.* U.S. Department of Transportation, Federal Highway Administration. Washington, DC, July 1992: p. 14.

STPP conducted a rigorous analysis[1] of more recent data (1992-1997) to examine the relationships between the growth in driving and other factors measured by TTI. STPP analyzed the growth of vehicle miles traveled (VMT) versus the growth of population, growth in the size of the urbanized area, increase in the number of highway lane miles, and initial density of the urban area[2]. This analysis demonstrates how the spreading out of the metropolitan area has contributed to an increase in driving. TTI's data reveals that every 10% growth in the size of an urbanized area generally has resulted in a 2.5% increase in miles driven, over and above the increase in driving that comes from population growth or other factors. The influence of additional road capacity, another outgrowth of sprawl, is discussed later in this paper.

This analysis indicates that our current traffic congestion problems are not an inevitable result of the normal, healthy growth of our metro areas. These problems are more closely linked to the sprawling development patterns that require so much driving.

1. This analysis estimated a system of equations simultaneously; the results reported were generated with full-information maximum likelihood estimation. Contact STPP for detailed methodology.

2. With one exception, all data came straight out of the TTI database. The one exception was initial (1992) urban area density, which was developed by Professor Rolf Pendall of Cornell University and represents the average density of all urban development in the metropolitan area.

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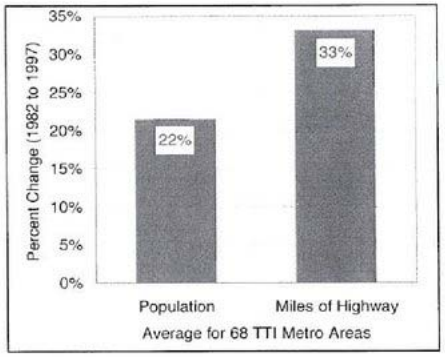
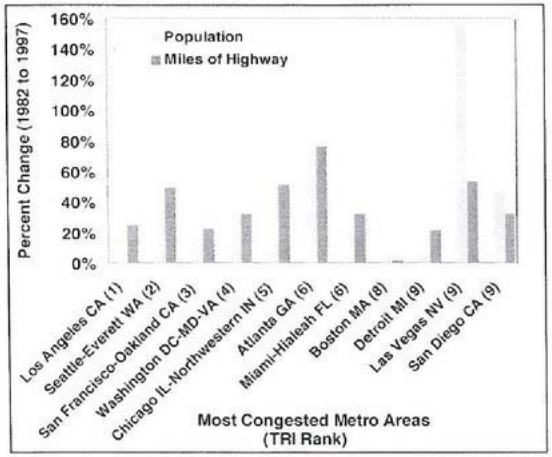
III. Roads: Keeping Pace with Growth

While we often hear that road building is not keeping up, the graphs below show that this is not the case. We used TTI data to compare the growth in population and the growth in miles of roadway since 1982, and found that road building is more than keeping pace with the real growth in our metro areas, the growth in population.



Forty-three of the 68 metro areas included in TTI's study added highway capacity at a greater rate than population growth; four others came very close to keeping pace. The average amount of roadway per person has grown 10% in the last 16 years, meaning that on average we are adding highways faster than we are adding people to drive on them. (see graph, right)

As shown below, eight of the metro areas with the worst rush hour congestion as measured by TTI built enough roads to keep up with the pace of population growth. (Graphs are available for all metro areas included in TTI's study; the ranking is by TTI's Travel Rate Index.) Our analysis shows that building highways to keep pace with population may not even be necessary. According to TTI's data, those metro areas which experienced a decline in the amount of roadway per person actually had slightly *lower* congestion levels than those metro areas showing an increase of roadway capacity per person.



Some would argue that metro areas should try to keep pace with the growth in driving. According to our analysis of TTI's data, the amount of driving per person has grown an average of 3% per year in metro areas since 1982. If all the metro areas in TTI's study were to attempt to build roads at this rate, it would require adding a total of 5,016 lane miles of highway per year at a prohibitive cost. Using a conservative estimate of the cost to add lanes to existing freeways[1], we found that the existing gas tax would have to be raised an average of 17 cents per gallon in the metro areas studied.

1. Costs were calculated at $1.45 million per lane mile added, which was derived from a study by the Federal Transit Administration (Cambridge Systematics, Inc. et al. *Characteristics of Urban Transportation Systems* prepared for FTA. USDOT, Publication Number DOT-T-93-07. September 1992.)

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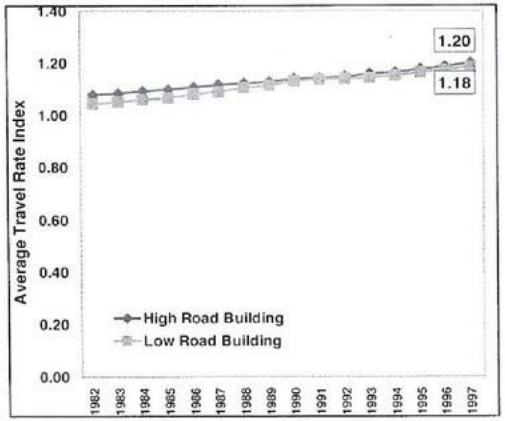
IV. Road Building Has Little Effect on Congestion

Our analysis of TTI's data shows that building new and wider roads has had little long-term impact on road congestion, and that such roads appear to actually generate additional traffic. In order to control for population growth, we looked at the amount of highway space per resident each metro area has added since 1982. We split the 68 metro areas included in TTI's study into three groups and compared the congestion rates for the high and low group. The high road-building areas increased road capacity per person by 28%, while the low-road building areas actually decreased road capacity per person by 11%. Despite this wide discrepancy, the rush-hour congestion profiles as measured by the Travel Rate Index for each group are almost identical. Interestingly, the high road building areas show slightly *higher* congestion levels than the low road-building areas throughout the period.

One explanation for this outcome is that new and wider roads tend to generate new traffic. This phenomenon, known as 'induced travel', occurs when road capacity is expanded and drivers flock to the new facility hoping to save time. The new roadways also tend to draw people who would otherwise avoid congested conditions or take alternative modes to their destinations. In the long run, this encourages additional development nearby, and that leads to even more traffic.

Our rigorous analysis of TTI's data[1] confirms this relationship. In the metro areas studied, a 10% increase in the size of the highway network has been associated with a 5.3% increase in the amount of driving. In other words, half of the new highway capacity has been filled with driving that would not have occurred if the road space had not been added. This is consistent with previous research on induced travel, including an FHWA sponsored study which found that when additional road capacity provides a 10% improvement in travel time, driving increases by 5%[2].



1. See Section II for a full description.

2. Patrick DeCorla-Souza and Henry Cohen. *Accounting for Induced Travel in Evaluation of Urban Highway Expansion.* Washington, DC: FHWA, 1997.

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Methodology

The data for this analysis comes from the Texas Transportation Institute's annual report, *Urban Roadway Congestion.* To read that report, visit TTI's website at http://mobility.tamu.edu. We are very grateful to TTI, particularly Tim Lomax and David Schrank, for giving us access to their data and permitting us to perform our own, independent analysis. Our analysis covers the entire 16 years of data collected by TTI, and used TTI's Travel Rate Index for ranking comparisons. See TTI's study for an explanation of their data source and rankings.

Perceived Population Growth

The perceived population growth was calculated by multiplying each metro area's population in 1982 by the percentage increase in vehicle miles traveled in each of those metro areas. For example, Los Angeles, California had a population of 9.9 million people in 1982. Multiplying this by the growth in vehicle miles traveled (56%) gives us the perceived growth in population of 5.5 million people.

Comparison of Congestion Indices

In order to compare the congestion indices of metro areas which built many roads between 1982 and 1997 and those that didn't, we divided TTI's 68 metro areas into three groups. The group which built many roads during the period increased their road capacity by an average of 28 percent per person. The group which build the fewest roads during the period actually experienced a decline in road capacity per person of 11 percent. We then averaged the Travel Rate Index for each of the groups, for all years from 1982 to 1997, and plotted the metro areas with high road-building rates against metro areas with low road-building rates.

Metro Areas Which Built Many Roads (averaged 28% increase in lane miles per capita)		Metro Areas Which Built Few Roads (averaged 11% decrease in lane miles per capita)	
Albuquerque NM	Milwaukee WI	Bakersfield CA	Hartford-Middletown CT
Austin TX	Nashville TN	Baltimore MD	Las Vegas NV
Charlotte NC	New Orleans LA	Beaumont TX	Norfolk VA
Chicago IL-Northwestern IN	New York NY-Northeastern NJ	Boston MA	Oklahoma City OK
Dallas TX	Pittsburgh PA	Boulder CO	Phoenix AZ
Detroit NM	Portland-Vancouver OR-WA	Brownsville TX	Sacramento CA
Fort Worth TX	Providence-Pawtucket RI-MA	Colorado Springs CO	San Antonio TX
Houston TX	Rochester NY	Columbus OH	San Bernardino-Riverside CA
Jacksonville FL	St. Louis MO-IL	Denver CO	San Diego CA
Laredo TX	Tampa FL	Eugene-Springfield OR	San Jose CA
Louisville KY-IN	Tucson AZ	Fresno CA	Tacoma WA
Memphis TN-AR-MS		Ft. Lauderdale-Hollywood-Pompano Beach FL	

Increase in Gas Tax

Finally, to calculate the additional average gas tax required to keep congestion rates steady, we used TTI's estimates of highway capacity deficiencies, and multiplied those numbers by $1.45 million per lane mile (a conservative estimate of the cost of road construction; from USDOT). Dividing this figure by the number of gallons of gasoline consumed per year (in the affected metro areas) gives the average gas tax increase required, over and above what would be needed to continue normal building practices.

It should also be noted that wherever we use the terms 'miles of highway' or 'miles of roadway,' this has a specific definition and refers to lane miles of Interstates, freeways, expressways and principal arterials.

3.6 Comments and Responses for Individuals (I)

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LETTER: I56. SIGNATORY: SONOMA COUNTY PUBLIC MEETING. 3.6-150
LETTER: I57. SIGNATORY: DONALD BARRY TRUDEAU. 3.6-168
LETTER: I58. SIGNATORY: THOMAS SABERI. 3.6-169
LETTER: I59. SIGNATORY: RESIDENTS OF KENWOOD DRIVE. 3.6-171
LETTER: I60. SIGNATORY: SUSAN STOMPE. 3.6-172
LETTER: I62. SIGNATORY: TONY SILVEIRA. 3.6-173

Letter: I1.
Signatory: Ana Elvira Flores.

Response to Comment I1-1

Comments noted. The Preferred Alternative would benefit express bus services, like Golden Gate Transit, by making a proposed HOV lane available in each direction through Segment B.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

RECEIVED DEC 5 2007 CALTRANS-DIST 4 HQ WORKS

Date: 12-4-07
Name: ANA ELVIRA FLORES
Title and Agency/Company: home owner
Phone: 707-769-8922 E-mail: aflores@flash.net
Address: 137 ARLINGTON Dr.
City, State, Zip: PETALUMA, CA 94952

Comments (Continue on back, use multiple sheets if necessary)

Please, please, widen the Marin-Sonoma Narrows. I have been commuting to San Francisco for work for the last 12 years. I take the Golden Gate Transit buses so I feel I do my part to help with traffic congestion.

Every year I have experienced with frustration the delays on the 101 narrows, but this year it has extremely worsened. Golden Gate Transit has had to amend several of their time schedules in the mornings because of the traffic delays to try to get passengers to work on time

It has gotten so bad that I can no longer work on a day a have a medical appointment because you can't guarantee making an appointment if you're coming in from San Francisco. I have added on at least half an hour to forty minutes a day to my commute this year. That's on a good day it there are no accidents, or it it's not raining or right before a holiday.

I1-1

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I2.
Signatory: Angela Garvin.

Response to Comment I2-1

The proposed Rainer Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

Angela Garvin
<garvinma@pacbell.net>
12/13/2007 11:46 AM

To bijan_sartipi@dot.ca.gov, melanie_brent@dot.ca.gov, Doanh_nguyen@dot.ca.gov, jit_s_pandher@dot.ca.gov, rey_centeno@dot.ca.gov, holly.butler@sen.ca.gov,
cc glardon@comcast.net, Janicecader@comcast.net, oldeastpetaluma@yahoo.com
bcc
Subject Public Comment on MSN - Design Exeption for Rainier Interchange

To Caltrans:

I2-1 I ask that Caltrans **not approve** a design exception to allow less than one mile spacing between the East Washington and proposed Rainier interchange cross connector. There are several reasons that I ask you to not approve the design exception. One, the purpose of widening highway 101 is to safely move traffic. This design exception will only increase traffic through the Petaluma corridor. Adding an interchange will create another bottle-neck area, similar to Santa Rosa, where there are freeway entrances & exits consistently spaced close to one another, without sufficient lanes to absorb the traffic.

Secondly, The Rainier area is primarily residential with what I estimate to be close to 100 homes that would be directly impacted by freeway noise, pollution and privacy issues. As one of these homeowners, I would demand that there be a Community Impact Report, to study the potential negative impacts on these home-owners - including noise & air pollution. I would like to see what the negative health impacts will be on me and my family. We bought this home before this type of freeway on/off ramp was proposed. It's not fair to me, nor to other area homeowners to now impose a freeway, **LITERALLY in our backyard**. Will there be money to build a sound wall, to bring the noise down to acceptable decibals for the residences living next to the interchange? Will there be a fund set-up to help with health related illnesses that result, such as asthma and other respiratory illnesses?

Additionally, the Rainier interchange poses massive environmental impacts. Will there be an environmental impact report to study how developing in the flood plain will impact the surrounding area & homes? The area proposed for the interchange is directly in the Petaluma floodplain and the site of the last remaining Oak Savannah within the Petaluma River and Petaluma floodplain. Deer Creek is wider and stays green through July. It is also a nesting area for birds and other wildlife habitat. Deer Creek is making it's come back. Rainier is a nothing more than an environmental disaster.

From what I have researched, as per the cross town connector, the Petaluma City council and staff has had more than 5 years to secure an at-grade rail crossing from the PUC at Shasta Ave. I have been told that by walking the property you can see why Shasta Ave is not feasible due to sightlines and it's proximity to the existing Payran Street at- grade crossing. The other crossing point is one mile long approximately 40 feet high + four lanes, and in the shape of a question mark. Will a CalTrans representative walk this property, to get a better sense of what the impacts will be?

Letter - I2

Page 2

Also, a big question is how the project will be funded. Caltrans has stated in previous letters to the City of Petaluma, Rainier is a locally serving project and needs to be funded by the City of Petaluma. I haven't heard anything from the Petaluma City Council on what the funding plans actually are. I am aware that there are already other projects in Petaluma, also considered part of the MSN project, that aren't funded. This includes sound walls along the East Washington interchange. These are long overdue to these residences, who have lived without sound walls for 30 or more years, and who suffer from noise pollution above the acceptable levels.

The questions are; is this project financially feasible? Will it make traffic safer, and move more freely along the 101 corridor through Petaluma, or will the Petaluma corridor and Santa Rosa corridor merge into one 30 mile long bottle neck? Who pays for the cost of the project? Will there be a Community Impact Report, to study the potential negative impacts on the area home-owners who live in direct line with the proposed site - including noise & air pollution? Will there be an environmental impact report to study how developing in the flood plain will impact the surrounding area & homes? Will there be money to build a sound wall, to bring the noise down to acceptable decibals for the residences living next to the interchange? Petaluma is still trying to come up with money to build a sound wall for homeowners living along the East Washington Freeway interchange, and has in fact spent money on other projects, that could have gone towards these sound walls. Will the residences along McDowell & Rainer suffer the same fate?

Before we waist anymore time on Rainier, Caltrans and SCTA need to be clear with our local council members, city staff and most importantly the public on who pays and the true cost of adding Rainier to the 101 widening project.

This project is not good for Petaluma, or Sonoma County. This project is simply being pushed through to attract big developers into Petaluma - that is no secret to those of us living in the area proposed for this interchange. Petaluma is making decisions that are in the best interest of developers profits, and not in the best interst of the citizens who pay tax dollars and are raising families. Please do not allow Petaluma to do this to our community, and county. I2-1

Thank you,

Angela Garvin
315 Olympic Ct.
Petaluma, Ca 94954

Letter: I3.
Signatory: Mary Glardon.

Response to Comment I3-1

The Proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the City of Petaluma, the lead agency on that project.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 11-6-07
Name: MARY Glardon
Title and Agency/Company: Petaluma Citizen
Phone: 707-782-1138 E-mail: mgfashionart@comcast.net
Address: 105 Rushmore Ave
City, State, Zip: Petaluma, Ca. 94954

Comments (Continue on back, use multiple sheets if necessary)

Please do not make a design exception allowing an Interchange at Rainier Ave. which is less than 1 mile away from the East Washington Interchange. The result would undermine all the wonderful work that CalTrans is doing to [redacted]

I3-1 have the optimum safety and speed per lane on the freeway. We hope you will [redacted] preserve the best interest of the greater citizens as a whole, throughout Sonoma.

We rely on you Caltrans to protect us in all regards. Thank you. You are doing a terrific job!!

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I4.
Signatory: Melissa Abercrombie.

Response to Comment I4-1

The proposed Rainer Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

Melissa Abercrombie
<oldeastpetaluma @yahoo.com>
12/13/2007 01:42 PM

To bijan_sartipi@dot.ca.gov, melanie_brent@dot.ca.gov, Doanh_nguyen@dot.ca.gov, jit_s_pandher@dot.ca.gov, rey_centeno@dot.ca.gov, holly.butler@sen.ca.gov,
cc
bcc
Subject Design Exception for Rainier Interchance

Hello-
I have a number of concerns for the design exception for the Rainier interchange and feel it would be very irresponsible of Cal Trans to approve said exception.

*Rainier is a neighborhood and a rehabilitating habitat (Deer Creek), the impacts of this connector would be devastating to residents. Pollution, noise, SAFETY, night glare, decreased property values, loss of habitat... are these fair results to impose on a area? Will there be a Community Impact Report to properly analyze the impacts of this project?

*The 101 can not handle an additional on/off ramp in that area. I often take the East Washington exit off the 101 to get to and from my home on Vallejo street-- even with the recent addition of a third lane it can still be quite dangerous. There is simply not enough room to add Rainier. How can we mitigate the safety of the public to allow for the Rainier interchange? I4-1

*How will this project be funded?

*Is this project truly in support of Petalumans and their traffic woes along the East Washington corridor? (Or is it a gateway for the development of the DSL site?) If that is the rational for this proposed exception then I would like to note that Public Works Director Mr. Marengo pointed out, during his Nov. 5 th presentation, in Petaluma agenda, doc.s Page 11, the chart representing the future LOS (Level of Service) Full Scope Vs. Reduced Scope shows with Rainier AM Peak traffic at (Wash & McDowell) to go from F to D, yet with Rainier in place at the PM peak (at East Wash NB Ramps) the LOS goes down from a B down to a C with Rainier.

Thank you for your consideration and please do not approve the Rainer Interchange exception-- it is not in the best interests of the people of Petaluma.

Sincerely,
Melissa M.Abercrombie
221 1/2 B Vallejo Street
Petaluma, Ca 94952
(707)773-3738

Letter: I5.
Signatory: Rhonda Berberich.

Response to Comment I5-1

Due to variations in topography, traffic, and weather conditions, the instantaneous noise experienced by a given receiver can indeed be higher than the hourly averaged noise level that is used by Caltrans. Because instantaneous noise can vary so radically, it is impractical to use it as a standard for qualifying soundwalls. Caltrans uses an hourly averaged noise level (the total energy of the noise averaged over an hour's time) that conforms to the methodology approved by the Federal Highway Administration. It should be noted that the emphasis of the noise study is to try to find the areas with the highest predicted averaged noise levels under the worst traffic conditions in order to determine a noise impact under the federal regulations. Your area was found to have traffic noise impacts and a noise barrier (Soundwall No. 3) was found to be feasible. Soundwall No. 3 has been approved for construction; the determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

"Rhonda Berberich " <venerhonda @gmail.com>
12/02/2007 03:22 PM

To melanie_brent@dot.ca.gov, venerhonda@gmail.com
cc
bcc
Subject Barrier three Franklin Overhead Bridge

Rhonda Berberich
713 Lamont Ave.
Novato, Ca. 94945
December 2, 2007

To Caltrans, Marin Sonoma Narrows
Attention Ms. Melanie Brent, Office Chief

Dear Ms. Brent,

We need the Barrier #3 sound wall on the Franklin Overhead Bridge for several reasons;

1. Many trucks traveling on the 101 south Franklin Bridge Overhead use "Engine Braking" or "Exhaust Braking" to slow down there trucks which produces extreme amounts of noise pollution. This area receives this extreme noise pollution because 101 southbound downgrades from Delong Ave. to around the Novato Creek. If the sound wall was built at the Barrier Three, this would help alleviate and eliminate this extreme noise pollution to all the houses in the neighborhood.
2. Because of the horseshoe curve of the freeway around our neighborhood, I can see and hear the cars and trucks from the front, side and back of my house. I also get freeway noise from the front, side and back of my house. This is the same problem with many houses in the neighborhood. A sound wall would help alleviate this problem.
3. The freeway was built in the 1970's and the 100 houses in this neighborhood was built in the 1950's. These houses were build below extreme noise level standards and cannot shield from freeway noise. If the sound wall was built, it would help to eliminate an alleviate the noise problem in this neighborhood. I5-1
4. Freeway 101 has traffic 24 hours a day, 7 days a week because there are no other major freeways or streets running through Marin. Trucks use this freeway all night long. A sound wall would help alleviate and eliminate some of the noise pollution we hear all day and all night, especially from the trucks.
5. There is a sign on the freeway that lights up at night, shinning in several back yards and back windows. The sound wall would help eliminate and alleviate this invasive light shinning in our back yards and windows.
6. I contest your dBA noise level amount in your study and believe the dBa noise level to be much higher. I also believe there are more houses that would benefit from the sound wall than what your study shows.

Many neighbor are not happy with this project and we all want a sound wall for Barrier three Franklin Bridge. I am also trying to get another dBA reading. We don't want to stop the expansion of the freeway, we just want a sound wall to contain the sound it is intended to deflect.

Thank You Ms. Brent,

Letter - I5

Page 2

Sincerely, Rhonda Berbeich

Letter: I6.
Signatory: Rhonda Berberich.

Response to Comment I6-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted and was considered in making our final decision. This soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I6-2

See the response to Comment I6-1 above.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: December 2, 2007
Name: Rhonda Berberich
Title and Agency/Company: Home owner + Property owner
Phone: (415) 892-5295 E-mail: venerhonda@gmail.com
Address: 713 Lamont Ave
City, State, Zip: Novato, Ca. 94945

Comments (Continue on back, use multiple sheets if necessary)

Dear Ms. Brent,

We need the Barrier #3 soundwall on the Franklin Bridge Overhead for several reasons:

I6-1 1. Many trucks traveling on the 101 south use "Engine Braking" or "Exhaust Braking" to slow down these trucks which produces extreme amounts of noise pollution. This area receives this extreme noise pollution because 101 southbound downgrades from Delong Ave to Novato Creek. A soundwall would alleviate + eliminate this noise.

2. Because of the horseshoe curve of the freeway around our neighborhood, I can see and hear cars and trucks from the front, side and back of my house. Many houses have the same problem here so a sound wall would help alleviate this problem.

I6-2 3. The freeway was built in the 1970's and the 100 houses in this neighborhood

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter - I6

Page 2

Response to Comment I6-3

It is true that a soundwall could reduce exposure of some residents to existing freeway headlight and sign glare. However, the existing night lighting from the freeway sign and car headlights would not be considered an impact of this specific project in this analysis. Justification for soundwall construction would be based upon the potential noise effects of the project only.

Response to Comment I6-4

Due to variations in topography, traffic, and weather conditions, the instantaneous noise experienced by a given receiver can indeed be higher than the hourly averaged noise level that is used by Caltrans. Because instantaneous noise can vary so radically, it is impractical to use it as a standard for qualifying soundwalls. Caltrans uses an hourly averaged noise level (the total energy of the noise averaged over an hour's time) that conforms to the methodology approved by the Federal Highway Administration. It should be noted that the emphasis of the noise study is to try to find the areas with the highest predicted averaged noise levels under the worst traffic conditions in order to determine a noise impact under the federal regulations. Your area was found to have traffic noise impacts and a noise barrier (Soundwall No. 3) was found to be feasible. Though only the residences which were predicted to get a minimum of 5 dBA in noise reduction are defined as receiving a benefit under the Caltrans noise protocol, it is true that changes in the noise levels from the construction of this noise barrier will be noticeable to more residences than are noted in the noise study. As noted in the responses above, Soundwall No. 3 has been approved for construction.

was built in the 1950's. These houses were built below extreme noise level standards and cannot shield from the freeway noise. A sound wall would alleviate the noise problem in this neighborhood

I6-2 4. Freeway 101 has traffic 24 hours a day, 7 days a week because there are no other major freeways or roads running through Marin County.

I6-3 5. There is a sign on the freeway that lights up at night, shinning in several backyards and back windows. A sound wall would help eliminate the invasive light shinning in our backyards

I6-4 6. I contest the dBA noise level amounts in your study and believe the levels to be much higher. I also believe there are more houses that would benefit from the sound wall than what your studies show.

Many neighbors are not happy with this project and we all want a sound wall for Barrier Three Franklin Bridge. We don't want to stop the expansion of the freeway, we just want a sound wall to contain the sound it is intended to deflect.

Thank You Ms. Brent,

Sincerely, Rhonda Berberich

Letter: I7.
Signatory: Ruth and Norm Lynch.

RECEIVED
OCT 31 2007
OFFICE OF ENVIRON/ANALYSIS

Response to Comment I7-1

Your change of address is acknowledged, and your contact information has been updated in our mailing list.

October 29, 2007

TO: Whom It May Concern:

FR: Ruth & Norm Lynch

I7-1 Effectively immediately, please note the change of mailing address below:

OLD ADDRESS:

P. O. Box 750909
Petaluma, CA 94975-0909

NEW ADDRESS:

21 Gunn Drive
Petaluma, CA 94952

Thank you,

Ruth R Lynch

Letter: I8.
Signatory: Sean Buckley.

Response to Comment I8-1

This comment pertains to the proposed Rainier interchange, which is being studied under a different project and is not part of the Marin-Sonoma Narrows Project. Comment will be forwarded to the City of Petaluma, the lead agency on that project.

Response to Comment I8-2

Please see the response to Comment I8-1 above.

James Richards/D04/Caltrans/CAGov
12/13/2007 03:19 PM

To melanie_brent@dot.ca.gov
cc
bcc
Subject Fw: Off-Ramp at Ranier St in Petaluma

Another comment to be addresses in our response to comments document.

James B. Richards
District 4
Deputy District Director
Environmental Planning & Engineering
----- Forwarded by James Richards/D04/Caltrans/CAGov on 12/13/2007 03:19 PM -----

Bijan Sartipi/D04/Caltrans/CAGov
12/13/2007 12:28 PM

To "Mr. James Richards" <james_richards@dot.ca.gov>
cc "Helena Lenka Culik-Caro" <helena_lenka_culik-caro@dot.ca.gov>
Subject Fw: Off-Ramp at Ranier St in Petaluma

----- Original Message -----
From: Sean Buckley [seanbuckley2000@yahoo.com]
Sent: 12/13/2007 12:04 PM
To: Bijan Sartipi
Cc: lisa.badenfort@asm.ca.gov
Subject: Off-Ramp at Ranier St in Petaluma

I8-1 Dear Officials...I was told to email you regarding my OPPISITION to an exception the the 1 mile between freeway off ramps law. I am a Petaluma resident and tax payer and I feel that another off ramp will further erode the quality of life that we Petalumans enjoy,

I8-2 Further I have seen on-ramps / off-ramp configurations where cars entering the freeway almost collide with cars exiting the freeway due to insufficient length of lanes to merge. This UNSAFE and if there is ever an accident I feel that CalTrans and the City of Petluma should be liable for damages. Thank You for taking the time to read this and I hope that you will act accordingly...sean buckley

Be a better friend, newshound, and

Letter: I9.
Signatory: Tim Hurley.

Response to Comment I9-1

The proposed Rainer Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

Timothy Hurley
<timothy.hurley@sbcglobal.net>
12/13/2007 05:44 PM

To bijan_sartipi@dot.ca.gov, melanie_brent@dot.ca.gov, Doanh_nguyen@dot.ca.gov, jit_s_pandher@dot.ca.gov, rey_centeno@dot.ca.gov, holly.butler@sen.ca.gov,
cc
bcc
Subject Petaluma

Dear CalTrans,

I9-1 I am a resident of Petaluma. I wish you to know that I am NOT in favor of a freeway interchange at a proposed Rainer crossing. Therefore I am not in favor of an exception for the on/off ramp rules that would be needed for this. There are many in Petaluma who feel the same way and may not have written to you.

Tim Hurley
15 Howard St, Petaluma, CA 94952
timothy.hurley@sbcglobal.net

Letter: I10.
Signatory: Steven Seifert.

Response to Comment I10-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted and was considered in making our final decision. Soundwall No. 3 has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I10-2

Adding carpool lanes would increase overall freeway mainline capacities. Since carpool lanes will take carpool vehicles away from mixed flow lanes, fewer vehicles will stay in mixed flow lanes; consequently, congestion will be reduced.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12/3/07
Name: STEVEN SEIFERT
Title and Agency/Company:
Phone: 415 898 8695 E-mail: clasjs@earthlink.net
Address: 711 LAMONT AVE
City, State, Zip: NOVATO CA 94945

Comments (Continue on back, use multiple sheets if necessary)

I-1 THE NEIGHBORHOODS IN THE FRANKLIN BRIDGE AREA ARE AFFECTED BY FREEWAY NOISE AND A SOUNDWALL ON BOTH SIDES OF THE FREEWAY WOULD ALLEVIATE SOME OF THIS.

I-2 ALSO IF WIDENING THE FREEWAY TO THREE LANES NORTH OF NOVATO, AND TO FOUR LANES SOUTH OF THAT, DOESN'T THAT LEAVE THE SAME BOTTLENECK SITUATION AS BEFORE?

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I11.
Signatory: Residents of Arlington Drive.

November 19th, 2007

Petaluma City Council
And
Cal Trans, California

I11-1 Fifty one years ago Hwy 101 was opened by our homes. Nothing since has been improved along this part of the freeway. You are now and have always been diverting water from a public roadway onto private property along the freeway into the backyards of the homes along Arlington. The ditch is not sufficient to divert the toxic water to the creeks at each end of our street. You said you are removing the trees, put in piping to the creeks and building the sound walls. We want to know when??????? If you take out the trees which is our only help from the noise, shaking, and booms all the time, you must replace them with Soundwalls to keep us safe from cars crashing into our homes, things being thrown from cars, and stop endangering the lives of the homeowners and their families. Without the trees or a sound wall you will be responsible for our safety. Thank You.

I11-2

Dan Bricker	49 Arlington Drive
Jennifer Bricker	49 Arlington Drive
Brighton Denison	53 Arlington Drive
Amy [illegible]	53 Arlington Dr.
ALFREDO CABALLERO C.	57 Arlington Drive
Patricia Bohler	61 Arlington Dr.
Alan C Ritchie	105 Arlington Dr.
264RC Connie Ritchie	105 Arlington DR
Lucille Napier	109 Arlington Dr
[illegible]	121 Arlington DR
Nichell [illegible]	121 Arlington Dr.
[illegible]	129 Arlington Dr.
Maria Romo	129 Arlington Drive

Response to Comment I11-1

East Washington Street Interchange Area: Caltrans maintenance personnel have reported backyard flooding in at least some of the residences located in the southeast quadrant of the East Washington Street interchange. A field review of this area indicates a depressed area to the south and east of the northbound off-ramp where highway and adjacent property runoff may be trapped by the bordering residential development. It is recommended that a more thorough study of this area be undertaken to determine the probable extent and cause of flooding and how it can be eliminated. Reconstruction of the East Washington Street interchange is planned, either as part of this project or as an accelerated separate project. Measures should be included during redesign of the interchange to relieve any nuisance flooding resulting from freeway runoff by conveying the roadway drainage away from this area. The Washington Street Interchange is not mapped in the FEMA Special Flood Hazard Area, save Washington Creek, which will not be significantly impacted by the project.

Response to Comment I11-2

A soundwall with a safety barrier is proposed in the northbound direction between the SR 116/US 101 on-ramp and East Washington Interchange in order to help protect residential areas from traffic hazards.

Letter - I11

Page 2

November 19th, 2007

Petaluma City Council
And
Cal Trans, California

Fifty one years ago Hwy 101 was opened by our homes. Nothing since has been improved along this part of the freeway. You are now and have always been diverting water from a public roadway onto private property along the freeway into the backyards of the homes along Arlington. The ditch is not sufficient to divert the water to the creeks at each end of our street. You said you are removing the trees, put in piping to the creeks and building the sound walls. We want to know when??????? If you take out the trees which is our only help from the noise, shacking, and booms all the time, you must replace them with Sound walls to keep us safe from cars crashing into our homes, things being thrown from cars and stop endangering the lives of the homeowners and their families. Without the proper sound wall you will be responsible for our safety. Thank You

[illegible] Bradley	133 Arlington Drive Pet since 1979
[illegible] Lopez	145 ARLINGTON DR PET 45 years
Marie Lopez	145 Arlington Dr Pet. 45 year
William C Myers	149 Arlington Dr Petaluma 17 yrs
Bonnie C Myers	149 Arlington DR Pet 1[illegible]
Marcha & Donald Ketzler	157 Arlington Dr. Pet 30 years
Margaret E Saragnia	125 Arlington Dr. Petaluma 40 yrs
[illegible] Plumley	125 Arlington Dr Petaluma [illegible]
Shelly Ford	165 Arlington petaluma [illegible]
[illegible]	45 ARLINGTON PET. 25 yr
Jeremy Meininger	33 Arlington Dr Pet. 11 yr
Shae Meininger	33 Arlington Dr Pet 11 yrs

Letter - I11

Page 3

Petaluma City Council

Cal Trans, Calif

Fifty one years ago Hwy 101 was opened by our homes. Nothing since has been improved along this part of the freeway. You are now and have always been allowing water from a public roadway onto private property along the freeway into the backyards of the homes along Arlington. The ditch is not sufficient to divert the water to the creeks at each end of our street. You said you are removing the trees, put in piping to the creeks and building the sound walls. We want to know when????? If you take out the trees which is our only help from the noise, shaking, and booms all the time, you must replace them with Soundwalls to keep us safe from cars crashing into our homes, things being thrown from cars, and stop endangering the lives of the homeowners and their families. Without the trees or a sound wall you will be responsible for our safety. Thank You

Julie Byron	25 Arlington Dr.	19 YRS
Neal E Byron	25 Arlington Dr.	19 YRS
Bobby J Beckett	26 Arlington Dr	25 yrs
DM Johnson	30 Arlington	13 yrs
Scott Dai	34 Arlington Dr.	12 yrs
Laurie A. Brown	38 Arlington Dr.	20 yrs.
Curtis A Brown	38 Arlington Dr.	20 yrs.
Ed Johnson	46 Arlington Dr	25 yrs
JoAnne Johnson	46 Arlington Dr	25 yrs
Linda Scott	42 Arlington Drive	51 yrs.

Letter - I11

Page 4

November 19th, 2007

Petaluma City Council
And
Cal Trans, California

Fifty one years ago Hwy 101 was opened by our homes. Nothing since has been improved along this part of the freeway. You are now and have always been diverting water from a public roadway onto private property along the freeway into the backyards of the homes along Arlington. The ditch is not sufficient to divert the water to the creeks at each end of our street. You said you are removing the trees, put in piping to the creeks and building the sound walls. We want to know when??????? If you take out the trees which is our only help from the noise, shaking, and booms all the time, you must replace them with Soundwalls to keep us safe from cars crashing into our homes, things being thrown from cars, and stop endangering the lives of the homeowners and their families. Without the trees or a sound wall you will be responsible for our safety. Thank You.

Judy Elledge	58 Arlington Drive
Russell Phillips	58 Arlington Drive
[illegible]	41 Arlington Drive
Javier Chavez	13 Arlington Drive
Lisa A Chavez	13 Arlington Drive
Christopher M Chavez	13 Arlington Drive
Sadie Chavez	13 Arlington Drive
Lara Unlen	9 Arlington Drive Petaluma Ca
[illegible]	1 Arlington Dr Petaluma CA
John Pinckney	1 Arlington Dr. Petaluma
Deborah Gray	6 Burlington Dr Petaluma
Dolores Tomasi	21 Arlington Dr. Petaluma

Letter - I11

Page 5

November 19th, 2007

Petaluma City Council
And
Cal Trans, California

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Eudoxia Denison	53 Arlington
Ann O'Hara	63 Arlington Drive
Barbara Reynolds	54 Arlington Drive
Clodie Reynolds	" " "
Susie Reynolds	" " "
Nick Reynolds	" " "
Scott Sinnard	62 Arlington Drive
Amy Claypole.	62 Arlington Drive
BEN CONDPHY	1109 MADISON STREET
Matt Miller	1105 MADISON ST
Richard Sanders	101 Arlington Dr.

Letter - I11

Page 6

November 19th, 2007

Petaluma City Council
And
Cal Trans, California

Fifty one years ago Hwy 101 was opened by our homes. Nothing since has been improved along this part of the freeway. You are now and have always been diverting water from a public roadway onto private property along the freeway into the backyards of the homes along Arlington. The ditch is not sufficient to divert the water to the creeks at each end of our street. You said you are removing the trees, put in piping to the creeks and building the sound walls. We want to know when??????? If you take out the trees which is our only help from the noise, shacking, and booms all the time, you must replace them with Soundwalls to keep us safe from cars crashing into our homes, things being thrown from cars, and stop endangering the lives of the homeowners and their families. Without the trees or a sound wall you will be responsible for our safety. Thank You.

Elizabeth Tinoco 77 Arlington Drive
Angelio Tinoco 77 Arlington Dr
Marianne Tinoco 77 Arlington Dr

Letter - I11

Page 7

November 19th, 2007

Petaluma City Council & Cal Trans;

I11-3 1. Toxic soil in backyards from water diverted illegally from the Freeway to private property should be tested.

I11-4 2. Peoples lives in danger, 8 cars and 1 bus crashing through the trees into backyards. Where will they land without trees or a soundwall?

I11-5 3. Fumes from the cars and trucks.

I11-6 4. Putting in new drainage pipes for the water.

I11-7 5. Removal permit for Redwoods over 18 inches in diameter.

I11-8 6. Houses on the off ramp, need soundwall just to not have to car lights in there faces.

I11-9 7. And the noise of GET OUT OF YOUR CAR waking you in the middle of the night.

I11-10 8. Please mail us notice of meetings in enough time to attend, both sides of Arlington.

Thank you.

Linda L. Scott
707-763-1291
42 Arlington Drive
Petaluma, Ca. 94952

Response to Comment I11-3

Surface runoff water, such as stormwater, is known to carry vehicle-related contaminants, e.g., hydrocarbons, along roadway pavement in very low concentrations. The runoff water typically flows towards the roadway shoulders and is then channeled along asphalt curbs or dikes towards storm drain inlets. The underground drainage network delivers the water to discharge points that typically empty into surface water bodies, such as rivers, creeks, and the bay. Caltrans puts much effort into protecting waterbodies by implementing "Best Management Practices" that reduce erosion of the soil contacted by the drainage water and that filter and clean the water before it enters the drainage system.

The older drainage system along the US 101 corridor contiguous to Arlington Drive in Petaluma is comprised of a channel set off to the side, parallel to and away from the paved traveled way, at a lower elevation so the water runs off the pavement and towards the channel. When the channel is not clogged with plant and tree debris, the water flows along the channel and drains into either of the creeks located to the north and south of Arlington Drive. Runoff water that drains from the roadway's pavement surface and contacts soil begins to percolate into the soil alongside the roadway under the influence of gravity. The soil through which the water drains usually serves effectively in filtering the water of the particulates it carries; these particulates can include relatively large things such as grains of soil and relatively small things like metal (e.g., copper and lead) and hydrocarbon molecules. The portion of the runoff water that flows along the ground surface is also filtered of particulates as it slowly moves through the surface soil and organic matter. This kind of filtering process is the reason that soil-contamination investigations along roadways find the highest concentrations immediately next to the pavement edge and demonstrate a rapid decrease in contaminant concentrations as the distance from the pavement edge increases.

It is due to this very limited spreading of contaminants within roadway corridors that elevated concentrations in the backyard soils of Arlington Drive are most unlikely. The soil and water sampling that will be planned and executed for the Marin-Sonoma Narrows Project, including the East Washington Avenue interchange component, will examine the contaminant locations and their concentration trends, both as a function of depth and lateral spread. These studies in all probability will show that the demonstrable impact of vehicle-related contaminants has dropped off significantly before leaving the US 101 right-of-way. If the results from the soil and groundwater studies show that the contamination impacts might extend beyond the state's right-of-way, and possibly into the backyards of Arlington Drive, the residents will be notified and further steps examined.

Response to Comment I11-4

A soundwall with a safety barrier is proposed in the northbound direction between the SR 116/US 101 on-ramp and East Washington Interchange in order to help protect residential areas from traffic hazards.

Response to Comment I11-5

The project has been determined to meet all of the requirements of the Clean Air Act. Air quality will not be impacted either locally or regionally.

Response to Comment I11-6

East Washington Street Interchange Area: Caltrans maintenance personnel have reported backyard flooding in at least some of the residences located in the southeast quadrant of the East Washington Street interchange. A field review of this area indicates a depressed area to the south and east of the northbound off ramp where highway and adjacent property runoff may be trapped by the bordering residential development. It is recommended that a more thorough study of this area be undertaken to determine the probable extent and cause of flooding and how it can be eliminated. Reconstruction of the East Washington Street interchange is planned, either as part of this project or as an accelerated separate project. Measures should be included during redesign of the interchange to relieve any nuisance flooding resulting from freeway runoff by conveying the roadway drainage away from this area. The Washington Street interchange is not mapped in the FEMA Special Flood Hazard Area, save Washington Creek, which will not be significantly impacted by the project.

Response to Comment I11-7

Tree removal will be permitted under the California Department of Fish and Game agreement. Tree mitigation is discussed in Volume 1, Section 3.3 of this FEIR/S. Please also see the mitigation monitoring and reporting plan in Appendix J in the Appendices volume.

Response to Comment I11-8

It is true that a soundwall could reduce exposure of some residents to existing freeway headlight and sign glare. However, the existing night lighting from the freeway sign and car headlights would not be considered an impact of this specific project in this analysis. Justification for soundwall construction would be based upon the potential noise effects of the project only.

Response to Comment I11-9

The comment is reference to Soundwall No. 8. Your input in support of this soundwall was taken into consideration in reaching a final decision. Soundwall No. 8 has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I11-10

Although no meetings have been planned for the near future regarding noise abatement, your name will be placed on a mailing list for announcements of any future public meetings regarding the MSN Project.

Letter - I11

Page 8

PETALUMA ARGUS COURIER

NOVEMBER 7 TO 13, 2007

Freeway soundwalls in jeopardy

Sections of Narrows EIR shows soundwalls around interchange, but funding is uncertain, city says

By COREY YOUNG
ARGUS-COURIER STAFF

Petaluma may have to choose between moving partial East Washington Street interchange improvements forward ahead of the Highway 101 widening or chipping in to help Caltrans pay for soundwalls that are in jeopardy there.

Caltrans has not committed to building soundwalls in all four quadrants of the interchange, said Vince Marengo, Petaluma's public works director.

The expected cost of four soundwalls outweighs what the Marin-Sonoma Narrows draft environmen-

See SOUNDWALLS, page A5

Soundwalls

Continued from page A1

tal report says is the "reasonable allowance" toward their construction, Marengo told the City Council Monday.

"The dollars aren't there," he said.

The shortfall is $3.6 million — coincidentally, slightly less than the $4 million the city set aside two years ago as its share of a fast-tracked project for new on- and off-ramps at East Washington.

Since that time, however, the project costs have increased, and the city and Caltrans agreed to scale down the project and leave some features waiting until the overall widening of the freeway, still years away.

The Narrows EIR that was released last month references soundwalls at East Washington in some sections, but other areas of the report contradict that — photo simulations of the view of the freeway from backyards along Kresky Way show large trees there removed with no soundwalls in their place.

"When you cut down 780 trees and not put up soundwalls, there's a significant environmental concern the public is going to have," Marengo said.

Complicating the picture, the separate EIR expected for the East Washington improvements is not yet available — so the city doesn't know if soundwalls are called for in that document.

Meanwhile, the public comment period on the Narrows EIR ends Dec. 14, and Petaluma residents with an interest in whether soundwalls are built should make their opinions known in writing or at a Nov. 14 meeting in Novato, Marengo said.

The draft EIR is available online at www.dot.ca.gov/dist4/msn. Details of next week's meeting in Novato are also listed there.

After the public comment period ends, the city will have to decide whether to proceed with partial ramp improvements at East Washington before the freeway widening, or pull back its $4 million to save for soundwalls as part of the later project, he said.

(Contact Corey Young at corey.young@arguscourier.com)

Letter: I12.
Signatory: Tinoco Family.

Response to Comment I12-1

A soundwall with a safety barrier is proposed in the northbound direction between the SR 116/US 101 on-ramp and East Washington Interchange in order to help protect residential areas from traffic hazards.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date:
Name: Tinoco family
Title and Agency/Company:
Phone: (707) 769-9268 E-mail:
Address: 77 Arlington Dr
City, State, Zip: petaluma CA 94952

Comments (Continue on back, use multiple sheets if necessary)

This is the Tinoco Family we live at 77 Arlington Drive in petaluma.
We will like to have a wall before cuting the tree's.
I12-1 – 5 years ago a car came through our yard from Highway 101.
– 3 years ago another car hit one of the trees it came down and hit a light pull inside our yard.
We are scar and don't want this to happend ever againg. thanks.
if you have any questions please call
(707) 769-9268
(we also have pictures about the crashes)
Tinoco

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I13.
Signatory: Brian Redroci.

Response to Comment I13-1

A feasible soundwall (Soundwall No. 3) has been determined for your area. Your input in support of this soundwall will be taken into consideration in the final decision. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 10 10 07
Name: Brian Redroci
Title and Agency/Company: Resadent
Phone: 415 897 2532 E-mail:
Address: 705 LAMONT AVE
City, State, Zip: NOVATO CA

Comments (Continue on back, use multiple sheets if necessary)

I13-1 Why CANT you JUST PUT sound WALL
The AWSER IS simpel

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I14.
Signatory: Marla Fields.

"Todd & Marla Fields"
<ToddFields @sbcGlobal .net>
11/23/2007 10:38 AM
Please respond to
<ToddFields@SbcGlobal.net>

To <Melanie_brent@dot.ca.gov>
cc
bcc
Subject Comment on draft EIR for Novato Narrows

To Whom It May Concern,

I14-1 I have reviewed your draft EIR for the widening of the 16 mile stretch of highway referred to as the Novato Narrows. I would like to see your goals and success measures clearly outlined Is it simply congestion, or are affect on air quality, and reduction of vehicle miles traveled also factors in reviewing alternatives for the 800 million dollar project?

I14-2 Novato, like many other cities in Marin and Sonoma has pleaded to significantly reduce their greenhouse gas emissions in the near term. Will expansion of the highway, which may well result in increased latent demand, result in higher overall emissions or will any reduction in congestion offset the likely increase in traffic? How do alternatives such as investment in transit compare in both reduction of congestion, reduction of vehicle miles traveled and reduction in emissions?

I14-3 There are many studies that indicate highway expansion does not solve congestion, and that latent demand and urban sprawl result in roadways filling back up to capacity within a few years. See the excerpt below from a report by Todd Litman of the Victoria Transport Institute of October 2006 for some ideas about alternatives which should be reviewed in your EIR

.

Comparing Roadway Expansion With Alternatives

I14-4 There are various possible congestion reduction strategies ("Congestion Reductions," VTPI, 2006). The best is the one with the greatest benefits and least total costs ("Least Cost Planning," VTPI, 2006). Highway expansion advocates often fail to compare their proposals with alternatives so it is impossible to determine which is truly optimal.
Public transit improvements can reduce congestion and provide other benefits (Litman, 2006b). Virtually any corridor with enough travel demand to experience congestion has enough to support high quality vanpooling and public transit services. High quality public transit services cost about $100 annually per capita in additional subsidies but reduce consumer costs about $500 annually per capita, reduce congestion 30-50% (Figure 4); and reduce traffic fatality rates 36% compared with peer cities (Litman, 2004).
Road pricing reduced congestion in Singapore, London and Stockholm ("Road Pricing," VTPI, 2006). Reduced traffic volumes provide proportionately larger reductions in delay: pricing in London and Stockholm reduced vehicle traffic about 20% and congestion delays about 30%. Harvey and Deakin (1996) predicted that in Southern California:

A 1¢ per vehicle-mile congestion fee reduces VMT 2.3% and congestion delay 22.5% (a 9.8 ratio).
A $3.00 (1991 dollars) daily parking fee reduces VMT 2.7% and delay 7.5% (a 2.8 ratio).
A 2¢ per vehicle-mile VMT fee reduces VMT 4.4% and congestion delay 9.0% (a 2.0 ratio).

Smart growth development tends to increase the *intensity* of costs such as congestion and roadway construction, due to increased density, but reduces per capita *costs* , since residents drive less and have better travel options.
As more impacts and options are considered, the value of roadway capacity expansion

Response to Comment I14-1

Please refer to the Master Response on Need and Purpose. Please also refer to Chapter 1 in Volume 1 of this FEIR/S.

Response to Comment I14-2

Please refer to the Master Responses for Greenhouse Gas Emissions, Induced Travel, and Cumulative Air Quality.

Response to Comment I14-3

Roadways filling back up to capacity is not necessarily due to highway expansion; it may be caused by developments in the vicinity. Section 3.1.3 of Volume 1 of the DEIR/S summarizes the result of a growth study that found that the MSN Project would not induce growth.

The references the commenter provides are not complete; however, the comments are similar to others received on the document regarding alternatives analysis, induced travel, and addressing congestion with highway expansion. The Master Response on Range of Alternatives (Section 2.5 in this Volume) and Section 2.6, Alternatives Considered and Withdrawn, of Volume 1 address your comments regarding consideration of transit alternatives. The Master Response on the Smart Mobility Report (Section 2.6 in this volume) and the Master Response on Induced Travel (Section 2.4) address your comments regarding highway expansion and congestion.

Response to Comment I14-4

Please see the Master Response on Range of Alternatives.

Letter - I14

Page 2

Response to Comment I14-5

Please see the Master Response on Range of Alternatives.

tends to decline and the relative benefits of alternative congestion reduction strategies increases (IEDC, 2006; VTPI, 2006), as illustrated in Table 3.

Described differently, traffic congestion results from market distortions that underprice driving and stimulate sprawl, resulting in economically excessive motor vehicle travel ("Market Principles," VTPI, 2006). Under such circumstances, expanding highways cannot reduce long term congestion, and would increase other transport problems such as downstream congestion, parking demand, accidents, pollution emissions, sprawl, and inadequate mobility for non-drivers. Alternative strategies can reduce traffic congestion and provide other benefits. Advanced modeling indicates that the most cost effective solution to traffic congestion reduction includes a combination of transit improvements, road pricing and smart growth land use policies. This is most efficient and equitable overall because it reflects market principles, including viable consumer options, cost-based pricing and more neutral public policies. This is not to suggest that driving is bad or that highways should never be improved. However, when all impacts and options are considered, highway expansion is significantly more costly than advocates claim and provides less overall benefit than many alternative policies and programs. I14-4

I hope you will review alternatives with objectives that include not only reduced congestion, but also parking savings, consumer cost savings, transport diversity, improved traffic safety, reduced pollution, energy conservation, efficient land use, improved fitness & health, and minimal impact on the environment. If a thorough review of alternatives is done with a full list of objectives, I believe you will be hard-pressed to defend the use of $800 million dollars for highway expansion versus a similar investment in an integrated public transit program of rail, shuttle, bus, ferry and possibly streetcars. I like others am continually frustrated by the congestion on our highways, and lack of real transit alternatives to bypass it. However, I am not convinced that continuing to incent more drivers to use single-occupancy vehicles and a never-ending reliance on automobiles through highway expansion alone is the right long-term solution for our County. I14-5

Respectfully,

M. Fields
Novato Resident

Letter: I15.
Signatory: Bill Kortum.

Response to Comment I15-1

The widths of the access roads conform to Caltrans Design Standards for lanes, shoulders and Class II bikeways. The project's growth study concluded that the MSN Project would not cause growth inducement. Please also see the response to Comment I50-4.

Bill and Lucy Kortum
<blkortum@sbcglobal.net>
12/13/2007 08:40 AM

To Melanie_Brent@dot.ca.gov
cc
bcc
Subject Draft EIR Narrows

Melanie Brent, Office Chief
Division of Environmental Planning and Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland CA 94612

Also sent by email to: Melanie_Brent@dot.ca.gov
Subject: Draft EIR Narrows

Dear Ms. Brent:

Caltrans' acceptance of the local request of Marin and Sonoma not to design the local service roads to be continuous with each other in the Narrows is probably unique and is to be congratulated.

Both counties could imagine the future pressure they would feel by property owners seeking permits to build commercial along a continuous frontal road.

Caltrans is probably aware of public support for the scenic designation for the corridor expressed by Sonoma County voters with votes above 70% to protect the corridor for twenty years.

I15-1

Respecting the public's concern for the corridor landscape, I submit the following comments. The design of the dead end service roads demonstrates too much width

Letter - I15

Page 2

and therefore would invite unwarranted development, even on the dead end segments. The width contributes to additional storm runoff, reduces water absorption area, and invites excessive speed particularly dangerous if the road segments serve as connectors for the bicycle trail. Visually the corridor becomes unnecessarily dominated by pavement in addition to the extra lanes of the freeway itself. I15-1

Consideration of side striping of the service roads instead of a central painted stripe would add much to the visual quality. Paved rural roads in France using side striping cut down on speed and accidents because drivers are more cautious. Milk trucks using rural roads do not have to be accommodated with 50 mph design. I15-2 I15-3

In the spirit of the impressive scenic corridor vote for the Narrows between the Marin County line and Petaluma, the aesthetic advisors on staff should call for a modification of the present service road design. I15-4

Sincerely,

Bill Kortum

December 13, 2007

Response to Comment I15-2

Striping is developed for safety and is governed by strict uniform federal and state rules and guidelines. Striping cannot be changed for visual or aesthetic reasons.

Response to Comment I15-3

Local road access standards are set by county agencies and provide county standard widths for vehicle access and contiguous bicycle passage.

Response to Comment I15-4

The design of access roads referred to in the comment, including standard lane widths, shoulders, and striping, is governed by strict uniform federal and state rules and guidelines. Although design exceptions are occasionally adopted in special instances, it is unlikely that exceptions to lane width or striping would be allowed in the case of the Narrows access roads for reasons of safety. Service roads will be hydro-seeded or landscaped as is appropriate to the local character of the specific area.

Letter - I15

Page 3

Response to Comment I15-5

The design of access roads referred to in the comment, including standard lane widths, shoulders, and striping, is governed by strict uniform federal and state rules and guidelines. Although design exceptions are occasionally adopted in special instances, it is unlikely that exceptions to lane width or striping would be allowed in the case of the Narrows access roads for reasons of safety.

Response to Comment I15-6

The additional impervious service areas and other impacts and mitigation associated with the alternatives is discussed in Volume 1 of the FEIR/S, Section 3.2.2.

BILL KORTUM, D.V.M.

180 Ely Road North, Petaluma CA 94954-1101
(707) 762-6219

Melanie Brent, Office Chief
Division of Environmental Planning and Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland CA 94612

Also sent by email to: Melanie_Brent@dot.ca.gov
Subject: Draft EIR Narrows

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Both counties could imagine the future pressure they would feel by property owners seeking permits to build commercial along a continuous frontal road.

Caltrans is probably aware of public support for the scenic designation for the corridor expressed by Sonoma County voters with votes above 70% to protect the corridor for twenty years.

Respecting the public's concern for the corridor landscape, I submit the following comments. The design of the dead end service roads demonstrates too much width and therefore would invite unwarranted development, even on the dead end segments. The width contributes to additional storm runoff, reduces water absorption area, and invites excessive speed particularly dangerous if the road segments serve as connectors for the bicycle trail. Visually the corridor becomes unnecessarily dominated by pavement in addition to the extra lanes of the freeway itself.

I15-5

I15-6

Letter - I15

Page 4

I15-7 Consideration of side striping of the service roads instead of a central painted stripe would add much to the visual quality. Paved rural roads in France using side striping cut

I15-8 down on speed and accidents because drivers are more cautious. Milk trucks using rural roads do not have to be accommodated with 50 mph design.

I15-9 In the spirit of the impressive scenic corridor vote for the Narrows between the Marin County line and Petaluma, the aesthetic advisors on staff should call for a modification of the present service road design.

Sincerely,

Bill Kortum

Bill Kortum

December 13, 2007

Response to Comment I15-7

Caltrans has acknowledged that this is a moderate to adverse negative visual impact within the project limits. Mitigation measures are set forth in Section 3.1.11 in Volume 1 of this FEIR/S.

Response to Comment I15-8

Striping is developed for safety and is governed by strict uniform federal and state rules and guidelines. Striping cannot be changed for visual or aesthetic reasons.

Response to Comment I15-9

The design of access roads referred to in the comment, including standard lane widths, shoulders, and striping, is governed by strict uniform federal and state rules and guidelines. Although design exceptions are occasionally adopted in special instances, it is unlikely that exceptions to lane width or striping would be allowed in the case of the Narrows access roads for reasons of safety.

Letter: I16.
Signatory: Marge and Bob Schram.

schramwer2@comcast.net
12/11/2007 12:13 PM

To melanie_brent@dot.ca.gov
cc
bcc
Subject Comment Card for HWY 101-Novato

I16-1 We wish to express my concern over the lack of real sound measures in the E.Orange and Olive Ave areas. We are the fourth house from the freeway and lived in our home for 43 years so I can tell you that the sounds have increased along with the soot. I would hope that consideration would be given so that we can get a sound wall or something of soundproofing on East and West or at least pave with the rubber ashphalt from E & WOrange Ave and Kenwood Ct and Elmwood Ct .

I16-2 Your last ad placed in the Marin IJ was so hard to find it blended in (I had to go through the paper twice to find it) with other ads so perhaps you can try in getting a more attention getting ad so that we can at be notified in a timely manner.

Thank You,
Marge & Bob Schram
682 E.Orange Ave
Novato CA 94945

Response to Comment I16-1

Caltrans follows the Code of Federal Regulations (23 CFR 772) and the Caltrans *Traffic Noise Analysis Protocol* which defines the specific noise levels that must be predicted for an area before consideration of soundwalls. The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls. No soundwalls or other noise abatement measures will be considered for this area.

Installation of rubberized asphalt will be based on the maintenance and safety needs of the roadway surface, and cost. An analysis of the pavement condition will be done during design and rubberized asphalt will be included if it is deemed necessary.

Response to Comment I16-2

You have been added to the project mailing list, and you will receive a copy of the Notice of Availability (advertisement) for the FEIR/S along with a notification letter.

Letter: I17.
Signatory: Carla OCodhain.

Carla OCodhain
<c.ocodhain @sbcglobal .net
>
11/14/2007 07:50 PM

To melanie_brent@dot.ca.gov
cc jenaea@sonic.net
bcc
Subject comment regarding sound wall along Hwy 101 Petaluma, Sonoma County

History: This message has been forwarded.

To whom it may concern;

I am a homeowner who lives on Stuart Drive in Petaluma. My backyard backs up to Highway 101. I bought my house approximately a year ago and read there were plans to build a sound wall along Hwy 101 in the near future. I am not sure I am sending this e-mail to the correct department that can answer any questions I might have regarding these future plans, but I am hoping this is a good place to start and could possibly be directed to the agency handling inquiries, or possibly my mail forwarded to the correct agency?

I17-1 I am concerned because our street is primarily a Hispanic community with many people who speak English as a second language and we may not be notified of developments or meetings. I also fear we may not be fairly considered and the city could underfund this area's improvement. If there isn't a high percentage of community involvement in vocalizing any concerns for improvements in this area then it's left for last. I think a sound wall along highway 101 shouldn't be considered a luxury but an expected mandatory standard for the basic quality of living. On Caulfield and East Washington street sound walls have been recently placed, and those streets only experience city traffic which is a quarter of the traffic noise we experience 24 hours a day, 7 days a week from Hwy 101. If another lane is added that only increases the noise and volume of traffic we already experience. This is practically the only part of Hwy 101 that hasn't provided a sound wall for the residents that live behind it, why?

I17-2 I am under the impression with the expansion process of widening Hwy 101 before the Washington Blvd. exit a sound wall will have to be placed by law when federal money is used. The sound of traffic is deafening, not to mention the pollution we are breathing-which I realize a sound wall wont prevent- But, the volume interferes with daily life. I find myself raising my voice more and more and not realizing it, because I am so use to the background traffic noise that I am constantly compensating. Our quality of sleep is effected. We don't even use our backyard! Traffic is so congested that every night around 5 pm we have bumper to bumper traffic looming along side of our backyard. I am seriously waiting for the day a vehicle comes through our fence into our yard. It literally is that serious and close to our backyard. We've never once had a social event backyard function. I am not exaggerating when I say a person has to almost scream to have a conversation in the backyard. This is ridiculous! It's the only area along Hwy 101 as far as I know from Novato to Santa Rosa that is not providing a sound wall for residents. It's long, long overdue. The fact it's even being contemplated is absurd in my opinion.

Response to Comment I17-1

Thank you for your comments. Caltrans and FHWA provided notification in La Voz, a English and Spanish language newspaper with circulation in the MSN Project area. A Spanish translator was provided at the meetings. Notices were sent to property owners adjacent to the project along US 101. You are welcome to contact Yolanda Rivas in the Office of Environmental Assessment at 510-622-1705 to obtain project updates in Spanish. Notification of future developments will also be produced in Spanish.

Caltrans y FHWA dio noticia en La Voz, un diario en Ingles y Espanol con circulation en la area del proyecto. Un traductor tambien estuvo a la orden en las reuniones. Noticias del los reunions tambien fueron mandados a duenos de propriedad al par del proyecto a la ruta 101. Personas interesados estan disponibles a llamar a Yolanda Rivas en la officina del ambiento a 510-622-1705 para obtener informacion en el futuro. Noticias sobre desarollos del proyector tambien seran producidos en Espanol.

See also the response to Comment I17-2 below.

Response to Comment I17-2

Caltrans applies the Code of Federal Regulations (23 CFR 772) to all projects requiring a federal approval or federal action. 23 CFR 772 and the Caltrans *Traffic Noise Analysis Protocol* define specific noise levels that must be attained before consideration of soundwalls. The noise levels predicted for your area require consideration of noise abatement, though they are not high enough to warrant mandatory construction of abatement. Soundwall No. 5, which is the soundwall proposed for your area, has been determined to meet the criteria for noise abatement, and has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Letter - I17

Page 2

I17-3 It's ridiculous to me that this city keeps building more houses, and adding more large department stores without accommodating for the influx of traffic.

I17-4 I want to make clear this letter is not aimed at any one person specifically. I have finally become outraged enough that I want to voice my concerns and not only complain amongst friends and colleagues, but begin the process of getting involved for change. I am that frustrated. To be honest I am surprised someone hasn't challenged this city with it's continuous expansion increasing the population and traffic without providing even what could be considered a minimal effort of improving the infrastructure to accommodate it.

I17-5 I see more and more accidents happening along Petaluma's corridor of Hwy 101 and other parts of the city. Petaluma's lack of planning and action could be seen as endangering people who travel these roads.. I don't know the precedent of any cases that might have been made before, but it seems plausible it's a case that could justifiably be made. That is just my observation and a few others opinions.

I17-6 Most importantly and why I originally began to write this letter is to find out, who can myself and my neighbors talk to or direct our questions regarding the sound wall along Hwy 101 before the Washington St. exit heading Northbound? Any information would be appreciated.

Sincerely,

Carla Ocodhain
358 Stuart. Dr.
Petaluma, Ca 94954
707-781-0777

Response to Comment I17-3

The proposed project will help accommodate anticipated growth of traffic on US 101. The impacts on local circulation should be addressed by a local sponsor of proposed development in its environmental impact report. These reports are customarily reviewed by the local city and county government.

Response to Comment I17-4

The commenter's frustration with the City of Petaluma is acknowledged. While Caltrans cannot speak on behalf of the City of Petaluma, the proposed project will help accommodate anticipated growth of traffic on US 101. The impacts on local circulation by proposed development should be addressed by a local environmental impact report.

Response to Comment I17-5

The commenter's safety concerns regarding increased traffic on US 101 are acknowledged. Although Caltrans is not in a position to respond to complaints about the City of Petaluma's planning, the proposed MSN Project is expected to enhance safety by standardizing shoulders and curves to improve highway operations on US 101 through the city of Petaluma.

Response to Comment I17-6

As noted above in the response to Comment I17-2, Soundwall No. 5 has been approved for construction in your area. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S. For information regarding the soundwalls discussed in this document you may contact the following individuals:

- Melanie Brent, Office Chief, Office of Environmental Analysis: 510-286-5231
- Jit S. Pandher, Regional Project Manager, Marin County: 510-286-6425
- Glenn Kinoshita, Branch Chief-Air/Noise Studies, Office of Environmental Engineering: 510-286-5677

Letter: I18.
Signatory: Dennis Coleman.

DCOLEMAN@comcast.net
11/20/2007 02:43 PM

To melanie_brent@dot.ca.gov
cc
bcc
Subject

Melanie my name is dennis coleman and i live at 706 alice st. novato. i am about 150 feet form the franklin st. overpass. A neighbor had just informed me that cal-trans is proposing a lane addition in my area. i have a few questions that i would like answered if posible.

I18-1 1. when is this project to be started.

2. if started how long is the projected time for completion.

I18-2 3. are they planning to put up a sound wall on the west side of the freeway.

4. if not why?

I18-3 5. from what i read on your chart it says that only 9 houses would be affected. i think that this number is too low.

6. if your representative (i was told it is mr. kinoshita) reallythinks that putting the sound wall up on only the east side is necessary then i invite him to visit my house at peak traffic time and sit in my backyard and try and carry on a conversation.

I18-4 7. since we live in close proxcimity to the freeway why were we not contacted.

I18-5 we bought this house after the freeway was built so we are living with the noise now. if the sound wall only goes up on the east side the noise (in my estimation) will go up dramaticaly.

i know your busy and appreciate your time.

looking forward to hearing from you.

dennis coleman
706 alice st.
novato, cal. 94945

Response to Comment I18-1

The first phase of the project is planned for 2010. Other phases will be planned as funding becomes available. Please refer to the Summary in Volume 1 of this FEIR/S for a description of phase 1 and project funding.

Response to Comment I18-2

A soundwall for your area (Soundwall No. 3) has been determined to meet the criteria for consideration of noise abatement under the Code of Federal Regulations 23 CFR 772. Although the estimated construction cost of this soundwall has been determined to exceed the reasonable allowance, so that it has been defined as not cost-effective, Soundwall No. 3 has nonetheless been approved for construction. It should be noted that cost-effectiveness is only one factor in making a final decision on any soundwall. Whether a wall is cost-effective or not does not guarantee or preclude its inclusion in the project. Any other pertinent factors, including public input, must be taken into consideration. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I18-3

The Caltrans *Traffic Noise Analysis Protocol*, which must be applied consistently to all projects requiring federal funds, defines the term “benefited residence” as a dwelling unit predicted to receive a noise reduction of at least 5 dBA from a proposed noise abatement measure. Only 9 houses in this area have at least a predicted 5 dBA noise reduction if a proposed wall is built, though it is understood that more houses will get some noise reduction.

Response to Comment I18-4

FHWA and Caltrans made every effort to include on the project mailing list residents adjacent to US 101 who may be impacted by right-of-way or proposed soundwalls. Mailing lists completed from scoping meetings and Policy Advisory Group meetings have also been included in our notice of availability. You have been added to the project mailing list regarding future public meetings for this project.

Response to Comment I18-5

Our estimation is that the soundwall has the potential for reflected noise that may increase the existing noise by 0.5 dBA on the opposite side. Such an increase in noise is not discernible to the human ear.

Letter: I19.
Signatory: Connie Ritchie.

COMMENT CARD

MARIN SONOMA NARROWS 101

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12-11-07
Name: Connie Ritchie
Title and Agency/Company:
Phone: (707) 763-2993 E-mail:
Address: 105 Arlington Drive
City, State, Zip: Petaluma, CA 94952

Comments (Continue on back, use multiple sheets if necessary)

Please consider the safety of the Arlington Drive neighborhood as you review the public comment portion of the DEIRS for MSN HOV project.
I19-1 Over the last twenty + years numerous members of our neighborhood have lobbied for a soundwall by going to meetings involving Cal Trans, city council, newspapers, Joe Nation, city public works, but until recently action by our city officials has been sorely lacking. What
I19-2 other section of freeway has errant vehicles entering adjacent properties at an increasing rate and no government official or agencies
I19-3 have even blinked an eye. We have on file at the City of Petaluma Public Works 15 years

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

over →

Response to Comment I19-1

Through public meetings with Arlington Drive neighborhood residents, Caltrans is aware of the history of the request for sound barriers and safety barriers for the homes adjacent to US 101.

The noise levels predicted for your area require consideration of noise abatement, and Caltrans has applied the Code of Federal Regulations 23 CFR 772 to the areas that would be impacted by the MSN Project. Through its analysis, Caltrans has found that Soundwall No. 8, which parallels the Arlington Drive neighborhood, has been determined to meet the applicable federal criteria and will be constructed as part of the MSN Project.

Furthermore, all of the soundwalls constructed as part of this project will be constructed upon safety barriers which will drastically reduce the possibility of errant vehicles entering adjacent properties. In addition, The discussion of which soundwalls have been approved is presented in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I19-2

Your safety concerns regarding errant vehicles leaving the US 101 roadway are acknowledged. As noted above, a soundwall has been approved for your area.

Response to Comment I19-3

Please see the response to Comment I19-1 above.

Letter - I19

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of correspondence concerning the soundwall.
We are hoping a soundwall is included
with the Washington Street on ramp
improvements to help guard us from
any more casino buses, pesticide trucks, cars
I19-3 and an exploding tanker trucks.

Letter - I19

Page 3

Response to Comment I19-4

The contribution of noise from the on-ramp will be imperceptible because it will be masked by the main source of noise which is the freeway itself. Any noise emanating from the ramp or possibly bouncing off of the buildings on the other side will not be detectible.

Response to Comment I19-5

The highest noise levels come from the mainline freeway at full capacity and freeway speeds. The contribution of noise from vehicles starting from metering lights will be negligible and will only be masked by the much higher noise levels emanating from the freeway.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12-11-07

Name: Connie Ritchie

Title and Agency/Company:

Phone: E-mail:

Address:

City, State, Zip:

Comments (Continue on back, use multiple sheets if necessary)

I19-4 ① Have reflective noise studies been made for the proposed northbound on ramp at Washington Street and U.S. 101? This ramp is 49 feet tall and 119 feet long. I feel it will have substantial reflective noise

I19-5 (2) New Metering lights will create excessive noise from idling, accelleration from a dead stop, gear changes. Have metering light noise studies for the northwest quadrant been done? If so what were the results.

③ back page ↓

How To Submit Your Comments:

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- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter - I19

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Response to Comment I19-6

The precise impacts to trees in the northeast quadrant of the East Washington interchange are not known at this time due to currently proposed changes to the project description of the East Washington Interchange Improvements Project, under which these impacts would take place. However assuming, as this FEIR/S did, that those trees would be removed at some time in the future, viewers along Arlington Drive would nevertheless not be affected from their residences because views of that portion of the freeway would be largely obstructed by the 12-foot-tall soundwall proposed in the northwest quadrant of the interchange under the MSN Project, between the lots of Arlington Drive residents and the freeway. Vine planting on the residential as well as freeway side of the soundwalls is therefore called for to mitigate potential visual effects of those walls on adjoining residents.

(3) Cal Trans study states in Impacts on Views to the Road. Nearby residents adjoining the highway in the northwest and southeast quadrants would be unaffected by proposed project. I disagree. There will be substantial decline in visual quality for residental viewers in the Northwest quadrant (Arlington Dr.). With trees (in northeast) removed I19-6 views of Petaluma Plaza shopping center loading docks, employee parking, lighting, cell phone towers and lights from trucks unloading at docks all these items will be viewed from gaps where trees have been knocked ~~trou~~ down in the Arlington subdivision.

Letter: I20.
Signatory: Claire McCarthy.

Claire McCarthy
<claire@justwrite.us>
12/13/2007 11:44 AM

To "" <bijan_sartipi@dot.ca.gov>, "" <melanie_brent@dot.ca.gov>, "" <Doanh_nguyen@dot.ca.gov>, ""
cc
bcc
Subject Rainier Interchange

Hello,

I20-1

1) I ask that Caltrans not approve a design exception to allow less than one mile spacing between the East Washington and proposed Rainier interchange cross connector. The purpose of widening highway 101 is to safely move traffic. This design exception will only increase traffic through the Petaluma corridor. Adding an interchange will create another bottle-neck area, similar to Santa Rosa, where there are freeway entrances & exits consistently spaced less than a mile apart.

2) The area proposed is primarily residential with close to 100 homes that would be directly impacted by freeway noise, pollution and privacy issues. Will there be a Community Impact Report, to study the potential negative impacts on these home-owners - including noise & air pollution? Will there be an environmental impact report to study how developing in the flood plain will impact the surrounding area & homes?

3) Will there be money to build a sound wall, to bring the noise down to acceptable decibals for the residences living next to the interchange?

4) The area proposed for the interchange is directly in the Petaluma floodplain and the site of the last remaining Oak Savannah within the Petaluma River and Petaluma floodplain

I20-2

5) Deer Creek is wider and stays green through July. It is also an nesting area for birds and other wildlife habitat. Deer Creek is making it's come back. Rainier is a nothing more than an environmental disaster.

I20-3

6) As per the cross town connector, the Petaluma City council and staff has had more than 5 years to secure an at- grade rail crossing from the PUC at Shasta Ave: By walking the property you can see why Shasta Ave is not feasible due to sightlines and it's proximity to the existing Payran Street at- grade crossing. The other crossing point is one mile long approximately 40 feet high + four lanes, and in the shape of a question mark.

7) The questions are; is this project financially feasible? Will it make traffic safer, and move more freely along the 101 corridor through Petaluma? Who pays for the cost of the project?
Will there be a Community Impact Report, to study the potential negative impacts on these home-owners - including noise & air pollution? Will there be an environmental impact report to study how developing in the flood plain will impact the surrounding area & homes? Will there be money to build a sound wall, to bring the noise down to acceptable decibals for the residences living next to the interchange? Petaluma is still trying to come up with money to build

Response to Comment I20-1

This comment pertains to the proposed Rainer Interchange/Cross-Town Connector, which is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

The growth study summarized in Section 3.1.4, Growth, in Volume 1 of this FEIR/S found that the MSN build alternatives would increase growth pressures slightly in Petaluma. However, given the land use controls and the existing level of growth pressures, such slight increase in growth pressure was judged unlikely to have an important effect on actual residential growth. The Petaluma planning representative on the expert panel agreed with the conclusions of the study and saw the proposed project as an operational improvement rather than a major capacity improvement, adding that the land use controls and the politics that control land use will not change due to the proposed project. Consequently, the proposed MSN Project is not expected to have a material impact on development in the floodplain.

Response to Comment I20-2

The MSN Project will not impact Deer Creek. Caltrans will forward your comments to the City of Petaluma to ensure that your concerns are addressed as part of the Rainier Interchange project.

Response to Comment I20-3

The proposed Rainer Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

Letter - I20

Page 2

a sound wall for homeowners living along the East Washington Freeway interchange, and has in fact spent money on other projects, that could have gone towards these sound walls. Will the residences along McDowell & Rainer suffer the same fate?

8) The public voted to study Rainier, they didn't vote to bankrupt the
city or slow traffic on the 101 corridor.

9) Caltrans has stated in previous letters to the City of Petaluma, Rainier is a locally serving project and needs to be funded by the City of Petaluma.

10) The Petaluma public voted in support of studying Rainier as a possible cross town connector plus interchange. Our local newspapers and city staff continue to fudge on the true cost of this project and it's environmental constraints. Before we waist anymore time on Rainier, Caltrans and SCTA need to be clear with our local council members, city staff and most importantly the public on who pays and the true cost of adding Rainier to the 101 widening project. I20-3

Sincerly
Claire McCarthy

Letter: I21.
Signatory: Dominga Lopez.

Response to Comment I21-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I21-2

As stated in the Bridge Widening subsection in Section 3.1.10.3, Impacts, of the DEIR/S (which is now Section 3.1.11.3 in Volume 1 of this revised FEIR/S), center widening of the Franklin Overhead bridge would reduce some of the daylight that currently illuminates the pedestrian passage under the bridge. Also, the Standard Highway Landscaping subsection in Section 3.1.11.4 states that lighting shall be provided beneath undercrossings to provide sufficient illumination for pedestrian and bicycle use.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12.10.07
Name: Dominga Lopez
Title and Agency/Company:
Phone: E-mail:
Address: 7010 Lemont Drive
City, State, Zip: Novato, CA 94945

Comments (Continue on back, use multiple sheets if necessary)

I21-1 We are concerned about the noise level that will be created if the soundwall will only be built on the Northside of the freeway. We would like both walls to be considered in this project.

I21-2 In regards to the Franklin Bridge, we often go for walks past the bridge, how will the natural light be affected, will there be light posts installed for the neighborhood? We're concerned it will create a safety issue.

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

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Table 3.2-15 Existing and Future Worst-case Traffic Noise Levels with the MSN Build Alternatives

Rec #	Segment A	Existing Peak Noise	No Build	Build Alternatives Build Worst-Case Noise Level (dBA) 8'Wall	10' Wall	12'Wall	14' Wall	Barrier #	Barrier Height (m)	Barrier Length (m)	# Homes Shielded
R-1	617 Manuel Dr	63(M)	67	65	63	62	---	1	3.7	200	9
R-2	613 Davidson St	61(E)	66	64	63	61	---		(12ft)	(660ft)	
R-3	101 Kenwood Ct	61(M)	62	---	---	---	---	No Wall Recommended			
R-4	201 Kenwood Ct	62(E)	63	---	---	---	---				
R-5	221 Kenwood Ct	59(E)	60	---	---	---	---				
R-6	Apartment	71(E)	72	---	66	64	63	2	4.3	480	17
R-7	1508 Armstrong Ave	71(E)	71	---	69	67	66		(14ft)	(1600ft)	
R-8	Pool-Mobile Home (Armstrong)	65(E)	65	---	63	62	61				
R-9	16 Elmwood Ct	65(E)	66	---	---	---	---	No Wall Recommended			
R-10	Playground(Olive/Elmwood)	65(E)	65	---	---	---	---				
R-11	725 W Orange Ave	64(E)	64	---	---	---	---				
R-12	43 Reichert Ct	65(E)	66	65	64	62	---	3	3.7	500	9
R-13	702 Lamont Ave	67(E)	67	64	63	62	---		(12ft)	(1650ft)	
R-14	701 Lamont Ave	65(E)	66	63	62	61	---				
R-15	7 Hankie Rd	67(E)	68	65	63	62	---				
R-16	1 Corinthian Ct, Novato	71(E)	72	---	68	67	66	4	4.3	270	27
R-17	1280 Redwood Blvd, Novato	73(E)	73	---	67	66	66		(14ft)	(890ft)	
R-18	82 Rosewood Dr., Novato	62(E)	63	---	---	---	---	No Wall Recommended			
R-19	706 Somoa Lane, Novato	63(M)	65	---	---	---	---				
R-20	Basketball Court	62(E)	63	---	---	---	---				

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seismic design standards would minimize ground shaking impacts from earthquakes up to the MCE.

Table 3.2-5 Proposed Structure Work

Bridge No.	Bridge Name	KP	Type of Work
27 0086K	South Novato Blvd. OC	30.5	Earthquake retrofit of columns and footings.
27 0089L/R	Novato Creek	R33.0	Widen in median, replace outside rails.
27 0090L/R	Franklin Ave. OH	R33.7	Widen in median, and outsides, soundwall both sides.
27 0092L/R	Olive Ave. UC	R34.5	Widen in median, add soundwalls on both sides. Build on raised falsework due to poor clearance.
27 0094L/R	North Novato OH	35.9	Widen in median, replace outside rails.
27 0115	Redwood Landfill OC	40.8	Widen on left (north) side with Options 4b and 12b.
TBD	San Antonio OC	42.6	New Overcrossing with Options 4b, 14b and 14d.
TBD	S. San Antonio Creek	N/A	New Bridge for frontage road
20 0019L/R	San Antonio Creek	44.5/0	Remove left Bridge, replace joint seals on right Bridge.
TBD	San Antonio Creek	44.5/0	New Bridge for US 101 on new alignment.
TBD	Petaluma Blvd. S. OC	5.1	New OC with all Access Options.
20 0156L/R	South Petaluma UC	5.6	Remove
20 0154L/R	Petaluma River	5.3	Replace on new vertical alignment.
20 0155L/R	US 101/SR 116 SOH	5.8	Widen left Bridge, replace right Bridge.
20 0163L/R	Washington Creek	7.7	Widen in median and on left and right sides.
20 0162L/R	Lynch Creek	8.3	Widen in median and on left and right sides.
20 0158L/R	North Petaluma OH	9.3	Replace OH on new vertical alignment.

Caltrans also evaluates structures for seismic retrofit. Any structure work as part of the Fixed HOV Lane Alternative would include an analysis of the seismic and scour deficiencies. Project plans would include seismic retrofit, as necessary. Table 3.2-2 indicates the South Novato Boulevard Overcrossing would undergo a seismic retrofit of columns and footings. Seismic work can be identified as part of the Advanced Planning Study, or would be identified as part of the General Plan development in final design.

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Option 12b. In the vicinity of the Redwood Landfill Overcrossing, Access Options 4b and 12b, which would convert the overcrossing to a full interchange, would result in greater construction noise impacts than Access Options 14b and 14d, which adapt the overcrossing for public access but would not upgrade the facility to an interchange.

No Build Alternative. The No Build Alternative involves no major construction activities and only routine maintenance and upkeep of the existing US 101 facilities. As a result, there may be noise impacts during maintenance and rehabilitation activities, but the effects would be relatively short in duration and affect far fewer receivers.

3.2.7.4 Avoidance, Minimization, and/or Mitigation Measures

Regulatory standards distinguish between noise abatement and noise mitigation. Mitigation is warranted where a project may cause future worst case noise levels that either show a substantial increase (12 dBA or higher) from the existing levels, or approach or exceed the NAC established by FHWA for different land uses.

Soundwalls to Abate Existing Noise Exposure. None of the receptors within the project boundaries would have a 12 dBA or more increase in future predicted noise level as a result of either Build Alternative. Consequently, mitigation is not recommended. However, abatement for existing noise levels has been identified at eight locations. Figure 3.2-9 depicts the approximate soundwall locations. The actual determination of those soundwalls that will be constructed will be made prior to the final environmental document. Caltrans will consider a number of factors in making its determination, including whether the soundwalls would substantially reduce noise exposure (at least 5 decibels), they are cost effective, they pose visual impacts or adversely affect environment resources, and they are acceptable/desirable in the local jurisdictions. A description of the soundwalls follows:

1. In Novato, a soundwall location was studied on the eastern side of US 101 on a bridge crossing over the SMART railway line, just south of the De Long Overcrossing parallel to Davidson Street. If constructed, the barrier would be 3.7 m (12 ft) high and approximately 200 m (656 ft) long at the outside edge of shoulder of the freeway. The future predicted noise levels in this residential area could be reduced from 67 dBA Leq(h) to 62 dBA Leq(h). An existing 1.2 m (4 ft) high earth berm would be replaced by this soundwall under the MSN

Letter - I21

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Project. Approximately nine residences would be shielded from future traffic noise. The reasonable allowance, if approved, for this soundwall is estimated to be $360,000.

2. A soundwall location was studied from Cherry Street northward toward Atherton Avenue Overcrossing, parallel to Armstrong Avenue on the eastern side of US 101 in Novato. If located at the outside edge of shoulder of the freeway the soundwall would be 4.3 m (14 ft) high and approximately 480 m (1,575 ft) long. The future predicted noise levels with the soundwall could be reduced from 72 dBA Leq(h) to 63 dBA Leq(h) in the adjacent residential area. Approximately 17 homes would be shielded from future traffic noise. The reasonable allowance for this soundwall, if approved, is estimated to be $680,000.

3. Approximately nine homes could benefit from a soundwall whose location was studied on the western side of US 101 north of Novato Creek and south of De Long Overcrossing. The new soundwall would be 500 m (1,640 ft) long and 3.7 m (12 ft) high at the outside edge of shoulder of the freeway. The future predicted noise levels in this residential area could be reduced from 68 dBA Leq(h) to 62 dBA Leq(h). The existing 1.2 m (4 ft) high earth berm would be removed due to roadway realignment. The reasonable allowance for this soundwall, if approved, is estimated to be $342,000.

4. A soundwall of approximately 270 m (886 ft) and 4.3 m (14 ft) high was studied in a location south of Rowland Boulevard and parallel to Redwood Boulevard on the eastern side of US 101 in Novato, shielding approximately 27 homes from future traffic noise. If constructed along the right-of-way, future predicted noise levels in this residential area could be reduced from 73 dBA Leq(h) to 66 dBA Leq(h). The reasonable allowance for this soundwall, if approved, is estimated to be $1,134,000.

5. In Petaluma, there are two options for achieving a minimum 5 dBA predicted noise level reduction in the residential areas adjacent to the eastern side of US 101. Option 1 studied a soundwall located at the outside edge of shoulder beginning just north of the SR 116 Overhead. This soundwall could be 3.7 m (12 ft) high and approximately 1,760 m (5,774 ft) long, ending at the East Washington Street Interchange. Under Option 2 the soundwall could be broken up into three parts. From the same starting point, a 4.9 m (16 ft) high

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motorists' immediate visual foreground, in place of the existing views of landscaping. This strong form, color and texture contrast with the existing setting would represent a substantial change in character as seen by very high numbers of motorists, with a corresponding decline in visual quality. In the context of moderate anticipated viewer sensitivity of motorists in this urban segment, this would represent a potentially substantial adverse effect.

In addition, a new 220 m (722 ft) retaining wall would be constructed on the eastern edge of Scottsdale Pond in connection with improvements to the southbound Rowland Avenue on-ramp, with associated removal of existing wetland vegetation; and a 155 m (508 ft) retaining wall would be constructed east of South Novato Boulevard. Revegetation would rapidly replace lost vegetation at Scottsdale Pond, and the new retaining wall would be designed to match the simulated stone finish of other visible concrete structures within the public park. With these measures net long-term impacts at Scottsdale Pond would be beneficial. Off-road areas with views of the South Novato Boulevard wall are virtually unused and the proposed wall would be little noticed by the nearest viewers. This wall would thus have no impact.

Reversible HOV Lane Alternative. This alternative would be identical to the Fixed HOV Lane Alternative within Landscape Unit 1 (Southern Segment).

No Build Alternative. Under the No Build Alternative, there would be no aesthetic impacts due to new structures or loss of vegetation.

Bridge Widening

Fixed HOV Lane Alternative. Under the Fixed HOV Lane Alternative, center widening of the Novato Creek Bridge, the Franklin Overhead Bridge, the Olive Undercrossing Bridge and North Novato Overhead Bridge would require the filling of center gaps between northbound and southbound structures. One result would be less penetration of sunlight causing a decline in visual quality.

The Novato Creek and North Novato Bridges are not heavily used by pedestrians and bicyclists. Due to the absence of sensitive receptors, impacts would be minor in those locations.

The road under the Franklin Overhead Bridge is currently used by pedestrians and bicyclists for access between the residential neighborhoods to the west and east of the freeway. This road also provides the community with access to Slade Park and

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other nearby open spaces. The bridge is relatively tall, allowing greater sunlight than bridges of more typical height. Nevertheless, center widening of the bridge would reduce the daylight that currently illuminates the pedestrian passage under the bridge, and degrading its visual quality and potentially undermining its use as a pedestrian and bicycle route. Because there are no nearby alternative undercrossings in the vicinity, viewers would have moderately high levels of sensitivity. In that context these impacts could be moderately adverse.

Similarly, Olive Avenue is a major connector between residential neighborhoods to the east of the freeway and the central downtown area to the west. The Olive Avenue undercrossing is currently landscaped with trees and receives moderate levels of use by motorists, pedestrians, and bicyclists traveling to and from downtown. The center widening of the Olive Avenue Bridge would result in the removal of trees and would reduce sunlight that currently illuminates the undercrossing. This loss of sunlight would create approximately 50 m (164 ft) of unlit passageway, making it less attractive and potentially deterring pedestrian use. Viewers would have moderately high levels of sensitivity to this change to a major gateway to downtown. In this context these impacts could potentially be substantially adverse (see Figures 3.1-24 and 3.1-25).

Reversible HOV Lane Alternative. This alternative would be identical to the Fixed HOV Lane Alternative within Landscape Unit 1 (Southern Segment).

No Build Alternative. Under the No Build Alternative, there would be no bridge widenings. Therefore, there would be no impacts to the community access routes.

Light and Glare

Fixed HOV Lane Alternative. Under the Fixed HOV Lane Alternative, light and glare impacts would result primarily from temporary nighttime construction activities in proximity to various sensitive receptors, including motorists, pedestrians, and nearby residences and businesses.

Reversible HOV Lane Alternative. This alternative would be identical to the Fixed HOV Lane Alternative within Landscape Unit 1 (Southern Segment).

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November 18, 2007

Dear Neighbor,

Tired of freeway noise? Ready for more? Caltrans is going to expand Highway 101 from four lanes to six lanes in our neighborhood without a soundwall unless we inform them that we do want a soundwall by filling- out the attached Comment Card and sending it in before December 14, 2007. I met Glen Kinoshita and Melanie Brent at the Marin-Sonoma Narrows meeting on November 14, 2007. They both informed me that the soundwalls in the proposal for the Franklin Bridge (where Lamont Ave. and Alice Street meet) will probably be cut and not approved because they are "not cost effective". Caltrans claims a soundwall will only benefit nine houses in our neighborhood and it would not lower the dBA noise levels enough to be "cost effective". Mr. Kinoshita told me the dBA sound levels have to be reduced by a least five points to be considered, but I think these figures are wrong. Mr. Kinoshita also said a soundwall on the other side of the Franklin Bridge is more cost effective and might be considered but that would make more sound bounce off the freeway wall toward our side of the freeway. We need a soundwall on both sides of the Franklin Bridge, which is in the proposal, to contain the sound it is intended to deflect.

Please fill out the attached Comment Card and send it in before December 14, 2007. This is an urgent community issue, forms must be received before December 14, 2007. I have also attached some information I picked up at the meeting regarding the Franklin Bridge. For more information, go on line to Marin-Sonoma Narrows Caltrans. If anyone has any information or suggestions, please contact me.

Thank You,

Rhonda Berberich
(415)892-5295
713 Lamont Ave. Novato, Ca. 94945.
venerhonda@gmail.com

Letter: I22.
Signatory: Greg Abell.

Response to Comment I22-1

Your support of soundwall installation is acknowledged. Caltrans applies Code of Federal Regulations 23 CFR 772 to all projects requiring a federal approval or federal action. 23 CFR 772 and the Caltrans *Traffic Noise Analysis Protocol* define specific noise levels that must be attained before consideration of soundwalls. The determination of final reasonableness, which is the process for determining which soundwalls have been approved for construction for this project, is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12-4-07
Name: Greg Abell
Title and Agency/Company:
Phone: 415-892-2242 E-mail: GAABE1937 @comcast.net
Address:
City, State, Zip: ~~Stony L~~ Novato, CA 94947

Comments (Continue on back, use multiple sheets if necessary)

I22-1 I support (for the quality of life of the citizens in of Novato) that sound walls be installed as shown in Cal TRANS proposals.

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I23.
Signatory: Chip Worthington.

"Pastor Chip Worthington " <chip@stopthecasino 101.com>
12/11/2007 10:03 AM

To melanie.brent@dot.ca.gov
cc
bcc
Subject COMMENTS: Marin-Sonoma HOV DEIR

EMAILED AND MAILED

December 10, 2007

Melanie Brent

Caltrans District 4

111 Grand Avenue

Oakland, CA 94612-3717

re: Marin-Sonoma Narrows HOV Widening Project

DEIR Comments

Dear Ms. Brent:

The following is intended for inclusion in the DEIR Comments on the Marin-Sonoma Narrows HOV Widening Project ("Novato Narrows").

I23-1 **As a Sonoma County resident, I am concerned with the fact that with regard to the Novato Narrows project, Caltrans is (1) reliant upon outdated traffic projections from various outdated General Plans and, (2) has failed to include the proposed Graton Rancheria Casino near Rohnert Park in its traffic projections, even though the casino project in its current location has been discussed in both Marin Transportation Authority and Sonoma County Transportation Authority meetings since approximately 2003-2004.**

I23-2 **Failure to update traffic projections with new data from the current General Plans and failure include the casino project in the Novato Narrows traffic projections constitutes a fatal flaw. Without accurate figures, any projections Caltrans may make with regard to capacity improvement for the project area will be overstated and misleading. In fact, without accurate information going in to the project, the result may well be no net improvement.**

Very truly yours,

Response to Comment I23-1

Regarding traffic projections used, please see the response to Comment SA2-1 in Section 3.2.

The Graton Rancheria Casino was not originally included in the traffic projections for this project because when the projections were produced the Graton Rancheria Casino was only a conceptual proposal without the information needed for a traffic forecast.

Based on the Casino's Draft EIR, the additional demand will total around 18,000 vehicle trips per day When factoring in an additional 18,000 vehicle trips, we have to take into account certain aspects of this additional traffic: 1) the vehicle trips are spread out over a 24-hour period with only a fraction traveling in one particular direction at any given time; 2) the casino peak hour occurs at a different time-usually later-than the commuter peak hour; and 3) the 18,000 additional vehicle trips will be spread out throughout the entire casino study area, not just specifically at the project site.

The information from the casino project's Final Traffic Impact Study (dated Sept. 2007) indicates that the casino would generate a 10% increase in Average Daily Traffic (ADT) north of Old Redwood Highway intersection. Therefore, the additional 18,000 vehicle trips per day will not add an overwhelming amount of traffic to the project area, and the MSN Project would remain an effective way to relieve the congestion currently experienced at this location on US 101 even with the construction of the casino.

Response to Comment I23-2

See the response to Comment I23-1 above.

Letter - I23

Page 2

Reverend Chip Worthington

Pastor, Rohnert Park Assembly of God Church

Founder, Stop the Casino 101 Coalition

c/o 4695 Snyder Lane

Rohnert Park, CA 94928

707-58-5673

chip@stopthecasino101.com

Letter: I24.
Signatory: Lisa Pedrani.

Response to Comment I24-1

FHWA and Caltrans made every effort to include on the project mailing list residents adjacent to US 101 who may be impacted by right-of-way or proposed soundwalls. Mailing lists completed from scoping meetings and Policy Advisory Group meetings have also been included in our notice of availability. You have been added to the project mailing list regarding future public meetings for this project.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12/12/07
Name: Lisa Pedrani / Gene Petersen
Title and Agency/Company:
Phone: 707-584-6612 E-mail: pennyfofo@AOL.com
Address: 2760 Redwood Hwy SP
City, State, Zip: Petaluma CA 94952

Comments (Continue on back, use multiple sheets if necessary)

I24-1 We own the property above & have not been informed of any meetings. Please forward all info pertaining to this to the address above. I understand there are maps as well. I would also like to be informed by Email of any future meetings on this subject.

Thank you

Lisa Pedrani

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 88
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

05/07/2007 18:01 7626856 PAGE 01/01

Letter: I25.
Signatory: Eleanor Sluis.

Response to Comment I25-1

Your preference for Access Option 12b is noted. This option has been identified as the Preferred Alternative, as discussed in Volume 1, Section 2.4 of this FEIR/S.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 11/14/07
Name: Eleanor SLUIS
Title and Agency/Company: — NOVATO Preservation League
Phone: 415-892-0128 E-mail: e.sluis@earthlink.net
Address: PO Box 240
City, State, Zip: Novato, CA. 94948

Comments (Continue on back, use multiple sheets if necessary)

- My preference is for 12b - because of:
1. Cost less $ -
2. Aesthetics - without are better - a San Antonio overpass
3. Less development will occur with no San Antonio overpass and thereby ~~not~~ not increasing the number of cars on the 12b project in the longterm -

I25-1

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I26.
Signatory: Frank Penry.

Response to Comment I26-1

Caltrans has been aware of public support for soundwalls in the city of Petaluma, particularly southeast and northwest of the East Washington Interchange, based upon scoping and community meetings with residents in those areas (see Table 6-1, MSN DEIR/S Public Outreach Coordination, in Volume 1). Based upon this background information as well as the information Caltrans has collected during the public comment period for this project, the soundwalls would be desirable to a number of residents adjacent to the project. Caltrans has determined that all the proposed soundwalls in Petaluma are reasonable and feasible, except for Soundwall No. 7, whose construction was determined to not be the best use of public funds.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 11/6/07
Name: FRANK PENRY
Title and Agency/Company: TRAFFIC ENGINEER - CITY OF PETALUMA
Phone: 707 #778-4495 E-mail: fpenry@ci.petaluma.ca.us
Address: 11 ENGLISH ST.
City, State, Zip: PETALUMA, CA, 94952

Comments (Continue on back, use multiple sheets if necessary)

I26-1 I UNDERSTAND IT IS THE INTENT OF CALTRANS TO USE PUBLIC COMMENT DURING THE REVIEW PERIOD AND PUBLIC HEARING TO ~~ADDRESS~~ DETERMINE THE SUPPORT FOR SOUNDWALLS IN THE CITY OF PETALUMA (MSN C). CALTRANS SHOULD REVIEW ALL PUBLIC REQUESTS/ COMMENTS/CONCERNS REGARDING SOUNDWALLS. IT IS MY UNDERSTANDING COMMENTS HAVE BEEN RECIEVED FOR THE PAST 20 PLUS YEARS.

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I27.
Signatory: Eva Andrews.

Response to Comment I27-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12/10/07
Name: EVA RANDREWS
Title and Agency/Company: owner of 763 Lamont Ave
Phone: 415-897-3566 E-mail:
Address: 763 Lamont Ave
City, State, Zip: NOVATO CA 94945-4155

Comments (Continue on back, use multiple sheets if necessary)

Sir, I'm sorry I can't be at either meeting, as I've had other commitments I could not get out of.

I've owned home for years, 1963 bought, watched freeway being built, had lots of dirt & mud during that period. They did give us a barrier on bridge that has helped but as the years pass, the traffic has increased, and sometimes stopped. The noise level, has really increased to the point, I've had to replace windows in my home, that has helped, but the noise is still a factor, when the trucks downshift its like a noise that causes a person to cringe, and hope it goes away. I really feel, we need a stronger noise barrier for now & when you put in new lanes.

I27-1

If no barrier, it would greatly decrease my home value, would you like that to happen to you.

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I28.
Signatory: Heracleo Munoz.

"Heracleo Munoz"
<rockyslawn@msn.com>
12/03/2007 06:15 PM

To <melanie_brent@dot.ca.gov>
cc
bcc
Subject comment card for sound walls

I28-1 Hello I live at 702 Lamont Ave. Novato CA And not just my self but Neighbors in the same street are tired of the freeway Noise and yeah we have more coming and I understand that Cal trans is going to expand 101 freeway without doing a sound wall simply because the wall will only benefit a few homes
well I think that either Cal trans or somebody consider this problem more deeply. the people that live in this neighborhood are the ones that have to live with the noise and smog. we do benefit from having a bigger freeway but again there should be something done to improve noise reduction. I would like to comment that people that live in this neighborhood also want the sound wall. there house numbers are 702, 701, 703, 704, 703, 706, 708, 710. I am sure you will also receive comment card from them also.

Response to Comment I28-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Letter: I29.
Signatory: Ed and JoAnn Johnson.

Jo Ann Johnson
<jjohnson6501@sbcglobal.net>
12/13/2007 10:10 AM

To melanie_brent@dot.ca.gov
cc
bcc
Subject Comment on DEIS/R for Marin-Sonoma Narrows HOV Widening Project

I29-1 Some years ago our neighborhood representative, Linda Scott, fought for and won promise of funding for a soundwall for our neighborhood. The money was transferred to the Sonoma County Transit Authority to be used for that purpose. Now I'm hearing that SCTA is saying "What money? We're out of money." Our neighborhood wants our promised soundwall to be included in the Washington Street overcrossing improvement project now in progress, and we want CalTrans to make good on their promise and require that SCTA "find" our money! When we went to the November 29 CalTrans environmental review meeting to request this, the CalTrans representative recommended we go to the City. But that is bad advice because it just gets us into the old run-around as the City tells us they can't build a soundwall on property that doesn't belong to them with money they don't have! The City HAS earmarked some supplemental funding for this project, which is the most which should be expected of them. We SHOULD have been able to ask a SCTA person at the meeting where our funding is, but there was no SCTA rep there.

You are adding a northbound onramp directly across the freeway from us. Why do you think you can further hurt us without offsetting relief?

Thankfully, our neighborhood gossip system informed those of us living across the street from the freeway that this meeting was being held. Although you probably weren't legally required to notice us, it would have been appropriate to do so.

I29-2 This neighborhood is being treated shamefully by the agencies which should be restoring a reasonable quality of life for us. Toxic runoff has been draining into all the back yards along the freeway for years. We suspect that when CalTrans finally addresses this illegal situation, they will remove the trees, our only protection, in the process, and we'll just be worse off. I believe that this neighborhood is the only place in Sonoma and Marin County where houses are crammed up against the freeway with no relief. As I said, this situation is shameful.

Ed and Jo Ann Johnson
46 Arlington Drive
Petaluma, CA 94952
707 762-6501

Response to Comment I29-1

Your neighborhood representative had earlier received approval for placement of your soundwall on a priority list under the federally funded retrofit soundwall program (also known as the HB311 program). A large number of soundwalls were prioritized as part of the program though many were not built due to lack of funding. In the 1990s, the retrofit soundwall program was combined with the overall transportation budgets of the local congestion management agencies under California Senate Bill 45. The congestion management agencies were then given the responsibility of deciding if they would build the walls or not depending on their available funds and transportation needs.

The soundwalls under consideration on this project are not part of that program but are considered abatement for traffic noise impacts of the project under federal regulations. In compliance with CEQA and NEPA, as part of the environmental process, all impacts will be disclosed and addressed.

Response to Comment I29-2

See the response to Comment I56-14 for discussion of localized flooding in the Petaluma urban area.

Trees in the area may need to be removed to build the soundwall. However, water quality treatment (during construction and post-construction) of pavement runoff will be considered to the maximum extent practicable through the implementation of design pollution prevention best management practices (BMPs), construction site BMPs, and permanent treatment BMPs. Please see response to Comment LJ2-10 for additional information.

Letter: I30.
Signatory: John Silvestrini.

Response to Comment I30-1

Your support for a bike path providing a safer route between Petaluma and Novato is acknowledged.

Response to Comment I30-2

Your preference for the longest Class I bike path is noted. Each access option is comprised of a combination of Class I and Class II paths.

Response to Comment I30-3

The bike path will alternate between the east and west sides of US 101 to provide accessibility to the Olompali SHP and the SMART corridor.

Response to Comment I30-4

Caltrans is designing the bike path according to design standards wherever feasible. The roadway and bike path typical cross-sections are presented in Figure 2-5 in Volume 1 of this FEIR/S.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 11/14/07
Name: JOHN SILVESTRINI
Title and Agency/Company:
Phone: E-mail: JOHNS@NUSD.ORG
Address:
City, State, Zip: PETALUMA, CA

Comments (Continue on back, use multiple sheets if necessary)

I30-1 BIKE LANE/PATH VERY IMPORTANT. THERE IS NO SAFE ROUTE BETWEEN PETALUMA & NOVATO.

I30-2 ① LONGEST CLASS 1 PATH IS BEST.

I30-3 ② PATH ON WEST SIDE OF FREEWAY UPWIND OF EXHAUST WOULD BE DESIRABLE.

I30-4 ③ SEPERATE BIKES FROM TRAFFIC AS MUCH AS POSSIBLE

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I31.
Signatory: Jonathan Kopp.

Response to Comment I31-1

The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls under the federal criteria, which are applied to this project. No soundwalls or other noise abatement measures will be considered for this area.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12/10/07
Name: Jonathan Kopp
Title and Agency/Company: Novato Resident
Phone: (415) 328-6587 E-mail: jbk@well.com
Address: 676 Orange Ave
City, State, Zip: Novato CA 94945

Comments (Continue on back, use multiple sheets if necessary)

I31-1 Our neighborhood desperately needs a soundwall. A high density residential area that predates the freeway.
On Orange Ave, a 24 hr. sound study done 14 yrs. ago indicated we were on the borderline of qualifying for walls.
The present sound test was done on only one side of the freeway.
Soundwalls are being proposed north & south of us, in much less dense areas.
Soundwalls for Orange Ave!

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I32.
Signatory: Les Pierce.

Response to Comment I32-1

The comment is in reference to Soundwall No. 5C. Your input in support of this soundwall has been noted. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Melanie Brent/D04/Caltrans/CAGov
11/14/2007 08:08 AM

To yolanda_rivas@dot.ca.gov@DOT
cc valerie_heusinkveld@dot.ca.gov@DOT
bcc
Subject Fw: HIGHWAY 101 -SOUNDWALLS

Narrows/E.Washington comment.

Melanie Brent, Office Chief
District 4 Environmental Analysis
(510) 286-5231 Office
(510) 715-8492 Cell
----- Forwarded by Melanie Brent/D04/Caltrans/CAGov on 11/14/2007 08:07 AM -----

"Les Pierce"
<petalumales@webtv.net>
11/12/2007 03:34 PM

To melanie_brent@dot.ca.gov
cc
Subject Fw: HIGHWAY 101 -SOUNDWALLS

(please see below) thanks.!!

From: Les Pierce
Sent: Sunday, November 11, 2007 10:19 PM
To: corey.young@arguscourier.com
Cc: russdougan@aol.com, jerryfmain2002@yahoo.com, ptorliatt@aol.com, mike4pet@aol.com, kpetersonnau@aol.com, teresa4petaluma@comcast.net, freitaspr@comcast.net, petalumamike@aol.com, jsanchez@pressdemocrat.com
Subject: HIGHWAY 101 -SOUNDWALLS

DEAR CORY, I READ YOUR ARTICLE REGARDING THIS ISSUE, AND WAS VERY SURPRISED.!

I32-1 THE SOUNDWALLS ON HIGHWAY 101 ARE VERY IMPORTANT TO THE PETALUMA RESIDENTS IN THIS AREA.
I LIVE BEHIND THE CURRENT SOUNDWALL
ON KRESKY WAY, AND THE FREEWAY "NOISE" IS ATROCIOUS. THE CURRENT WALL WAS BUILT "TOO-SHORT" TO BEGIN WITH BECAUSE IT IS "LOWER THAN THE FREEWAY AND WE CAN SEE THE
CARS ON 101 FROM OUR KITCHEN.

THE "DECIBAL NOISE FROM THE FREEWAY" IS ALREADY ABOVE ALLOWABLE LEGAL DECIBAL NOISE LIMITS, AND AGAINST THE LAW.
IN ADDITION, ON SATURDAY NIGHTS THEY RUN CAR RACES JUST ON THE OTHER SIDE OF THE FREEWAY....AT THE FAIRGROUNDS.

OUR NEIGHBORHOOD FEELS THAT WE ABSOLUTELY NEED HIGH

Letter - I32

Page 2

"SOUNDWALLS TO PROTECT US FROM 101 NOISE" WHEN
AN ADDITIONAL LANE AND ADDITIONAL TRAFFIC INCREASES "HIGHWAY NOISE."

I32-2 I SUGGEST THAT THE CITY OF PETALUMA
SEND OUT A SOUND-SPECIALIST TO MEASURE THE DECIBAL NOISE ON A SATURDAY NIGHT WHEN THERE IS CAR RACING AT THE PETALUMA FAIRGROUNDS, AND THEY WILL SEE WHAT I AM COMPLAINING ABOUT.
THANKS.

REGARDS,
MR. LES PIERCE
1231 KRESKY WAY
PETALUMA, CA. 94954

Response to Comment I32-2

For your area, a 12-foot soundwall will be built as part of this project.

The soundwall is described in Volume 1, Section 3.2.7.4 of this FEIR/S. In regard to the Petaluma Fairgrounds, the State does not have jurisdiction over areas not within its right-of-way and cannot make any commitments regarding the abatement of noise coming from them.

Letter: I33.
Signatory: Linda and Hoot Smith.

Response to Comment I33-1

Kastania Road is an existing two lane road with non-standard shoulders. Under the Preferred Alternative, this road will be widened to provide two 12-foot lanes and two 6-foot shoulders, for a Class II bike facility. It will extend from Gunn Lane to the South Petaluma Boulevard overcrossing to replace the direct access to US 101 that many property owners currently have. Information on the project will be updated and posted on the project website (www: dot.ca.gov/dist4/msn) along with Policy Advisory Group meeting notices.

Response to Comment I33-2

The proposed frontage road will fit within the 60 foot county right-of-way and additional right-of-way will not be required. Mainline at this location is proposed to be built to the east of the existing expressway and will not require additional right-of-way from parcel 019-330-005. The design is preliminary, existing right-of-way needs to be validated, and final design could require additional right-of-way needs.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: Nov. 26, 2007
Name: Linda & Hoot Smith
Title and Agency/Company: Owners / Kastania Vineyards
Phone: 707-291-5069 E-mail: hoot@kastaniavineyards.com
Address: 4415 Kastania Rd. / 4300 Kastania Rd.
City, State, Zip: Petaluma, CA 94952 Parcel# 019-330-005
Parcel# 019-330-017

Comments (Continue on back, use multiple sheets if necessary)

I33-1 We would like to receive any information on the proposed plan to widen Kastania Road to act as the frontage road for the west side of the 101 widening project.

I33-2 Will there be a need for addifional property to add to the 60' existing county right-of-way to accomodate the proposed roadway? Will additional property be needed for the widening project for the west side of 101? (Parcel# 019-330-005) ANY INFORMATION would be appreciated.

PROJECT LOOKS GREAT!

Hoot Smith

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I34.
Signatory: Diane Reilly Torres.

Diane Reilly Torres
<dreillytorres @sbcglobal .net>

12/14/2007 04:12 PM

To melanie_brent@dot.ca.gov
cc
bcc
Subject Comment on Marin-Sonoma Narrows HOV Widening Project DEIR

I34-1 The Marin/Sonoma Narrows project was to add HOV lanes from Novato to Old Redwood Highway in Petaluma and then HOV lanes from Old Redwood Highway to Rohnert Park Expressway in SCTA's Old Redwood Highway, Petaluma to Rohnert Park Expressway HOV Project.

The MSN Widening Project DEIR says the project ends north of Corona Road Over-crossing in Petaluma instead of Old Redwood Hwy. What is the plan for HOV lanes between Corona Rd and Old Redwood Hwy?

I34-2 Comments on Drainage and Flooding in Segment C: The DEIR fails to mention the flooding in segment C 12-31-05. I am including links to the City of Petaluma website of Photos from the 12-31-05 Flood Petaluma and want these photos included in my comment.

I34-3 The DEIR statement ..... Flooding within the Project Area Historical records indicate that, in general, the existing culverts and drainage systems adequately transport on-site and off-site flows to receiving waters without localized flooding.(PAGE 3.2.9) Are the following pictured locations of culverts and drainage systems adequate to transport on-site and off-site flows to receiving waters without localized flooding?

http://cityofpetaluma.net/images/flood_2005/photo_album/index.htm
#54Flood along southbound 101
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/054_jpg.htm
#56 Flood Hwy 101 OC RR Tracks
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/056_jpg.htm
#57 Hwy 101 South of Factory Outlet
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/057_jpg.htm
58 Hwy 101 Flooded Factory Outlet
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/058_jpg.htm
#60 Southbound 101 Flooded Looking East to West Corona OC
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/060_jpg.htm
#63 Hwy 101 Flooded Segment C HOV
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/063_jpg.htm
66 Highway 101 and Corona OC Youngstown Senior Mobilehome Park
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/066_jpg.htm
#68 Hwy 101 Corona OC & Petaluma Bl North
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/068_jpg.htm

Response to Comment I34-1

Caltrans and FHWA apologize for any confusion regarding the MSN Project boundaries. There is another HOV lane project from Old Redwood Highway to Rohnert Park Expressway (known as the Central Sonoma HOV Project) which is due to go to construction mid-2010 (see Table S-1 in Volume 1 of this FEIR/S). Although the stated MSN Project boundary is to just north of Corona Road Overcrossing, the study limits of the project extended to just south of Old Redwood Highway; and the MSN Project HOV lanes will conform to the lanes just to the north that will already have been constructed as part of the Central Sonoma project. Therefore, there will be no gap in the HOV system.

Response to Comment I34-2

The DEIR/S mentions the historical flooding problem in the City of Petaluma on page 3.2-10, lines 145-156. See the response to Comment I56-14 below for discussion of localized flooding in the Petaluma urban area.

Response to Comment I34-3

Historical records indicate that for the 17 miles of US 101, in general, the existing culverts and drainage systems function adequately for passage of both on-site and off-site flows. Exceptions to this general rule include the Petaluma urban area. The Petaluma River and most of the tributaries are included in FEMA's Special Flood Hazard Area detailed mapping. The culverts and drainage systems in this project were evaluated in accordance with Section 821.3 of the Highway Design Manual for 10-year and 100-year watershed flows.

Photo #54: Unknown photo location.

Photo # 56: Photo shows Petaluma River in the floodplain located southerly of US 101, near mainline station 2095 to 2098. There are no Caltrans cross culvert locations visible in this photo. The nearest drainage facility would be near the North Petaluma Overhead (shown in photo), where it is assumed there is a non-Caltrans culvert under the SMART line, which drains southerly to the Petaluma River.

Photos #57 & #58: Photos show Petaluma River in the floodplain and ditch that runs longitudinal to US 101. In this area, the tributary watershed flows are conveyed under US 101 by way of a system of 8'x3' Reinforced Concrete Boxes (RCBs). Hydraulic calculations indicated that this system met the criteria for culvert design in Section 821.3 of the Highway Design Manual. Work on the cross culverts includes extension of existing RCBs/culverts.

Photos #60, #66, #68, and #71: Photos are similar to photos 57 and 58. In this area near Corona Road, the tributary watershed flows are conveyed under US 101 in drainage facilities that include a system of 8'x3' RCBs along with multiple other cross culverts. Hydraulic calculations indicated that this system met the criteria for culvert design in Section 821.3 of the Highway Design Manual. Work on the cross culverts includes extension of existing RCBs/culverts.

Photo #63: Area is approximately 0.2 mile north of Corona Rd. Area shown is not within the project limits.

Photo #64: The Redwood Highway north interchange is not within the project limits.

Photos # 75 and #76: Photos show Petaluma River in the floodplain at the Lynch Creek confluence. There are no known flood conveyance design problems with the US 101 bridge at Lynch Creek. Higher water surface elevations in Lynch Creek can be a backwater influence from the Petaluma River.

Letter - I34

Page 2

#64 Hwy 101 & Old Redwood hwy
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/064_jpg.htm
71 101 across to Pet Bl N
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/071_jpg.htm
75 & 76 Hwy 101 Lynch Crek OC
I34-3 http://cityofpetaluma.net/images/flood_2005/photo_album/pages/075_jpg.htm
http://cityofpetaluma.net/images/flood_2005/photo_album/pages/076_jpg.htm

IMPACT: Hydrology and floodplains
Increased runoff from improvements that contribute additional storm waters to areas historically affected by flooding in Segments B and C.

I34-4 Proposed Mitigation Resizing and upgrading of culverts; consideration of ditches above significant cut faces, perforated underdrains, horizontal pipe drains, and detention ditches. NOT DOING ANY OF THIS IN SECTION C ONLY DETENTION PONDS Design and implementation of detention facilities. (page S-35)

Will the existing Holm Road Ditch adequately transport on-site and off-site flows to receiving waters without localized flooding. ?

I34-5 The proposed soundwall does not have to extend over Lynch Creek as there are no residences on either side. The mitigation of installing lights, who is paying for that, what if they are vandalized?

I34-6 I oppose any defered mitigations to the "Policy Advisory Group" including the following

Adverse impact from new soundwalls, interchange ramp improvements, and auxiliary lane due to substantial decline in motorists' views and community character and to loss of tree hedgerows.

No impact. Proposed Mitigation Plant clinging vines to soften appearance of soundwalls; apply architectural design measures determined with Policy Advisory Group; if possible, locate soundwalls at project right-of-way, retain trees, and replace landscaping on the highway side of soundwalls.

Potential impairment of community use of pedestrian/bicycle undercrossings at Lynch Creek Bridge due to center bridge widening and accompanying loss of light.

No impact. Proposed Mitigation Installation of lights underneath; architectural and landscape design determined with Policy Advisory Group.

Adverse impact from tree removal and introduction of soundwall at Lynch Creek Bridge.

No impact. Proposed Mitigation Plant clinging vines to soften appearance of

Response to Comment I34-4

At this phase, the Holm Road Ditch has not been specifically analyzed for conveyance performance. The double 10'x5' Reinforced Concrete Box near Sta 2115+15 was evaluated in accordance with Section 821.3 of the Highway Design Manual for 10-year and 100-year watershed flows. The double RCB is proposed to be extended for the addition of the HOV lane.

Response to Comment I34-5

Soundwalls need to extend beyond the residences at the end to provide adequate abatement for them. Installation of lights along the bike path under the Lynch Creek bridge as part of the proposed widening of the bridge would be paid for as part of the project. Future maintenance of the lights would be the responsibility of the City of Petaluma.

Response to Comment I34-6

Your opposition to deferred mitigation is noted. At the time that the mitigation measures were prepared, a Policy Advisory Group (PAG) existed that could serve as a venue for resolving issues and local preferences relating to details of project design. Since that time, however, the PAG was disbanded. In the absence of an inter-agency PAG, the best avenues for resident input into the detailed specification of mitigation measures after the present comment period are via local government representatives, including the Director of Public Works, City Council members, and other City staff. Caltrans can then incorporate input during the final project design phase. Please see the response to Comment I34-7 for additional detail.

Letter - I34

Page 3

I34-6 soundwalls; apply architectural design measures determined with Policy Advisory Group.

I34-7 Pleas answer the following regarding the defered mitigations:

- Why has that particular mitigating measure been selected?
- What is the desired future condition after mitigation – e.g. the performance standard?
- What are the options available to achieve the desired future condition?
- Has the agency committed to achieving it?
- Who is responsible for the mitigation?
- Where must the mitigation take place?
- When must the mitigation take place?
- Is the mitigation measure feasible to achieve (in view of economic, technical, legal and other factors)?

I34-8 Caltrans also evaluates structures for seismic retrofit. Any structure work as part of the Fixed HOV Lane Alternative would include an analysis of the seismic and scour deficiencies. Project plans would include seismic retrofit, as necessary. Table 3.2-2 indicates the South Novato Boulevard Overcrossing would undergo a seismic retrofit of columns and footings. Seismic work can be identified as part of the Advanced Planning Study, or would be identified as part of the General Plan development in final design.

When Caltrans conducted a review of all the structures in the MSN Project study area. and evaluated structures for seismic retrofit, how was it determined the Corona OC did not need a seismic retrofit? What date was the Corona OC seismically retrofitted?

I34-9 I oppose Caltrans approving a design exception to allow less than one mile spacing between the East Washington and proposed Rainier interchanges and oppose Caltrans coodinating the design and construction efforts in the segment C with the City of Petaluma to accomodate the future Rainier project.

The City of Petaluma General Plan 2025 DEIR on page 3.2-3 states …. "the ideal freeway capacity is 2,400 vehicles per hour per lane. However, segments of U.S. 101 through Petaluma have many features that reduce the capacity flow rates from the ideal of 2,400 vehicles per hour per lane, including:

· Heavy vehicles, including trucks, buses, and recreational vehicles,

Response to Comment I34-7

With respect to the specific mitigation measures referred to in comment I34-6, above, the measures were identified as the only available and feasible ones to address the impacts of concern. For example, Caltrans staff believe from experience on other projects that vine planting and appropriate architectural design enhancements can have a substantial effect in reducing the impact and improving the overall appearance of soundwalls. At earlier stages of project design, staff believed that it might be possible to retain existing trees or replace trees on the highway side of soundwalls. However, the physical feasibility of such measures is now in question.

The desired long-term condition after mitigation is to reduce the degree of adverse effects on overall visual quality to the greatest extent feasible. As noted in the Visual Impacts Assessment (VIA), page 133, these measures would partially mitigate anticipated impacts, but a level of adverse impact would remain and be unavoidable.

Caltrans staff are not aware of additional available options for reducing the impacts of tree removal and soundwall construction in these locations at this time. Highway plantings, including replacement tree and large shrub planting, are infeasible along proposed soundwalls in Petaluma because of the lack of available adjacent right-of-way; the proposed widening requires all remaining land up to the property lines of adjoining residences. In addition, substantial opposition to replacement tree planting was received by Caltrans from neighboring residents, many of whom view the existing trees as a nuisance. In any event, tree replacement would be infeasible in terms of accomplishing the stated purpose and need of the project in these locations (i.e., highway widening to accommodate additional lanes). Caltrans does believe from prior experience that extensive vine planting on soundwalls can dramatically reduce the decline in visual quality caused by them, in a relatively short period of time.

Caltrans is committed and indeed legally obligated to apply the mitigation measures called for in the FEIR/S and VIA. Caltrans is ultimately responsible for implementation of the mitigation measures called for in the environmental document. Monitoring and input on mitigation by other sources, including the public, are also possible via local representatives.

Mitigation measures must be implemented as described in the FEIR/S and VIA. For example, in the case of mitigation of soundwalls, the intent is to plant the entire wall with vines. As described in the VIA, Mitigation Measures for Tree/Vegetation Removal, p. 144:

> 'Replacement landscaping shall be funded through the parent roadway contract, programmed and completed as a separate contract within two years of completion of all roadwork.'

Any input into architectural design of soundwalls or other structures must take place early in the final project design phase, in order to be incorporated in final project engineering. Therefore, timely local involvement through local officials would be helpful for input to be incorporated into the project.

Proposed vine planting and architectural design measures for soundwalls proposed under the MSN Project are technically and economically feasible. Caltrans staff are not currently aware of any restricting legal factors that could prevent their implementation.

Response to Comment I34-8

Corona Road OC, Br. No. 20-0160 - This structure was retrofitted in 1996 (Earthquake Retrofit Project No. 402). There is no structure work for this bridge in the HOV lane project. Therefore, no seismic analysis was performed for this structure in the Advance Planning Studies.

Response to Comment I34-9

The Proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin Sonoma Narrows project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project.

Letter - I34

Page 4

represent approximately five percent of vehicles on U.S. 101;

· Locations with short merge distances for on-ramps;

· Interchange spacing typically less than two miles.

Therefore, the capacity of 2,200 vehicles per hour per lane was selected as an appropriate approximation of freeway capacity through Petaluma . "

Now, this documents clearly identifies "Interchange spacing less than two miles" as one of features that reduces the ideal volume of vehicles per hour per lane from 2,400 to 2,200, yet the City of Petaluma is suggesting Caltrans grant an exception for a new Interchange spaced less than one mile from an existing Interchange.

The spacing of one mile minimum between interchanges is for the public safety by decreasing the amount of fatal and nonfatal accidents on the freeways.

Interchange location, or "spacing" relative to adjacent interchanges, is a design feature which is critical to the safe and efficient utilization of all freeways. Inadequate interchange spacing frequently creates a "bottleneck" which, in peak demand periods, often compromises safety and results in the under-utilization of freeway mainline capacity. I34-9

I34-10 Caltrans must follow their re own project procedures for locally funded new interchanges on existing freeways . In addition the "Rainier Interchange Project"

· Will receive $0 Measure M funds or any State or Federal money

· The PUC will have to approve a new at grade railroad crossing or the structure will have to go over the railroad tracks,

· will also have to go over the Petaluma River

· will have pylons in the FLOODWAY (from the Rainier DEIR)

· is not a regional traffic improvement but is to open up development in

Response to Comment I34-10

The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin-Sonoma Narrows Project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project.

Letter - I34

Page 5

the floodplain in a City that has already spent millions of dollars on a Flood control project that is not completed and continues to have major floods

· will make traffic worse on 101 and is not part of the widening of 101

Specifically the Advisory Measure voters passed in 2004 urged and advised the City Council to:

Make appropriate designations of the Rainier Cross-Town Connector and Interchange Project to the Sonoma County Transportation Authority, the Metropolitan Transportation Commission and CalTrans so that the project can be coordinated with the widening of Highway 101;

Expeditiously complete the Environmental Impact Report for the Rainier Cross-Town Connector and Interchange Project;

Finalize the design of the Rainier Cross-Town Connector and Interchange Project incorporating an at-grade railroad crossing if feasible, determine the precise footprint of land needed for the project and take steps to preserve the necessary right-of-way;

Prepare a financing plan for the Rainier Cross-Town Connector and Interchange Project that maximizes the contributions from property owners and businesses directly benefiting from the project via the use of benefit assessment districts and other appropriate mechanisms;

Not allow the Environmental Impact Report for any development proposal to utilize the Rainier Cross-Town Connector and Interchange Project as assumed traffic mitigation until such time as
(1) all necessary Environmental Impact Reports have been certified,
(2) all funds to construct the project have been identified and secured, and
(3) no substantial impediments remain to construction of the project;

Design the Rainier Cross-Town Connector and Interchange Project so as to fully mitigate all flooding impacts and to incorporate appropriate bicycle and pedestrian pathways.

I34-10 If Caltrans going to honor the above if Rainier is included?
Thank you for your consideration, Diane Reilly Torres

Letter - I34

Page 6

Diane Reilly Torres

Letter: I35.
Signatory: Diane Reilly Torres.

Response to Comment I35-1

The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin-Sonoma Narrows Project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project.

Diane Reilly Torres
<dreillytorres @sbcglobal .net
>
11/18/2007 03:48 PM

To bijan_sartipi@dot.ca.gov, melanie_brent@dot.ca.gov
cc Doanh Nguyen <Doanh_nguyen@dot.ca.gov>, Jit Pandher <jit_s_pandher@dot.ca.gov>, Rey Centeno <rey_centeno@dot.ca.gov>, janicecader@comcast.net,
bcc
Subject Caltrans not approve a design exception

Dear Mr. Sartipi and Ms. Brent,

I ask that Caltrans not approve a design exception to allow less than one mile spacing between the East Washington and proposed Rainier Interchanges.

The City of Petaluma General Plan 2025 DEIR on page 3.2-3 states .... "the ideal freeway capacity is 2,400 vehicles per hour per lane. However, segments of U.S. 101 through Petaluma have many features that reduce the capacity flow rates from the ideal of 2,400 vehicles per hour per lane, including: Heavy vehicles, including trucks, buses, and recreational vehicles, represent approximately five percent of vehicles on U.S. 101; Locations with short merge distances for on-ramps; and Interchange spacing typically less than two miles. Therefore, the capacity of 2,200 vehicles per hour per lane was selected as an appropriate approximation of freeway capacity through Petaluma. "

Now, this documents clearly identifies "Interchange spacing less than two miles" reduces the ideal volume of vehicles per hour per lane from 2,400 to 2,200, yet the City of Petaluma is suggesting Caltrans grant an exception for a new Interchange spaced less than one mile from an existing Interchange.

I35-1 Please, do not grant the City of Petaluma an exception to the required mandatory spacing between an existing interchange and the proposed new Rainier Interchange.

The spacing of one mile minimum between interchanges is for the public safety by decreasing the amount of fatal and nonfatal accidents on the freeways.

Interchange location, or "spacing" relative to adjacent interchanges, is a design feature which is critical to the safe and efficient utilization of all freeways. Inadequate interchange spacing frequently creates a "bottleneck" which, in peak demand periods, often compromises safety and results in the under-utilization of freeway mainline capacity.

I ask Caltrans to follow their own project procedures for locally funded New interchanges on existing freeways, in addition The Rainier Interchange Project

- Will receive $0 Measure M funds or any State or Federal money
- The PUC will have to approve a new at grade railroad crossing or the structure will have to go over the railroad tracks,
- will also have to go over the Petaluma River
- will have pylons in the FLOODWAY (from the Rainier DEIR)
- is not a regional traffic improvement but is to open up development in the floodplain in a City that has already spent millions of dollars on a Flood control project that is not completed and continues to have major floods
- will make traffic worse on 101 and is not part of the widening of 101

Thank you for your consideration,

Letter - I35

Page 2

Diane Reilly Torres

Letter: I36.
Signatory: Diane Schaumleffel.

Response to Comment I36-1

The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls under the federal criteria, which are applied to this project. No soundwalls or other noise abatement measures will be considered for this area.

Installation of open-graded asphalt concrete (OGAC) will be based on the maintenance and safety needs of the roadway surface, and cost. An analysis of the pavement condition will be done during design and OGAC will be included if it is called for.

Response to Comment I36-2

The traffic noise studies were done in complete compliance with Code of Federal Regulations 23 CFR 772 and the Caltrans Traffic Noise Analysis Protocol. The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls under the federal criteria, which are applied to this project. Measurement of existing noise levels would not change the results of the study because determination of noise impact is based on predicted noise levels, which are always higher than the measured existing levels. There is no compelling reason to extend the comment period to take further noise readings.

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Repo
Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening

Comments received at the 12/10 Novato City Council Mtg.

Date: DECEMBER 10 2007
Name: DIANE SCHAUMLEFFEL
Title and Agency/Company:
Phone: (415) 897-2657 E-mail:
Address: 695 ORANGE AVE
City, State, Zip: NOVATO CA

Comments (Continue on back, use multiple sheets if necessary)

I36-1 Please accept this as a formal request for a soundwall from south of Orange Avenue ~~the~~ to the north end of Kennard, and from south of West Orange Avenue to the north of Elmwood; also a soundwall of soundbrick material of 14' height; also the roadway material of OGAC or rubber.

I36-2 Please accept this as a formal request for an extension of the C.E.R. process until adequate sound study can be achieved; specifically real sound testing on Orange Avenue with 7 day sound test - the neighbors will be informed of and given information of - specifically date and time of test as well as results

Please accept these 7 pages of petitions with 106 signatures requesting these sound walls.

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter - I36

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B1

Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
Aldo D. Rosa		5 OAK PARK Dr.	415 879-8613
GERALDINE DiPASQUA		5 Oak Park Dr	415-822-5913
Ken Denton		678 orange Ave	(415) 250-1969
Kevin Butler		712 Orange Ave	415 898.1857
BRIS SEATON		705 OLIVE AVE	415 898-1703
CONSUELO ASCENIC		705 Olive Ave	5107261808
MARTIN ASCENIC		705 Olive Ave	5107261808
MARG GALBRAITH	Marg Galb.	1201 Chase St.	415 897-7780
JAMES E. "	Jim Galbraith	" " "	" "
SAM CARAS	Sam Caras	717 OLIVE AVE	415-498-3289
Manuel Rosado	Manuel Rosado	670 Olive	415 897-5058
Judy Rosado	Judy Rosado	670 Olive	415 897-5058
Bruce Musser		669 Olive	415-254-6869
JoAnn Rucker	JoAnn Rucker	684 Orange	415-897-1222
Tara Johnson	Tara John	699 Orange	415-897-2760
Lena Johnson	Lena Johnson	699 Orange	
Sirena Johnson	Sirena Johnson	699 Orange Ave	
Sheila Hulbert			
Sheila Hulbert	Sheila Hulbert	671 Orange Ave	897-7347
Dwight Hulbert	Dwight Hulbert	671 Orange Ave	897 7347

Letter - I36

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Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address 94945	Phone 415
MARGARET Schram	Margaret Schram	682 ORANE Ave	897-6545
Robert Schram	Robert Schram	682 orange Ave	897-6545
John Schaumleffel	John Schaumleffel	695 ORANGE AVE NOVATO	897-2657
DIANE SCHAUMLEFFEL	Diane Schaumleffel	695 Orange Ave Novato	897-2657
Biru Zhang	[illegible]	678 Orange Ave	415 680-8883
Jonathan Kopp	[illegible]	676 Orange Ave	415-328-6587
STEVE EHRLICH	[illegible]	674 ORANGE Ave	415 897 6221
Spencer Thomas	[illegible]	674 orange Ave	415 [illegible] 9439
Joan Ehrlich	Joan A Ehrlich	674 Orange Ave	415 897 6221
LISA EHRLICH	Lisa Ehrlich	674 ORANGE Ave	"
Paul BELLI	Paul Belli	672 ORANGE	892 6618
Arlene Heiser	Arlene Heiser	672 Orange	577-7794
John Berry	John Berry	669 Orange	892 9952
Jan Berry	Jan Berry	669 Orange	892 9952
GLORIA McINTOSH	[illegible]	664 ORANGE	899-9630
Paul McIntosh	[illegible]	664 Orange	899 9630
CAROLE FREY	Carole Frey	3 Oak Park	897-5186

Letter - I36

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Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
Mary Ellen Conti	Mary Ellen Conti	66 10 range	892-3736
Lawrence P. Conti	Lawrence P. Conti	661 Orange	892-3736
Richard E. Mull	Richard E. Mull	673 ORANGE	892-2780
MIKE Obergfell	Michael Obergfell	863 Olive	250-4511
Rob Chevalier	[illegible]	681 Olive	415-812-5630
Laurel Freeman	Laurel C. [illegible]	675 Olive	897-8644
MASON WEST	Mason West	667 OLIVE	892-1840
Shaun West	Shaun West	667 Olive	892-1840
Lani Rosado	[illegible]	670 Olive Ave	897-5058
Ashley Vallee	Ashley Vallee	101 Kenwood Ct	899-1619
Mark Vallee	Mark Vallee	101 Kenwood Ct	897-1619
[illegible]	Lee Nixon	1205 CHASE ST	892-6695
Shawn Sack	[illegible]	1212 chase St	897 4499

Letter - I36

Page 5

Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
Anthony Soares		710 Orange	892-4610
Naomi Terasawa		680 Orange	892-1809
Kiyoshi Terasawa		680 Orange	892-1809
Jason Wu		697 Orange	893-1111
Jennifer Wu		697 ORANGE	893-1111
Linda Pierucci		697 Orange	893-1111
Gene PARDINI		668 ORANGE	892-3894
ANTHONY OLIVE		666 ORANGE	972263
JACK MAYNARD		1138 East St	897-1711
Eva Maria Gubat	Eva Gubat	666 Orange	987-6132
[illegible]	[illegible]	10 OAK PK Dr	
ANNE KOPP		676 ORANGE AVE	897-8551

Letter - I36

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Petition for sound wall on Westside of Hwy 101 along W.Orange Ave./Olive/Elmwood ct. They have planned a sound wall along the eastside of 101 along Cherry St to Atherton Ave. and south of Delong Ave.

Name	Signature	Address	Phone
Jane Grosso	Jane Grosso	735 Olive	415-892-3564
Rick Brust	Rick Brust	740 Olive	415-897-4614
Rick Olivera	Rick Olivera	735 Olive Ave	" 899 6692
Esme Graham	ESME GRAHAM	734 OLIVE	892-5897
Maria Gorria	[illegible]		415 897 8601
ZENA TSELASSIE	[illegible]	5 ELMWOOD CT NOVATO, CA-94945	415-898-3481
MESRAKE MOGES	Mesrake Moges	5 Elmwood ct	415 898-3481
James P Maloney	James P Maloney	9 ELMWOOD CT	415 897-2045
Jeannie Maloney	Jeannie Maloney	" "	" "
Michael Maloney	Michael Maloney	" "	" "
[illegible]	[illegible]	13 "	415 6168341
Sergio Pelis	Sergio Pelis	23 ELMWOOD	415 6968347
Linda Martinez	Linda Martinez	23 Elmwood.	(415) 898-8340
Amelia Escalera		"	"
Pedro Floriano De		"	"
Jesus Pangel	[illegible]	"	"
Juan De Jesus	[illegible]	"	"
TRACY CORDOVA	Tracy Cordova	20 Elmwood Ct	415 297-1995
James Allagan	James Allagan	20 Elmwood CA	Same
MARIA FREITAS	Maria Freitas	727 Olive Ave Pa	(415) 897-2040

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Petition for sound wall on Westside of Hwy 101 along W.Orange Ave./Olive/Elmwood ct. They have planned a sound wall along the eastside of 101 along Cherry St to Atherton Ave. and south of Delong Ave.

Name	Signature	Address	Phone
DOUG BOWERS	Doug Bowers	778 W. ORANGE	899-0144
Debbie Cortuyre	Debbie Cortuyre	728 W. Orange ave	899-0148
Katie Lopez	Katie Lopez	731 W Orange Ave	415 408-3509
Willy Lopez	Willy Lopez	731 W. Orange Ave	408-3509
Jose Martinez	Jose Martinez	730 W. Orange AVE	415 892 0141
Gladis Martinez	Gladis Martinez	732 W. Orange Ave	415-320-0497
[illegible]	[illegible]	736 W. Orange Ave	(415) 261-4100
MARTHA ACUNA	[illegible]	736 W. Orange Ave	(415) 261-4100
Leta HILL	Leta Hill	733 W. Orange Ave	(415) 892-9470
Tim Hill	[illegible]	733 W. Orange AV	(415) 892-9470
Edie Thomas	[illegible]	735 W Orange Ave	415 209 6855
Joe Thomas	[illegible]	735 W. Orange Ave	415 209 6855
Bob Desimone	Bob Desimone	738 W. Orange Ave	415 897 7489
Jim Rodriguez	[illegible]	740 West Orange A	897 7461
[illegible]	[illegible]	735 Olive AVE	893 0266
Juan Sanchez		735 Olive Ave	246 23 87
Maria Reyes	[illegible]	735 Olive AVE C-3	892-0612
Stanley Brig	Stanley Briggin	736 Olive AVE	897-2455
Samantha Briggin	Samantha Briggin	736 Olive Ave.	897-2455
Rebekah Briggin	Rebekah Briggin	736 Olive Ave	897-2455
Robert Grosse	Robert Grosse	738 - Olive	892 3560

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or trees

Petition for sound wall on East side of Hwy 101 along Orange Ave./Olive/Kenwood ct. They have planned a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
O Glover	O Glover	151 Kenwood	8980202
D Eddings	D	201 Kenwood Ct.	415-~~897~~ 5307
R. BRACKEN	Renee Bracken	111 Kenwood Ct	8982539
S. BRACKEN	S. Bracken	111 Kenwood Court	898-2539

Letter: I37.
Signatory: Diane Schaumleffel.

12/14 by J Richards

MARIN SONOMA NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: DECEMBER 12, 2007
Name: DIANE SCHAUMLEFFEL
Title and Agency/Company:
Phone: (415) 897-2657 E-mail: jdleffel@verizon.net
Address: 685 ORANGE AVE - EAST SIDE
City, State, Zip: NOVATO CA 94945

Comments (Continue on back, use multiple sheets if necessary)

PLEASE SEE ATTACHED 5 SHEETS

PLUS 6 PAGES OF PETITIONS FOR SOUNDWALLS FROM S of ORANGE to N of KENWOOD; S of W ORANGE to N of ELMWOOD

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter - I37

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Hello Melanie,

It was nice to meet you in person.

Please accept this as an addendum to the comment card that I handed you, along with the 106 petition signatures, on Monday, December 10, 2007. I wish to change the request from 14' soundwalls to 16' soundwalls, as Glenn stated that this is the standard height, at the Novato City Council meeting. For the sake of simplicity, I will reiterate what I wrote, and then I wish to add more.

I37-1 Please accept this as a formal request for a soundwall from south of Orange Avenue to the north end of Kenwood, and from south of West Orange to the north of Elmwood; also a soundwall of soundsorb material of 16' height; also the roadway material of OGAC or rubber.

I37-2 Please accept this as a formal request for an extension of the EIR process until adequate sound study can be achieved; specifically real sound testing on Orange Avenue with 7 day, 24 hour sound test - that neighbors will be informed of and given information of - specifically dates and times of test as well as results.

Please accept these 7 pages of petitions with 106 signatures requesting these sound walls.

Melanie, I didn't get a copy of the last page of signatures that I gave you. Could you please mail or fax me a copy?

I37-3 I would also like to add that I am requesting that Caltrans approve and include the following Novato City Council recommendations, which they unanimously supported:

Additional noise study of 7 days, 24 hours duration

Soundwalls for both sides of Orange neighborhood, as well as other specified areas

All soundwalls be of soundsorb material

All freeway roadway through Novato be of rubber or OGAC

I37-4 I would like to add that during the preview time before the City Council meeting, we repeatedly heard residents from varying neighborhoods state that the sound study was invalid, [less politely worded though]. The reasons being:

Affected neighborhoods were not sound tested

One sound test was not included in the EIR [W Orange with a higher actual reading than areas of planned soundwalls]

The duration of the actual sound test was inadequate - one resident said they saw them test for 10 minutes. A 7 day 24 hour measurement, as was done in San Rafael, needs to be done here.

The placement of testing equipment was in quieter areas [right next to but below the freeway]. 4-10 houses back is noisier.

Planned soundwalls in areas of no residence, but not in our already highly populated residential areas.

Response to Comment I37-1

Your support for soundwalls in your area is noted. Caltrans staff did attend the Novato City Council meeting, and we are aware of the local residents' views regarding the traffic noise studies.

Caltrans follows the Code of Federal Regulations 23 CFR 772 and the Caltrans *Traffic Noise Analysis Protocol* which defines the specific noise levels that must be predicted for an area before consideration of soundwalls. The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls.

As for the roadway material, installation of rubberized asphalt or OGAC will be based on the maintenance and safety needs of the roadway surface, and cost. An analysis of the pavement condition will be done during design and rubberized or open-graded asphalt will be included if it is appropriate.

Response to Comment I37-2

Caltrans and FHWA acknowledge and thank the commenter for the signed petition. Twenty-four-hour field measurements have been done for this study. The readings are used only to determine the worst hourly traffic noise. In order to determine qualifying soundwalls, Caltrans uses predicted levels for the finished project, which are higher than the existing noise levels.

Response to Comment I37-3

Your support for these Novato City Council recommendations is noted. The City of Novato input will be taken into consideration.

Twenty-four-hour field measurements have been done for this study. As noted above in the response to Comment I37-2, the readings are used only to determine the worst hourly traffic noise. In order to determine

qualifying soundwalls, Caltrans uses predicted levels for the finished project, which are higher than the existing noise levels. Therefore, additional noise measurements would not change the conclusions of the noise study.

As noted above in the response to Comment I37-1, the predicted noise levels for your area were not high enough to qualify for a soundwall. As for the other soundwalls that will be built as part of this project, the addition of SoundSorb® type material to the soundwalls would provide no benefit for the additional cost. The studies Caltrans has done indicate only a potential of a 2 dBA decrease in reflected noise from addition of SoundSorb to a soundwall. Changes of less than 3 dBA in traffic noise are imperceptible to the human ear. Hence, any changes due to the addition of SoundSorb would not be perceptible to residences of the affected neighborhoods, and would not justify the additional cost and ongoing maintenance.

Regarding the roadway material, please see the response to Comment I37-1 above.

Response to Comment I37-4

Thank you for your comments. Please see the above responses to Comments I37-2 and I37-3 regarding 24-hour field measurements and why additional noise studies are not necessary.

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I37-5 The evasiveness and contradictions of the sound person and his refusal to give information. When asked for dates, days of week, times of sound tests, he has given [in prior conversations as well as at the meeting] various answers; "I don't know", " I don't have that information", "It's not relevant": and has repeatedly refused to give it to us. Since these readings are what the sound study is based on, they are relevant, and it should be public information.

I37-6 Caltrans projected increased freeway noise with this project just north of us, and just south of us, obviously there will be increased noise for us as well.

I37-7 We want written prior notice for the additional sound tests that specify where, when, and duration of test; and then the results.

I have included the papers that I read from, and gave to, the Novato City Council on December 10.

I believe the comment period was extended another week, but am mailing this priority to make sure you get it on time.

Thank you Melanie for your professionalism.

Sincerely,

Diane Schaumleffel [415]897-2657 phone & fax jdleffel@verizon.net

cc:
Pat Eklund, Novato Mayor
Jim Leland, Mayor Pro Tem
Jeanne MacLeamy, Council Member
Madeline Kellner, Council Member
Carole Dillon-Knutson, Council Member
Dianne Steinhauser, TAM
Judy Arnold, Marin County Supervisor
Suzanne Dunwell, Senator Carole Migden's Office
Jit Pandher, RPM Caltrans
Doanh Nguyen, Dist. Div. Chief Caltrans
Dan McElhinney, Chief Dep. Dist. Director Caltrans
Bijan Sartipi, District Director Caltrans

Response to Comment I37-5

All traffic noise studies are public record, in full compliance with federal regulations, and are fully disclosed and addressed in compliance with CEQA and NEPA. A copy of the project traffic noise study will be sent to you. Although the specific times of day of the sound tests are not stated, the locations are provided and they are conducted at the peak hour of traffic. The methodology of the study complies with state and federal requirements.

Response to Comment I37-6

The area is predicted to receive an increase in noise of 1 dBA. Average noise levels after project completion are predicted to be 64 dBA, which is below the soundwall-qualifying criteria.

Response to Comment I37-7

It is customary for Caltrans to contact property owners for their permission to conduct tests and to inform them of their timing and duration beforehand. It is unknown at this time when the test results will be available, but your request has been noted and the results will be provided when available.

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Hello, my name is Diane Schaumleffel, 695 Orange Avenue, Novato.

We live on the east side of 101 near Olive. Our neighborhood was here before the freeway, and is the largest number of Novato residents along this noisy corridor. We want a soundwall put in along the stretch of highway from just south of Orange Avenue to the end of Kenwood Court, and Elmwood. There are soundwalls planned just north and just south of us, but our neighborhood was skipped. We have over 100 signatures of voting residents who strongly voice the need for this mitigating measure. Before the freeway cut through our neighborhood, we were promised mitigating measures for soundproofing, and it was not done. This needs to be done with this project. I37-8

Our property values and quality of life have suffered because of this broken promise. As we spoke with neighbors, we were told repeatedly how they suffered sleep deprivation from freeway noise, and being woken in the middle of the night due to it. I37-9 Our homes and yards are covered in soot from the freeway and are intolerable with the noise from 101. We had a nice quiet neighborhood, and it has been denigrated. With the widening of the freeway it will get worse without real mitigation measures. I37-10

In speaking with the Soundwall Noise Abatement Committee, as well as our own Council Members, City staff, and County Supervisor, [thank you], we have found support and information. We need a 4.3 meter, or 14 foot soundwall of soundsorb material [porous cementaceous material which absorbs the noise], as well as the OGAC [open graded asphalt concrete] or rubber roadway, both of which absorb the road noise. The rubber material was used on Miracle Mile in San Rafael with excellent results. The soundsorb walls and OGAC are both being put in San Rafael, replacing the old material. We want the same for our corridor. I would like to add, do it once, do it right. After all, this is our tax money, we are paying for this. I37-11

The current plans call for 4 soundwalls in Novato, as shown on volume 1, page 3.2-96 of the EIR ; and exhibit 3 of the Traffic Noise Impact Report. There are over 100 homes on the east side, and 43 homes on the west side which are affected by the freeway noise and will benefit from a soundwall. As you can see, soundwalls are planned for areas of fewer residents and in some cases with lower noise levels. Sound tests were not done on our street, which is extremely noisy, and much worse during the summer. Also, according to the data, the tests were only done for one hour, and it doesn't say the exact time of day, much the less the day of the week. Was it done on Sunday at 9? Fourteen years ago Cal Trans did a 24 hour sound test on our street. They told us then that the freeway noise was borderline abatement level. Obviously it is noisier now. The sound study is inadequate. It did not cover the affected areas, did not cover an adequate study time [7 day testing], and the data has not been made public: according to CFR 771, 772 and 773, when this criteria is not met, the EIR is incomplete. **We need a soundsorb wall!!!!!!!** I37-12

Also, I'd like to point out that the plans call for spending 2-3 times as much money on soundwalls in Petaluma. I37-13

Thank You,

Diane Schaumleffel [415]-897-2657 jdleffel@verizon.net

Response to Comment I37-8

The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls under the federal criteria, which are applied to this project. No soundwalls or other noise abatement measures will be considered for this area.

Response to Comment I37-9

Please see the response to Comment I37-6 above.

Response to Comment I37-10

The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls under the federal criteria, which are applied to this project. No soundwalls or other noise abatement measures will be considered for this area.

Response to Comment I37-11

The addition of SoundSorb® type material to the soundwalls would provide no benefit for the additional cost. The studies we have done indicate only a potential of a 2 dBA decrease in reflected noise from addition of SoundSorb to a soundwall. Changes of less than 3 dBA in traffic noise are imperceptible to the human ear. Hence, any changes due to the addition of SoundSorb would not be perceptible to residences of the affected neighborhoods, and would not justify the additional cost and ongoing maintenance.

Installation of rubberized asphalt or OGAC will be based on the maintenance and safety needs of the roadway surface, and cost. An analysis of the pavement condition will be done during design and rubberized or open-graded asphalt will be included if it is called for.

Response to Comment I37-12

Title 23, Part 772 of the Code of Federal Regulations (23 CFR 772), titled "Procedures for Abatement for Highway Traffic Noise and Construction Noise," outlines procedures for noise studies that are required for approval of federal-aid highway projects. The Federal Highway Administration (FHWA) requires that state highway agencies prepare state-specific policies and procedures for applying 23 CFR 772. These policies have been defined in Caltrans' August 2006 *Traffic Noise Analysis Protocol* (the Protocol), which documents the specific steps for the determination of traffic noise impacts and abatement. The Protocol applies to Caltrans and local agency projects that receive federal funding or require FHWA approval.

Twenty-four-hour field measurements have been done for this study. The readings are used only to determine the worst hourly traffic noise. In order to determine qualifying soundwalls, in compliance with federal regulations, Caltrans uses predicted levels for the finished project, which are higher than the existing noise levels. Predicted noise levels for this neighborhood did not reach the qualifying criteria levels stated in the Protocol and 23 CFR 772. Additional noise measurements would not change the conclusions of the noise study.

Response to Comment I37-13

Soundwalls are considered where traffic noise impacts have been determined in compliance with federal regulations. All communities are treated equally under the regulations.

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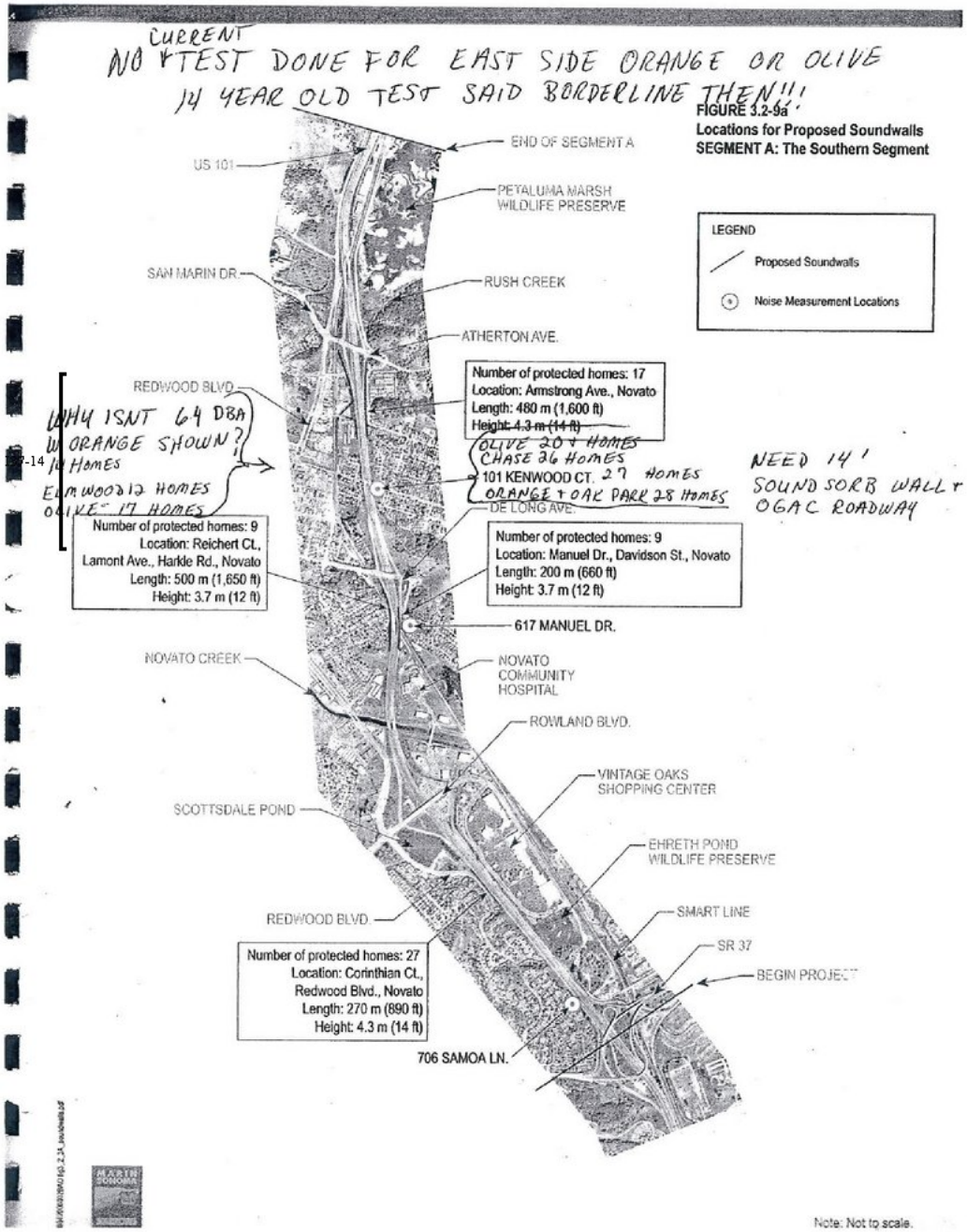
Response to Comment I37-14

Noise abatement is only considered for the homes closest to the freeway because soundwalls are not effective for those further away.

Regarding the request for SoundSorb walls and OGAC, please see the response to Comment I37-11 above.



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Noise Summary Table

Existing and Predicted Future Worst-case Traffic Noise Levels

Segment - A

Rec #	Location	Existing Peak Noise	Future Build Worst-Case Noise Level (dBA) No-Wall	8'Wall	10' Wall	12'Wall	14' Wall	Barrier #	Barrier Height(m)	Barrier Length(m)	# Homes Shielded
R-1	617 Manuel Dr	63(M)	67	65	63	62	---	1	3.7 (12ft)	200 (660ft)	9
R-2	613 Davidson St	61(E)	66	64	63	61	---				
R-3	101 Kenwood Ct	61(M)	62	---	---	---	---	No Wall			
R-4	201 Kenwood Ct	62(E)	63	---	---	---	---				
R-5	221 Kenwood Ct	59(E)	60	---	---	---	---				
R-6	Apartment	71(E)	72	---	66	64	63	2	4.3 (14ft)	480 (1600ft)	17
R-7	1508 Armstrong Ave	71(E)	71	---	69	67	66				
R-8	Pool-Mobile Home (Armstrong)	65(E)	65	---	63	62	61				
R-9	16 Elmwood Ct	65(E)	66	---	---	---	---	No Wall			
R-10	Playground(Olive/Elmwood)	65(E)	65	---	---	---	---				
R-11	725 W Orange Ave	64(E)	64	---	---	---	---				
R-12	43 Reichert Ct	65(E)	66	65	64	62	---	3	3.7 (12ft)	500 (1650ft)	9
R-13	702 Lamont Ave	67(E)	67	64	63	62	---				
R-14	701 Lamont Ave	65(E)	66	63	62	61	---				
R-15	7 Hankie Rd	67(E)	68	65	63	62	---				
R-16	1 Corinthian Ct, Novato	71(E)	72	---	68	67	66	4	4.3 (14ft)	270 (890ft)	27
R-17	1280 Redwood Blvd, Novato	73(E)	73	---	67	66	66				
R-18	82 Rosewood Dr., Novato	62(E)	63	---	---	---	---	No Wall			
R-19	706 Somoa Lane, Novato	63(M)	65	---	---	---	---				
R-20	Basketball Court	62(E)	63	---	---	---	---				

EXHIBIT 3

1 of 3

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Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address 94945	Phone 415
MARGARET Schram	Margaret Schram	682 ORANE Ave	897-6545
Robert Schram	Robert Schram	682 Orange Ave	897-6545
John Schaumleffel	John Schaumleffel	695 Orange Ave Novato	897-2657
DIANE SCHAUMLEFFEL	Diane Schaumleffel	695 Orange Ave Novato	897-2657
Bini Zhang	[illegible]	678 Orange Ave	415 680 8383
Jonathan Kopp	[illegible]	676 Orange Ave	415-328-6587
STEVE EHRLICH	[illegible]	674 ORANGE Ave	415 897 6611
Spencer Thomas	[illegible]	674 Orange Ave	415 [illegible] 9439
Joan Ehrlich	Joan A Ehrlich	674 Orange Ave	415 897 6221
Lisa Ehrlich	Lisa Ehrlich	674 ORANGE Ave	"
Paul Belli	Paul Belli	672 ORANGE	892 6618
Arlene Heiser	Arlene Heiser	672 Orange	577-7794
John Berry	John Berry	669 ORANGE	892 9952
Jan Berry	Jan Berry	669 Orange	892 9952
GLORIA McINTOSH	[illegible]	664 ORANGE	897-9630
Paul McIntosh	[illegible]	664 Orange	897 9630
CAROLE FREY	Carole Frey	3 Oak Park	897-5186

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Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
Aldo Dibosco		5 OAK PARK Dr.	415 819-3014
GERALDINE DiPrisco		5 Oak Park Dr	415-892-5913
Ken Denton		678 Orange Ave	(415) 250-1909
Kevin Butler		712 Orange Ave	415-898-1857
KRIS SEATON		703 OLIVE AVE	415 898-1703
CONSUELO ASCENCIO		705 OLIVE AVE	5107201808
MARTIN ASCENCIO		705 OLIVE AVE	5107201808
MARG GALBRAITH	Marg Galbraith	1201 Chase St.	415 897-7780
JAMES E. "	Jim Galbraith	" " "	" "
Sam Capra	Sam Capra	717 Olive Ave	415-458-3289
Manuel Rosado	Manuel Rosado	670 Olive	415 897-5058
Judy Rosado	Judy Rosado	670 Olive	415 897-5058
Bruce Mousee		669 Olive	415-754-6869
JoAnn Rucker	JoAnn Rucker	484 Orange	415-897-1222
Tara Johnson	Tara John	699 Orange	415-897-2960
Lena Johnson	Lena Johnson	699 Orange	
Sirena Johnson	Sirena Johnson	699 Orange	
Sheila Hulbert			
Sheila Hulbert	Sheila Hulbert	671 Orange Ave	897-7347
Dwight Hulbert	Dwight Hulbert	671 Orange Ave	897 7347

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Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
Mary Ellen Conti	Mary Ellen Conti	661 Orange	892-3736
Lawrence P. Conti	Lawrence P. Conti	661 Orange	892-3736
Richard E. Mull	Richard E. Mull	673 ORANGE	892-2780
MIKE Obergfell	Mike Obergfell	863 Olive	250-4511
Rob Chevalier	[illegible]	681 Olive	415 812-5630
Laurel Freeman	Laurel C. [illegible]	675 Olive	897-8644
MASON WEST	Mason West	667 OLIVE	892-1840
Shaun West	Shaun West	667 Olive	892-1840
Lani Rosado	[illegible]	670 Olive Ave	897-5058
Ashley Vallee	Ashley Vallee	101 Kenwood Ct	899-1619
Mark Vallee	Mark Vallee	101 Kenwood Ct	899-1619
[illegible]	Lee Nixon	1205 CHASE ST.	892-6695
Shawn Sack	[illegible]	1212 Chase St	892 4499

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Petition for sound wall on East side of Hwy 101 along Orange Ave. This needs to be completed by December 5, 2007. Plans are for a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
Anthony Soares	[illegible]	710 Orange	892-4610
Naomi Terasawa	[illegible]	680 Orange	892-1809
Kiyoshi Terasawa	[illegible]	680 Orange	892-1809
Jason Wu	[illegible]	697 Orange	893-1111
Jennifer Wu	[illegible]	697 ORANGE	893-1111
Linda Pierce	[illegible]	697 Orange	893-1111
Gero Pardini	[illegible]	665 ORANGE	842-3894
ANTHONY OLIVA	[illegible]	666 ORANGE	972263
JACK MAYNARD	[illegible]	1138 East St	897-1711
[illegible]	EVA GUBAT	666 ORANGE	987-6132
[illegible]	[illegible]	10 OAK [illegible]	
ANNE KOPP	[illegible]	676 ORANGE AVE	897-8551

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Petition for sound wall on Westside of Hwy 101 along W.Orange Ave./Olive/Elmwood ct. They have planned a sound wall along the eastside of 101 along Cherry St to Atherton Ave. and south of Delong Ave.

Name	Signature	Address	Phone
DOOO BOWERS	Doug Bowe	728 W. ORANGE	899-0148
Debbie Cantayre	Debbie Cantayre	728 W. Orange ave	899-0148
Katie Lopez	Katie Lopez	731 W. Orange Ave	415 408-3509
Willy Lopez	Willy Lopez	731 W. Orange Ave	408-3509
Jose Martinez	Jose Martinez	730 W. ORANGE AVE	415 892 0141
Gladys Martinez	Gladys Martinez	732 W. Orange Ave	415-320-0497
ALEJANDRO TIOS	[illegible]	736 W. ORANGE AVE	(415) 726-4141
MARTHA ACUNA	[illegible]	736 W. Orange Ave	(415) 6141 00
Leta HILL	Leta Hill	733 W. Orange Ave	(415) 892-9470
Jim Hill	[illegible]	733 W. Orange AV	(415) 892-9470
Edie Thomas	[illegible]	735 W. Orange Ave	415 209 6855
Joe Thomas		735 W. Orange Ave	415 209 6855
Bob Desimone	Bob Desimone	738 W. Orange Ave	415 897 7489
Jim Rodrigues	[illegible]	740 West Orange A	897 7461
PEDRO	[illegible]	735 Olive AVE	893 0266
Juan Sanchez		735 Olive Ave	246 23 87
Maria Reyes	[illegible]	735 Olive AVE C-3	892-0612
Stanley Brig	Stanley Briggin	736 Olive AVE	897-2455
Samantha Briggin	Samantha Briggin	736 Olive Ave	897-2455
Rebekah Briggin	Rebekah Briggin	736 Olive Ave	897-2455
Robert Corosso	Robert [illegible]	738 - Olive	892 3560

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Petition for sound wall on Westside of Hwy 101 along W.Orange Ave./Olive/Elmwood ct. They have planned a sound wall along the eastside of 101 along Cherry St to Atherton Ave. and south of Delong Ave.

Name	Signature	Address	Phone
Jane Grosso	Jane Grosso	735 OLIVE	415-892-3564
Rick Brust	Rick Brust	740 OLIVE	415-897-4614
Rick Oliveira	Richard Oliveira	735 Olive Ave	" 897 6692
Esme Graham	ESME GRAHAM	734 OLIVE	892-5897
Maria Garcia	[illegible]		415 897 8601
ZENA TSELASSIE	[illegible]	5 ELMWOOD CT NOVATO, CA-94945	415-898-3481
MESRAKE MOGES	Mesrake Moges	5 Elmwood ct	415 898-3481
James P Maloney	James P Maloney	9 ELMWOOD CT	415 897-2045
Jeannie Maloney	Jeannie Maloney	" "	" "
Michael Maloney	Michael Maloney	" "	" "
[illegible]	[illegible]	13 "	415 6168341
Sergio Pelis	Sergio Pelis	23 ELMWOOD	415 6988347
Linda Martinez	Linda Martinez	23 Elmwood.	(415) 898-8340
Amelia Estalya		"	"
Pedro Floriano D.		"	"
Jesus Rangel	[illegible]	"	"
Juan de Loc	[illegible]	"	"
TRACY CORDOVA	Tracy Cordova	20 Elmwood Ct	415 297-1995
James Atlagen	James Atlagen	20 Elmwood CA	Same
MARIA FREITAS	Maria Freitas	727 Olive Ave Pa	(415) 897-2040

Letter: I38.
Signatory: Edith Rivasplata.

Nanaedith8@aol.com
11/27/2007 07:14 PM

To melanie_brent@dot.ca.gov
cc
bcc
Subject Re: Marin Sonoma Narrows EIR

History: This message has been forwarded.

Hi,
I just opened this today-my address is as follows: Mrs. Edith Rivasplata
302 Olive Avenue
Novato, CA 94945

Thank you for your assistance. Edith

****
Check out AOL's list of 2007's hottest products.
(http://money.aol.com/special/hot-products-2007?NCID=aoltop00030000000001)

Letter - I38

Page 2

Response to Comment I38-1

Caltrans apologizes for the difficulty you experienced in trying to download the DEIR/S document files. Breaking the document into smaller files would still not ensure your ability to access them via a dial-up connection due to the figures and graphical elements in the document that tend to result in large file sizes. Members of the public are always welcome to request a hardcopy or a PDF version on CD. We will work toward trying to make this more clear in the future.

You have been added to our mailing list and you will receive a CD of the final environmental document when it becomes available.

Nanaedith8@aol.com
11/24/2007 10:15 AM

To melanie.brent@dot.ca.gov
cc
bcc
Subject Marin Sonoma Narrows EIR

Dear Melanie

I38-1 I have a dial-up internet connection and am unable to download (or even open) the draft EIR/EIS for the Novato Narrows project. Can Caltrans please break this into smaller files so that the many people out there who do not have a high speed connection can at least access the executive summary and individual chapters of the EIR?

. I am an elderly resident of the Novato area and no longer drive. It is not possible for me to get to the library or other locations where printed copies of the document are available. I am a long time resident of the area and am very interested in the project.

I understand that Caltrans has been attempting to provide better community outreach -- the lack of an accessible file works at cross-purposes to that mandate. It is your responsibility to make it accessible for all segments of the community -- including those who do not have high speed computer access. This will be a great public service.

I would appreciate a response. Thank you.

Edith Rivasplata

Check out AOL Money & Finance's list of the hottest products and top money wasters of 2007.

Letter: I39.
Signatory: Edith Rivasplata.

Response to Comment I39-1

Please see the Master Responses on Range of Alternatives and Need and Purpose.

Response to Comment I39-2

Please see the Master Response on Range of Alternatives.

December 17, 2007

Melanie Brent
Caltrans District 4
111 Grand Avenue
Oakland, CA 94612-3737

Subject: Comments on the Draft EIR for the Marin-Sonoma Narrows HOV Widening Project.

Dear Ms. Brent

These comments are submitted on behalf of:
Edith B. Rivasplata
302 Olive Avenue
Novato, California 94945.

I have reviewed the Draft EIR for the MSN project and find that the document does not comply with CEQA review requirements in four areas:
1) Statement of objectives and range of alternatives,
2) Growth inducing impacts,
3) Global warming, and
4) Short-term environmental effects versus long-term effects

1a) Statement of Objectives and Range of Alternatives

I39-1 The CEQA document fails to provide an accurate statement of the objectives of the project and, consequently fails to address an adequate range of alternatives that would allow for a solution to the transporation problems plaguing the northern Marin and southern Sonoma County, where this section of Highway 101 is located (CEQA Guidelines Section 15124(b).

The DEIR's statement of objectives does not accurately identify the problem that is driving the need for the project. The key problem is the movement of people along the 101 corridor. Therefore, the solution and the objectives of the project should be to provide the most practical and efficient means of transport for the maximum number of people from southern Sonoma County to points south in northern Marin County and the greater Bay Area.

I39-2 Section 2.4 of the DEIR (Alternatives Considered and Withdrawn) seems to indicate that the entire focus of the alternatives development process was short-sighted and narrow in its focus, predisposing a narrow range of alternatives. The DEIR focuses solely on the movement of automobiles, and therefore from the outset narrows the range of solutions. This failure to address the source of the real problem results in an inadequate range of alternatives in the DEIR (CEQA Guidelines

1

Letter - I39

Page 2

15126.6).

Movement of people along the corridor can be accomplished by more than roadway widening. An alternative that ensures that a variety of transportation modes will be accomodated, and even actively promoted, within the corridor needs to be evaluated and given serious, not token, consideration. While Section 2.4.3 acknowledges that Express Bus Service and the MSN project are complimentary, I do not believe that an alternative involving Express Bus Service is adequately fleshed out. For example, no serious discussion is given to an alternative that combines elements of Express Bus Service and structural changes. The DEIR avoids examining such an alternative. Express Bus Service and the MSN Project are not an "either/or" proposition as noted in lines 526 to 529, "Furthermore, investments in express bus service only, rather than the MSN project, would not correct the operational deficiencies of US 101 through Segment B...."

I39-2 I would like to see the DEIR recirculated with an evaluation of an Enhanced Express Bus Service/Novato Narrows Project (EEB/NNP) Alternative. This Alternative would consist of a program to actively promote the use of more frequent and convenient Express Buses serving the 101 corridor using existing HOV lanes in Segments A and C, and a new HOV lane in Segment B. This alternative would include the access restrictions and operational improvements provided for in Segment B by the Fixed HOV Lane Alternative, but would not provide for additional lanes in Segments A and C. The reduced environmental impacts of this alternative would potentially include fewer noise impacts in Segments A and C with the possibility of precluding the need for extensive sound walls and their attendant aesthetic impacts.

I39-3 The description in the DEIR of the process used for developing alternatives does not give me a sense that a holistic approach was employed in coming up with the alternatives to be considered in the DEIR. Perhaps the approach used was comprehensive, but the explanation is lacking in the DEIR.

I39-4 Once a comprehensive solution is identified, then the agencies involved can go about creating a means of implementing the solution. I realize that funding is often restricted to specific types of projects, but a *vision* is needed in order to create lasting solutions, not band-aid solutions. It has been shown that increasing roadway capacity is a short-term solution, and congestion relief is temporary (see "Stuck in Traffic" by Anthony Downs).

I39-5 **1b) Range of Alternatives**
Another aspect of the Alternatives Analysis that does not comply with CEQA is the fact that the environmental impacts of the two Build Alternatives are practically identical. CEQA Guidelines 15126.6 states that an EIR must describe "a range of reasonable alternatives.....that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..". The two Build Alternatives, the HOV Fixed Lane and the HOV

2

Response to Comment I39-3

The alternatives evaluation process is fully disclosed in Appendix A of the DEIR/S and this FEIR/S.

Response to Comment I39-4

Please refer to the Master Response on Range of Alternatives.

Response to Comment I39-5

Please see the Master Response on Range of Alternatives.

Letter - I39

Page 3

I39-5 and Petaluma - that bottleneck being the purported reason for the project. Since
I39-6 Segment B will still be narrower than the other two segments of the project, an adverse traffic congestion situation will return at some point.

I39-7 The project provides a short-term solution to the congestion problem and does not address long-term considerations. The DEIR must disclose and examine the need to revisit this very same problem in the future when the project's increased capacity will have been consumed by ever more vehicles using the roadway (see "Stuck in Traffic" by Anthony Downs). The project represents a substantial committment of resources and as such, there should be some assurance of long-term benefits for such a committment.

Thank you for considering these comments.

Prepared by:
Melinda M. Rivasplata, AICP
4900 Alta Drive
Sacramento, CA 95822
916 454-5937
melrivas@earthlink.net

4

Response to Comment I39-6

Please see the response to Comment I39-7 below.

Response to Comment I39-7

Caltrans' traffic analysis considers up to twenty years in the future. Caltrans will update the Project's traffic analysis in preparation for future phases of construction.

See the Master Response on Induced Travel.

This project will allow US 101 to carry more traffic. Even if in the future US 101 is over capacity, it will still serve the traveling public's needs better with the HOV lanes constructed by this project than without them.

Letter: I41.
Signatory: George Bertram III.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: November 14, 2007
Name: George A. Bertram, III
Title and Agency/Company: GNS Investments, Inc
Phone: 415-897-1271 E-mail:
Address: 1530 Armstrong Ave
City, State, Zip: Novato CA 94945

Comments (Continue on back, use multiple sheets if necessary)

See Attached Letter

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter - I41

Page 2

Response to Comment I41-1

The comment is in reference to Soundwall No. 2. Your input stating your opposition to this soundwall was taken into consideration, but Soundwall No. 2 has been selected for inclusion in the MSN Project. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I41-2

Soundwall No. 2 will be shortened so as not to cover the mobile home park on Armstrong Avenue, while providing some abatement for residents from 1512 Armstrong Avenue to the apartment complex at the corner of Cherry Street and Armstrong Avenue. The shortened wall length should reduce visual impact to this property's views.

GNS INVESTMENTS, INC.
1530 Armstrong Avenue Novato, CA 94945
(415) 897-1271

November 16, 2007

Melanie Brent
Office Chief, Supervising Environmental Planner
Office of Environmental Analysis
District 4, Division of Environmental Planning & Engineering
Mail Station: 8B
111 Grand Avenue
Oakland, CA 94612

Dear Ms. Brent:

Thank you for having the October 16, 2007 meeting. It was a pleasure to discuss with you and Mr. Pandher the preliminary study for the Atherton over crossing. I do not think a sound wall is neither needed nor appropriate between the Atherton off ramp and Armstrong. My reasons are as follows:

I41-1

1) The Table 3.2-15, R-7 and 8 readings were taken on the freeway side of a sound wall which was built in 1995. My engineered sound wall, which sits on the property line between my property and the freeway, protects my residents from the freeway noise and would reduce the DBAs to a level below the required sound wall DBAs.

2) The off ramp's elevation is greater than my properties. The rising dirt off ramp already protects my property from freeway noise.

3) The freeway expansion occurs in the current median therefore the additional noise is the farthest away from the property.

4) The Atherton Avenue off ramp basically remains the same opposite my property therefore there will be no additional DBAs on my property from the HOV lanes.

I41-2

5) As the property owner of 1530 Armstrong Avenue representing myself and several of my residents that were also present at the November 13th meeting we are very much opposed to any sound wall of any height between ourselves and the freeway.

6) Aesthetically it would be a disaster and reduce property values resulting in damage to myself and my residents.

Letter - I41

Page 3

I41-3 For the same reasons I also oppose any proposed CAL TRANS easements on Armstrong Avenue as I feel they are unnecessary.
I am enclosing for your review:

a) Map of proposed HOV lane alternative.
b) Table 3.2-15
c) Letter from Melanie Brent, Department of Transportation dated October 16, 2007
d) Letter from myself to Melanie Brent date October 29, 2007
e) Signed Comment Card.

Yours,

George A. Bertram, III
Owner
GNS Investments, Inc.

cc. Jit S. Pandher

Response to Comment I41-3

Thank you for your comments. Your opposition to Caltrans easements on Armstrong Avenue has been noted. Caltrans and FHWA strive to avoid right-of-way conflicts in the planning and design of projects, and to minimize them where they cannot be avoided. Whether easements can be avoided or minimized for this project will be determined during the final design phase.

Letter - I41

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Letter - I41

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Table 3.2-15 Existing and Future Worst-case Traffic Noise Levels with the MSN Build Alternatives

Rec #	Segment A	Existing Peak Noise	No Build	Build Alternatives Build Worst-Case Noise Level (dBA) 8'Wall	10' Wall	12'Wall	14' Wall	Barrier #	Barrier Height (m)	Barrier Length (m)	# Homes Shielded
R-1	617 Manuel Dr	63(M)	67	65	63	**62**	---	1	3.7 (12ft)	200 (660ft)	9
R-2	613 Davidson St	61(E)	66	64	63	**61**	---				
R-3	101 Kenwood Ct	61(M)	62	---	---	---	---	No Wall Recommended			
R-4	201 Kenwood Ct	62(E)	63	---	---	---	---				
R-5	221 Kenwood Ct	59(E)	60	---	---	---	---				
R-6	Apartment	71(E)	72	---	66	64	**63**	2	4.3 (14ft)	480 (1600ft)	17
R-7	1508 Armstrong Ave	71(E)	71	---	69	67	**66**				
R-8	Pool-Mobile Home (Armstrong)	65(E)	65	---	63	62	**61**				
R-9	16 Elmwood Ct	65(E)	66	---	---	---	---	No Wall Recommended			
R-10	Playground(Olive/Elmwood)	65(E)	65	---	---	---	---				
R-11	725 W Orange Ave	64(E)	64	---	---	---	---				
R-12	43 Reichert Ct	65(E)	66	65	64	**62**	---	3	3.7 (12ft)	500 (1650ft)	9
R-13	702 Lamont Ave	67(E)	67	64	63	**62**	---				
R-14	701 Lamont Ave	65(E)	66	63	62	**61**	---				
R-15	7 Hankle Rd	67(E)	68	65	63	**62**	---				
R-16	1 Corinthian Ct, Novato	71(E)	72	---	68	67	**66**	4	4.3 (14ft)	270 (890ft)	27
R-17	1280 Redwood Blvd, Novato	73(E)	73	---	67	66	**66**				
R-18	82 Rosewood Dr., Novato	62(E)	63	---	---	---	---	No Wall Recommended			
R-19	706 Somoa Lane, Novato	63(M)	65	---	---	---	---				
R-20	Basketball Court	62(E)	63	---	---	---	---				

Letter - I41

Page 6

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5231
FAX (510) 286-5600
TTY (800) 735-2929

Flex your power!
Be energy efficient!

October 16, 2007

Dear Interested Party:

Subject: Marin-Sonoma Narrows (MSN) Project: Draft Environmental Impact Report/Environmental Impact Statement (DEIR/S)

The California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA), in cooperation with the Transportation Authority of Marin and the Sonoma County Transportation Authority, have prepared a DEIR/S addressing the need to reduce congestion and improve traffic and highway operations along US 101 from State Route 37 in Marin County to Corona Overcrossing in Sonoma County. In addition to reducing congestion, the proposed HOV lanes would extend existing HOV lanes south of the project limits and proposed HOV lanes to the north, from Petaluma to Windsor.

The DEIR/S is also available for review at the locations listed in the enclosed advertisement, and may be viewed and printed from the internet at http://www.dot.ca.gov/dist4/msn/. TTY users may request copies of the document in alternate formats through the California Relay Service at 800-735-2929 or by dialing 711.

You are also cordially invited to attend an open house regarding the DEIR/S. The open house meetings will provide project information in conjunction with the 60-day comment period from October 16 through December 14, 2007. Participants will have the opportunity to ask questions of Caltrans staff and provide comments on the DEIR/S.

When and Where

Location:	Sonoma-Marin Fairgrounds 175 Fairgrounds Drive, Petaluma	Location:	Novato Unified School Boardroom 1015 7th Street, Novato
Date:	Tuesday, November 6, 2007	Date:	Wednesday, November 14, 2007
Time:	5:30-8:30	Time:	5:30-8:30

Individuals who require special accommodations or translation services should contact me at (510) 286-5231 at least 3 days prior to one of the scheduled public meetings.

If you desire more information regarding this project, please contact the Project Manager, Jit Pandher, at (510) 286-6425.

Melanie Brent Melanie Brent
Office Chief
Division of Environmental Planning and Engineering

Enclosure

"Caltrans improves mobility across California"

Letter: I42.
Signatory: Janice Cader-Thompson.

Response to Comment I42-1

The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin-Sonoma Narrows Project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project. The MSN Project will not impact Deer Creek.

Janice Cader-Thompson
<Janicecader@comcast.net>
11/19/2007 01:41 PM

To Holly Butler <holly.butler@sen.ca.gov>, Lisa Badenfort <lisa.badenfort@asm.ca.gov>, Pamela <ptorliatt@aol.com>, Suzanne Smith <suzsmith@sctainfo.org>, Teresa Barrett
cc David Keller <dkeller1@sonic.net>, Diane Reilly Torres <dreillytorres@sbcglobal.net>, Abigail Smith <asmith@waterboards.ca.gov>, Melissa Abercrombie
bcc
Subject Re: Rainier acceptation

History: This message has been forwarded.

Please see attached photo's. I had to send fewer photo's due to the size of the JPEG images.

--
Janice Cader-Thompson
732 Carlsbad Court
Petaluma, CA 94954
707 762-7279

On 11/19/07 9:48 AM, "Janice Cader-Thompson" <Janicecader@comcast.net> wrote:

Dear Mr. Sartipi and Ms. Brent,

I42-1 My name is Janice Cader-Thompson, I am a former Petaluma council member. I ask that Caltrans **not approve** a design exception to allow less than one mile spacing between the East Washington and proposed Rainier interchange cross connector. The purpose of widening highway 101 is to safely move traffic. This design acceptation will only increase traffic through the Petaluma corridor. After carefully reviewing the city's staff report it's clear the true cost of this proposed acceptation is not reflected in the material supplied by Petaluma City staff.

As a council member I requested a meeting with Caltrans and SCTA. Linka Caro and Suzanne Wilfred Smith and others attended this meeting. We walked the site and it became very clear the enormous size of the project, and the fact it is directly in the Petaluma floodplain. Is Caltrans planning on removing the last remaining Oak Savannah within the Petaluma River and Petaluma floodplain to accommodate the Rainier project? It is important that Caltrans staff and SCTA members take a walking tour of the proposed project. I would like to be at this walk. I've Cc, Mayor Torliatt and council member Teresa Barrett in hope they would work with city staff and Caltrans to set up a date for a tour of the site. Could you include, Assembly member Jarrd Huffman, Senator Carol Migden, and SCTA members.

As per the cross town connector, the Petaluma City council and staff has had more than 5 years to secure an at- grade rail crossing from the PUC at Shasta Ave: By walking the property you can see why Shasta Ave is not feasible due to sightlines and it's proximity to the existing Payran Street at- grade crossing. The other crossing point is one mile long approximately 40 feet high + four lanes, and in the shape of a question mark. The questions are; is this project financially feasible? Will it make traffic safer on the 101 corridor? Who pays for the cost of the project? The public voted to study Rainier, they didn't vote to bankrupt the city or slow traffic on the 101 corridor.

Attached for the public record are photo's from December 2004 of the DSL "Rainier" site lines and the last 21 photo's are from 2007. You can see from the photo's how water flows directly through Deer Creek from East Petaluma under the freeway and directly to the Petaluma River. Up until 2004 Deer Creek has been plowed every year. You can see from the

Letter - I42

Page 2

I42-1 2004 photo's to 2007 Deer Creek is wider and stays green through July. It is also an nesting area for birds and other wildlife habitat. Deer Creek is making it's come back. Rainier is a nothing more than an environmental disaster.

I42-2 I support reducing traffic congestion on Highway 101, by making sure traffic flows through the 101 corridor. Caltrans has stated in previous letters to the City of Petaluma, Rainier is a locally serving project and needs to be funded by the City of Petaluma. I am concerned with the Corona Road over-crossing; due to the age and width of this existing structure, will Caltrans need and support a design acceptation for Corona? Has the Corona over crossing **pillars** been retrofitted? With a design acceptation is the Corona span wide and tall enough to make travel on the 101 corridor safe?

I42-3 The Petaluma public voted in support of studying Rainier as a possible cross town connector plus interchange. Our local newspapers and city staff continue to fudge on the true cost of this project and it's environmental constraints. For the past 15 years I've been stating that the cost of Rainier is well over 100 thousand dollars. Is Caltrans and SCTA willing to add an addition 100 thousand dollars to the cost of widening 101 through the Petaluma corridor? Before we waist anymore time on Rainier, Caltrans and SCTA need to be clear with our local council members, city staff and most importantly the public on who pays and the true cost of adding Rainier to the 101 widening project.

Janice Cader-Thompson
Gerald A. Thompson

IMG_0640.JPG IMG_0663.JPG IMG_0658.JPG IMG_0696.JPG

Response to Comment I42-2

Regarding the Corona Overcrossing, a design exception has been approved for reduced shoulder width at the center column in the median; the column will be retrofitted with a barrier to protect the column and the traveling public. A seismic retrofit project was implemented in 1995 to the structure.

Response to Comment I42-3

The proposed Rainer Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

Letter: I43.
Signatory: Janice Cader-Thompson.

Response to Comment I43-1

The East Washington Improvement Project was approved in March 2008. A Notice of Determination has been filed with the State Clearinghouse.

Response to Comment I43-2

Many of these individual comments are in such abbreviated form, it is difficult to discern their full intent and meaning. We will respond to them to the extent possible. This commenter also wrote the previous letter, Letter I42, in which her comments are presented in much greater clarity and detail; we hope that our responses to Letter I42 cover most if not all of her concerns regarding the MSN Project expressed in the present comment card.

A number of the comments pertain to the Rainier project. The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the City of Petaluma, the lead agency for that project.

Response to Comment I43-3

For a discussion of flooding of San Antonio Creek, see the response to Comment LC9-7 in Section 3.5.

Response to Comment I43-4

The MSN Project will not be impacting Deer Creek. Caltrans will forward your comments to the City of Petaluma to ensure that your concerns are addressed as part of the Rainier Interchange project.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 11/6/07
Name: Janice Cader-Thompson
Title and Agency/Company: former Petaluma Council Member + Citizen
Phone: 707 762-7279 E-mail: JaniceCader@comcast.net
Address: 732 Carlsbad ct
City, State, Zip: Petaluma, CA 94954

Comments (Continue on back, use multiple sheets if necessary)

I43-1 Washington St EIR who is holding this document up?
Segment C Route 116 to Old Redwood South
Corona Overcrossing exception?
I43-2 Measure M money "No money for Rainier"
Sound walls needed now in Petaluma
"Rail tracks" smooth transition higher + longer span
Site changes
I43-3 Flooding San Antonio Creek
Purpose of widening "more traffic"
Deer Creek East + West side of existing freeway
I43-4 Wetlands / Bird Habitat
Rainier initiative "No funding + most important public
Wants a cross-town connector

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I44.
Signatory: Kevin and Kirsten Strain.

Response to Comment I44-1

The preliminary design of the proposed improvements near the Strain property has been modified in response to comments received. The proposed frontage road has been moved closer to the freeway lanes. Shore retaining walls may also be utilized to avoid impacts to the horse arena.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 11-6-07
Name: KIRSTEN STRAIN / KEVIN STRAIN
Title and Agency/Company:
Phone: 707-981-7178 (415) 440-4044 E-mail: KSTRAIN@NAIBI.COM
Address: 4600 KASTANA RD (Redwood Hwy South)
City, State, Zip: PETALUMA CA 94952

Comments (Continue on back, use multiple sheets if necessary)

KEVIN + KIRSTEN STRAIN RESIDE AT 4600 KASTANA RD
WE HAVE THE HORSE FACILITY W/ REGULATION
LENGTH DRESSAGE AREA (200') VISIBLE FROM
101. IT IS IMPERATIVE TO PRESERVE THE
LENGTH AND WIDTH OF THE AREA NOT
I44-1 ONLY DO WE NOT HAVE ADDITIONAL ROOM
TO MAKE UP FOR THE DISTANCE LOST AS
PROPOSED FOR THE FRONTAGE RD BUT TO
DUPLICATE THIS ARENA ELSEWHERE IS
EXTREMELY DIFFICULT AND EXPENSIVE.
PLEASE CONTACT US PRIOR TO THE
FINAL FRONTAGE ROAD ROUTE.
KEVIN + KIRSTEN STRAIN
CEL (415) 440-4044

EMAIL KSTRAIN@earthlink.net

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I45.
Signatory: Marilee Montgomery.

Response to Comment I45-1

See the response to Comment LJ5-9 regarding the Graton Rancheria Casino.

The River Rock Casino expansion and the Cloverdale Casino are newer proposals that are still in the preliminary stages, so it is premature to include them in our planning. In addition, since both of these proposed casino projects are a considerable distance from the project area, their impacts in the project area would be less than if they were nearer. Much of their generated traffic would either be dispersed onto other roads or would have reached its final destination before reaching the project area.

Melanie Brent/D04/Caltrans/CAGov
12/14/2007 08:37 AM

To yolanda_rivas@dot.ca.gov@DOT
cc
bcc
Subject Fw: Marin-Sonoma Narrows (MSN) HOV Widening Project DEIR Comments

Melanie Brent, Office Chief
District 4 Environmental Analysis
(510) 286-5231 Office
(510) 715-8492 Cell
----- Forwarded by Melanie Brent/D04/Caltrans/CAGov on 12/14/2007 08:37 AM -----

"Marilee Montgomery " <donegal@sonic.net>
12/13/2007 06:21 PM

To <melanie_brent@dot.ca.gov>
cc
Subject Marin-Sonoma Narrows (MSN) HOV Widening Project DEIR Comments

re: Marin-Sonoma Narrows (MSN) HOV Widening Project DEIR Comments

Dear Ms. Brent:

I45-1 I am disturbed that Caltrans Highway 101 projects in Marin County and Sonoma County have uniformly failed to take into consideration the following tribal casino projects that would be accessed by Highway 101:

1) The proposed Graton casino/hotel project on Wilfred Avenue near Rohnert Park

2) The expansion of the existing River Rock Casino in Alexander Valley near Healdsburg

3) The proposed Cloverdale casino in or near the town of Cloverdale, for which land has recently been purchased.

Failure to include these projects will greatly skew projected capacity improvement.

Attached is a January 2005 report on traffic projections for the San Pablo casino. This report was presented at the March 2005 Town Hall meeting given by Assemblymember Loni Hancock. It provides a realistic formula for casino traffic projections. Please include the attached report in the record.

Sincerely,

Marilee Montgomery
152 Wilfred Avenue

Letter - I45

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Santa Rosa, CA 95407

707-793-2355 SanPabloTrafficStudy.pdf

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San Pablo Casino Traffic Analysis
Preliminary Findings

Prepared by: Katz, Okitsu & Associates

January 28, 2005

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Assumptions and Findings

With the potential introduction of a large number of slot machines at the San Pablo Casino, substantial effects could occur to circulation. Information that has been helpful in estimating the future number of trips is the "Proposition 68 Traffic Analysis" by Parsons Brinkerhoff, dated September 2, 2004. Below are a series of discussion points that can help focus one on the important issues. Following that, the technical study is presented.

The proposed introduction of between 2,500 and 5,000 slot machines at this location represents a very dramatic increase in the potential trip making concentrated in this already problematic area. For a sense of scale, the trip making associated with this project is equivalent of up to nearly 7,000 single-family homes or regional shopping center of 1.3 million square feet. It is also the amount of trip making that would normally be equivalent to the heavier volume carried by a 4-lane freeway (2 lanes each way) operating at an acceptable level of service.

Some of these points are as follows, and we shall begin by reviewing certain assumptions.

Assuming:

- Daily trip generation rate of 13.6 trips per gaming position/slot machine.
- Peak hour trip generation rates of 0.47 and 0.788 for AM and PM respectively for each gaming position/slot machine.
- Estimated average duration of visit of two hours per patron and an occupancy factor of approximately 1.18 persons per car.
- Each parked car required 350 square feet of space.

Points regarding the proposed slot machine expansion:

- Up to 2,500 slot machines are proposed, with the possibility of expansion in 2008 for the San Pablo Casino. The original plan called for 5,000 slot machines, so those numbers are analyzed as well.
- At 13.6 trips per weekday per machine, up to about 34,000 daily trips could result with 2,500 machines, and double that from 5,000 machines.
- A typical 4-lane roadway becomes congested above 30,000 vehicles per day.
- In the peak hour of the AM that could mean 1,175 trips and for the PM peak it could result in 1,970 trips with 2,500 machines. For 5,000 machines, those numbers would be doubled.
- Each lane of a roadway can typically handle up to 1,900 vehicles per hour if the signals were continuously indicating green and no red time.
- Parking for an estimated 1,687 extra vehicles would be needed for 2,500 machines, and double that number for 5,000 machines.
- The parked vehicles would consume 13.6 acres of space on one level or 3.4 acres of space on four levels at the 2,500-machine level.

Points regarding the circulation system accessing and the development patterns serving the existing San Pablo Casino:

- The nearest access point for regional traffic on the I-80 is at the San Pablo Dam Road interchange, which is an older, lower capacity diamond configuration.
- Peak hour traffic congestion measures at some of the intersections between the ramps and San Pablo Dam Road show it is presently failing.
- Even more intersections in the area are projected to be failing in the future without introducing any more traffic associated with the proposed new traffic to the Casino.

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The next interchange to the north on I-80 is out-of-direction and the next one to the south is approximately a mile away.

I-80 is carrying approximately 187,000 daily vehicles currently at San Pablo Dam Road, and the volume can be expected to grow in the future.

Traffic congestion on the I-80 is substantial.

The portion of San Pablo Dam Road leading from the Casino to I-80 is a four lane, urban roadway with intervening traffic signals serving local commercial development that constrains the ability to widen it.

The City and Caltrans have been working on preparing a Project Study Report to make improvements to the San Pablo Dam interchange with I-80, but the funding and timing are not completely known nor committed yet.

The Brookside Hospital/Doctors Medical Center is adjacent to the Casino and depends on the same roadway system for access for emergency vehicles and patients.

Therefore, the implication of these points is:

The slot machines alone create enough new daily traffic to demand the capacity of up to two completely brand new 4-lane major roads.

Even using all available roadways in the area, the congestion that will be introduced by the additional slot machines will overwhelm the capacity of the existing roadway system, and there is very limited opportunity to do anything to increase the capacity without tearing out existing development.

Congestion will be extreme on the portion of San Pablo Dam Road leading to I-80 and will potentially cause this area to completely fail operationally.

The impacts will not only occur in the worst commuting peak hours, but the impact will also be spread over the whole day and night as typically occurs with casino operations.

Operations on I-80 itself will be dramatically affected by this substantial increase in traffic since it represents a potential increase to freeway traffic of over 25% above existing I-80 traffic. There is little, if anything, that can alleviate it short of building an additional lane along I-80 and creating a new interchange just for the extra casino traffic.

Air quality and fuel consumption will degrade and increase respectively at the nearby surface intersections. There will be an estimated annual additional 53 thousand gallons of fuel consumed and 1.8 tons of CO released into the air just due to congestion at the nearby intersections.

The costs associated with mitigation of the Casino impacts include the following:

Arterial Widening: $3 million per lane per mile, including land acquisition costs. Assume one lane mile of widening would be required for a total cost of $3 million.

Freeway Widening: $6 million per lane per mile, not including land acquisition costs. Assume ten lane miles of widening would be required for a total cost of $60 million, plus additional land acquisition costs.

Bridge Overcrossing Widening: $500,000 per overcrossing. Assume five bridge overcrossings for a total cost of $2.5 million.

Interchange Reconstruction: $25 million per interchange. Assume one interchange reconstruction for a total cost of $25 million.

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The total costs for roadway improvements associated with the Casino would be $90 million, plus additional land acquisition costs for freeway improvements.

Technical Information

This section contains the results of the limited technical study we prepared to arrive at these conclusions.

Introduction

Casino San Pablo is currently operating at 13255 San Pablo Avenue in the City of San Pablo. The main entrance of the casino is the west leg of the intersection of San Pablo Avenue and San Pablo Dam Road. Casino San Pablo was established in 1995, and in 1999 the Lytton Band of Pomo Indians and the City negotiated the Municipal Services Agreement outlining details of taxation, facility expansion, security levels, and other operating and development procedures. The Casino is currently licensed to operate 100 gaming tables; it also has a live entertainment showroom, a full-service restaurant, a cocktail lounge, and entertainment facilities.

Casino San Pablo is considering expanding its operations. Because the magnitude of the expansion is unknown at this time, this study analyzes two scenarios: a) 2,500 additional gaming machines, and b) 5,000 additional gaming machines. This study examines the potential traffic impacts of the anticipated expansion. Existing and future analyses are performed to compare traffic conditions with and without the gaming expansion for both scenarios. The exact date of project completion is unknown at this time; however, Contra Costa County's long range traffic forecast model uses Year 2025 as its horizon year; therefore this study uses Year 2025 as the future year of analysis.

Trip Generation

Trip generation for the expansion of Casino San Pablo is based upon rates published in an article of the May 2002 issue of the ITE Journal. The article provides a trip generation rate for casinos based upon its number of gaming positions. A study prepared by Parsons Brinckerhoff titled, *Proposition 68 Traffic Impact Analysis*, also uses these published rates. Table 1 below outlines the trip generation rate as specified by ITE, and the trips for the expansion of Casino San Pablo for both scenarios.

Table 1 – Trip Generation

Land Use	AM Peak Hour			PM Peak Hour		
Casino	Total	In (57%)	Out (43%)	Total	In (52%)	Out (48%)
Trips/Gaming Position	0.470	0.2679	0.2021	0.788	0.40976	0.37824
2,500 Gaming Positions	**1175**	**670**	**505**	**1970**	**1024**	**946**
5,000 Gaming Positions	**2350**	**1340**	**1011**	**3940**	**2049**	**1891**

An expansion of 2,500 new gaming machines at Casino San Pablo is forecast to generate 1,175 trips in the AM peak hour, and 1,970 trips in the PM peak hour. The expansion of 5,000 additional gaming machines is forecast to generate 2,350 trips in the AM peak hour and 3,940 trips in the PM peak hour.

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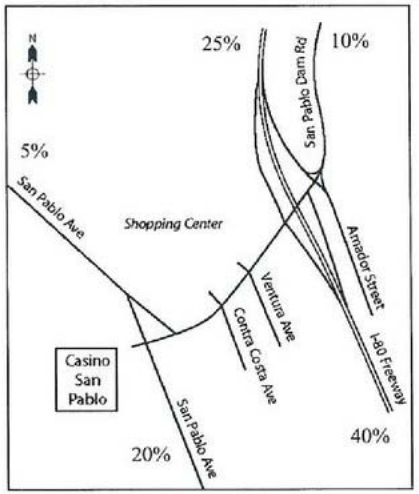
Trip Distribution

Casino San Pablo is anticipated to attract customers from the entire East Bay region and beyond. Therefore, a significant percentage of patrons are forecast to arrive on-site via the I-80 Freeway. Most are anticipated to use the San Pablo Dam Road ramps, while a portion might use San Pablo Avenue ramps, approximately one mile south of the project site. The Casino expansion will result in a considerable amount of traffic on I-80. However, the focus of this study is not traffic impacts on freeway segments. A small number of local customers currently access the Casino from San Pablo Avenue. It is assumed that this number will not increase significantly. An estimated 10% of project traffic will come from the Orinda/ Walnut Creek area via San Pablo Dam Road. Trip distribution forecasted for this study is shown in Figure 1.

Figure 1 – Trip Distribution



Existing Conditions

Existing turning movement volumes were collected in the AM and PM peak periods at all signalized intersections along San Pablo Dam Road between the main entrance of the Casino and I-80 Freeway ramps. Existing volumes were collected on Wednesday, October 27, 2004, by Baymetrics Traffic Resources, of El Cerrito, CA. These volumes were used for the existing conditions analyses.

Future Conditions (Year 2025)

Future traffic turning movement volumes were derived from model forecasts provided by the Contra Costa Transportation Authority. Existing traffic volumes were compared with Year 2000 Validation Model Runs to derive Model Calibration Correction (MCC) Volumes. Year 2000 volumes were used without adjustment to 2004 because regional land use and economic character have remained relatively unchanged since 2000. The MCC Volumes were added to

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2025 Model Output Volumes to generate Adjusted Model Output volumes. Adjusted output link volumes and existing turning movement volumes were used to calculate 2025 turning movement volumes by the Furness Method, as described in Contra Costa Transportation Authority's Technical Procedures manual. Where necessary, further manual adjustment and volume balancing were applied to ensure a reasonable forecast.

Three scenarios were analyzed in the Future Year (2025) condition: Without Project, and With 5,000 additional machines, and With 2,500 additional machines. A comparison between the analyses results of these scenarios would forecast the potential impact of the proposed casino expansion.

Analyses Results

Traffic performance was analyzed at six signalized locations. The analyzed locations represent the most probable ingress and egress route future and current casino patron use to the casino. The intersection of I-80 Eastbound off-ramp, San Pablo Dam Road, and Amador Street functions as one elongated intersection controlled by a single traffic signal controller in real life; the complex operation was simulated using Synchro signal timing analysis software to reflect the special signal phasing required to serve traffic movements. This intersection complex has been reported as separate intersections.

Tables 2 and 3 present the results of the 2,500 additional machine scenario analyzed. Tables 4 and 5 present forecast intersection performance for the 5,000 additional machine scenario.

Table 2 – Intersection Performance (2,500 Machines)
(AM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	15.6/B	0.577/A	129.0/F	1.171/G	172.4/F	1.412/H	43.4	0.214
Contra Costa Ave & San Pablo Dam Road	8.9/A	0.472/A	110.5/F	1.106/G	143.3/F	1.257/H	32.8	0.151
Town Center/Ventura & San Pablo Dam Road	10.1/B	0.524/A	113.6/F	1.178/G	133.1/F	1.296/H	19.5	0.118
I-80 WB Ramps & San Pablo Dam Road	17.6/B	1.104/F	207.4/F	2.906/H	213.1/F	2.984/H	5.7	0.078
I-80 EB Off Ramp & San Pablo Dam Road	27.0/C	0.544/A	221.6/F	1.063/F	229.0/F	1.166/G	7.4	0.103
Amador Street & I-80 EB On Ramp	37.1/D	0.937/E	249.3/F	1.824/H	251.2/F	1.899/H	1.9	0.075

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

In the existing AM peak hour, both ramps at San Pablo Dam Road currently operate at physical capacity limits of Level of Service E or F. Delays are within barely tolerable limits, and the ICU is approximately equal to 1.0, the physical limit to capacity. By 2025, all intersections are forecast to operate at Level of Service F. With the additional traffic anticipated from the expansion of the casino, all study intersections are forecast to experience severe congestion.

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Table 3 – Intersection Performance (2,500 Machines)
(PM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	37.1/D	0.827/D	136.4/F	1.191/G	198.6/F	1.595/H	62.2	0.404
Contra Costa Ave & San Pablo Dam Road	13.3/B	0.602/B	26.9/C	0.890/D	103.4/F	1.121/G	76.5	0.231
Town Center/Ventura & San Pablo Dam Road	14.4/B	0.726/C	36.5/D	0.965/E	131.2/F	1.195/G	94.7	0.23
I-80 WB Ramps & San Pablo Dam Road	19.7/B	0.988/E	119.4/F	1.942/H	156.9/F	2.116/H	37.5	0.174
I-80 EB Off Ramp & San Pablo Dam Road	22.0/C	0.688/B	116.9/F	0.735/C	175.1/F	0.834/D	58.2	0.099
Amador Street & I-80 EB On Ramp	21.6/C	0.955/E	166.4/F	1.526/H	198.4/F	1.659/H	32.0	0.133

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

In the 2,500-machine scenario, both AM and PM peak hours are forecast to experience severe congestion; although delay increases are not forecasted to be as substantial as the 5,000-machine scenario seen below. The intersection of San Pablo Dam Road and Town Center Avenue is forecast to experience to most significant increase in vehicle delay.

The ICU levels forecast are well above 1.0 and are as high as 3.2. A value of 3.2 can be interpreted to suggest that 3.2 intersections will be required where only one intersection is currently present. Delay values of 200 seconds or higher suggest that motorist will queue up excessively and wait for 4-6 green lights before finally getting through the intersection.

Table 4 – Intersection Performance (5,000 Machines)
(AM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	15.6/B	0.577/A	129.0/F	1.171/G	225.7/F	1.747/H	96.7	0.576
Contra Costa Ave & San Pablo Dam Road	8.9/A	0.472/A	110.5/F	1.106/G	170.6/F	1.408/H	60.1	0.302
Town Center/Ventura & San Pablo Dam Road	10.1/B	0.524/A	113.6/F	1.178/G	163.5/F	1.447/H	49.9	0.269
I-80 WB Ramps & San Pablo Dam Road	17.6/B	1.104/F	207.4/F	2.906/H	218.8/F	3.248/H	11.4	0.342
I-80 EB Off Ramp & San Pablo Dam Road	27.0/C	0.544/A	221.6/F	1.063/F	240.2/F	1.269/H	18.6	0.206
Amador Street & I-80 EB On Ramp	37.1/D	0.937/E	249.3/F	1.824/H	253.1/F	1.974/H	3.8	0.150

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

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Table 5 – Intersection Performance (5,000 Machines)
(PM Peak Period)

Intersection	Existing (2004)		2025 Without Project		2025 WITH Project		Increase	
	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay/LOS	ICU/LOS	Delay	ICU
San Pablo Dam Road & San Pablo Ave	37.1/D	0.827/D	136.4/F	1.191/G	262.2/F	2.043/H	125.8	0.852
Contra Costa Ave & San Pablo Dam Road	13.3/B	0.602/B	26.9/C	0.890/D	187.5/F	1.352/H	160.6	0.462
Town Center/Ventura & San Pablo Dam Road	14.4/B	0.726/C	36.5/D	0.965/E	214.4/F	1.426/H	177.9	0.461
I-80 WB Ramps & San Pablo Dam Road	19.7/B	0.988/E	119.4/F	1.942/H	189.6/F	2.541/H	70.2	0.599
I-80 EB Off Ramp & San Pablo Dam Road	22.0/C	0.688/B	116.9/F	0.735/C	211.1/F	0.963/E	94.2	0.228
Amador Street & I-80 EB On Ramp	21.6/C	0.955/E	166.4/F	1.526/H	215.4/F	1.793/H	49.0	0.267

Note: ICU= Intersection Capacity Utilization (a method of determining congestion at intersections.) LOS= Level of Service. Delay is seconds per vehicle.

The two freeway ramp intersections are operating at Level of Service E in the existing PM peak hour scenario. By 2025, the intersections of San Pablo Dam Road at San Pablo Avenue, and San Pablo Dam Road at Ventura Avenue are also forecast to operate at deficient levels. In the 2025 5000-machine scenario, all study intersections are forecast to experience extreme congestion.

J. Arnold Torma, PE
Principal Engineer

Letter: I46.
Signatory: Marian Giddings.

Response to Comment I46-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

MARIN SONOMA 101 NARROWS

COMMENT CARD

Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Marin-Sonoma Narrows High Occupancy Vehicle (HOV) Widening Project

Date: 12-10-2007
Name: MARIAN GIDDINGS/GONZALO BARAJAS
Title and Agency/Company: Property owners
Phone: 415-479-3858 E-mail: MARIANG76@sbcglobal.net
Address: 701 LAMONT (37 SANDALWOOD CT.)
City, State, Zip: NOVATO, CA. 94947 (SAN RAFAEL, CA-94903)

Comments (Continue on back, use multiple sheets if necessary)

I46-1 A sound wall on the west (southbound) side of De Long is essential. In addition to the regular traffic din, large trucks downshift loudly at this junction before starting down hill. Noise is so loud from the freeway that such quality of life issues as sleep, normal conversation are adversely affected. Property value is also negatively affected for the entire neighborhood where most homes date back to the 1950/1960s. People find it impossible to use their yards because the freeway noise precludes any conversation, let alone peace and quiet! The hearing of children is in danger of being damaged by the noise, especially outdoors. In Novato — children may not play outdoors because of danger of hearing loss from the freeway noise. In Novato! Incredible.

How To Submit Your Comments:

- Place your completed comment card in the comment box tonight located at the sign-in table.
- Mail your completed comments to:
  Melanie Brent, Office Chief
  Division of Environmental Planning & Engineering California Department of Transportation
  111 Grand Avenue, Mail Station 8B
  Oakland, CA 94612
- E-mail Melanie Brent at melanie_brent@dot.ca.gov.
- Please submit your comments by close of business on December 14, 2007.

Letter: I47.
Signatory: Residents of Stuart Drive.

November 14, 2007

To who is in charge of letters regarding sound wall concerns:

I47-1 We are all residents of either Stuart Drive or Kresky all of in which back up to the freeway. We all have great concern of the freeway widening with out a sound proof wall. As it is already a four lane freeway two in each direction the noise is sometimes unbearable. We cannot imagine what the noise is going to be like with six lane freeway. Many of us residents are of age or have infants and the noise control is important to our health. Some of us have questions to why sound walls have been built in Santa Rosa areas where no housing is established and yet there are doubts in if there is money to build one where housing is developed. Also ,why has a sound wall been built at the new Freitas housing on Lakeville freeway, Caulfield and Washington when the residents there don't even have half of the noise level that we have to deal with? Why and how do those residents get a sound wall put up quickly when all of us residents have waited patiently. We all as neighbors agree that the money that has been set aside should go into the sound wall before the six lane freeway is built and before more money is put into a new East Washington ramp as the Argus courier paper has stated. Let's think about the resident's health and safety for once!!!!!!

Residents Name	Residents Address
[illegible]	350 Stuart Dr. Petaluma, CA
314 [illegible] Mulegno	
x Chris O'Kearney	362 Stuart Dr. Petaluma, CA
x [illegible] Stuart Dr [illegible] Sanchez	
x Karina Barrajas	426 Stuart Dr Petaluma CA 94954
x Jose Chavez	429 Stuart Dr. Petaluma, CA 94954

Response to Comment I47-1

Caltrans will only consider new soundwalls on projects that will change the freeway in a major way. As part of this project a soundwall (Soundwall No. 5) was under consideration for your area; this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Letter - I47

Page 2

* Joann M. Folla
347 Stuart Dr.

* Jennie Thompson
343 Stuart Dr.

* Francisco Morales
338 Stuart Dr.

* Monica Huerta
339 Stuart Drv.

* Carlos Ramo & Carlos Ramirez
318 Stuart Drive.

* Jose Encarnacion
310 Stuart Dr.

* 307 Stuart DR Manuel Carrillo.

* Fernando Luis 346 Stuart Dr.

* Fernando Contreras 351 STUART DR

* Hortensia Andrade 769 0665

* Pedro Morales 446 Stuart Dr.

* Roberto Grimaldi 470 Stuart Drive.

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* VERONICA CASTILLO
502 Stuart Dr.
Petaluma

*

* Ross Dougan

Ross Dougan
1235 Kresky Way
Petaluma CA 94954

* Florence Woolley
510 Stuart Dr.
Petaluma, CA 94954

* 1255 KRESKY WAY
PETALUMA CA 94954

* JUANITA H. ASHE
1227 KRESKY WAY
PETALUMA, CA. 94954

* 1251 Kresky Way
Petaluma, CA 94954

*

* Tim H. Dill
1251 Kresky Way
Petaluma CA 94954

* Charles Escalante
1217 Kresky Way.
Petaluma Ca. 94954

* Carol Stornetta
1239 Kresky Way
Petaluma, CA 94954

* Ron Stornetta
1239 KRESKY WAY
PETALUMA, CA 94954

Letter: I48.
Signatory: Marian Giddings.

Response to Comment I48-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Marian Giddings
<mariang7@sbcglobal.net>
12/11/2007 05:58 PM

To melanie_brent@dot.ca.gov
cc
bcc
Subject sound wall west side of De Long, Novato, CA

December 11, 2007

DIVISION OF ENVIRONMENTAL PLANNING & ENGINEERING
111 Grand Avenue
Oakland, CA 94612

ATTENTION: Ms/ MELANIE BRENT:

Re: Request for a west/southbound side sound wall at De Long Avenue, Novato, CA

I48-1 A sound wall on the southbound (west) side of the freeway at De Long Avenue, Novato, CA is essential to diminish the din from the freeway traffic.

The deafening noise is a result of:

a. Vehicles speeding up to get on the freeway from De Long Avenue
b. Trucks on the freeway downshifting/braking as they start down the grade
c. Incessant regular traffic both day and night

Deafening noise affects quality of life for households within a wide radius:

a. People are awakened from sleep repeatedly by the noise, affecting daily life and work.
b. Normal conversation is difficult indoors/hopeless outdoors.
c. Use of front and back yards is impossible because of the constant loud noise:
d. Children cannot play outside without permanently endangering their hearing

Of great concern is the proposed building of a sound wall only on the opposite side of the freeway (northbound/east side).

a. The present high noise level in the entire neighborhood will increase further as freeway noise bounces off that wall thus aggravating existent quality of life problems.
b Freeway noise already affects property values negatively; increasing the noise level will lower property values and make selling difficult, if not impossible

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Property owners will be faced with untenable living conditions yet unable to recoup their investment.

I48-1 Please consider the above and build a sound wall for the west/southbound freeway side at De Long Avenue, Novato.

Sincerely,

Marian F. Giddings
Gonzalo Barajas

Letter: I49.
Signatory: Neal Osborne.

Response to Comment I49-1

The Caltrans noise protocol requires that all known existing terrain features be taken into consideration in the prediction of future noise levels. The existing wall provides some abatement, so the measured noise level is 63 dBA, which is well below the criterion of 67 dBA. Therefore, no new soundwalls have been proposed for this area.

==========
From: novatocouncil@ci.novato.ca.us
Date: 2008/01/02 Wed PM 06:44:31 CST
To: neoindependence2007@verizon.net
Subject: Re: [Potential Spam] U.S. Highway 101 widening

Thank you for your e-mail. It has beenforwarded to the City Council.
Future hearings on the project willbe conducted by Cal Trans. Please forward your comments to Cal Trans fortheir consideration

<neoindependence2007@verizon.net>
12/31/2007 02:01 PMTonovatocouncil@ci.novato.ca.usccSubject[Potential Spam] Â U.S. Highway101 widening

Dear Novato City Council,

[49-1 I recently was able to watch television during the holidays and observedthe tape of the December 10, 2007 City Council meeting regarding the draftEIR/EIS for the CalTrans project to widen U.S. Highway 101 north from theHighway 37 and South Novato Boulevard interchange. Â I was particularlyinterested in the discussion regarding soundwall construction.
Â Asa resident of 30 Tahoe Circle, I already am exposed to excessive noisefrom vehicular traffic on the highways and South Novato Boulevard.
Â Thisis predominately due to an existing substandard height concrete block soundwalland a gap of approximately 135 lineal feet where Cheda Creek flows underthe highway. Â The noise for the residents at 66 Plumas Circle, 636Fairhaven, and many other residents that are closer to the highway thanmy residence must be oppressive and diminishing their quality of life.Â I request a comprehensive sound study at the edge of the highwayright-of-way adjacent to all residential areas within the project vicinitythat may be subject to additional noise associated with the additionaltraffic two new lanes will encourage. Â It seems like the 101 and 37/SouthNovato Boulevard interchange would have the greatest potential for additionalnoise as a result of the project because this is where the most numberof vehicles are traveling. Â All residential areas where 67dBA is exceededshall be protected with new soundwalls with the design specified by theNovato Design Review Board and as approved by the Novato City Council andCalTrans. Â Noise absorbing materials shall be utilized so that noiseis not merely reflected to the other side of the highway or to a higherelevation. The use of native vegetation is recommended. Â Please keepme informed of any future hearings or public meetings associated with thisproject.

Sincerely,

Neal Osborne
30 Tahoe Circle
Novato Â CA Â 94947

telephone: 892-0279

2

Letter: I50.
Signatory: Frank Egger.

December 11, 2007

Melanie Brent
Office Chief
Division of Environmental Planning and Engineering
Department of Transportation
P.O. Box 23660 Oakland, CA 94623-0600

RE: Comments to the Cal Trans Draft EIR/EIS for the Proposed Marin-Sonoma Narrows HOV Widening Project

FROM: Frank Egger, 13 Meadow Way, Fairfax CA 94930 and Fairfax Tomorrow

Dear Ms. Brent,

Please accept these comments from me as an individual who served for a combined 20+ years on both the original Highway 101 Corridor Committee, made up of public officials from Marin and Sonoma Counties, and the precursor to TAM, the Marin Transportation Authority and also as a representative for Fairfax Tomorrow.

I50-1 The purpose of a reversible HOV Lane is to require less right-of-way and freeway widening,not more. It also reduces the right-of-way purchase costs for the Project. One of the proposed alternates is a reversible lane but unfortunately the Draft EIR/EIS does not consider an HOV lane with a moveable barrier but rather a lane with shoulders and fixed barriers. Cal Trans must study a real reversible HOV lane with a moveable barrier as an alternative.

I50-2 A reversible HOV lane with moveable barrier will be HOV 24/7, 12 hours South from Petaluma in the AM and 12 hours North from Novato in the PM. The primary proposal will result in an HOV lane only 10% of the time (2&1/2 hours for each half of the freeway) and 90% of the time they will be mixed use lanes thereby increasing freeway capacity a minimum of 50% and eventually going to 100%. The remainder of the freeway South thru Marin cannot handle a 50% increase in traffic, let alone 100% in the future. There is no where to put that kind of increase in vehicles on 101 once they reach Marin.

I50-3 The $40 Million per interchange cost is prohibitive and the three proposed massive interchanges should be dropped and either a simple flyover or underpass should be located at San Antonio Road. The Landfill Access overcrossing is sufficient at that location and frontage road improvements to Kastania and the State Park, Olompali, are sufficient.

I50-4 The balance of the $120 Million dollars for interchanges should be applied to purchasing the agricultural lands along the freeway frontage otherwise the massive interchanges will foster growth and development in lands used primarily for agriculture and agricultural services.

I50-5 The Draft EIR/EIS does not properly address the growth inducing impacts on Marin and Sonoma Counties including lands in the vicinity of the three proposed interchanges. The massive freeway widening proposal is miss-titled a HOV lane proposal when in fact it would only be HOV 10% of the time and 90% of the time will it be a mixed use 6, to ultimately 8 lane, freeway.

(1)

Response to Comment I50-1

An alternative incorporating a moveable barrier system was considered early in the development of project alternatives but was rejected due to the cost for installation and operation of the system.

Response to Comment I50-2

FHWA/Caltrans have decided the reversible HOV lane is not a preferred alternative. The Preferred Alternative, Fixed HOV Access Option 12b, will provide access to the HOV lanes during non-peak hours.

Response to Comment I50-3

Access Option 12b has been identified as the Preferred Option to reduce the potentially significant visual impacts within Segment B, which excludes an interchange at San Antonio Road.

Response to Comment I50-4

The proposed interchanges would replace and consolidate existing intersections of local roads with US 101 in Segment B and would not create new access. If access were the prime criterion for growth inducement, Marin County would have long-standing problems with growth inducement in this corridor. In contrast, Marin County has successfully managed growth pressures on agricultural lands for the last several decades and is recognized as the leader in developing a countywide approach to growth management of agricultural lands.

To examine this and other growth issues, a growth inducement analysis was conducted, the results of which are summarized in Section 3.1.3, Growth, of the DEIR/S (which is now Section 3.1.4 in Volume 1 of this FEIR/S). Using the area around San Antonio Road on the border between

Marin and Sonoma Counties as a sample location of sensitive agricultural lands combined with a proposed interchange, the growth inducement analysis carefully analyzed the proposed project's impact on it. The study found that the improved speed of the mainline traffic on US 101 under the proposed improvements would cause a slight increase in growth pressures in the area only if land use constraints were not considered. When the constraining effect of the land use plans of Marin and Sonoma Counties was considered, the growth analysis projected no impact for the area. The expert panel, which included planners from the two counties and local cities, agreed with this conclusion, saying that the land use plans for this area would not change because of the project and that the time savings were too small to have an important effect on growth. Results of the growth inducement analyses for other actual or potential residential areas considered in the study were similar. The study concluded that the proposed project would support planned growth, but would not induce unplanned growth in the region.

Response to Comment I50-5

The proposed interchanges in Segment B would mainly give safer access from US 101 than currently exists with the several at-grade intersections. If access from US 101 were the determining factor for growth, the lands along Segment B would currently have runaway growth, given that access is less restricted than it would be under the proposed project. See also the response to Comment I50-4. The commuter time savings of two to ten minutes for mixed flow traffic over the entire length of the proposed project were found to be not substantial enough to cause material shifts in residential location. With the exception of weekend conditions, the hours of operation for the HOV lanes would typically extend through the peak congested periods and would open up for non-HOV traffic during off-peak times when they would provide less time benefit. The growth inducement study carefully analyzed the effect of the projected time savings for commuters in the context of the area land use controls and concluded that the proposed project would support planned growth, but would not induce unplanned growth in the region.

Letter - I50

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Page 2
Comments to Cal Trans
Draft EIR/EIS Marin-Sonoma Narrows
From: Frank Egger/Fairfax Tomorrow

I50-6 The impact on SMART has not been sufficiently addressed. The Proposed Narrows Project competes with SMART as a transportation solution between Marin and Sonoma Counties and it will reduce the viability of a rail solution.

I50-7 The impact of the Project on air quality is not sufficiently addressed. As the widened freeway attracts more and more cars, the dirty air will just be pushed to Solano County by the Westerly breezes.

I50-8 The Draft EIR/EIS is silent on the impact of the Project by the two proposed mega Tribal Gambling Casinos, one between Petaluma and Novato and the other in Rohnert Park. The Dry Creek Rancheria with their Nevada partner, Nevada Gold & Casinos, is proposing a 2 to 5,000 slot Las Vegas type casino, South of Petaluma, on their 277 acres fronting Highway 101. This casino, when built will alone generate up to 68,000 car trips per day totally negating any of the proposed improvements to the Narrows Project, in fact the "new" freeway will be more congested than it is today. Every Tribe in the State wants to be the closest to the lucrative San Francisco Bay gambling markets.

Add to that the Rohnert Park Casino, a project of the Graton Rancheria and Station Casinos of Nevada, projected to generate anywhere from 27,000 to 68,000 car trips per day (13.6 trips per slot), whose Compact is currently being negotiated with Governor Schwarzenegger for another Las Vegas type casino with a huge entertainment venue. If the Governor approves another 3000 slot machines on top of their projected 2000, like he has for the four Southern California Tribes, we will see another Las Vegas built right here between Novato and Rohnert Park.

The DEIR/EIS must address the significant adverse impact the two casinos will have on the Narrows Project and the actual reduction to level F of the Narrows when the two casinos open.

Thank you for the opportunity to comment on the DEIR/EIS,

Frank Egger and Fairfax Tomorrow
13 Meadow Way
Fairfax, CA 94930

(2)

Response to Comment I50-6

The ridership study for the SMART EIR (Appendix I) took into account the proposed HOV lanes. Because the EIR assumed the completion of the HOV lanes as baseline for SMART, the effect of the HOV lanes was fully considered by SMART.

Response to Comment I50-7

The increase in vehicle miles traveled and its resulting emissions have been analyzed on a region-wide basis as well as local area basis for compliance with the Clean Air Act. In order to comply with the Act the project must be included in a Regional Transportation Plan and Transportation Improvement Program, and the analysis of those plans must be shown to be within the emissions budgets. The project is included in those plans, has been analyzed for regional air quality, and has been shown to meet the National Ambient Air Quality Standards.

Response to Comment I50-8

See response to Comment LJ5-9.

Based on the Graton Rancheria Casino's DEIR, the additional demand will total around 18,000 vehicle trips per day. We agree with this estimate and feel that estimates of 27,000 to 68,000 vehicle trips per day are unsubstantiated. We have not been able to find any basis for the 13.6 trips per slot machine per day figure.

It appears that the Dry Creek Rancheria Casino discussed in this comment refers to the proposal to build a casino adjacent to US 101 on Kastania south of Petaluma. This proposal is in a very early stage and is only one of the proposals being considered for the parcel of land. The environmental process has not begun for any use of this parcel and it is far too early to even estimate what the impacts of these uses might be.

Letter: I51.
Signatory: George Bertram III.

October 29, 2007

Melanie Brent
Office Chief
Division of Environmental Planning and Engineering
Department of Transportation
111 Grand Ave.
P.O. Box 23660
Oakland, Ca., 94623-0660

RECEIVED
OFFICE OF ENVIRON/ANALYSIS

NOVATO RV PARK

The Best of the City In a Country Setting

Novato RV Park
1530 Armstrong Ave.
Novato, California
94945
Direct:
415.897.1271
Reservations:
1.800.733.6787
Facsimile:
415.897.5500

Dear Ms. Brent:

I own the Novato Mobile Home and R.V. Park located at 1530 Armstrong Ave., Novato and I am responding to your letter of October 16th. If you could please respond to the following:

I51-1 1. Do you propose a sound wall between my property and the expanded freeway? Where would it start and end?

I51-2 2. If so, what is the proposed height, width, and length? Would there be landscaping on both sides of the wall? If so, what is the proposed design of the wall and landscaping plans?

I51-3 3. Where would the sound wall be located? On Cal Trans side of the existing wire fence, or on Armstrong's side?

I51-4 4. Will you ask for any easements or right-of-ways from any property owners along Armstrong Ave? If so, why are they needed? Do you plan to expand onto Armstrong Ave.? If so, when?

5. Have you contacted my neighbors along Armstrong Ave? If so, who?

I51-5 6. Are you proposing a four-way stop light on the corners of Atherton Ave. and Armstrong Ave.?

I51-6 7. Would Cal Trans place a sign on the shoulder of north and south bound lanes indicating a "R.V. Park, Next Exit" signage?

I51-7 I am very concerned how a fourteen-foot tall sound wall would affect my property, residents and neighbors. What kind of screening or planting would you plant on our side of the wall? Who would maintain this planting? Who would pick up the trash? How would such a wall affect our view(s) of the sunset, westerly mountains, shadows, sunsets, etc.?

I truly appreciate you quick response so when I (with perhaps my neighbors and residents) come to the November 14th meeting I can positively respond to your design.

Thank you,

George A. Bertram III

Response to Comment I51-1

Soundwalls are being proposed for areas where the predicted noise levels reach the criteria designated in the Caltrans *Traffic Noise Analysis Protocol* and federal regulations, and where such walls are constructible and will provide a benefit. A feasible soundwall has been approved for this area which would be constructed at the edge of the freeway and off-ramp shoulder, starting to the south of Cherry St. and ending at the corner of the northbound off-ramp and Atherton Avenue.

Response to Comment I51-2

The height of the wall will be 14 feet. The wall that is proposed will be approximately 1,600 feet in length but adjustments to all of the soundwalls will be made in response to comments or other factors that may arise in the course of the public comment period.. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I51-3

The soundwall would be located on the Caltrans side of the existing fence.

Response to Comment I51-4

No temporary easements or additional right-of-way from property owners along Armstrong Avenue are currently anticipated. A soundwall is proposed along US 101 adjacent to Armstrong Avenue. Temporary traffic control with flaggers may be required along Armstrong Avenue for the sound wall construction.

Response to Comment I51-5

We are not proposing any change on the corner of Atherton Avenue and Armstrong Avenue.

Response to Comment I51-6

In consideration of your concerns that a sound wall would block motorists view of the RV park, Caltrans has determined that a shortened sound wall would provide the desired visibility and still provide noise abatement to adjacent residents.

Response to Comment I51-7

Soundwall No. 2 will be shortened so as not to cover the mobile home park on Armstrong Avenue, while providing some abatement for residents from 1512 Armstrong Avenue to the apartment complex at the corner of Cherry Street and Armstrong Avenue. Specific plant selection for wall screening, as well as specific wall design and responsibility for maintenance and trash pickup, would be developed in consultation with City of Novato staff. The shortened wall length should reduce visual impact to this property's views.

Letter: I54.
Signatory: Mary Glardon and Kevin Bodwell.

Response to Comment I54-1

Caltrans and FHWA thank you for your comments. The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin-Sonoma Narrows Project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project.

Jit S Pandher/D04/Caltrans/CAGov
12/13/2007 08:26 AM

To Yolanda Rivas/D04/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Comment on the Draft EIR/EIS of MSN

Jit S. Pandher
Ph # (510) 286 -6425
Fax # (510) 286 - 5136
----- Forwarded by Jit S Pandher/D04/Caltrans/CAGov on 12/13/2007 08:25 AM -----

MaryGlardon@comcast.net
12/13/2007 05:43 AM

To To: <bijan_sartipi@dot.ca.gov>, <melanie_brent@dot.ca.gov>, Doanh Nguyen <Doanh_nguyen@dot.ca.gov>, Jit Pandher <jit_s_pandher@dot.ca.gov>, Rey Centeno <rey_centeno@dot.ca.gov>, Holly Butler <holly.butler@sen.ca.gov>, Lisa Badenfort <lisa.badenfort@asm.ca.gov>
cc
Subject Comment on the Draft EIR/EIS of MSN

To All Government Officials Of Concern,

This is Kevin Bodwell's and my Comment on the Draft EIR/EIS of the MSN project.

I54-1 We are asking Caltrans not to grant a design exception of the proposed Rainier Interchange in Petaluma, Ca. It is not in the best interest of the public to grant the exception of the mandatory 1 mile between interchanges rule. We believe to grant an exception, would result in the undermining of the safety and effectiveness of the Marin Sonoma Narrows widening project. I, Mary, would never choose to exit at Rainier, due to the weave, even though my home resides closer to this road than to East Washington. I have been the victim of a dangerous weave of an auxillary lane in San Rafael, between the inlet ramp of westbound 580 meeting with an offramp to central San Rafel. I was in the flow of traffic,coming from Corte Madera heading north toward Terra Linda, when a driver darted out of the auxillary lane and hit me. It was a terrifying, painfull experience and I don't wan t anyo ne else to experience this in their lifetime. It was a hit and run accident as the driver fled the scene. I still have ongoing back pain. One of my best friends husband almost lost his hand, and endured over a year of recovery, as the result of the dangerous weave of an auxiliary lane coming onto the freeway, from Sir Francis Drake,getting off the offramp to go south on 101. These are dangerous scenarios that should be eradicated, not planned and built.
A Design Exception at Rainier will not benefit Petalumans or the transportation needs of Sonoma residents. It will undermine the very goals of the widening of the 101 freeway, which is to facilitate optimum transportation speed and safety. No one has taken into account, in the studies,

Letter - I54

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of the proposed Casino in Rohnert Park. Today, our Argus Courier newpaper states that our State Assemblyman Jared Huffman thinks it may generate a range of from 27,220 to 68,000 new vehicle trips a day, depending on the number of slot machines allowed. Our General Plan 2025 EIR states, any Interchange spacing, less than 2 miles apart, slows traffic movement down from the desired 2400 cars per hour, per lane. It states there is no mitiga tion for this.

Exherting much political pressure, our city of Petaluma Council passed a Resolution authorizing the City's consultant to pursue a Design Exception with Caltrans for the Rainier Interchange, and to not endorse braided ramps or collector/distributors as an alternative. In our opinion, the Council wants an auxillary lane because it will be the least expensive in meeting their political agenda, and not require them to have to take out 25 homes and/or business buildings in the path of the other 2 alternatives of the above stated mitigations.

The Petaluma City Council is balking at the growing cost of Rainier and is looking for other ways to lower the cost, or pay for it. Especially since they watched the home builder associations have sticker shock of the new fees being proposed for the infrastructure of the Capital Improvements coming into the City. Rainier is a huge amount of these costs. They already have to do an auxillary lane for the East Washington Interchange project. If they can get Caltrans to pay for it, they can lower the rising cost of Rainier now estimated to be in the $60 million to possibly $100 million range. The Feds won't pay for it, and the Sonoma County Transit Authority won't either. It is the agenda of the pro development council members seated, that took large amounts of their campaign funds from Developers. (According to our newspaper The Press Democrat, the Campaign funds of Mr. Rabbitt&nbs p;&nbs p;from developers was 61%, Mr. Obrien 59%, Mr. Harriss 40%, and Ms. Nau 73%.)It is unlikely they would have won their seats without the funds. The dream for Rainier is to open up that field for a Downing Savings & Loan development. The proposed development is a close duplication of the Rancho Cordova commercial strip mall, now being built in Sacramento. This is a 27 acre strip mall, a sea of asphalt, with Lowes as a 350 thousand Sq. Ft. anchor.

The premise that these 4 Councilmembers, are using to persuade Caltrans and the public of the need for Rainier is that it will help the East Washington Interchange Level of Service (LOS) by 25%.

However, Public Works Director Mr. Marengo pointed out, during his Nov. 5 th presentation, in Petaluma agenda, doc.s Page 11, the chart representing the future LOS (Level of Service)Full Scope Vs. Reduced Scope shows with Rainier AM Peak traffic at (Washington & McDowell)to go from F to D, yet with Rainier in place at the PM peak (at East Wash NB Ramps) the LOS goes down from a B down to a C with Rainier. That pretty much negates, or neutralizes that premise.

The Council has stated that 73% of Petalumans voted for Rainier, but that is untrue. Of a population of 50 thousand plus Petalumans in 2004, only 17,759 voted for the advisory only, Measure S, which was purported to give the city traffic relief on McDowell, and the measure stated no cost of the project. So people voted in ignorance of its total scope. The General Plan 2025 EIR states that The Current Level of Service (LOS) at Mcdowell and Rainier is A at AM Peak, and B at PM Peak , and that once Rainier turns into an Interchange, it will go down to LOS of D AM Peak and E PM Peak.

Rainier is of relatively little value to Petaluman drivers, yet it has a huge cost. It is of no value to the Sonoma County resident driver or to Caltrans in regards to their overall transportation goals.

I54-1

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Please don't grant the exception. We, the citizens, look to Caltrans to protect our safety and well being.

We would like to request that Caltrans work with the Sonoma County Transportation Authority (SCTA) to secure Funding and require the Segment C to have Soundwalls with the construction of the MSN Project. The sound exceeds the 65 decibels allowed by federal standards. It is a quality of life issue for the Petalumans that live here along the River, up to Corona. I54-1

Thank you for your kind consideration of our requests,

Mary Glardon & Kevin Bodwell
Petaluma Citizens
Any questions or comments, Mary can be reached at 707-782-1188
Kevin " " " " 707-782-0944

Response to Comment I54-2

Caltrans has been working with SCTA regarding the project design and inclusion of features, such as the soundwalls. Please refer to Section 3.2.7.4 regarding the Avoidance, Minimization and Mitigation Measures of the Noise and Vibration discussion. This section discusses the proposed soundwalls and the process of determining which ones will be approved for construction. You will see that three of the four soundwalls have been approved, including Soundwall No. 6, which would be closer to your residence as described in this letter. The intended benefit of this soundwall is to abate noise by as much as 5 dBA.

Letter: I55.
Signatory: Marin County Public Meeting.

---o0o---

MARIN-SONOMA NARROWS
HIGH OCCUPANCY VEHICLE (HOV) WIDENING PROJECT
PUBLIC COMMENTS AT PUBLIC MEETING
NOVATO UNIFIED SCHOOL DISTRICT BOARD ROOM
1015 SEVENTH STREET
NOVATO, CALIFORNIA
WEDNESDAY, NOVEMBER 14TH, 2007
5:30 O'CLOCK P.M.

CERTIFIED COPY

REPORTED BY: DEBORAH FUQUA, CSR#12948

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P U B L I C S P E A K E R S

George Bertram, III	Doug Abell
Doug Slakey	Eleanor Sluis
Rhonda Berberich	Mike Williams

---o0o---

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Response to Comment I55-1

Caltrans noise analysis procedures require that all terrain features that are known to exist at the time of this environmental document be taken into consideration in determining the need for any new soundwall. This includes all existing structures, walls, and earth berms, regardless of whether they were constructed by a private party or not. When noise predictions are done, they are always in outdoor areas of frequent human use. In the case of private residences, this will always be outside of Caltrans right-of-way, at locations that are used by people for extended periods and are the most exposed to the freeway.

Wednesday, November 14, 2007 5:49 o'clock p.m.

---o0o---

P R O C E E D I N G S

GEORGE BERTRAM, III: George A. Bertram, B-E-R-T-R-A-M, III. I own the Novato RV Park, located at 1530 Armstrong Avenue, Novato. I am here because I sent a letter on October 29th to Melanie Brent and have not yet received a response. Tonight, she told me that she would respond to all the comments at once.

I55-1 My second reason for being here tonight was to object to the sound wall that is proposed per Chapter 3, No. 2 on 32- -- on Page 32-104. I learned tonight that the current decibel reading, dBA, are 63 to 65 projected with the highway improvements. The measurement was taken outside -- excuse me -- on the freeway side of my property. On the freeway side of the property, I constructed a tall, I believe, 10-foot-high, sound wall in 1995, per an engineer -- it was engineered.

Therefore, the dBA's on my side of the sound wall is much lower than the dBA estimated on the outside of the sound wall. The conclusion would be that there would be no -- a sound wall is not required, nor desired in front of my property.

The only improvements -- only highway

3

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Page 4

Response to Comment I55-2

FHWA/Caltrans have decided the reversible HOV lane is not a preferred alternative. The Preferred Alternative, Fixed HOV Access Option 12b, will provide access to the HOV during non-peak hours.

I55-1

I55-2

1 improvements would be at the off-ramp on Atherton
2 Avenue.
3 The reversible HOV lane alternative, I guess
4 that's EA 04-264000, shows the current off-ramp to be
5 relocated only five or so feet towards my property with
6 a rise in the off-ramp as you exit. The off-ramp
7 reduces the dBA's due to the dirt berm on the off-ramp
8 between my property and the freeway.
9 I talked with Jit Pandher this evening and
10 will confirm this in writing to him this week.
11 Thank you very much.
12 (Whereupon, the presentation was given
13 from 5:59 p.m. to 6:23 p.m.)
14 DOUG SLAKEY: My name is Doug Slakey, S-L-A-K-E-Y.
15 And my comment is that the reversible HOV lane
16 is a crazy idea. I just think it should be dropped for
17 further consideration, or whatever the expression is,
18 because I don't come up this way too often, but I can
19 just see it being closed when I want to use it because
20 it can only be used for peak traffic direction. And in
21 the off-peak period, it has to be closed. And it just
22 seems like it's a waste of taxpayers' money to put all
23 that in place and there's no difference in the roadway
24 width. So there you go.
25 RHONDA BERBERICH: Rhonda Berberich, R-H-O-N-D-A,

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Response to Comment I55-3

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I55-4

See the response to Comment I55-3 above.

B-E-R, another B, E-R-I-C-H, Berberich. I live at 713 Lamont, L-A-M-O-N-T, Avenue, in Novato, California, 94945.

And I was told that a sound wall is -- what did he say? He said the sound wall is not cost-effective that they were thinking of putting up in the Lamont-Alice area, Lamont Avenue and Alice Street area. And I want a sound wall there. We need a sound wall. The neighborhood was established in the '50s. the freeway was put there in 1974. And the noise is just unbearable. The windows shake. I can see the freeway and the cars from my front window, side window, and it wraps around, and I can see it in the back of my house.

I55-3

And I just hope that they consider putting in a sound wall there. Okay? Because it really needs a sound wall in the neighborhood. And thank you very much.

I55-4

GREG ABELL: Hi. I'm head of property at 702 Alice Street. And I'm very much in favor of Sound Wall -- I believe it's 3, which would be at the intersection of Franklin and Alice. The noise now and the contaminants coming off the freeway are, to me, excessive. I very much would like to see that sound wall incorporated in this project. It's my

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Letter - I55

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Response to Comment I55-5

The Preferred Alternative that has been identified is Access Option 12b. Please refer to the Preferred Alternative discussion in Section 2.4 in Volume 1 of this FEIR/S.

Response to Comment I55-6

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

I55-4

I55-5

I55-6

1 understanding there's a possibility of it not being
2 funded, and I think that would be a travesty for the
3 whole entire neighborhood, a neighborhood that was
4 established long before the freeway was built.
5 ELEANOR SLUIS: Eleanor Sluis, E-L-E-A-N-O-R, S,
6 as in Sam, L-U-I-S, Sluis. And I live in Novato. And
7 also formed the Novato Preservation League -- or helped
8 to form it. Okay.
9 My preference is for the 12-B, and that's the
10 12-B section, because it will -- three things. It will
11 cost less money without the San Antonio Overpass. The
12 esthetics will be better without having two overpasses
13 in a short period of mileage, short period driving. In
14 the long run, there will be less development in our --
15 in that area with the 12-B. Less development will
16 occur with no San Antonio Overpass, and thereby the
17 chances are there will be fewer cars on the road. And
18 that will save us from having to build, in 20 or 30
19 years, more frontage roads or more -- widening the
20 freeway again. So cost effective, 12-B.
21 The other thing is to take into consideration
22 the sound walls by Landing Port, I think it is, that
23 people are concerned about, that they need the sound
24 walls, because they live very closely. And the reason
25 they want the sound walls, not only because of the

6

Letter - I55

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Response to Comment I55-7

Oaks will be replanted in Olompali State Park. See the responses to the comments in Letter SA1 for more details.

noise but because of the increase in toxins and toxic material, the asphalt, the brakage toxics that come over the wall. That would be -- without the wall, they just come right into their house. Their houses are very close on -- maybe it's Lamont Avenue in Novato. So the sound walls are very important where there is housing because, again, because of the toxins from the freeway, which is a health hazard to children, pregnant women and elders, seniors. Let's see. So that's two. I55-6

The third thing, as long as I'm talking, is there any way to replant trees in the Petaluma area where they're going to be cut? I55-7

And again, going back, 12-B very -- yeah, fewer overpasses the better.

Thank you. My phone number and e-mail, Eleanor Sluis, and it's 415-892-0128. And e-mail, esluis@earthlink.net. And my address, PO Box 240, Novato, 94948.

The other alternative would be not to widen it, do nothing. So if we don't widen it, we will save water and money in the long run.

I do have another comment. The comment is thank you. The displays are marvelous, and the people who were presenting all of the displays, thank you very much to all the people who are having the displays.

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Response to Comment I55-8

Caltrans and FHWA have followed the statutory requirements under CEQA and NEPA in conducting public meetings within the review and comment period. We also extended the public comment period from 45 to 60 days. The breadth and volume of comments received demonstrate the adequacy of meeting the statutory requirements of the environmental process.

I55-8

My suggestion is they do this two more times in Novato because I don't think the turnout was big enough because there was a mistake in the newspaper. I think people would be very, very interested to have this on a Saturday afternoon or morning, just to get 50 to 100 people involved. And it needed more publicity. It was only like -- I saw a little article about a couple weeks ago, and then I went to a meeting, I heard about it. And then today's paper did not give enough time for people to come out. A Friday evening would be good too, Friday, Saturday.

And I think the other suggestion would be that people do want to make public comments so other people can hear their concerns. And I've heard a couple of people say the format of the meeting did not seem to be cohesive enough to involve people so they can hear other people's viewpoints on the bike paths, on the sound walls, on the 12-B San Antonio Creek, and on the people who do not even want to have the freeway. That was one of the issues.

And the other thing, it was not televised. We have a television station. This whole thing could have been presented as a televised program. And my suggestion would be they still consider NPAS, that's the Novato Public Access Station, putting it on the

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Response to Comment I55-9

Please see the response to Comment RA3-4. Please note that any planned expansion is being sponsored by the utility districts independently of the MSN Project or its impacts. As stated in the FEIR/S, the MSN Project will not induce growth, and by extension, will not lead to a need for an expansion of utility facilities.

Response to Comment I55-10

Caltrans and FHWA will be mitigating for impacts to wetlands. Please see discussion in Section 3.3 in Volume 1 of this FEIR/S.

Television Station Channel 26, talking to Rick Tucker. Putting it on as a program and presenting the five or six issues or concerns that people have and who to contact and how to make comments. Because this is, again, public moneys. We're talking, what, $600 million of taxpayers' money. I55-8

What I've heard is also the issue of the north Marin water pipe. There's something on the aqueduct and the water pipe issue, not having enough water and how it's going to be placed, where the new pipes will be. And I'm not sure about that. But I've heard that there is an issue with the water -- what is it -- yeah, bringing water from the Eel River and the Russian River to Marin. And that pipe will be enlarged.

And does the highway pay for that or -- it's a question who is going to pay for that. Not the highway but the -- what is this group called? The Narrows Project, does it have anything to do -- what's the relationship between the water coming and the highway and the development? Sewer, storm, and water lines, where will they be placed? Where will the storm drains, sewer lines, and water lines be placed or widened, or how does that all -- how does that all work? I55-9

And the reason -- one reason that some people I55-10

9

Letter - I55

Page 10

I55-10

do not even want the freeway is because they -- apparently the desiccation of the wetlands by San Antonio Creek.

MIKE WILLIAMS: Mike Williams, so it's M-I-K-E, Williams, W-I-L-L-I-A-M-S.

Basically, Section B, I like that, with the overpass, the bridge over the San Antonio Creek. I believe the other idea would be to put bigger shoulders than what they have right now, go to the fullest point of their right of way to do everything.

Also I guess you call it -- the sign boards, you have those big black ones. You should have about four or five of those so if there's emergencies we can go off and on at those places. And other than that, I would just try to do it as fast as possible to get everything organized.

That's about it -- oh, the reversible commute lane, no, I hate.

(Whereupon, the comments closed at 8:03 o'clock p.m.)

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Letter - I55

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STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, DEBORAH FUQUA, a Certified Shorthand Reporter of the State of California, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that the foregoing proceedings were reported by me, a disinterested person, and thereafter transcribed under my direction into typewriting and is a true and correct transcription of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named, nor in any way interested in the outcome of the cause named in said caption.

Dated the 30th day of November, 2007.

DEBORAH FUQUA

CSR NO. 12948

11

Letter: I56.
Signatory: Sonoma County Public Meeting.

---o0o---

MARIN-SONOMA NARROWS
HIGH OCCUPANCY VEHICLE (HOV) WIDENING PROJECT
PUBLIC COMMENTS AT PUBLIC MEETING
SONOMA-MARIN FAIRGROUNDS
BEVERLY C. WILSON HALL
175 FAIRGROUNDS DRIVE
PETALUMA, CALIFORNIA
TUESDAY, NOVEMBER 6TH, 2007
5:30 O'CLOCK P.M.

CERTIFIED COPY

REPORTED BY: DEBORAH FUQUA, CSR#12948

1

Letter - I56

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P U B L I C S P E A K E R S

Richard Squaglia Janice Cader-Thompson

Diane Reilly Torres Mary Gilardon

---o0o---

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Letter - I56

Page 3

Response to Comment I56-1

The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin-Sonoma Narrows Project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project.

Tuesday, November 6, 2007 5:42 o'clock p.m.

---o0o---

P R O C E E D I N G S

RICHARD SQUAGLIA: Richard Squaglia, S-Q-U-A-G-L-I-A, and I'm a resident of Petaluma, California.

I56-1 And I have come to understand that the City is seeking an exception of the, I believe, interchange rule -- that would be not having one interchange closer than at least one mile to the nearest one because it tends to cause back-ups on the freeway of because people coming on and off.

And I think that's really dangerous because basically what happens, the freeway backs up. We have this situation in Santa Rosa where you're driving along the freeway and then, all of a sudden, the traffic comes to a stop. It's really dangerous, especially if, say, this stop occurs on the other side of a rise or around a corner. So you come around the corner and just over a rise, and the traffic stops, and you jump on the brakes.

And the problem is, the guy behind you, you wonder: Does he has enough room? And generally, I've had situations where that's happened, and I just barely had enough room to stop. And I know the person behind

3

Letter - I56

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Response to Comment I56-2

Caltrans and FHWA apologize for any confusion regarding the MSN Project boundaries. The commenter is correct that there is an HOV Lane Project from Old Redwood Highway to Rohnert Park Expressway, which is due to go to construction mid-2010 (see Table S-1 in Volume 1 of this FEIR/S). This project also goes by the name of the Central Sonoma HOV Project.

When the MSN Project was first being developed, the schedule for the Central Sonoma Project was not certain, so the MSN Project Development Team assumed that the HOV lanes would be constructed after the MSN Project.

Once the Central Sonoma Project progressed, the MSN Project boundaries were adjusted southward. Because it would not make sense to end and begin HOV lanes in the middle of an interchange, it is logical to end the MSN Project before the Old Redwood Interchange and conform the HOV lanes to the ones that will already be constructed. Therefore, there will be no gap in the HOV system.

1 me has a little less, and the guy behind him has a
2 little less. So you're just hoping that the last guy
3 in line doesn't cause an accident.
4 And I know people that are involved in
5 chiropractic industry. And they've seen a number of
6 people who have been involved in accidents on 101 where
7 they've been rear-ended, horrific neck injuries, spinal
8 injuries. So I'd hate to see this exception be granted
9 to Petaluma for the Rainier Cross-Town Connector,
10 because it -- what I see, it basically sets up a
11 killing zone because, if you're ever involved in an
12 incident like that -- and most of us have been at one
13 time or another if you've been driving for any length
14 of time -- when it's all over, you say to yourselves,
15 "It's a miracle someone didn't get killed."
16 So I'd hate to see that exception granted for
I56-1 17 this so-called "Cross-Town Connector."
18 Thank you.
19 DIANE REILLY TORRES: Diane, D-I-A-N-E,
20 R-E-I-L-L-Y, T-O-R-R-E-S. Let's see. I wanted to know
21 why the original -- originally, the Marin-Sonoma
22 Narrows HOV Widening Project was supposed to go to Old
I56-2 23 Redwood Highway, and it's not. It's stopping at north
24 of Corona Road. And I wanted to know why and when that
25 was decided.

4

Letter - I56

Page 5

Response to Comment I56-3

HOV lanes north of the proposed project are proposed in a different project, and are in the design phase now.

Response to Comment I56-4

The proposed Rainier Interchange/Cross-Town Connector is being studied under a different project and is not part of the Marin Sonoma Narrows Project. Comments will be forwarded on to the City of Petaluma, the lead agency on that project.

Response to Comment I56-5

The purpose of the environmental document is to compare alternatives based upon environmental impacts. The design exception at Corona overcrossing will be done as a design measure to conserve right-of-way, not to reduce environmental impacts.

Response to Comment I56-6

Widening the Corona overcrossing is beyond the scope of the MSN Project and would fall under the SHOPP (State Highway Operation and Protection Program) program for bridge improvements. The structure did receive a seismic retrofit in 1995.

I56-3

1 And also, what are they going to do between
2 Corona Road and Old Redwood Highway? I mean, are they
3 going to have -- what's the plan to put in HOV lanes
4 there? There's a gap.

I56-4

5 Also, I'm against -- I'm into safety, and I'm
6 against -- I don't think CalTrans should make any
7 exceptions, in particular regarding -- for last -- for
8 the Rainier Interchange. And some people in the City
9 want CalTrans to give them an exception because the
10 distance is shorter than the mandatory distance that
11 Cal Trans requires. And I'm totally against that
12 because I think that would hurt us, people.

I56-5

13 And the other question I had is, the Corona
14 overcrossing in the -- in the project study report, it
15 says -- it says here, "The development of HOV lanes'
16 standard inside shoulders will require that distance
17 exceptions be obtained for the reduction of the
18 standard shoulders from 3 millimeters to 2.4
19 millimeters at the Corona Road Overpass."
20 And I did not see that in the draft EIR --
21 draft EIR. I just didn't see that.

I56-6

22 But I did talk to Jit, and he said, "Yeah,
23 that's true." But I don't think CalTrans should grant
24 that exception because it's not safe there. And I
25 would like -- as a citizen, I'm really pushing because

5

Letter - I56

Page 6

Response to Comment I56-7

The proposed Rainer Interchange/Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the city of Petaluma, the lead agency on that project.

the Corona Road Overpass is so dangerous, you can't ride -- you're supposed to ride your -- it's not pedestrian friendly. It's got sidewalk on one side where people that ride their bicycle have to share the road. And there's no lights.

And I don't think it's been -- I want to know if it's been seismic retrofitted because what I would like is to not get rid of that exception and take it down. And we could use SHOPP funds to make it a safe overcrossing, you know.

So I'm against -- as a citizen, I just think that CalTrans owes us a high regard of safety. And granting any of these exceptions would make it unsafe for us, the citizens. I56-6

Now, regarding the exception for the Rainier Interchange, the exception from East Washington to the Rainier Interchange, I'm reading something that says "CalTrans District 4 requires that all new on-ramps to U.S. 101 in the area of Sonoma County include provisions for future ramp metering. CalTrans requires construction of the additional ramp lanes needed for metering operation and the associated conduits for the signal equipment. Actual operations of the ramp metering will not occur until a future date when the entire ramp metering system is running." I56-7

6

Letter - I56

Page 7

Response to Comment I56-8

Caltrans applies Code of Federal Regulations 23 CFR 772 and the Caltrans *Traffic Noise Analysis Protocol* to all of its projects that require federal approval or action. It is correct that the increases in traffic noise do not rise to the level of significant impact; hence, all soundwalls proposed on the project are considered abatement, as opposed to mitigation. What this means is that soundwalls are not legally mandated but the decision-making process must be consistently followed. Public comments are a major, though not the only, consideration in the final decision. The determination of which soundwalls have been approved for the MSN Project is presented in the "determination of final reasonableness" portion of Section 3.2.7.4 in Volume 1 of this FEIR/S.

With ramp metering, CalTrans requires that two lanes be provided on the ramps, one metered lane and one unmetered lane. So my question is, is that still a requirement? And if that's the case, that means there would be the auxiliary lane -- they'd have this exception; there would be the auxiliary lane and the two -- I don't know how they're going to fit all the lanes is my question -- and the sound wall. I56-7

(Whereupon, the presentation was given from 6:34 p.m. until 7:04 p.m.)

DIANE REILLY TORRES: So Segment C, regardless of the build alternative, four sound walls were noted as being part of the proposed project. Reading further into the document, those sounds walls do not appear to be a mitigation measure for the proposed project, but that they are considered abatement for existing noise levels. I56-8

Furthermore, it is noted that the actual determination of those sound walls that will be constructed would be prior to the final environmental documentation.

Does this mean that the sound walls may not be constructed? By whom or when will -- by whom or when will this determination be made? Will the public have an opportunity to re-comment on that decision?

7

Letter - I56

Page 8

Response to Comment I56-9

Please see the response to Comment I56-8 above.

The reasonable allowance is based on a formula described in the Caltrans *Traffic Noise Analysis Protocol*. In addition to a base allowance it also takes into consideration predicted absolute noise levels, the predicted increase in noise, and the achievable noise reduction. It is true that a major part of the calculation of the reasonable allowance is the number of residences that will receive a noise reduction. The intent was to give greater consideration to soundwalls that would serve more people. It should be noted that cost-effectiveness is only one factor that must be considered and it is not intended to be used by itself to eliminate or include any soundwall.

The following is the comparison of estimated construction costs to reasonable allowances for all of the soundwalls based on 2007 costs.

Sound-wall No.	No. of Benefited Receptors	2007 Reasonable Allowances	2007 Construction Costs
1	9	$450,000	$416,250
2	17	$850,000	$774,000
3	9	$432,000	$851,000
4	27	$1,404,000	$763,250
5	61	$3,294,000	$3,163,500
6	18	$972,000	$494,500
7	20	$1,000,000	$1,870,500
8	34	$1,768,000	$1,406,000

I56-8

It appears to be kind of misleading the public with this document saying that, "We're going to build sound walls," but then it's like, "We might not."

I56-9

And the next one is, given the reasonable allowance estimates in the document, it appears that no consideration is given to the length or height of the sound walls required to abate conditions. In fact, two separate locations, including 18 and 20 residents, have reasonable allowances of 792,000 and 800,000 respectively, while the length of the sound walls for each location are 755 feet and 3,018 feet. Is this allowance used to determine whether the sound wall is constructed or not? If so, what are the estimated costs for all the sound walls proposed?

I56-10

Many of the residents in the subject neighborhoods have been requesting CalTrans to install sound walls for a number of years, actually, over 20 years. The City of Petaluma had previously indicated that those walls finally be built as part of the East Washington Interchange Project. City staff has recently indicated that the project has been downsized and no longer includes the sound walls and that they have been -- and that they have been excluded in this project.

I56-11

So what is to become of the sound walls that

8

Response to Comment I56-10

Please see Section 3.2.7 in Volume 1 of this FEIR/S for determination on soundwalls in Segment C.

Response to Comment I56-11

Please refer to Section 3.2.7 in Volume 1 of this FEIR/S for a determination on which soundwalls are proposed for construction as part of the MSN Project. The East Washington Interchange project and the MSN Project are independent projects and not dependent upon one another.

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Response to Comment I56-12

The commenter refers to figures in the MSN Project DEIR/S that showed portions of the East Washington Improvement Project being complete. Caltrans apologizes for any confusion. The East Washington Improvement Project was approved as a separate project; in the visual simulations of the MSN Project DEIR/S, parts of the East Washington project are depicted because it is assumed that this project will be constructed prior to Segment C of the MSN Project.

After Caltrans and FHWA approve a project, such as the East Washington Project, construction can be planned in anticipation of other projects or stages, dependent upon resources. Decisions regarding construction phasing is made during the final design and the PS&E phases.

1 are not constructed with Segment C? Additionally, how
2 does the timing and release of the environmental
3 documents for both of these projects affect the options
I56-11 4 of the other?
5 And then I just was -- that the East
6 Washington Improvement Project was taken out of the
7 Sonoma -- the Sonoma-Marin Narrows HOV Draft EIR. It
8 was taken out of the Marin-Sonoma Narrows HOV Widening
9 Project in order so we could get the East Washington
10 Improvement Project built, you know, prior to the
11 widening of 101.
12 Yet the EIR -- draft EIR is not out. So I
13 think that they should be -- I think they should be --
14 take the East Washington Improvement Project and put it
I56-12 15 back in with the Marin-Sonoma Narrows HOV Widening
16 Project because it's behind. It was supposed to be
17 this traffic relief.
18 And what's confusing about it is, because the
19 draft EIR for the widening shows parts of the East
20 Washington Improvement Project, like, ramps, but yet
21 it's not included in that project. So how can it
22 get -- how can it be done? I think they need to put it
23 back in.
24 And that would answer my questions with the
25 sound walls.

9

Letter - I56

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Response to Comment I56-13

There will be some outside widening around East Washington Interchange and Lynch Creek to accommodate the improvements in Segment C. For the most part, the proposed HOV and auxiliary lanes can be accommodated within the existing right-of-way. A small amount of additional right-of-way is required along the northbound East Washington off-ramp. Temporary easements will also be required for soundwall construction.

I think I already talked about the exceptions. And then I was curious if I asked about the -- I thought I had a piece of paper here.

If they choose not to include the East Washington Improvement Project back in with this Marin-Sonoma Narrows HOV Widening Project, then they should extend the public comment for the Marin-Sonoma Narrows HOV Widening Project to coincide with the East Washington Improvement Project Draft EIR.

I56-13 On Page 3.1-125 Marin-Sonoma Narrows HOV Widening Project Draft EIR, as new project structures -- and this is for Segment C, Petaluma. And it says that they're going to put new auxiliary lanes, "New northbound auxiliary lane to be introduced between Caulfield Road and East Washington Interchange. And a new southbound auxiliary lane would be introduced between the Lynch Creek Bridge and the East Washington Interchange, requiring outside widening of the highway."

So my question is, with the new HOV lane and then these additional auxiliary lanes, I don't see how they're going fit them. How are they going to -- how is it going to be fitted? Is there going to be a design exception making them narrower to make it unsafe? I just want to make sure that doesn't happen.

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Letter - I56

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Response to Comment I56-14

Petaluma Urban Area: Localized flooding has historically been a problem in the City of Petaluma, especially in the region from US 101 westward to the Petaluma River. Much of this area lies in the Petaluma River floodplain, and in the floodplains of several small creeks that flow to the river. Corona Creek, Lynch Creek and Washington Creek drain watershed areas to the east of the City of Petaluma and flow westward, under the freeway, to the Petaluma River. Most of the on-site drainage from the freeway, as it exists today, discharges into these small creeks and finds its way to the river. This project will increase the paved surface area of the freeway corridor and thereby could increase stormwater runoff to the regions historically affected by flooding.

In 2001, the U.S. Army Corps of Engineers, in conjunction with the City of Petaluma, embarked on a project to reduce flooding along the Petaluma River as it passes through the city. This project included re-shaping and reconstructing 3,500 feet of river channel from Lakeville Avenue to the confluence of Lynch Creek, replacing two vehicular bridges and two railroad bridges. Since completion of the USACE project in 2005, it will provide protection from a 100-year flood event. However, when the contributory watershed areas are fully developed (estimated to occur about 2040) the level of protection will have dropped to a 40-year flood event unless strict detention or retention measures are mandated. For this reason, it is important that new construction within state right-of-way (ROW) not increase the level of stormwater runoff beyond that which currently exists.

In order to maintain on-site highway drainage at or below current levels, detention facilities are planned, where necessary, throughout the Petaluma urban area. Several methods of detaining stormwater runoff have been considered: (1) ponds, (2) open swales and/or ditches, and/or (3) underground storage. Detention basins or ponds are advantageous in that they have a relatively low construction cost and can improve the quality of stormwater runoff. However, an important disadvantage of ponds in

1 In the Marin-Sonoma Narrows HOV Widening
2 Project Draft EIR, it states that one of the
3 improvements is going to be drainage. They're going to
4 put drainage. But I didn't see any improvements in
5 Section C. The only thing I see is detention ponds.
I56-14 6 And that's not a good idea because we flood really
7 bad -- we flood really bad. And detention ponds
8 haven't worked for the city of Petaluma.
9 So I think we need to have some additional
10 drainage improvements for flooding since this is going
11 to be in the flood plan. So I'll stop right now.
12 1657 Rainier Avenue, Petaluma, 94954.
13 JANICE CADER-THOMPSON: Janice Cader, C-A-D-E-R,
14 hyphen, Thompson, T-H-O-M-P-S-O-N, J-A-N-I-C-E.
15 732 Carlsbad Court, C-A-R-L-S-B-A-D, Petaluma,
16 94954.
17 So my first comment is on the -- I want to
I56-15 18 know when the Washington Street EIR is coming before --
19 is open for the public to review. And I thought Old
I56-16 20 Redwood Highway was included in Segment C. I want to
I56-17 21 know if the Corona Overcrossing can accommodate two new
22 lanes, HOV lanes. And as far as Measure M money, no
23 money for Measure M is supposed to be used for the
I56-18 24 Rainier Interchange Cross Town Connector that's within
25 that document. That's not mentioned.

11

urbanized areas is that they typically require the purchase of expensive ROW for construction. Swales and ditches also have relatively low initial cost and provide for good quality enhancement of storm runoff. Additionally, swales can frequently be constructed within existing rights-of-way. A possible disadvantage of using swales for detention is increased maintenance cost for control of unwanted growth and debris clean-up.

Underground detention structures are "clean" from the standpoint of being out of sight and not requiring frequent cleaning by maintenance personnel. Also, if underground storage is properly designed and constructed, future widening could occur without modification of the storage facilities or acquisition of additional ROW. The primary disadvantage of underground storage is that the initial cost is significantly greater than above-ground storage, and removal of sediments and debris, when eventually required, will be more expensive. Based on existing ample ROW holdings along the Petaluma corridor and the relative costs of various detention methods, the January 2006 Preliminary Drainage Report recommended implementation of above-ground detention storage in swales and/or ditches.

The current peak stormwater run-off for a 100-year event was calculated to be 2.27 cfs per 1,000 feet of roadway for each side of the highway. It is desired to reduce the existing runoff rate by about 50%, to ensure that the current runoff level is not exceeded as a result of the new construction. Therefore, the maximum (peak) discharge rate from detention facilities should be limited to about 1.13 cfs per 1,000 feet for each side of the highway. Detention ditches should be located strategically to discharge into natural (existing) drainage channels that ultimately flow to the Petaluma River. Metering devices should be constructed in the ditches to limit the rate of discharge to pre-construction conditions.

Response to Comment I56-15

The East Washington Improvement Project was approved in March 2008. A Notice of Determination has been filed with the State Clearinghouse.

Response to Comment I56-16

Caltrans and FHWA apologize for any confusion regarding the MSN Project boundaries. There is an HOV Lane Project from Old Redwood Highway to Rohnert Park Expressway, which is due to go to construction mid-2010 (see Table S-1 in Volume 1 of this FEIR/S). This project also goes by the name of the Central Sonoma HOV Project.

When the MSN Project was first being developed, the schedule for the Central Sonoma Project was not certain, so the MSN Project Development Team assumed that the HOV lanes would be constructed after the MSN Project.

Once the Central Sonoma Project progressed, the MSN Project boundaries were adjusted southward. Because it would not make sense to end and begin HOV lanes in the middle of an interchange, it is logical to end the MSN Project before the Old Redwood Interchange and conform the HOV lanes to the ones that will already be constructed. Therefore, there will be no gap in the HOV system.

Response to Comment I56-17

Sufficient right-of-way exists to accommodate the HOV lanes proposed under the Fixed HOV Lane (preferred) alternative. At the Corona Road Overcrossing, the proposed US 101 inside shoulder would be reduced from 3 m (10 ft) to about 2.4 m (8 ft) due to the bridge columns. A design exception for this point restriction in the shoulder width has been approved.

Response to Comment I56-18

The proposed Rainier Interchange Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the City of Petaluma, the lead agency on that project. Sonoma County Transportation Agency is the decision-making body on Measure M funds.

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Response to Comment I56-19

Your support of soundwalls in Petaluma has been noted. The determination of final reasonableness is discussed in Section 3.2.7.4 in Volume 1 of this FEIR/S.

Response to Comment I56-20

Any relocation of utilities or rail tracks would be for the MSN Project and not any other local projects (e.g., Rainier Cross-Town Connector).

Response to Comment I56-21

The proposed Rainier Interchange Cross-Town Connector is being studied under a different project and is not part of the MSN Project. The MSN Project will not be impacting Deer Creek. Caltrans will forward your comments to the City of Petaluma to ensure that your concerns are addressed as part of the Rainier Interchange project.

Response to Comment I56-22

The proposed Rainier Interchange Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the City of Petaluma, the lead agency on that project.

Response to Comment I56-23

A feasible soundwall (Soundwall No. 6) has been determined to benefit residences on Lynch Creek Parkway on the east side of the freeway. Your input in support of this soundwall has been noted. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S.

I56-19 Sound walls -- they are needed in Petaluma, and they should be a top priority.

I56-20 The rail tracks for smooth transition, I want to make sure that it's -- it's for moving traffic and not -- not built to accommodate an undercrossing or on- and off-ramps; it would be to move traffic on 101, and that's the purpose.

I56-21 As far as Deer Creek, on the east and west sides of the existing freeway needs to be restored and -- needs to be restored. And I don't want to see it piped.

I56-22 There's a lot of wetlands within that area where Rainier is, and there's a lot of bird habitat in there. And that's it for now, but I might be back. Thanks.

MARY GILARDON: Mary Gilardon, M-A-R-Y, and then last name is G-I-L-A-R-D-O-N.

It's best said like this.

I56-23 What I wanted to comment about is we -- I have two concerns. One is that we would like to see a sound wall put up across the freeway on the east side that is between Lynch Creek and, say, South Point Road or Rainier. We would like to see a sound wall there, because there's existing neighborhoods across from that field. And those of us who have two-story houses,

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Response to Comment I56-24

The proposed Rainier Interchange Cross-Town Connector is being studied under a different project and is not part of the MSN Project. Comments will be forwarded to the City of Petaluma, the lead agency on that project.

which are a lot of the houses over there and most of the townhomes, we hear the freeway now. And so if you're going to extend that and get more traffic, we would really like sound walls there to protect us. And the hospital is also there and senior citizen housing. And we just would like to give us some peace and quiet.

The environmental impact report of the General Plan up to 2025 has already shown that the level of sound with the freeway is already in excess of what it should be for our -- for our homes. So -- requiring nobody open their window, air-conditioning throughout the homes. And these homes were all built before air-conditioning. I56-23

And something else, which I can't remember right now, but it was very costly to us consumers.

And then suppose we want to go out into our yards and have a barbecue or play with our children out in the yard; so -- okay.

If you can hold for a second.

We, the citizens in -- many citizens in Petaluma have a concern that we would like to see at Rainier, off of the freeway -- we have a situation where that is less than one mile away from the previous interchange, which is East Washington. I56-24

And we have some politicians and some of our

13

Letter - I56

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1 merchants that have money interests who are asking
2 CalTrans to make an exception of the one-mile rule,
3 that there should be no less than one mile in between
4 interchanges.
5 And having looked at the General Plan,
6 environmental impact report states that, with a Rainier
7 Interchange, freeway interchange, there, that our level
8 of service on McDowell, which is the very next, you
9 know, like, arterial road in our city, we'll go from a
10 peak at a.m. at A and a peak at p.m. at Level B --
11 these are levels of service of congestion. I mean,
12 this is really good, A and B.
13 And with an interchange being placed on the
14 freeway at Rainier, we will then go to Level D in the
15 a.m. and Level E in the p.m., which is not only a lot
16 of congestion, but they're predicting several queues
17 going through the green light. And we predict that it
18 will be queues all the way onto the freeway.
19 And so we understood that CalTrans's goal is
20 the safety of not only the Petaluma citizens, you know,
21 exiting and -- entering and exiting on the freeways,
22 but also the optimum goal of 2400 cars per lane per
23 hour.
24 So if we have these queues of several lights
25 at McDowell, it's going to back these cars up all the

14

I56-24

Letter - I56

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way onto the freeway, which denigrates the whole goal that CalTrans is actually trying to accomplish for not only the Petaluma citizens but all of the general public at large.

And so we're -- we're hopeful that CalTrans will uphold their one-mile rule that there should be no design exceptions to be putting in an interchange. That's something like 4,000-some-odd feet from East Washington at that point, which is less than even a mile apart.

And our General Plan says the fact that it would be two -- less than two miles apart an interchange gives considerable congestion, and it cannot be mitigated. So we're praying that CalTrans looks to the best interest of the public and the Petaluma citizens. That's it. I56-24

(Whereupon, the public comment period was concluded at 7:53)

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Letter - I56

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STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, DEBORAH FUQUA, a Certified Shorthand Reporter of the State of California, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that the foregoing proceedings were reported by me, a disinterested person, and thereafter transcribed under my direction into typewriting and is a true and correct transcription of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named, nor in any way interested in the outcome of the cause named in said caption.

Dated the 30th day of November, 2007.

DEBORAH FUQUA

CSR NO. 12948

16

Letter: I57.
Signatory: Donald Barry Trudeau.

Response to Comment I57-1

The comment is in reference to Soundwall No. 3. Your support of Soundwall No. 3 has been noted, and this soundwall has been approved for construction. The determination of final reasonableness is discussed in the revised Section 3.2.7.4 in Volume 1 of this FEIR/S. Please see the response to Comment I37-3 for more information on the use of sound absorbing material.

Response to Comment I57-2

Open-graded asphaltic concrete (AC) is proposed for the final wear course of the proposed project.

Susan M Burke/D04/Caltrans/CAGov
12/17/2007 11:20 AM

To Melanie Brent/D04/Caltrans/CAGov@DOT
cc Caltrans D4/D04/Caltrans/CAGov@DOT
bcc
Subject Fw: Home page email about sound walls

History: This message has been replied to.

Hi Melanie,
This must be a comment that came in on the MSN project DED to the wrong web site. Can we add it to the MSN comments and respond accordingly?

Susan Burke
Branch Chief - Design D - SON, NAP
Office of Landscape Architecture
510-622-8725
----- Forwarded by Susan M Burke/D04/Caltrans/CAGov on 12/17/2007 11:19 AM -----

Caltrans D4/D04/Caltrans/CAGov
12/14/2007 10:07 AM

To Susan M Burke/D04/Caltrans/CAGov@DOT
cc
Subject Home page email about sound walls

Hi Susan:

I received this email from our home page. Please either respond the customer or let me know if you are not the right person to send this to.

Thanks,

Lawrence Fleming

buannas@earthlink.net on December 13th, 2007 at 10:14PM (PST).

name: Donald Barry Trudeau
email: buannas@earthlink.net
telephone: 415-892-4626
comment: Speaking to the Novato portion of 101. I would like to propose a
I57-1 sound study be held in the Clausing Ct area in Novato. Also suggest that a
sound wall be built adjacent to that area and that it be covered with sound
absorbing matterial. I would also suggest that the highway in and thoughout
I57-2 Novato be covered with open graded asphalt. Thanks D. Barry Trudeau

Letter: I58.
Signatory: Thomas Saberi.

WILLIAM H. PAYNTER
(LICENSED IN CA AND MI)
THOMAS I. SABERI
RYAN KUJAWSKI

LAW OFFICE OF
WILLIAM H. PAYNTER
1045 AIRPORT BLVD., SUITE 12
SO. SAN FRANCISCO, CA 94080
650/588-2428
FAX 650/873-7046

SONOMA OFFICE
MAIN: (707) 996-5605
FAX: (707) 996-4629
PLEASE DIRECT TO:
809 BROADWAY, SUITE 6
SONOMA, CA 95476

December 10, 2007

VIA FEDERAL EXPRESS ONLY

Melanie Brent
Caltrans District 4
111 Grand Avenue
Oakland, CA 94612-3717

Re: Public Comments on Marin-Sonoma Narrows:

Dear Ms. Brent:

Please let this letter serve as public comments from myself on behalf of Andy and Zaida Saberi, Roy Shimek and Gas Club LLC located at 4550 Redwood Highway Petaluma, CA. This address consists of a parcel of real property and also the service station that is on the Westside of 101 at the Kastania Rd. turnoff. (The "service station")

Our public comments are as follows:

I58-1 1. I do not think that Caltrans has given enough consideration to the other 26 options that were to be considered in the plan originally as referenced in Section 2.3.3 of the Draft EIR on page 2-15. The four options chosen for consideration in the Draft EIR all do not consider the fiscal impact upon the above service station. Once any of the four plans for expansion on 101 are adopted, the traffic to the service station will be reduced to a trickle and the expansion of 101 will become a taking of the this property to which the property and business owner should be entitled to payment from the State of California.

I58-2 The only way to access the service station under the proposed Draft EIR would be to get off at the So. Petaluma Blvd. over cross and go south down Kastania Rd for two plus miles. This entrance does not even compare to the ingress and egress that the service station now has currently at the corner of 101 and Kastania Rd.

I58-3 2. The State should adopt a draft EIR that considers the fiscal impact to the service station along with the fiscal impact that would borne upon the County of Sonoma who's citizens would then continuing traveling south and would purchase fuel in Marin County thus reducing sales tax revenue for Sonoma County.

Re: Public Comments on Marin-Sonoma Narrows 1

Response to Comment I58-1

The alternatives evaluation process is fully disclosed in Appendix A of the DEIR/S and this FEIR/S (see the Appendices volume). There would be no fiscal impact to the service station as a result of the project, as access will be maintained to the service station.

Response to Comment I58-2

Please see the response to Comment I58-3.

Response to Comment I58-3

Currently, the Gas N' Shop does not have direct access to US 101. The ingress and egress of this establishment is on Kastania Road and this access point will not change under either Build Alternative, including the Preferred Alternative. Access to the gas station will be maintained during construction.

Currently, due to heavy congestion, motorists are deterred from directly accessing the gas station via a left-hand turn movement from US 101 to Kastania Road, where the gas station is located. This deterrence most likely leads to the gas station being bypassed. Under the Preferred Alternative, this movement would be eliminated and the Petaluma Boulevard South Interchange would be constructed; access to the gas station from US 101 would be via the interchange and Kastania Road. The existing portions of Kastania Road proposed to remain would be widened and rehabilitated. In addition, there is currently no advance signage in either direction along US 101 to alert drivers to the availability of a gas station. Under built conditions, this standard type of signage could be installed. However, the location of the gas station is neither a socioeconomic nor natural resource that can be evaluated under CEQA and an economic or fiscal analysis is not warranted.

Letter - I58

Page 2

WILLIAM H. PAYNTER
(LICENSED IN CA AND MI)
THOMAS I. SABERI
RYAN KUJAWSKI

LAW OFFICE OF
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❑ PLEASE DIRECT TO:
809 BROADWAY, SUITE 6
SONOMA, CA 95476

Melanie Brent
Page Two
December 10, 2007

I58-3 The Draft EIR is deficient in the above two areas and should be re-written to accommodate the above service station property and its owners.

Please contact me if you should have any questions or wish to discuss any of the issues set forth above.

Very truly yours,

THOMAS I. SABERI

cc: William H. Paynter, Esq.

Letter: I59.
Signatory: Residents of Kenwood Drive.

Response to Comment I59-1

The predicted noise levels for your area were not high enough to qualify it for the consideration of soundwalls under the federal criteria, which is applied to this project. No soundwalls or other noise abatement measures will be considered for this area.

or trees

I59-1 Petition for sound wall on East side of Hwy 101 along Orange Ave./Olive/Kenwood ct. They have planned a sound wall along the eastside of 101 along Cherry St to Atherton Ave.

Name	Signature	Address	Phone
O Glover	O Glover	151 Kenwood	8980202
D Elling	[illegible]	201 Kenwood Ct.	415-~~837~~ 5387
R-Bracken	[illegible]	111 Kenwood Ct	898 2539
S Bracken	[illegible]	111 Kenwood Ct.	898-2539

Letter: I60.
Signatory: Susan Stompe.

Response to Comment I60-1

Access Option 12b has been identified as the Preferred Alternative.

Response to Comment I60-2

Oaks will be replanted in Olompali State Park. See the responses to the comments in Letter SA1 for more details.

Response to Comment I60-3

Access was considered east of the railroad tracks and rejected due to environmental impacts during the matrix analysis process.

The project footprint was reduced to the maximum extent practicable while still meeting the project's purpose and need. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's purpose and need.

Susan S. Stompe
110 San Mateo Way
Novato, CA 94945

Dec. 14, 2007

Ms. Melanie Brent, Office Chief
Division of Environmental Planning & Engineering
California Department of Transportation
111 Grand Avenue, mail Station 8B
Oakland, CA 94612

Re: Marin Sonoma Narrows HOV Project DEIR/DEIS

Dear Ms. Brent:

After reading through the DEIR/DEIS I am convinced Alternative 12B would best serve the needs of the MSN area residents and businesses. There are some improvement that could be made to it, however.

I60-1 The PAG strongly recommended keeping within the existing footprint and this project greatly exceeds that footprint, in every alternative. The only place I see justification for this is at Olompali State Historic Park, where cutting a new access road to the park may be damaging to the archeological resources. Reducing damage to archeological resources, as well as the general impact to the area, is a strong reason to avoid an interchange at San Antonio Creek. Alternative 12B is the only fixed HOV lane alternative that does not have that interchange.

I60-2 However, 12B seems to encroach on many more trees than other alternatives. Additional work on the Landfill interchange could reduce that exorbitant number of trees lost. An effort should be made to reduce the tree loss. For those trees that prove to be unavoidable, replacement at 5:1 is appropriate, preferably close to where they were removed. For areas where replacement sites are limited, I would strongly recommend that mitigation for trees lost in Segment A or B be planted to embellish Novato's interchanges. Few of Novato's interchanges received any landscaping when the highway was built.

I60-3 All the alternatives show the access to Mira Monte crossing the wetlands south of the Landfill access road. I recommend that access to Mira Monte be east of the railroad tracks to avoid the damage to the wetlands and to reduce the number of railroad crossings.

The impacts of the project could be reduced in all categories if the footprint kept closer to the existing footprint, as recommended by the PAG 3 or 4 years ago, while still achieving the creation of the HOV lane.

Thank you for the opportunity to comment.

Yours truly,

Susan Stompe

Letter: I62.
Signatory: Tony Silveira.

Tony Silveira
SILVEIRA RANCHES
P.O. Box 150209
San Rafael, CA 94915-0209

January 25, 2008

Melanie Brent
Office Chief
Division of Environmental Planning and Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612

Dear Ms. Brent,

Attached is my feedback to the Draft Environmental Impact Report/Environmental Impact Statement on the Marin-Sonoma Narrows HOV Widening Project as it pertains to my Novato property along Segment B. Had I been properly noticed and advised by Caltrans as to the progress of the project and its studies, I would have responded to this Draft EIR/EIS by December 14. As stated in the attached document, Silveira Ranches is not included in the distribution list of property owners presented in the Draft EIR/EIS.

Sincerely,

Tony Silveira

Tony Silveira

Attachment

Letter - I62

Page 2

Response to Comment I62-1

The address we had for you in our records was apparently incorrect; we have now corrected our records with the new address you have provided:

Anthony Silveira, 140 Blackstone Drive, San Rafael, CA 94903

We have also complied with your request for mapping files and technical studies, and we have added you to Chapter 8 in Volume 1 of this FEIR/S. Caltrans apologizes for the previous omissions.

Response to Comment I62-2

In regard to individual property owners, Caltrans and FHWA will adhere to procedures under the Uniform Relocation Assistance Program (please refer to Appendix E of the FEIR/S).

The DEIR/S included a discussion of agricultural lands adjacent to US 101 that would be impacted by the MSN Project Build Alternatives. While the MSN Project would convert agricultural lands, the roadway configurations will not sever you from accessing your lands. Likewise measures will be taken to ensure that construction does not interfere with agricultural operations.

Response to Comment I62-3

In regard to individual property owners, Caltrans and FHWA will adhere to procedures under the Uniform Relocation Assistance Program (please refer to Appendix E of the FEIR/S).

The DEIR/S included a discussion of agricultural lands adjacent to US 101 that would be impacted by the MSN Project Build Alternatives. While the MSN Project would convert agricultural lands, the roadway configurations will not sever you from accessing your lands. Likewise measures will be taken to ensure that construction does not interfere with agricultural operations.

Tony Silveira
SILVEIRA RANCHES
P.O. Box 150209
San Rafael, CA 94915-0209

Melanie Brent
Office Chief
Division of Environmental Planning and Engineering
California Department of Transportation
111 Grand Avenue, Mail Station 8B
Oakland, CA 94612

Re: Marin-Sonoma Narrows HOV Widening Project – Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)

Dear Ms. Brent:

I62-1 I am the owner of Silveira Ranches, which owns property that is located north of Novato and borders both sides of "Segment B" in the proposed Highway 101 freeway expansion *for a total distance of five miles*. Undoubtedly, my land is the single property most adversely affected by the proposed project. ***Yet Silveira Ranches is not included among the property owners listed in Chapter 8 of Volume 1 of the Draft EIR/EIS.*** This is troubling and may explain the spotty communication I have received to date about the project.

When I granted access to portions of the ranch property for the purposes of the environmental studies being conducted in connection with preparation of the Draft EIR/EIS, I was assured by Caltrans that it would keep me in the loop and automatically provide copies of all distributed reports, studies and communications. That hasn't happened consistently, as is the case with the Draft EIR/EIS.

I62-2 The omission of Silveira Ranches from the property owner list mirrors gross oversight in the Draft EIR/EIS. The Draft EIR/EIS fails, in numerous material respects, to understand and adequately address the potential environmental and physical impacts of the proposed freeway widening on my land, business and agricultural operations. The Draft EIR/EIS cannot be considered accurate or adequate unless all of these impacts are taken into account.

I62-3 The configuration and design of the expanded and widened roadways proposed in each of the Segment B alternatives discussed in the Draft EIR/EIS occupy and consume far more land than is necessary. This is in contrast to areas in Segment C where the proposed widening will be accomplished in a much more space-efficient and economical way. Segment B needs to be reworked to achieve the same economy in land use.

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Letter - I62

Page 3

I62-4 I am not only concerned about the amount of Silveira Ranch property targeted by the project, I am also dismayed that each of the Segment B alternatives contains inept and inadequate access options for a sizeable portion of the Silveira property.

Some of my specific concerns and questions are set forth below:

I62-5 I strongly oppose the proposed location of the San Antonio Road interchange as presented in Alternatives 4b, 14b and 14d. The interchange is one too many in the freeway stretch along the Silveira property and needs to be distanced further away from the Redwood Landfill interchange. The San Antonio interchange is necessary, but it needs to be built north of the Marin-Sonoma county line, close to where southbound motorists currently take the first exit to San Antonio Road. That location is more logical and appropriate for two reasons. First, it will better serve the greater concentration of property owners in that area. Second, an interchange at that location will be more appropriately located farther away from the Redwood Landfill interchange and the Silveira property, thereby minimizing the impacts on a single property owner.

I62-6 I am also strongly opposed to the configuration and size of the Redwood Landfill interchange as proposed in Alternatives 4b, 12b and 14d. It wastes much of the newly built infrastructure at the site (the existing flyover was opened on June 1, 2006) and also is an excessive – and unnecessary -- intrusion upon our land and business. As proposed, the configuration of the new ramps proposed will needlessly affect the quarry and current easement road to the Redwood Landfill and will mostly likely also affect the cell towers on the east side of our property. It appears that the economic ramifications and business impacts of this design have not been adequately considered. The design proposed in Alternative 14b could be made acceptable if the northbound access road to the flyover is positioned closer to the freeway – much as it is currently – and if southbound access is provided by way of a frontage road on the west side of the freeway. The connectors to the existing flyover should be adapted, rather than eradicated as proposed in Alternatives 4b, 12b and 14d or partially removed as in Alternative 14b. The interchange needs can be met without taking unnecessary amounts of land and destroying new infrastructure.

I62-7 On the subject of frontage roads: The project appears to respect the Olompali parkland, and it seeks to minimize the impacts on parklands when it comes to design of the right-of-way (ROW). By contrast, the proposed taking of lands from the Silveira Ranch property for ROW and setback purposes is excessive. The Silveira property on the west side of the freeway is dominated by pristine tree-covered hills; my family has owned the property for many decades and has never removed any of those trees to create open areas. The flat and open portion of our property on the west side of the freeway is already constrained in size without this project reducing it even more in size. Instead of excessively cutting into the Silveira land on the west side of the freeway for the newly proposed ROW, the project should use the existing ROW line of the current Highway 101 and adapt its existing southbound freeway lanes to be the future frontage road. This would shift the freeway to the east. The ROW on the east side of Highway 101 would need to be tightened so not to take an unnecessary amount of the Silveira land.

I62-8 As far as the expanse of Silveira property on the east side of the freeway, the project proposes to eliminate our current access points and thereby creates an island effect, isolating and damaging our property, exacerbating the government's severance damages liability, and making it necessary to build

2

Response to Comment I62-4

The Silveira property will have access to the frontage road system and the existing cattle crossing will be perpetuated.

Response to Comment I62-5

Fixed HOV Access Option 12b has been identified as the Preferred Alternative.

Response to Comment I62-6

A clear recoverable zone (CRZ) along the mainline and minimum county right-of-way width for local roads are required to meet the project need and purpose. An alternative featuring non-standard CRZ and county right-of-way width was considered but rejected as it does not meet the project's need and purpose. Impacts associated with this rejected alternative were not evaluated.

Response to Comment I62-7

The frontage road is located on the west side of mainline to provide access from existing San Antonio Road to the proposed Landfill Interchange. The proposed right-of-way acquisitions have been reduced to the extent practicable while still providing a safe facility meeting design standards. Caltrans will continue to work with individual property owners during final design to further reduce impacts where possible.

Response to Comment I62-8

Access will be provided via a frontage road system. Access damages will be appraised during the right-of-way acquisition process and compensation will be provided.

Letter - I62

Page 4

I62-8 internal roadways in order to get from one point to the next within that area. This is problematic, of course, as it would be on the west side if access were similarly compromised.

I62-9 The existing Silveira Ranch cattle undercrossings – one south of our dairy and one north of it -- must be retained and enhanced as part of any engineering solution.

I62-10 The project as proposed is a huge land grab of Silveira land, affecting multiple direct access points. The plan needs serious reworking to address the problematic issues it poses for the Silveira property.

I62-11
- The rights of way need to be tightened so that less Silveira land is taken.

I62-12
- The location of the frontage road proposed for the west side of the freeway needs to be shifted to the east using the current ROW as the future ROW line.

I62-13
- The access deficiencies of the plan need to be carefully considered, given the problematic "island affect" it creates for parts of the Silveira property.

I62-14
- The San Antonio interchange is unacceptable where proposed. It needs to be built north of the county line, where it will provide more convenient access for the greater concentration of local property owners in that area.

I62-15
- The existing Redwood Landfill flyover needs to be adapted to serve as the interchange at the proposed location, but this needs to be done in such a way that will minimize the amount of Silveira land used and will avoid disruption of the quarry site and cell towers.

I62-16
- With regard to our property to the north and south of Miramonte (the east side of the freeway), the biological maps include "404 CWA wetlands" designations. Does this imply that delineations were performed by the Army Corps of Engineers? I had authorized access to only a portion of the property for the Draft EIR/EIS studies, so I want to know how it is possible that delineations could have been conducted without my permission.

I62-17
- In Volume 1, 4-13, there is the statement "The proposed farmland conversions would not ... sever existing owners from accessing their properties." This is misleading with regard to the Silveira property. The access problems presented by the project are potentially very significant – in some cases, they create an "island effect" and will exacerbate the government's taking and severance damage liability.

I62-18
- In Volume 1, 4-20, the statement "The proposed project would not result in loss of mineral resources and conflict with mineral resource plans" is incorrect. Alternatives 4b, 12d, 14d would impact the quarry on the Silveira property.

I62-19
- The maps on the Caltrans web site http://www.dot.ca.gov/dist4/msn/alt.html include a roadway along the railroad that is not presented in the printed EIR materials I received via the Transportation Authority of Marin. The web site maps are dated 2005 and are presumably outdated. Please confirm.

Sincerely,

Tony Silveira

Tony Silveira

3

Response to Comment I62-9

Both cattle undercrossings will be perpetuated with this project.

Response to Comment I62-10

The proposed right-of-way acquisitions have been reduced to the extent practicable while still providing a safe facility meeting design standards. Existing access will be redirected to the proposed interchanges. Numerous public meetings have been held to solicit comments. Caltrans will continue to work with individual property owners during final design to further reduce impacts where possible.

Response to Comment I62-11

Right-of-way for a clear recoverable zone (CRZ) along the mainline and minimum county right-of-way width for local roads are required to meet the project's need and purpose. An alternative featuring non-standard CRZ and county right-of-way width was considered but rejected as it does not meet the project's need and purpose. Impacts associated with this rejected alternative were not evaluated.

Response to Comment I62-12

Local access was studied on the east side during the Evaluation Criteria Matrix performed in June of 2005, and was eliminated due to environmental impacts and because it would not be feasible to provide access for all properties in the area.

Response to Comment I62-13

All affected properties within the project limits will receive access to US 101 via the interchange and frontage road system.

Response to Comment I62-14

Caltrans and FHWA understand that the proposed location of the San Antonio Interchange will impact your property, hence your request for an alternative site further north. The location of the interchanges was based primarily on restoring access in Segment B in light of property owners' loss of direct access to US 101 under the Build Alternatives. The need for access was balanced against other project needs, environmental resources, and engineering and cost considerations. All of the considerations are presented in Appendix A of the DEIR/S and this FEIR/S. The consideration of access and traffic needs between Access Options 4b, 12b, 14b and 14d is discussed in the DEIR/S and the FEIR/S in the latter part of Section 2.3.4. This discussion also appears on pages 3.1-78/79 of the DEIR/S and pages 3.1-86/88 of the FEIR/S. Caltrans analysis points out the trade-offs of the different Access Options between heavier traffic movements around Redwood Landfill and San Antonio Creek. In light of the potential impacts to your property, Caltrans will seek to minimize the need for additional right of way wherever feasible.

Response to Comment I62-15

The project footprint was reduced to the maximum extent practicable while still meeting the project's need and purpose. An alternative featuring additional design exceptions was considered but rejected as it does not meet the project's need and purpose.

Response to Comment I62-16

The wetland delineation was conducted by consultants working for Caltrans and has been verified by the U.S. Army Corps of Engineers. Field work was conducted only on property where permission to enter was obtained. In areas where access was not obtained, the limits of jurisdiction for wetlands and other waters of the U.S. was determined based on wetland data points taken in other parts of the project area where conditions were similar.

Response to Comment I62-17

Access will be provided via a frontage road system and the two existing cattle crossings will be perpetuated after final design.

Response to Comment I62-18

The quarry is on the back side of the hill adjacent to US 101 and the landfill road. The proposed access to the landfill road goes right through the hill and quarry. Option 12b, as presented, cuts into the quarry. Caltrans and FHWA will seek ways to refine the access road configuration to reduce the impacts to the quarry during the final design phase.

Response to Comment I62-19

The mapping provided on the website from 2005 does not include the design change of relocating the proposed frontage road along the existing railroad to just west, along the proposed mainline. Relocating the road near the mainline reduces environmental impacts.