

Gerald P. Cauthen & Associates
900 Paramount Road
Oakland CA 94610
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Transportation 2035 Plan Draft EIR - Comments

The Bay Area now faces a brand new set of problems. First, the era of reliably cheap energy is ending. Second, fossil fuel-caused global warming is upon us. Because of these oncoming problems, now would a propitious time for the Bay Region to take the steps necessary to:

- 1.) cause virtually all new development to be transit-oriented,
- 2.) upgrade and expand all forms of public transit, and
- 3.) to adopt roadway pricing as necessary to ease traffic congestion and reduce VMT.

Now is no time to be expanding and extending freeways.

The draft EIR acknowledges the need for such changes. However, the MTC program referred to and described in the EIR fails to meet these vitally-important objectives. The following comments will serve to underscore some of the areas in the EIR that are in need of additional thought and consideration:

- 1.) **Destructive Trends Continued**: EIR Table S-1 acknowledges that the Proposed Alternative, by continuing past development and transportation trends, will inevitably subject the Region to more sprawl, more loss of habitat and prime agricultural land, increased VMT, more long term community disruption, increased production of greenhouse gases, more freeway-caused noise pollution affecting sensitive receptors, and worsening traffic congestion.

Mitigations are noted in the Table. However, since they are mostly voluntary in nature, they offer no assurance that anything can or will be implemented.

2.) The No Project Alternative: The “No Project” Alternative falls flat. It is not legitimately a “no project” alternative because it unaccountably includes a large number of highway expansions and other projects of the past that would do nothing to alleviate any of the above-indicated regional problems. These aging proposals...many still in the planning stage...were conceived and politically “sold” 20 or more years ago, before the oncoming energy and climatic problems were widely-known or understood.

In the EIR the “No Project” Alternative should exclude all projects that are not as yet actually under construction or in the construction stage. Only in that way will it be possible to gauge the true environmental and other effects of the “Build” alternatives. Given the new paradigm and the vital need for this region to “switch gears”, there isn’t room for sacred cows.

3.) "Superior" Alternatives Discarded: On page ES-8 of the EIR Summary, MTC acknowledges that the land-use oriented alternative and the pricing-oriented alternative are both "environmentally superior" to the Proposed highway-expanding Alternative". This is a significant finding. Yet Staff recommends dropping both of the superior alternatives, on grounds that the "MTC and its partners lack the authority to implement them". A lack of current authority to implement is not a sufficient reason to drop an environmentally superior alternative.

The EIR should include a description of what it would take by way of State legislation and actions by other jurisdictions to implement each environmentally superior alternative. MTC, in its newsletters, press releases, press conferences and public testimony, as well as in the EIR, should clearly and forcefully state the advantages of environmentally superior alternatives in terms of addressing the Region’s environmental and transportation problems, and set forth the steps needed to implement them.

Not being able to do something is one thing. But not even trying to rectify the situation while burying the truth of what's needed in a single sentence in an EIR (See page ES-9) is quite something else again. An entirely fresh look at the situation is warranted.

4.) **Optimal Alternative Missing**: Most observers recognize that the surest way of reducing the Region's excessive reliance on the private automobile would be through a combination of effective:

- a.) public transit improvement,
- b.) transit-oriented development
- c.) pricing incentives.

Yet the EIR includes no alternative that incorporates this rather obvious combination.

5.) **HOT Lane Fallacies**: In its public documents MTC claims that by allowing some motorists to drive with less starts and stops, HOT lanes would "reduce emissions". But no where in the EIR is there a discussion about the additional traffic that these HOT lanes would encourage, and no where is there a section dealing with the additional emissions that this additional traffic would generate. The secondary effects of MTC's highway-expanding program, including in particular the regional traffic-inducing effects of its HOT lane program, should be addressed and presented in a revised version of the EIR.

6.) **Fuel Economy versus MTC's Program**: Because of high fuel costs, and State and recent federal initiatives, the fuel efficiency of the light trucks and cars traveling on California's streets and highways is projected to increase steadily in the coming decades. It is also likely that car buyers...especially in California...will continue to opt for smaller and more efficient vehicles. The overall VMT effect on the Bay Region of these general improvements in vehicular fuel economy should be set forth and identified in a separate section of the EIR.

7.) **Noise Pollution**: In the EIR, twenty five pages are devoted to describing different types of noise, how noise is created, the noise pollution regulatory environment, the damage noise can cause and how noise affects different receptors. On Page 2.6-7 it is stated that "traffic noise is usually not a serious problem for people who live more than 500 feet from heavily traveled freeways". On Page 2.6-8 it is stated that noise emanating from freeways and arterials "can be a significant environmental concern where buffers (e.g., buildings, landscaping, etc.) are inadequate or where the distance from centerline to sensitive uses is relatively small".

Yet nowhere in the EIR are there projects devoted to noise control or noise suppression. In the Bay Area there are hundreds of sensitive existing receptors afflicted with excessive noise, such as schools abutting high speed roadways, exposed BART platforms sandwiched between freeway lanes, residences adjacent to BART viaducts and harried BART passengers screaming to be heard while passing under the Bay. Despite these major problems, many of long standing, Transportation 2035 Plan ignores them. Before expanding the Region's freeway system, thereby significantly exacerbating noise problems in many parts of the Region, MTC should direct significant resources to alleviating unacceptable existing noise conditions.

Final Note: In response to rising fuel costs, an overriding need to become energy independent and global warming, State and federal government, as well as many private companies and corporations, are starting to make significant changes. This San Francisco Bay Region should do likewise.

Gerald Cauthen
510 208 5441