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Melanie Brent, Office Chief  
Office of Environmental Analysis  
Caltrans District 4  
PO Box 23660  
Oakland, CA 94623-0660

October 15, 2009

Re: Scoping Highway 101 Greenbrae/Twin Cities Corridor Improvement Project

Dear Ms. Brent,

The Sierra Club Marin Group, on behalf of its approximate 5,000 members, is pleased to have the opportunity to comment and request discussion of specific issues is included in the Environmental Impact Report for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project. Consideration of the operational analysis for the DEIR should also include our following comments and concerns. Members of our organization attended the September 29, 2009 TAM/Caltrans Open House regarding this project in Larkspur. We analyzed the board displays of the project and heard the public testimony. We've reviewed the written materials distributed to the public at this and prior meetings. We find the alternatives selected for study in the EIR are contrary to the public's requests, and the intent of the TAM context sensitive design process. We believe the purpose and need statement, as well as the project is focused instead on an engineering driven solution.

We find the purpose and need paper describing the project inadequate. It must be expanded to include the following points.

**Purpose to be added to the EIR scope:**

- The purpose of the project must include the need to reduce the traffic congestion and improve the traffic flow on the east to west segment of Sir Francis Drake Blvd (Greenbrae Interchange) leading to and from the Richmond San Rafael Bridge and Greenbrae/Bon Aire Shopping Center. Major funding for this project comes from Regional Measure 2 bridge toll revenue. The "nexus" for funding of this project is to improve traffic flow to and from the Richmond San Rafael Bridge. Currently the east/west traffic flow in Greenbrae, particularly at the junction of the 101/Sir Francis Drake Blvd (Greenbrae Interchange) is experiencing major traffic congestion and delay, not only in the am or pm peak periods due to operation deficiencies, but all day long and on weekends. The primary purpose of this project should be to improve the congestion and LOS at this junction of Sir Francis Drake and US 101. Improving Highway US 101 from Sir Francis Drake Blvd. to Tamalpais Drive should be secondary to the improvements needed at the Greenbrae (Sir Francis Drake/101) Interchange.

**Needs to be added to the EIR scope:**

- Protect environmental resources and habitat
- Recognize and abide by local General Plan Policies
- Maintain and enhance visual and aesthetic quality in the project area and of Mt. Tamalpais
- Reduce noise and light impacts of project on adjacent neighborhoods
- Minimize land use and economic (community) impacts

The Sierra Club Marin Group requests the Environmental Impact Report include information regarding the following issues:

**Regarding All North bound Alternatives:**

1. Both Northbound Option E as well as D must be studied in the EIR. The analysis of the difference between these two northbound alternatives, relating to the flow of traffic east and west bound at Sir Francis Drake and Highway 101 (Greenbrae Interchange), must to be included. Which alternative would improve, to the greatest extent, the traffic flow to and from the Richmond San Rafael Bridge? Would one of these alternatives remove the need for at least one of the traffic signals at the Greenbrae Interchange? How would this improve the flow of traffic through the Greenbrae Interchange?
2. Diagram and discuss in detail the retaining and sound walls required for Northbound Options E as well as D. What are their visual impacts when looking west from the Cost Plus Shopping Center in combination with Alternative E's Braided off ramp? How will this be mitigated?
3. Diagram and compare the existing and proposed roadway footprints and impacts, in relation to the Shoreline Marsh, with the construction of the new Wornum Drive. How will the new Wornum Drive/Redwood Highway intersection impact the upland biology and habitat adjacent to and of the Shoreline Marsh?
4. The project description discusses constructing new bicycle and pedestrian paths. CEQA states an EIR must study the whole, not only segments, of a project. Include in the project description and EIR analysis all the bicycle and pedestrian path alternatives on the east side of Highway 101. One alternative discussed in the project description is for a bicycle path to run along Redwood Highway frontage road and cross Corte Madera Creek. Shown in previous diagrams for North bound alternatives is a bicycle/pedestrian path alternative which would be constructed behind Cost Plus Plaza along the berm adjacent to Shoreline Marsh. We do not understand why this other alternative bike/ped path is not included or shown in the latest project description or diagrams. This alternative continues to be considered for TAM's (Transportation Authority of Marin's) Central Marin Ferry Connection project. The Redwood Highway frontage road, as described in this as well as previous North bound alternatives is also included in TAM's Central Marin Ferry Connection project. The EIR must discuss all the alternatives of the Central Marin Ferry Connection project south of Corte Madera Creek since these various alternatives are being considered for the same project. The EIR can not decide to study one and not the other alternatives. This would be segmenting and not include the whole project. What are the environmental impacts to the Shoreline Marsh from the alternative which places the bicycle/pedestrian path adjacent to the marsh?

**Regarding Southbound Alternatives:**

*Please Note: The Marin Independent Journal newspaper polled its Marin readers. On September 30, 2009 the results showed 84% voted no to the closure of Madera Drive on and off ramp to 101. Only 16% were in favor of closing Madera Drive. Also, the Town of Corte Madera has passed a resolution opposing closure of Madera Drive and detailing other concerns regarding the South bound Option C.*

5. Discuss in detail and diagram different alternatives to South bound Option C which would not require construction of the Lucky/Fifer Braided Ramp or the closure of Madera Blvd. We believe, as well as a vast majority of the public, such an alternative would be preferred to the proposed South bound Option C.

6. Discuss the impacts regarding the environmental constraints of the stream, wetlands and pond on the west side paralleling the existing highway beginning at Max's Restaurant north to the Corte Madera Creek. We have walked this area during the rainy season and there is considerable stream water flowing to what is stated in the TAM list of Environmental Constraints as a "flood retention lagoon". The "flood retention lagoon" is incorrectly named and should be reclassified as a year around pond and wetland habitat area. How much of the stream, wetland and pond will be covered by construction of the South bound project alternative? How much fill will be required? How many truckloads of dirt? Will the proposed project alternative require the stream to be culverted underground? What are the biological and habitat implications of covering this stream, pond and wetland areas?
7. Discuss and diagram the location, height, length and overall size of all required South bound sound walls. How close will the sound walls be to the existing buildings and what are their visual impacts as seen from US 101 as well as adjacent buildings? What will the sound walls impacts be to the stream, pond wetlands, habitat, flood areas, etc.
8. Discuss and diagram the location, height, length and overall size of the required South bound retaining walls. How close will the retaining walls be to the existing buildings and what are their visual impacts as seen from US 101 as well as adjacent buildings? What will be the retaining walls impacts to the steam, pond, wetlands, habitat, flood areas, etc.
9. Discuss and show in a photo simulation the visual impacts of Option C's lengthy Lucky/Fifer Braided Ramp along with retaining and sound walls; as viewed from US 101 as vehicles drive north and south; as viewed from the east side of US 101; as viewed from the west side of the highway from adjacent buildings as well as "peaking" through the side roadways.
10. How high off the ground is the proposed Lucky/Fifer Braided Ramp? We have heard approximately 4 stories off the ground. What are the measurements from the ground to the bottom as well as top railing of the ramp?
11. Discuss the impacts and amount of light intrusion from vehicles to surrounding residential areas and building occupants from Option C's raised Lucky/Fifer Braided Ramp. How far would the light from the headlights travel? Diagram and chart distance and intensity of the headlights from the raised Lucky/Fifer approximate 4 story high Braided Ramp? Would the headlights shine into building windows? How would they affect the visual quality of the night time sky in the surrounding area and of Mt. Tamalpais?
12. Analyze and discuss the noise impacts from a raised Lucky/Fifer Braided Ramp approximately 4 stories off the ground from vehicles on residents and businesses. What are the dBD's from vehicles during daytime, night time, windy and rainy conditions? How far will this noise travel? How can this noise be adequately mitigated from an elevated structure?
13. How does this approximate 4 story high Braided Ramp conform to the General Plan policies of the local communities in relation to height of structures/buildings, noise, visual quality, etc?
14. Discuss in detail, listing by building and/or shopping area, the number of parking spaces lost with the construction of South bound Alternative C as well as other alternatives to be studied. How will the loss of parking spaces impact the property owners, residents and businesses? How will this impact the Corte Madera Town Center's city parking requirements, as well as other business's parking requirements? How will the loss of these parking spaces be mitigated?

15. How will construction of the South bound Option C affect the access to buildings which face Highway 101 with the new Option C “frontage road”?
16. The South bound Option C is proposed to be constructed in 3 phases. CEQA states an EIR can not be segmented and must discuss the whole project. TAM and Caltrans have stated they plan to first construct South bound Options Phase 1 and 2. Phase 3 will be constructed at a future time. The public and Town of Corte Madera have repeatedly stated they do not want Madera Blvd off and on ramp to be closed. The EIR only diagrams and discusses a Phase 3 South bound alternative which closes Madera Blvd along with a redesign of the Tamalpais Interchange. Include, diagram and discuss alternative designs for Phase 3 which would not require the closure of Madera Blvd off and on ramp.
17. Study and discuss the impacts of the traffic flow and congestion within the Corte Madera Town Center if Madera Blvd. off and on ramp is closed. If closed the majority of the Corte Madera Town Center traffic will need to travel through the shopping center to enter and exit on Tamalpais Dr. There no longer would be an alternate Madera Blvd exit or on ramp.
18. Discuss the impacts to the Chevron Gas station, Max’s Restaurant and the Best Western Motel with the closure of Madera Blvd. If the EIR is unable to discuss the economic impacts to these businesses, please include discussion of the amount of business that will be lost in comparison to what they experience today.

**Regarding Combined North and South bound Alternatives:**

19. Wornum Drive’s traffic flows from east to the west under US 101. The North bound and South bound projects will be linked by Wornum Dr. as the connector. Study, analyze and discuss the projected new traffic flow, congestion, various roadway segment time delays, various intersection levels of service, and etc from the cumulative north and south traffic passing from east to west. Compare to the existing east to west traffic patterns. How will this also impact the adjacent local roads (i.e. Tamalpais, Redwood Frontage Road, etc)?
20. Discuss the cumulative traffic patterns and impacts created by the North bound and South bound projects. How will the North bound and South bound alternatives work together, from the Greenbrae Interchange to the Tamalpais Interchange?
21. Include photo simulations which show wide angle views when traveling North bound and South bound on Highway 101, both the east and west sides of Highway 101. Include in the photo simulations the Braided Ramps, sound and retaining walls as viewed from various points; from the center of Highway 101; the east side of the freeway near the Cost Plus Shopping Center looking west; and the west side of the freeway by MMWD and Gold’s Gym looking east. This will assist in understanding the cumulative visual impacts of the project. Discuss the visual impacts and how they relate to the local General Plan policies.

Thank you for responding to our questions and comments. We look forward to reading them in the DEIR.

Karen Nygren, Transportation Committee Chair  
Sierra Club Marin Group

Cc: Bill Whitney, TAM Project Manager  
Corte Madera City Council  
Larkspur City Council  
Diane Steinhauser, Ex Director TAM