



November 15, 2024

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415.302.0110

Transportation Authority of Marin
900 Fifth Avenue #10
San Rafael, CA 94901

RE: 101/580 Project EIR Scoping Comments

Honorable Commissioners and Staff,
Sustainable San Rafael has been part of TAM's Stakeholder Working Group studying the connector idea for several years.

We have questioned the cost of a new interchange--with elevated flyovers and a widened freeway to receive them-- compared to investments of greater priority, such as protecting I-580 and east San Rafael from sea level rise. We wonder whether these costly improvements will remain viable in the higher waters that are inevitable here.

Sustainable San Rafael therefore supports the current proposal to separate out the Bellam Avenue pedestrian, bike, and traffic improvements as a stand-alone EIR alternative. We urge particular attention to creating a safe and welcoming pedestrian route through this concrete domain.

We have also questioned the early decision not to examine the alternative of improving the portion of Sir Francis Drake between the two freeways as a landscaped parkway. This would be a less expensive and more appropriately scaled and situated improvement, recognizing that the traffic on this easterly portion of Drake consists largely of commuters between Southern Marin and the East Bay. The option would also be less disruptive of the vulnerable Canal community.

Accordingly, Sustainable San Rafael requests that the following items be included in the scope of Project's EIR:

- An additional alternative analyzing appropriate Drake parkway improvements.
- The effects of sea level rise through 2125 on all proposed improvements, and project design that avoids these impacts.
- Analysis of comfortable pedestrian and bicycle improvements connecting Bellam to the Canal neighborhood and the North-South Greenway improvements, including pedestrian path widths of at least eight feet, with separated bicycle facilities or wider multiuse paths, together with ample space for street trees and planting strips buffering pathways from traffic lanes.

- Analysis of GHG and other traffic emissions, in particular the impacts on the Canal and adjacent neighborhoods. The Canal is the only neighborhood in Marin that already suffers poor air quality, registering a 4.0 Pollution Burden Score of 77 on the CalEnvironScreen Environmental Justice map, and between the 95th and 100 percentile for particulate matter 2.0 on the EPA Environmental Justice map.
- Analysis of GHG impacts (increases and decreases) needs to factor in a) the increased travel distances of vehicles using the proposed connector alternatives, b) baseline usage of Drake and the Bellam exit, c) the increasing use of EVs through and beyond completion of the project.
- Visual and noise impacts of proposed traffic flyovers, on both the Canal and downtown San Rafael.
- Potential traffic and emission reductions attainable by funding increased East Bay transit and ferry services, potentially as project mitigations.
- Mitigations of GHG impacts sufficient to support a finding a no significant GHG impact for the project.

We appreciate the flexibility of TAM to reconsider transportation priorities in response to changing conditions.

Sincerely,

William Carney,
Vice-President

CC: San Rafael City Council