Transportation Solutions Defense and Education Fund

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March 3, 2017
By E-Mail to:
nilescanyon
projects
@dot.ca.gov

Elizabeth White
Office of Environmental Analysis
Caltrans District 4, MS 8B
111 Grand Avenue
Oakland, CA 94612

Re: Proposed Replacement of the Alameda Creek Bridge: SR 84, PM 13.0

Dear Ms. White:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit advocating for the regional planning of transportation, land use and air quality, with a focus on climate change. We take an interest in this project because it is likely to exacerbate the dependence of Bay Area residents on personal automobiles, rather than build infrastructure to support commute travel markets with public transit. We offer the following thoughts on the Revised Draft EIR/EA for the Alameda Creek Bridge Replacement Project ("DEIR"). Citations are to DEIR page numbers.

Context Sensitive Design

If ever there was an area that called out for a context sensitive design, it would be Niles Canyon. The Department has developed a significant body of policy guidance on context sensitive solutions:

> The Department uses “Context Sensitive Solutions” as an approach to plan, design, construct, maintain, and operate its transportation system. These solutions use innovative and inclusive approaches that integrate and balance community, aesthetic, historic, and environmental values with transportation safety, maintenance, and performance goals.

> Caltrans Director's Policy on Context Sensitive Solutions, (DP #22), 2001. Caltrans' website accessed 3/3/17: http://www.dot.ca.gov/hq/oppd/context-solution.pdf
> The policies, practices or mandatory design standards used for any project should meet the minimum guidance given to the maximum extent feasible, but the philosophy provides for the use of nonstandard design when such use best satisfies the concerns of a given situation. Deviations from the Caltrans policies, practices or mandatory design standards requires review and approval for nonstandard design through the exception process (see Index 82.2 of the Highway Design Manual) and should be discussed early in the planning and design process.
> Caltrans' website accessed 3/3/17: http://www.dot.ca.gov /hq/LandArch/16_livability/css/index.htm.

The fact that the design process resulted in the proposed demolition of an historic bridge on a Scenic Highway is an indication of a complete failure to implement the Department's Context Sensitive Solutions policies. The proposed project is a classic example of applying Caltrans' design standards in a cookbook manner, without any recognition of context.

Purpose and Need

p. 4: We strongly disagree with the Project Purpose's implication that "driver expectations of SR-84's operating speed" are a value that should be given more weight than the Scenic Highway designation. This is a values judgment, not an engineering judgment. The State of California has decided that its scenic and historic resources must be preserved. Increasing the typical speeds on a roadway is a direct challenge to the experiential qualities that have been preserved in law and regulation.

While modern transportation has descended into merely getting from one place to another as quickly as possible, this stands in sharp contrast to the savoring of scenic and historic places, such as Niles Canyon. While America has built millions of unmemorable places--and unmemorable freeways to connect them--Niles Canyon represents something entirely different: a place where taking the time to take in the experience is paramount. Caltrans is proposing to destroy this resource to make it more like the rest of California, to make it more convenient for oblivious commuters. We do not accept the premise.

Specific Comments

p. 5: The Alameda Creek Bridge has functioned for 89 years without shoulders (similar to the SFOBB). Please provide a justification for the destruction of an historic resource to enable the construction of shoulders, based on an actual history of incidents that demonstrate the need for shoulders. "The Design Manual requires us to put shoulders into the design" is not an acceptable justification for this sensitive context.

p. 6: Because we disagree with the criteria used for the evaluation, we reject the classification of the bridge as "functionally obsolete." By those criteria, all of our national monuments would have to be torn down, as not compliant with current building codes. Obviously, that would be silly. Treating an historic and scenic resource with the same standards as Caltrans treats its typical roadways is profoundly wrong. It goes against all the current thinking about context-sensitive planning, a value Caltrans allegedly champions. (See above.)

p. 15: We note that 12-foot travel lanes are associated with high-speed freeways. It is well-known that road diets--the utilization of narrower lanes--produce lower average speeds, resulting in lower accident rates, less severe injuries, and fewer fatalities.[1] If speeds on the bridge are too high, narrower lanes on the approaches should be used as a way of controlling "driver expectations." Making lanes wider in the name of safety makes no more sense than letting out one's belt in order to control one's weight. It is also well known that the severity of injuries and the probability of fatal collisions increases with increased average speeds.

p. 43: The rejection of the TDM Alternative is unsupported by evidence. Note that the language in the Reason for Rejection refers to structural deficiencies: "A TSM and TDM Alternative would not meet the project's purpose and need as this alternative would not improve the structural deficiencies of the Alameda Creek Bridge and its approaches in a manner that improves safety and provides a facility that meets driver expectations of SR-84's operating speed." (emphasis added.)

This is contradicted by the statement on p. 5 that "Although the bridge is structurally adequate as of 2017, it is currently classified as "functionally obsolete, meaning it is no longer functionally adequate for its task due to the design deficiencies listed above." TRANSDEF asserts that applying modern design standards to historic and scenic resources--and demolishing them when they don't measure up--is a fundamentally flawed approach to preserving those resources. We also disagree (see above) that driver expectations are a valid factor in considering the preservation of historic and scenic resources.

Project Segmentation

Table 38, List of Projects Considered for Cumulative Impacts Analysis, p. 239, is woefully inadequate. A series of projects are underway, including Alameda County Transportation Commission's East-West Corridor project, which, when cumulatively considered, will provide significantly more capacity for vehicles to travel from I-580 in the Tri-Valley to the Peninsula, via the Dumbarton Bridge. The DEIR has failed to adequately study the cumulative impacts of this collection of projects. This is classic segmentation, and is not permissible under CEQA.

Caltrans has focused far too narrowly with this DEIR. What must occur is a program-level document (which used to be called a Major Investment Study) that studies travel in the SR 84 Corridor, and selects the feasible alternative with the least environmental impacts to serve that travel. This will necessitate origin-destination studies, to be able to

determine exactly which the travel patterns need to be accommodated with higher capacities.

The proposed project has resulted from a narrow design process that did not consider the users. Because Niles Canyon Road is a state highway and not just a local road, it is essential to start with a regional planning perspective, recognizing the need to understand who is travelling, where they are going, and whether they are travelling to specific destinations in sufficient numbers to warrant service by a new public transit mode. Merely providing more capacity for more cars is no longer an adequate approach to transportation planning in the age of climate change.

Resource Areas with No Adverse Impacts

TRANSDEF strongly disagrees with the projects' impact characterization in Table 8, p. 49: Resource Areas with No Adverse Impacts. Because the stated purpose of the project is to increase speeds on the approaches and over the bridge, the proposed Project would increase vehicle throughput, even though it does not add a lane, thereby making SR 84 more attractive to commuters. The increased traffic, especially when considered in the context of reasonably foreseeable future projects (see above), will result in cumulative impacts that were not disclosed in the DEIR, including the increased emissions of criteria pollutants and greenhouse gases.

Greenhouse Gas Emissions

While the DEIR mentions "The California Transportation Plan (CTP) provides a long-range policy framework to meet California's future mobility needs and reduce greenhouse gas emissions" (p. 54), it ignores its policy guidance. We have significant problems with the DEIR's treatment of greenhouse gases (GHGs).

p. 302: Consistent with Caltrans' 100% focus on automobiles, the analysis of strategies to reduce GHGs completely ignores shifting travel activity to lower-carbon modes, including public transit.

p. 309: The list of state laws and Executive Orders is not current. SB 743 and SB 32 are especially significant recent laws relating to climate change. When Caltrans was given the legislative mandate by SB 391 to plan for an 80% reduction in GHGs, senior management removed the parts of the Draft CTP that did so, and replaced them with Business-As-Usual language that did not comply with the law.

p. 311: It is unclear which edition of the Scoping Plan is being discussed. The current draft Scoping Plan has a later inventory.

312: TRANSDEF asserts that, due to its inadequate cumulative impacts analysis, the DEIR's conclusion is incorrect that "The proposed project ... is not anticipated to have an increase in operational greenhouse gas emissions."

p. 314: The discussion of GHG reduction strategies is all fluff. Caltrans continues to build capacity-increasing projects, which result in increased VMT and GHG emissions.

p. 402: TRANSDEF asserts that the time has passed where Caltrans can "get away" with statements like this one in the Initial Study:

> An assessment of the greenhouse gas emissions and climate change is included in the body of environmental document. While Caltrans has included this good faith effort in order to provide the public and decision-makers as much information as possible about the project, it is Caltrans determination that in the absence of further regulatory or scientific information related to GHG emissions and CEQA significance, it is too speculative to make a significance determination regarding the project's direct and indirect impact with respect to climate change. Caltrans does remain firmly committed to implementing measures to help reduce the potential effects of the project. These measures are outlined in the body of the environmental document.

The scientific evidence is now in, and is reflected in the CTP[2] and the Draft 2017 Scoping Plan Update.[3] These documents acknowledge the essential role that VMT reduction must play in California's response to climate change. As a result, Caltrans must make an impact significance determination. We disagree that there are any measures in the DEIR that mitigate the project's operational greenhouse gas emissions.

Alternatives

TRANSDEF has long advocated for a new passenger rail line in this corridor, connecting the Central Valley with the Silicon Valley. Because the existing Altamont Commuter Express shares low-speed tracks with Union Pacific freight trains, its ability to attract commuters is limited. A higher speed line, potentially capable of 150 mph, would be time-competitive with auto travel: it would be far more convenient, faster and more comfortable than commuting in heavy traffic (and travelling over this bridge).

TRANSDEF proposes that Caltrans evaluate at a programmatic level the Alternatives Analysis[4] completed by the Alameda Corridor Rail Project, along with its Appendices,[5] Preliminary Project Description,[6] and project promotional brochures,[7, 8] as a distinct alternative to adding highway capacity to the SR 84 Corridor, including the East-West Connector and similar projects. The Rail Alternative should include a reopened Dumbarton Rail Bridge, to provide a complete rail alternative to SR 84. If large amounts of traffic were diverted from the highway to rail, it would result in lower congestion, lower GHG emissions, lower fatalities, and happier travelers, able to spend more time at home. Commuting by train has the potential of lowering household transportation costs.

TRANSDEF appreciates this opportunity to advocate for an environmentally sustainable alternative to the destruction of historic and scenic resources.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President
David@Schonbrunn.org

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[1] Area-wide urban traffic calming schemes: a meta-analysis of safety effects, Elvik, R, 2001, http://dx.doi.org/10.1016/S0001-4575(00)00046-4 (Accessed 3/3/17.)
[2] California Transportation Plan 2040, Caltrans, 2016, http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-PRINT-NoBleed_secured.pdf (Accessed 3/3/17.)
[3] Proposed Final 2017 Climate Change Scoping Plan Update, ARB, 2017, https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf (Accessed 3/3/17.)
[4] Altamont Corridor Rail Project, Project Environmental Impact Report/Environmental Impact Statement, Preliminary Alternatives Analysis Report, February 2011 http://transdef.org/HSR/Altamont_assets/Altamont%20Corridor%20Rail%20Project%20Preliminary%20AA%20Report.pdf (Accessed 3/3/17.)
[5] Preliminary AA Report Appendices, http://transdef.org/HSR/Altamont_assets/%20Preliminary%20AA%20Report%20Appendices.pdf (Accessed 3/3/17.)
[6] Altamont Corridor Preliminary Project Description, California High-Speed Rail Authority, May 2009, http://transdef.org/HSR/Altamont_assets/Altamont_Corridor_Preliminary_Project_Description_5_1_09.pdf (Accessed 3/3/17.)
7 "Welcome to the start of a new vision!", October 2009 newsletter from Altamont Corridor Rail Project, http://transdef.org/HSR/Altamont_assets/Altamont Newsletter1Oct2009.pdf (Accessed 3/3/17.)
[8] "Help Realize The Altamont", February 2011 newsletter from Altamont Corridor Rail Project, http://transdef.org/HSR/Altamont_assets/AltamontNewsletter%202011.pdf (Accessed 3/3/17.)