Kentfield Planning Advisory Board

P.O. Box 304, Kentfield, California 94914

February 14, 2013

Valerie Shearer, Senior Environmental Planner
Caltrans District 4
Office of Environmental Analysis, MS-8B
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Re: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project
Initial Study and Mitigated Negative Declaration

Dear Ms. Shearer:

The Kentfield Planning Advisory Board (KPAB) is a citizen group appointed by the Marin County Board of Supervisors to make recommendations to the county on land use and public works projects in the unincorporated Kentfield and Greenbrae area. We are advisory, not decision-makers, to county staff and elected officials.

While this project is not located in the unincorporated area for which we review projects, it is a major travel corridor for the entire Ross Valley and would affect the convenience and safety of Kentfield and Greenbrae residents driving, walking or using public transit on a daily basis.

We are particularly concerned about: pedestrian safety of transit stops; failure to address flooding in the project area, congestion on Sir Francis Drake Blvd, the sharp turn and merge required for NB traffic exiting 101 to head west on SFD, impacts of the East Bay traffic which is a primary cause of peak hour congestion at the interchange and on 101, plans and schedules for construction, and how the project would affect Larkspur Landing and ferry terminal traffic on East SFD. Insufficient information is provided about proposed ramp metering at the on-ramps to know if this would help drivers entering SB 101 from SFD.

It is hard to understand details of the project from the project document. Figure 1-2 on p. 1-15 does not have sufficient detail. Indeed, the environmental document is superficial and should be redone as an Environmental Impact Report with more detail and a full analysis of alternatives.

We request the following information be provided.

Greenbrae Transit Stops. There are four stops proposed in the vicinity of the interchange. Please provide an exhibit, with overlay showing existing conditions, which shows the following:

- Location of the transit stops in relation to the roadway and the vehicle traffic lanes at those locations and their direction of movement.
- The sidewalks, walkways or crosswalks that riders would use to access and leave the transit stops including the distance from the transit stop to their parked cars if they would be parking nearby to use a bus. Otherwise, explain where riders would originate.

- Parking lots or other points where bus riders would leave cars, or indicate if the project anticipates riders walking from home or workplace to the transit stops. Include the number of parking spaces available in the area for transit users and their location.
- Projected flood elevations of the transit stops if the stops are proposed in a floodplain or where BCDC or FEMA projections indicate future probable intrusion of bay waters or flooding which is caused by combinations of high tides, storm surges, wind-driven waves, and, in the future, sea-level rise. The project description indicates that the project planning horizon is at least to 2035. BCDC projects (p. 2.6-18) up to 16 feet sea level rise by 2050 so some of this would take place by 2035.

Separately provide an analysis of these walkways or crosswalks with regard to pedestrian safety, and details on Golden Gate and Marin Transit schedules that would serve the stops.

Flooding and Sea-Level Rise. The discussion under 2.6 on Climate Change is largely unrelated to the project and defers consideration of sea level or flooding impacts until the state or other agencies have specific plans and recommendations. This is not a responsible approach in planning a project that presumably would have a design life of several decades and be used by thousands of people daily. The environmental document admits that alternate routes would not have the capacity to handle traffic diverted from Highway 101 in a flood situation and this should be addressed in more depth than this document provides.

Please provide an exhibit that indicates probable floodwater elevation in the Greenbrae project area at least for 2035 and 2050. Describe possible measures, such as flood walls, roadway elevation height changes and alternate access routes from East and West SFD to Highway 101 that could be constructed that would keep cars and people out of harm's way in flood events.

Project Construction. Aside from some protective measures regarding air quality, noise and avoidance of nesting season, there is no description of the construction. TAM representatives stated that the project would be built in phases as funds become available; this indicates that construction could occur over a long time, at least two years. The project document merely states (p. 1-20) that "...proposed construction will require temporary roadway and shoulder closures and detouring which will be planned for in a Transportation Management Plan...". Due to the massive and significant impacts this work will create for Kentfield and Greenbrae drivers information on this work should not be deferred to a plan to be written after project approval. A full description of the work and its impacts should be in the project document or EIR.

Please provide a timetable for the work to be done along with a description of attendant roadway closures and redirection of traffic to alternate routes that would be needed. Also provide the number and type of construction vehicles, where construction parking would take place, locaton of laydown areas, and the impact of construction vehicles and operations on GHG emissions.

Provide graphic representation of any changes to local roads that would take place during construction, e.g. lane changes or changes in traffic signals on SFD, Bon Air Road, Magnolia Avenue and at SFD intersections along the way. Include aerial views of any changes proposed (parking location/configuration, lanes, medians, pedestrian and bicycle movement, access points) that would occur. Enumerate the number of any public parking spaces that would be lost and

represent any changes to roadway landscaping required to improve sight distance. Use overlays to show proposed changes to existing conditions.

Sir Francis Drake Congestion/NB Exit to SFD West. Residents of the Ross Valley are concerned about daily congestion on Sir Francis Drake Blvd and the project does not indicate any improvement to this even though the project extends to Eliseo Drive. It appears that the project does not even address the sharp curve at the northbound exit from 101 to SFD headed west. There is a sharp left curve here followed quickly by a merge with traffic exiting SB for 101 to SFD and traffic coming from east SFD. This should be improved. Please describe how the project affects this exit and merge and measures that would improve this for drivers.

Ramp Metering. The project description states that ramp meters may be used. While we recognize that this strategy, to hold surface traffic at on-ramps when the freeway is congested, can be useful, it could also impact drivers coming from the Ross Valley who could be delayed by the metering. Please describe how this measure would be implemented at the SB SFD on-ramps and any measures to ensure that unacceptable backups and increased congestion do not occur.

SB SFD On-Ramp Extension/Merging. Although a project goal is elimination of the short merge distances in the interchange, at least with the SB SFD on-ramp the project appears to only push the merge operation to Fifer Avenue where it merges onto Highway 101. At this juncture the SB traffic from East and West SFD appears to be joined by vehicles entering from Fifer Avenue, with all lanes merging onto 101. This would seem to create a bottleneck at this location. The exhibits and text do not fully explain this. Please provide a graphic of the SB SFD on-ramp, the proposed flyover, changes at Fifer Drive and the merge onto Highway 101, showing on the graphic the number of lanes at any one location and the distances along the way between the various changes. The project document states (p. 1-12) that Caltrans' standard weaving distance is 1,600 feet, but it is not clear exactly what would be the appropriate distance in which to accomplish this merge. Please provide detailed information along with a graphic representation of what would take place at this entry point to 101 so the public can assess how this would work.

East Bay Traffic. The project document states (p. 1-10) that the causes of Highway 101 SB congestion "are the bottlenecks at the intersection of Sir Francis Drake Boulevard and Eliseo Drive…and the high traffic volumes entering the highway from Sir Francis Drake Boulevard…between Sir Francis Drake Boulevard and Fifer Avenue." There is no mention of the volume of traffic that moves through this interchange from the East Bay. This should be acknowledged and analyzed for its cumulative impacts on the interchange.

Larkspur Landing/Ferry Terminal Intersection. The Larkspur Landing/Ferry Terminal intersection is problematic and should be analyzed in relation to this project. When traffic is backed up, it delays Kentfield/Greenbrae residents from traveling westbound on SFD under 101.

How does this project impact this intersection, especially if more people try to enter 101 from the east or as more pedestrians try to cross SFD from buses at new transit stops? Impacts that could reasonably occur due to the proposed train station and Larkspur Landing Station Area Plan currently being processed by Larkspur should be assessed.

Project Alternative Designs. A range of alternatives to the Build Alternative, should be developed and analyzed in an EIR in the same depth as the Build Alternative. Design should focus on minimal changes to address major deficiencies at this time, and there should be no major construction until such time as the flooding problem in the project area is addressed. More modest projects that could be evaluated could include, for example, eliminating the exit at Lucky/Fifer from 101 Southbound and using SFD or Madera Boulevard to exit 101 and reach Lucky/Fifer, or providing an auxiliary lane from SFD to Tamalpais Avenue. These would eliminate the need for the flyover described.

Project Description and Visual Impacts. The document does not have an exhibit that shows in one place all the proposed construction and roadway changes with sufficient graphic detail. Please provide one good graphic showing current conditions and proposed changes, with distances, number of lanes, etc. all indicated. This could be done on an 11 by 17 inch sheet, with an overlay of existing conditions and should be available to the public.

The visual impacts from Greenbrae of changes proposed are not clearly defined. Please provide some simulations of the proposed flyover and interchange work from the multi-use path that runs along the creek on the west side of Highway 101.

In summary, the Kentfield Planning Advisory Board requests this project to include:

- A solution for flooding and sea level rise for the life of the improvements to the roadway,
- Analysis and a solution for improvements to the exit from 101 and the intersections at Eliseo Drive and SFD as well as at Larkspur Landing Circle and SFD to handle the increase in traffic load both vehicular and pedestrian,
- An analysis of the proposed increase in pedestrian traffic and its impact on circulation,
- An analysis of the construction phase of the project and the proposed mitigation for its impact on pedestrian and vehicular traffic,
- An interim solution to improve safe traffic flow until these issues can be resolved.

Yours truly,

Anne Petersen

Anne Petersen, KPAB Chair
KPAB Members: Alan Derwin, Sandy Guldman, Dale Hansen,
Eva Long, Pamela Scott, Mary Sylla; Ann Thomas, Secretary

Cc: Greenbrae Property Owners Association
Kent Woodlands Property Owners Association
Larkspur City Council
Corte Madera City Council
Bill Whitney, Transportation Authority of Marin
Supervisor Katie Rice