

Board of Commissioners  
Transportation Authority of Marin  
781 Lincoln Ave., Suite 160  
San Rafael, CA 94901



February 13, 2013

*Via US Mail and E-mail*

Re: "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project"  
District 4 – MRN – 101 – PM 7.2/8.9  
EA 1A6600

Dear Commissioners:

From its inception almost 80 years ago the Marin Conservation League has been actively involved in land use and transportation issues affecting the County. We believe that MCL's efforts have had an important role in creating and maintaining Marin's special character as a place to live and visit. For the past several years MCL has been following and participating in the proposals developed by the Transportation Authority of Marin for addressing traffic issues along highway 101 in the corridor between Sir Francis Drake Blvd. in Greenbrae and Tamalpais Drive in Corte Madera. Many of our members live in this area and are personally familiar with the problems and issues with this stretch of highway 101. After reviewing the publicly available information, we oppose the proposed "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project" as currently planned.

### ***Global Warming***

Marin will be significantly impacted by sea-level rise due to global warming over the next few decades. In addition, one well-documented effect of global warming has been to produce storms of greater intensity and severity. We believe that it is essential that all levels of government begin planning to deal with sea level rise and with more frequent and serious storm events. Any new long term investment in transportation infrastructure should proactively address these issues.

The Highway 101 corridor between Sir Francis Drake and Tamalpais is located in the Corte Madera Creek floodplain, and the project includes areas that are *currently* subject to periodic flooding due to tides and storms. Over time, the existing flooding issues will only get worse, and a project that does not address sea level rise and flooding is seriously flawed.

Moreover, this stretch of freeway is a critical link in Marin's transportation system, and closure of the road or its access points due to flooding could be devastating. Emergency vehicles rely on these routes. There is no realistic alternative route across Corte Madera Creek. MCL believes that the first priority of any new highway projects in the county should be to prepare for sea level rise.

PHONE: 415.485.6257  
FAX: 415.485.6259

EMAIL: [mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)  
WEB: [marinconservationleague.org](http://marinconservationleague.org)

ADDRESS: 175 N. Redwood Dr., Ste. 135  
San Rafael, CA 94903-1977



***The Massive Scale of the Project Is Out of Character For Marin***

The project appears to be one of the largest freeway projects undertaken in Marin in many decades. It would impose a huge mass of concrete as large as anything ever seen in Marin in order to create a complex web of new traffic routes. At Wornum Drive, for example, the project would almost triple the width of the existing freeway and its access points. An unsightly “flyover” structure would be visible for miles around. The project would act as a huge barrier between the east and west sides of 101.

This area of Marin is presently dominated by marsh lands and residential property. Despite the comment in the “Environmental Document” it is not anything close to be a “highly urbanized” area. Parks and other public spaces along the Bay and along Corte Madera Creek are found on both the east and west sides of the freeway, highlighted by views of Mt. Tamalpais. Since its inception, MCL has fought on behalf of maintaining the natural character of Marin. We believe that this project, with its enormous mass of new concrete roadways, is simply out of character with the values and aspirations of Marin’s residents. It is inappropriate for Marin.

***The High Cost of the Project Appears To Be Out of Proportion To The Benefits***

Sir Francis Drake Blvd. (“SFD”) is one of Marin’s most important, heavily used and congested roads. A very large volume of SFD traffic from both east and west of highway 101 enters the freeway at this key intersection, and is one cause of SFD congestion. From careful review of the publicly available data, we believe that the project is likely to do little if anything to improve traffic congestion on SFD. Likewise, we believe that the available statistics for accident rates and travel times in the relevant portion of highway 101 show that these problems are not sufficiently serious to justify the very high dollar and environmental costs of the project. It is using a sledge hammer to kill a flea.

There are other major projects planned for the immediate vicinity that have the potential for exacerbating the already serious congestion of SFD. The City of Larkspur is developing a SMART “Station Area Plan” that has the potential for dramatically increasing SFD traffic in areas immediately adjacent to 101. Likewise, the plan for a major expansion of the Marin General Hospital will appreciably add to congestion on SFD. Neither of these major projects is discussed in the Caltrans documentation and so it appears that their impacts have not been considered.

***The Project Would Have Substantial Negative Impact on Pedestrian and Bicycle Routing***

While MCL favors some of the pedestrian and bicycle route improvements incorporated into the project, we believe that the elimination of the existing highway 101 overcrossing and the routing of pedestrian and bicycle traffic to Wornum is troublesome. We note that these changes have generated substantial complaints from bicycle advocacy groups

and from residents in the area. This is not merely a matter of convenience; we believe that requiring bicyclists and pedestrians to cross multiple lanes of Wornum traffic getting onto and off the freeway presents a serious safety issue.

***CEQA and NEPA Require the Preparation of An EIR/EIS***

CEQA and NEPA require preparation of an EIR/EIS for any project that will have a substantial impact on the environment. We believe that it is disingenuous and illegal to pretend the project will have not have *any* substantial environmental impact and bypass the preparation of an Environmental Impact Report under CEQA, and an Environmental Impact Statement under NEPA. The construction, noise, and visual impacts alone are substantial and require an EIR/EIS. Accordingly, we oppose proceeding with this project without fully complying with CEQA and NEPA.

Accordingly, we urge TAM to reject the project as currently proposed. Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink that reads "Susan Stompe". The signature is written in a cursive, flowing style.

Susan Stompe  
President

cc: California Department of Transportation