

**Sonoma 101 Widening & Soundwall Construction (Wilfred to Route 12)
Final Negative Declaration/Final Environmental Assessment**

COMMENT #38 - LETTER (page 1 of 2)

Richard S. Gaines

Saturday, November 28, 1998

Ms. Kathleen McBride
Branch Chief
Office of Environmental Planning, North
Caltrans, District 4
Box 23660
Oakland, CA 94623-0660

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Via: Electronic Mail and United States Postal Service

COMMENTS ON THE INITIAL STUDY/ENVIRONMENTAL ASSESSMENT AND IN OPPOSITION
TO THE PROPOSED NEGATIVE DECLARATION (CEQA) TO WIDEN HIGHWAY 101 AND
CONSTRUCT SOUNDWALLS IN SONOMA COUNTY FROM THE WILFRED AVENUE
INTERCHANGE TO THE ROUTE 101/12 SEPARATION

Dear Ms. McBride:

In accordance with the directions contained in the above-referenced Initial Study/Environmental Assessment (the "Initial Study"), I, Richard S. Gaines, a resident of the Town of Windsor, Sonoma County, California, do hereby respectfully submit the following comments on the Initial Study, opposing adoption of the proposed negative declaration (the "Negative Declaration") and urging that a full Environmental Impact Report ("EIR") be prepared.

The capacity of a single freeway lane, assuming safe distances between vehicles in accordance with National Safety Council standards, is approximately 1,500 vehicles per hour at 35 mph. The capacity decreases with either increased or decreased vehicle speed. This capacity figure has, no doubt, decreased since the introduction of sports utility vehicles (SUV) which utilize more road capacity than traditional passenger vehicles. **A**

The addition of a third lane in both directions will result in a capacity increase of approximately 3,000 vehicles per hour during the commute periods. This will be true even if the highway is not widened south of Wilfred Ave. or north of Highway 12; however, it is clear that it is the intent of the Sonoma County Transportation Agency, the Metropolitan Transportation Commission, and Caltrans to widen Highway 101 from the Town of Windsor in north Sonoma County to the Marin County line. **B**

Breaking up the widening of the highway into small segments until funding for the entire project is available does not relieve the lead agency of the responsibility for preparing a complete EIR for the Project. The IS/EA Proposed Negative Declaration provides no calculations for increased air pollution that will inevitably result from the project. The document states unequivocally that: "The proposed project will not affect air quality in the vicinity of the proposed project. There will be no significant impacts and no mitigation is required." No evidence nor proof is offered to support these statements! **C**

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COMMENT #38 - LETTER (page 2 of 2)

The quality of the air is the quality that we all breathe at nose level. Automobile and truck exhaust emissions are the primary cause of photochemical smog. These emissions account for 18 percent of the sulfur dioxide (SO₂), 6 percent of the particulates, 33 percent of the organic compounds such as olefins, aldehydes, and other highly reactive chemicals. Fifty-nine percent of the nitrogen oxides that give our skies the whiskey brown color and 84 percent of the carbon monoxide.

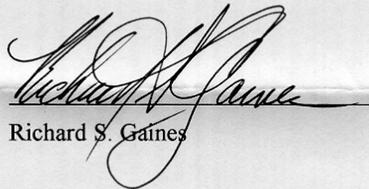
To argue that the health effects of air pollution, whether it is exhaust emissions at nose level or more general air pollution in the vicinity are not significant environmental impacts is like stating that a small amount of ptomaine bacteria in restaurant food is insignificant.

This widening project is but a segment in a much larger widening project that will have very significant air pollution impacts in a non-attainment region of Northern California. This project will result in a significant increase in air pollutant emissions and deterioration of ambient air quality; the IS/EA offers no evidence that is not true! Inasmuch as this project will use federal funds as well as state funds, a complete EIR is required.

It is an oxymoron to state that this project will not generate additional traffic. Every study including the most recent Texas Transportation Institute (TTI) Study prove that additional freeway lanes generate more traffic. In fact, David Schrank, one of the study's authors states: "we can't build our way out. That's the theme across the board."

According to James Corless of the Surface Transportation Policy Project in San Francisco, "If you want to add lanes and add lanes, that's like loosening your belt to cure obesity. And if you really want to look at the end of that road, it's called Los Angeles"

Respectfully submitted this 28th day of November, 1998.


Richard S. Gaines

D



E

RESPONSE #38 - LETTER

Richard Gaines

Comment Number	Response
38-A	The capacity of a freeway lane is as high as 2,300 passenger cars per lane per hour (pcplph), for ideal conditions. At capacity, freeway speeds are about 35 to 45 mph, yet flows as high as 2,200 to 2,300 pcplph can be maintained. The volume mentioned would only occur in a traffic queue upstream of a traffic bottleneck. This would not be a "capacity" volume, but would represent a volume "constrained" by the traffic bottleneck.
38-B	See response to 38-A
38-C	See 37-G
38-D	<p>This project is contained in the 1998/99 Regional Transportation Plan (RTP) and the 1998 Transportation Improvement Program (RTIP). The Federal Highway Administration (FHWA) has determined that both the TIP and the RTIP conform to the Transportation Conformity Rule as amended by EPA on August 15, 1997.</p> <p>This project meets the regional tests for conformity with the State Implementation Plan (SIP). The SIP is a plan detailing the steps that will be taken (by a state or regions within a state) to meet federal air quality standards. The SIP contains Transportation Control measures (TCM's) adopted to further air quality improvements. All applicable TCM's are included in this project including TCM 8 (Construct Carpool/Express Bus Lanes on Freeways), one of twenty TCM's in the Bay Area Quality Management District's (BAAQMD) Clean Air Plan.</p>
38-E	Comments noted