GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

August 19,1997

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

Dear Ms. Simpson:

Re: **Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for Marin 101 HOV Gap Closure Project**

Golden Gate Bridge, Highway and Transportation District (District) appreciate this opportunity to comment on the above-referenced DEIS/DEIR, dated June 1997 and Traffic Study Report, dated September 1996. our comments pertain to potential impacts to Golden Gate Transit (GGT), Golden Gate Ferry and District property, including the former Northwestern Pacific Railroad (NWP) right-of-way (ROW).

SUMMARY OF COMMENTS

1. DEIS/DEIR document makes no assessment of the effect of the Marin 101 HOV Gap Closure Project (project) on the efficiency or effectiveness of District bus services, including ferry feeder services, or any consequent effect on transit patronage. Please reference District letter of February 25, 1993 to Mr. David Black concerning the scoping of DEIS/DEIR.

2. DEIS/DEIR evaluates ten project alternatives. However, the Alternative Analysis presented does not rigorously and conclusively consider transit alternatives as a viable option. Several claims in the document are without substantiation and appear contradictory.

3. DEIS/DEIR is focused on traffic operations on the freeway mainline. Document does not assess traffic impacts on freeway ramps, weaving sections and adjacent arterial streets. These latter elements are extensively used by GGT and are crucial to the long-term success of transit service along the U.S Highway 101 corridor (Corridor).

4. Although DEIS/DEIR Abstract states "temporary impacts from construction" will result from either the "Ultimate Gap Closure" (Ultimate) or "Build Southbound Only HOV Lane" (Southbound Only) projects, temporary construction impacts on traffic circulation, GGT ridership and the NWP ROW are not identified. Impacts specific to reconstruction of the northbound viaduct in central San Rafael to GGT service, traffic circulation and potential closure of existing park-and-ride lots, are not identified. Also, the opportunity of diverting commuters to transit services during project construction to mitigate anticipated delay along the Corridor is not identified.

SPECIFIC COMMENTS

Golden Gate Bus and Ferry Transit

5. DEIS/DEIR refers to a District "S year plan for the bus system." The District's Short-Range Transit Plan forecasts for a ten-year period the financial viability of maintaining existing GGT and Golden Gate Ferry service.

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principally as means for managing traffic congestion on the Golden Gate Bridge. It is not intended to identify bus transit options for addressing specific mobility needs of the project area as an alternative to the 101 Gap Closure as might be interpreted from its inclusion in the Transit only alternative description (page 21).

District staff concurs that the project is one "part of a multi-modal transportation system" to address congestion along the Corridor. So also is the existing District transit services along the Corridor. Potential transit alternatives may or may not be effective additions to the system.

While the DEIS/DEIR states the Transit Only alternative does "not meet the purpose of and need of the project because of the low number projected for ridership" and it "costs far more than what is programmed in the STIP" the supporting data is not presented in the document. District suggests the document clarify "projected ridership," "costs," and "inconsistency with transportation planning approved by Marin County and the MTC."

DEIS/DEIR states the Transit only alternative is "not intended to take the place of a fully developed HOV lane system" and is therefore "rejected as a viable alternative" to a fully developed HOV. This rejection of the Transit only alternative appears to be based on the self-imposed definition of the transit alternative, rather than analysis. Since transit could significantly reduce dependance on single occupant vehicles and relieve congestion along the Corridor, could it not be designed as an effective alternative? DEIS/DEIR does not appear to substantiate or justify why various transit alternatives could not replace or be an element in the Marin 101 Gap Closure Project (page 21).

6. The DEIS/DEIR correctly states that there are numerous freeway level bus stops (or "pullouts" or "bus pads") along the Corridor. There are only two bus pads affected by the project, located at Lucky Drive in Larkspur and North San Pedro Road in San Rafael (page 22).

7. Drawings W-1, W-20, S-1, and S-19 do not recognize that current taper lengths for existing bus pullouts are substandard according to guidelines in "A Policy On Geometric Design Of Highways and Streets," by the American Association of State, Highway and Transportation Officials and "Bus Use of Highways: Planning and Design Guidelines," by the National Cooperative Highway Research Program Report No. 155. Current deceleration lanes require buses to quickly maneuver into the bus pads reducing ride comfort for GGT passengers, whereas short acceleration lanes require more abrupt, less safe maneuvers by GGT drivers. District requests the Final Design of these bus pads comply with industry design guidelines for acceleration and deceleration lanes, pavement markings and treatment, lighting, ADA accessibility, and adequately accommodate turning radii of GGT buses.

8. GGT operates approximately 81 buses per hour during the morning peak hour (7 a.m. - 8 a.m.) on southbound U.S. Highway 101 at Tiburon Boulevard/Blithedale Avenue, and 48 buses per hour on southbound U.S. Highway 101 at Manuel Freitas Parkway. The DEIS/DEIR reports a volume of 65 and 11 buses at these two locations, respectively. These lower bus volumes may be attributed to upstream freeway delay during field observations.

Similarly, GGT operates 41 buses per hour during the afternoon peak hour (4 p.m. - 5 p.m.) on northbound U.S. Highway 101 at Tiburon Boulevard and 29 buses per hour on northbound U.S. Highway 101 at Manuel Freitas Parkway. The DEIS/DEIR reports a volume of 76 buses at both locations. Higher bus volumes on U.S. Highway 101 are possibly due to airport, subscription, charter, and

tour buses, although bus volumes at Freitas Parkway appear too high. It should be further noted that the afternoon peak hour for northbound GGT buses at Tiburon Boulevard occurs approximately between 5 p.m. to 6 p.m. when 74 buses per hour are scheduled. Peak-hour volumes at the Freitas Boulevard interchange are similar (page 47).

9. DEIS/DEIR states "energy savings are largely attributable to increases in the average speed of mixed flow rather than increased speed or use of HOV's." Greater HOV utilization and transit ridership are strategies that effectively reduce energy use. This point is neither quantified nor mentioned in the document. Table D-2 and Table D-3 clearly demonstrate the efficiency of transit service in the Corridor by transporting approximately 15 percent of traveling persons with 1 percent of vehicular morning peak hour volumes, and 27 percent of traveling persons with 1.5 percent of vehicular afternoon peak hour volumes (page 108).

10. DEIS/DEIR states that reconfiguration of U.S. Highway 101/1-580 interchange "would bring energy savings beyond those resulting from increased levels of HOV use." No quantification of this statement is provided (page 108).

11. Feasibility of new ferry routes to alleviate congestion along the Corridor should also refer to the "Regional Ferry Plan," by Metropolitan Transportation Commission, September 1992 (page 21).

12. Larkspur Ferry Terminal (LFT) proposals referenced in the DEIS/DEIR refer to recommendations reported in the Larkspur Ferry Terminal Access Improvement Project completed in January 1996. DEIS/DEIR should be corrected to indicate there are no active plans to either construct a garage or a new ramp from U.S. Highway 101 to LFT.

Current Golden Gate Ferry projects to enhance service between Larkspur and San Francisco include construction of a fourth vessel (expected to enter into revenue service around January 1998 and reduce travel time from 45 to 30 minutes) ' revisions to GGT ferry feeder routes (including new non-stop service between LFT and San Rafael Transit Center via U.S. Highway 101), and expansion of the LFT lot by approximately 180 spaces (page 21).

District Property

13. DEIS/DEIR states that Ultimate project - Segment #1 would result in bus and parking space impacts on District-owned facilities. Location of these impacts are not disclosed and need to be clarified. Contrarily, Dwg W-22A, pertaining to Ultimate project - Segment #4 (i.e., Irene Street interchange), which show impacts to District-owned facilities along Andersen Drive, are not mentioned in the DEIS/DEIR (page 95).

14. DEIS/DEIR does not cite any impacts to District property during project construction.

Northwestern Pacific Railroad Right-Of-Way

15. DEIS/DEIR correctly states that had a November 1990 ballot initiative successfully passed, a light rail transit (LRT) system on the NWP ROW would have been funded. However, use of this failed initiative as justification to exclude rail transportation as a reasonable modal alternative conflicts with other statements contained in the DEIS/DEIR: the Traffic Study Report cites traffic demand as "significantly lower" with LRT alternatives, LOS information in Table D-4 and Table D-5 (page 87) show significant improvements to the

Corridor as a result of potential LRT; recent purchase of the ROW for public transit purposes (acknowledged on page 14); recently completed Sonoma/Marin Multi-Modal Transportation and Land Use Study (referenced on page 21), and the current bi-county effort for a possible sales tax ballot initiative in November 1998 for rail transportation along the Corridor (page 14).

16. The DEIS/DEIR incorrectly states "the portion (of railroad ROW) south of Larkspur has been sold." The NWP ROW between Paradise Drive in Corte Madera and Corte Madera Creek remains intact (page 14).

The DEIS/DEIR incorrectly **characterizes the NWP ROW** as "unused." Nearly all segments of the **NWP ROW are active** railroad rights-of-way. The sole exception is a 13.5-mile segment between Ignacio and Corte Madera which is in "discontinued" status (page 14).

The NWP ROW is owned by three entities. District holds title to 14 miles of the NWP mainline ROW between Paradise Drive in Corte Madera and Novato Creek in Novato. Northwestern Pacific Railroad Authority (i.e., a three-member Joint Powers Authority which consists of the District, County of Marin, and North Coast Railroad Authority) holds title to 41-miles of ROW between Novato Creek and Healdsburg, and 24-miles of ROW between Ignacio and Lombard in Napa county. Finally, North Coast Railroad Authority (i.e., a four-member Joint Powers Authority which consists of the counties of Sonoma, Mendocino, Trinity, and Del Norte) holds title to the ROW between Healdsburg and Arcata (page 41).

17. DEIS/DEIR states in point no. 6 (page 20 and page 21), that the Regional Transportation Plan does not identify regional funds for rail transit in the Corridor and consequentially rail transit was dropped from further consideration in this document. This statement is not consistent with point no. 10 (page 23) that use of NWP ROW for HOV lanes was dropped from further consideration due to "projected use" of the ROW for rail service.

18. Concerning the use of the NWP ROW as a potential busway or passenger rail service, DEIR/DEIS claims these transportation alternatives require "significant expansion of the local arterial system" to minimize traffic impacts in downtown San Rafael. Specific warrants for, or estimates of, "arterial expansion" are not identified in the document (page 23).

19. DEIS/DEIR does not clearly state what is intended by "some type of system" required to operate a two-way busway on the NWP ROW (page 23).

20. Figure 2 Geological Map incorrectly characterizes two railroad tunnels along the NWP corridor as "abandoned." As noted above, the NWP ROW (and their tunnels) shown on this figure are in a "discontinued status" (page 27).

21. DEIS/DEIR states "parts of the right-of-way (near the southern portal of the CalPark Hill railway tunnel, "Tunnel No. 3") are within State right-of-way." According to District files and Marin County Assessor office records, Assessor Parcel Nos. 018-171-01, 018-171-02, 018-171-16, 018-171-17, 018-17118 and 018-171-19 are jointly owned by the District and Marin County. However, drawings W-3 through W-5 and S-3 through S-5 indicate the State ROW coincides with the centerline of the NWP ROW. These drawings require modification to illustrate the correct State ROW (page 41).

22. DEIS/DEIR incorrectly states "just south of the trestle (over Corte Madera Creek) the NWP ROW ends." As stated previously, the District holds title to the NWP ROW between Paradise Drive in Corte Madera and Novato Creek. In addition, the ROW near East Sir Frances Drake Boulevard (SFD) is currently

leased by Marin Airporter for long-term parking and is not "paved over" (page 41).

23. DEIS/DEIR states the Ultimate project will mitigate potential impacts to the railroad tunnel located at CalPark Hill (Tunnel No. 3). Several components of the Southbound only project will be implemented in consideration of the Ultimate project (e.g., land acquisition along Brookdale Avenue and Francisco West Boulevard and noise barriers). Mitigation of Tunnel No. 3 impacts for Ultimate project should also occur as part of the Southbound Only project for the following economic and transit operating reasons: 1) Because of the greater passage of time, repairs to Tunnel No. 3 may require a greater expenditure and be broader in scope as-part of the ultimate project than if addressed as part of the Southbound Only project; and 2) Since transit use of Tunnel No. 3 may occur before the ultimate project is undertaken, mitigation work on the tunnel as part of the ultimate project may potentially cause significant disruption to transit operations (page 69 and page 71).

24. DEIS/DEIR states District "has plans to repair this tunnel" (Tunnel No. 3). Current plans call for design of a project to stabilize the CalPark Hill tunnel. To date, no funds have been identified for construction of this project (page 72).

25. DEIS/DEIR does not state assumptions used concerning LRT operating characteristics (i.e., headway, capacity, ridership, average travel times) or auto vehicle occupancy rates (i.e., HOV or mixed-flow lanes). The assumptions used can significantly alter traffic circulation and transit ridership projections presented in the document (page 84).

26. DEIS/DEIR states "Adding LRT to ... Ultimate Gap Closure scenario would have virtually no effect on southbound mixed-flow and HOV travel times. AM peak period traffic demand would decrease marginally and result in only minor decreases in delay." These statements are inconsistent with traffic operational analysis summarized in Table D-4 and Table D-5 on page 87 which show <u>significant</u> savings in the afternoon peak northbound direction as a result of this transit alternative (page 85).

27. DEIS/DEIR projects delay will increase between 2010 and 2020 for the "Ultimate Gap Closure Without LRV alternative. Forecasts with LRT alternative are not presented, making difficult a comparison between a freeway expansion alternative with a multi-modal transportation system advocated on page 21 (page 85).

28. DEIS/DEIR projects morning peak period mixed-flow travel delay would increase from 29 to 38 minutes for the "Ultimate Gap Closure Without LRV alternative which is virtually identical to "No-Build" alternative delay at 40 minutes. This appears to support a multi-modal transportation solution for congestion along the Corridor (page 85).

29. DEIS/DEIR. states LRT was excluded from the energy analysis for the "build" alternatives due to its "negligible effect ... on the US 101 freeway corridor operations." Again, this contradicts findings in Table D-4 and Table D-5 that show potential corridor mobility improvements attributable to a LRT system
(page 108).

30. Drawings W-12 and S-11 illustrate an expansion along west curb of Francisco Boulevard West at Irwin Street by approximately 10 feet. This dimension approximately coincides with the current distance between NWP ROW
(75-foot width) and the south curb line of Francisco Boulevard West. Assuming

a 5-foot minimum sidewalk and adequate separation from NWP ROW, will there remain adequate space for a sidewalk or will acquisition of NWP ROW be required?

31. Drawings W-9 to W-12 and S-8 to S-11 also illustrate relocation of Francisco Boulevard West between a new southbound Andersen Drive exit and Second Street in San Rafael. Commercial tenants and their customers have periodically requested GGT to serve Francisco Boulevard West. To date, this request has not been accommodated due to inadequate shoulder width and absence of curb, gutter, and sidewalk for buses to safely load and unload passengers along the east curb. Would this relocation provide adequate space for safe bus passenger activity along this arterial?

32. Appendix H "Bicycle Paths," presents existing and proposed bicycle paths near the project study area. NWPRA is not aware of any existing class II bicycle lane across the NWP ROW in vicinity of Andersen Drive at Francisco Boulevard West. It is understood that the document's intent in presenting proposed class I bicycle lanes is to identify previously recommended alignments for public access and recreational trails at a conceptual level. Note that implementation of these trails will be the responsibility of local authorities. Also note that bicycle trails proposed to utilize the NWP ROW need to be planned such that they will not adversely impact future passenger rail transportation, are not currently funded, and will require review and approval by the NWPRA Board of Directors

Traffic and Circulation

33. DEIS/DEIR does not fully address traffic operations at the U.S. Highway 101/SFD interchange. This interchange and surrounding arterials are subject to on-going delay. Current geometry requires northbound buses that serve Lucky Drive to experience delay at the intersection with both northbound ramps, thereby increasing travel time, travel delay, and affecting GGT ridership on many routes. In addition, north/south bicycle access across Corte Madera Creek and SFD is substandard.

34. Ultimate project description should specifically mention provision for an eastbound 1-580 flyover from northbound U.S. Highway 101 to eastbound 580. This addition to the existing interchange would allow redirection of East Bay bound traffic from East SFD Boulevard (a local arterial) where the traffic competes with local access to the LFT (page 6).

35. DEIS/DEIR should also reference the following park-and-ride lots along the Corridor (from south to north): Seminary Drive in Mill Valley, Lincoln Avenue in San Rafael, Smith Ranch Road in San Rafael, and Alameda del Prado in Novato. There is no park-and-ride lot at Ignacio Blvd at U.S. Highway 101 as indicated in the DEIS/DEIR (page 22 and page 106).

36. DEIS/DEIR states "conversion of an existing mixed flow lane... to an HOV lane, would further exacerbate the congestion in the mixed flow lanes as well as the HOV lanes." This statement should be substantiated and associated assumptions identified (page 22).

37. The following comments pertain to Table D-4 and Table D-5 (page 87): Why do "No-Build" delays (mixed-flow and HOV) for southbound morning peak-period decrease from Year 2000 to Year 2010 at Lincoln Avenue?

Why do "Build SB HOV only" delays (mixed-flow and HOV) for southbound morning peak-period decrease from 2000 to 2010 at Miller Creek Road?

DEIS/DEIR estimates a significant benefit for northbound travel (particularly at U.S. Highway 101/I-580 interchange) in 2010 with "Build Ultimate With LRT" compared to "Build Ultimate Without LRT" scenarios. Why is estimated benefit for southbound travel between these two scenarios shown to be only 0.2 minutes (12 seconds)?

Projected traffic delays are similar for both "Year 2020 Build Ultimate Without LRT" and "Year 2000 No-Build Alternative," suggesting further consideration of a multi-modal solution to corridor congestion.

38. DEIS/DEIR should note the widening of northbound on-ramp from East SFD to U.S. Highway 101 recently completed (page 89).

39. Figure W-8A shows removal of many existing movements at the Bellam Boulevard and I-580 service road intersection. However, since southbound U.S. Highway 101 will still be allowed to access this intersection, this scheme does not represent a "closure of the Bellam Blvd interchange" as stated in the DEIS/DEIS (page 90).

40. Figure W-9A shows the proposed configuration for the I-580 and U.S. Highway 101 interchange for the "Ultimate Gap Closure Project." Although not specifically addressed, the flyover will presumably relieve northbound-to-eastbound congestion and improve access to the LFT by alleviating traffic demand on East SFD. These presumed traffic benefits are not discussed in either DEIS/DEIR or Traffic Study Report, nor are the following arterial concerns regarding the flyover from northbound U.S. Highway 101 to eastbound I-580. Figure W-9A indicates one lane will be dedicated to southbound exiting traffic at a new Andersen Drive off-ramp. This southbound demand is currently served by two lanes, one at the Andersen Drive exit and one at the Bellam Boulevard exit. Although the proposed scheme successfully eliminates a southbound mainline weaving section, how will southbound exiting traffic (including current GGT buses) be accommodated at the adjacent intersection? How will existing on-ramp traffic from eastbound Francisco Boulevard West be accommodated at the intersection? What are the traffic levels-of-service for current and proposed conditions at the intersection?

41. District assumes traffic on Andersen Drive will increase following construction of a proposed Irene Street interchange. Subsequentially, GGT pull-in and pull-out operations along Andersen Drive could be severely impacted by excess delay. Have these impacts been quantified and is a bus priority control signal proposed?

The opportunity to review this important projects documentation is appreciated. Please call Maurice P. Palumbo at (415) 257-4431 if you have questions.

Very truly yours,

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and Policy Analysis

by

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