

# EAST BAY BICYCLE COALITION

POST OFFICE BOX 1736 OAKLAND, CALIFORNIA 94604

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July 28, 2006

Gregory C. McConnell, Senior Environmental Planner  
Attention: Sheryl Dorado Associate Environmental Planner  
Dept. of Transportation, District 4  
Environmental Analysis Mail Station 8B  
P.O. Box 23660 Oakland, CA 94623-0660

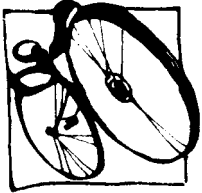
**RE: Caldecott Improvement Project: Draft Environmental Assessment / Environmental Impact Report (EA 294900)**

Dear Mr. McConnell:

Since 1972 the East Bay Bicycle Coalition (EBBC) has represented the interests of bicyclists throughout Alameda and Contra Costa Counties. Our members, both East and West of the Caldecott Tunnels, represent both recreational bicyclists and clubs, as well as utility transportation bicyclists who commute or otherwise bicycle for everyday travel needs, either by conscientious choice or due to economic limits that preclude automobile or transit use. Together, this broad coalition of bicycling interests has given tremendous importance to this project since the Caldecott Tunnel Corridor Study Discussion Paper of Dec. 1998 was provided by the MTC. Our initial review comments of that Discussion Paper, published in our Sept. 1999 newsletter (See: Appendix, Item #1) unfortunately remain unacknowledged in the current Caldecott Improvement Project: Draft Environmental Assessment / Environmental Impact Report (hereafter referred to as DEIR).

Overall, the DEIR is woefully inadequate, flawed and fails to meet California Environmental Quality Act (CEQA) policies to provide a comprehensive review of the overall and cumulative impacts that the proposed project would entail, nor does it consider a variety of options. Furthermore, the DEIR has failed to mitigate the wide array of adverse effects. In short, this is the absolute worst DEIR we have ever reviewed. We strongly urge that the DEIR be withdrawn. A subsequent environmental analysis of traffic needs to be conducted that considers project alternatives that include ways to relieve congestion by enhancing transit and encourage regional patterns of travel by bicyclists through the provision of Safe Routes to Transit. The existing study does not address minority or low-income community transportation needs, nor mitigate the project impacts on these groups. Exclusion of low-income bicyclists, pedestrians and the disabled from the Caldecott corridor is not an acceptable strategy for enhanced mobility.

The EBBC membership sees the Caldecott Improvement Project as an opportunity to address a major barrier to bicycle transportation in the East Bay. Any improvements to the Caldecott Tunnel complex need to include bicycle access. Adopted federal, state and local transportation policies promote the inclusion of bicycle access in all transportation projects. These policies include the US Department of Transportation's *Accommodating Bicycle and Pedestrian Travel: A Recommended Approach A US DOT Policy Statement on Integrating Bicycling and Walking*



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into *Transportation Infrastructure*; and the California Department of Transportation's *Deputy Directive Number: DD-64* that calls for full consideration of the needs of non-motorized travelers (including pedestrians, bicyclists and persons with disabilities) in "all programming, planning, maintenance, construction, operations and project development activities and products." Most recently, the Bay Area Metropolitan Transportation Commission (MTC) adopted a similar policy titled *Routine Accommodation* (MTC Resolution No. 3765).

The Caldecott Improvement Project conflicts with the above adopted policies. As proposed in the DEIR it fails to elaborate on the transit policies, discussed below under "Bicycle Access Conditions," and openly examine the bicycle access plans in the project area that CEQA requires to be publicly addressed.

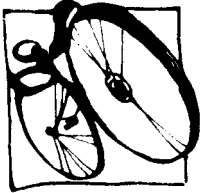
The adverse impacts of increased traffic on alternative transportation have historically resulted in greatly diminished non-motorized access and safety. When the Third Bore was added in the 1960s and widening of the tunnel approach demolished the Landsdale Bridge, a convenient crossing that once linked Lake Temescal Regional Park with neighborhoods on the north of SR 24 was severed. The current project proposal does not seek to correct this serious prior error. Instead, the current project's increased traffic, pollution, and noise will result in significant impacts for non-motorized travel and contribute to reduced livability in communities along the project corridor in Alameda County while only promoting a single mode of travel—the automobile. The DEIR's omissions and failure to acknowledge existing programs supporting alternative transportation will have significant impact on the future ability of the region to offer bicycle access and safety as promoted in adopted Countywide and Regional Bicycle Plans.

## **BICYCLE ACCESS CONDITIONS**

Because the DEIR did not address bicycle access, and whereas the bicycle access conditions have bearing on the discussion of the proposed project's purpose and need, a short description of bicycle access conditions are provided in the following paragraphs:

The Caldecott Tunnels provide the straightest and easiest access between central Contra Costa and Alameda Counties. The tunnel complex consists of 3 bores of traffic lanes each. Two were completed in the late 1930's and are 3610' long. A 3rd bore, 3,771 feet long, was added to the north of the other tunnels in 1964. It included two westbound lanes and the ingenious pop-up bollards that have allowed the efficient use of the complex by changing lane directions in the center tunnel based on demand. Approaching the tunnels from the east is a 4 lane freeway, and a 5-lane freeway approaches from the west. Usually, traffic in the commute direction uses two tunnels for a total of 4 lanes, while reverse commute traffic is allocated two lanes through the tunnels.

To avoid using the tunnels, bicyclists must climb an extra 500 feet, partly on grades of over 10% and add several miles of out-of-direction travel to any trip through the hills. To avoid the 10% grade, any detour adds even more mileage and still includes substantial distances with grades



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greater than those on the tunnel approaches. Until 1965, SR 24 was an ordinary state highway, and bicyclists were able to use the tunnels to travel between Alameda and Contra Costa Counties. When the highway was converted to a freeway, with the addition of the third bore, bicyclists were banned from using the tunnels. If that conversion had occurred today, Caltrans would have been mandated to provide equivalent access for bicyclists.

The exclusionary effect of the previous tunnel expansion project on bicycle access, together with the lack of consideration for bicycle access in the current project, constitutes a significant “cumulatively considerable” impact under CEQA’s Mandatory Findings of Significance.

The regionwide Bike-on-BART program has been in place since 1974 offering popular indirect bicycle access between either side of the Caldecott Tunnel complex. The so-called BART-Black-out prohibits bicyclists from using BART to bypass the hill during commute hours in the peak direction, and BART prohibits several types of useful bikes through its size restrictions. Again, the DEIR does not consider the long-established Bike-on-BART program, nor does it mention that the lengthy alternative direct bicycle trips most often follow the Skyline Regional Bikeway--the Bay Area's initial regional bike route established by BART, the City of Oakland and the East Bay Regional Park District. The Skyline Regional Bikeway was designed to link the Rockridge BART Station with Skyline Blvd via Chabot and Tunnel Roads. This established regional bikeway intersects the project zone at multiple points and deserves considerable focus from the DEIR. Traffic conflicts with bicyclists currently exist and will only be more problematic with the increase in traffic that an additional Tunnel Bore will shift to the local routes in Alameda County.

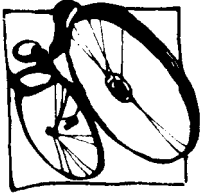
On the Contra Costa County side, Caltrans makes an extraordinary allowance for bicycle access on the SR 24 freeway shoulder between Fish Ranch Road and Orinda. Again, the DEIR fails to acknowledge this important regional feature. Not only must this access for bicyclists be preserved, but the DEIR must consider ways to provide for improved access and safety in this corridor.

Because the DEIR does not acknowledge the existence of regionally significant bikeways, and bicycle-on-transit travel policies, it offers no stated mitigation measures for the cumulative increase in traffic that would in fact diminish the access and safety of alternative transportation.

Bicycle access on the shoulder of SR 24 between Fish Ranch Road and Orinda is not considered and its loss would represent a significant impact on bicycle access.

Bicycle access and safety improvements on the existing Skyline regional bikeway need to be fully considered as either a component of any Caldecott Improvement Project, or secondarily, as a mitigation for the traffic impacts of the project on bicyclists.

Overall, the proposed project will have a significant traffic impact on these existing bikeways and add to the hazard of bicycle travel on both the designated routes that directly intersect with



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the project, as well as nearby bikeways. We respectfully ask that the above issues be addressed in the Transportation/Traffic analysis of a reissued DEIR.

## EXCLUSION OF BICYCLISTS' NEEDS

The DEIR discussion of the proposed project's "Purpose and Need" dismisses the Bikeway Tunnel Alternative (p. x). This is a far too narrow approach to a well-documented need for bicycle access. A number of direct access options were not examined and discussed in the DEIR. Furthermore—rather than moving from a discussion of direct bicycle access, to an assessment of the plethora of indirect bicycle-transit needs that meet the “delay reduction” and “improved mobility” purposes (pp. vi, 5), or need to “relieve congestion during off-peak periods” (pp. vii, 6)—the DEIR subsequently drops substantive discussion of ANY bicycle access.

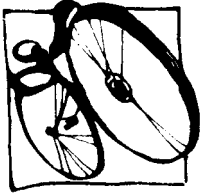
Not only are low-cost direct bicycle access options feasible—yet unexamined by the DEIR—but indirect bicycle access (i.e., bike-to-transit) in the Caldecott corridor presently removes many of daily trips from the Caldecott Tunnel approaches and has the capacity to remove thousands more. These existing and potential bicycle-transit trips are definitely within the "congestion reduction" purpose and need for the project.

The DEIR is deficient for not noting that during the westbound morning commute “bottleneck” at the Caldecott Tunnel approach near Fish Ranch Road, discussed under the “Need for Proposed Project,” (p. 6), westbound weekday bicycle restrictions at the Orinda BART Station extend from 6:39am to 8:39am. Recurrent delays for motorists never approach the 2-hour delay experienced by bicyclists! In contrast, thousands of indirect bicycle trips are absolutely precluded in the peak direction.

The “Need for Proposed Project” section continues with another entire paragraph describing the “eastbound evening commute”...“bottleneck...near the west-end portal of the tunnel” (p. 7). We again note that if this peak-travel information is relevant to the project need, the DEIR should include that the eastbound weekday bicycle restrictions at the Rockridge BART Station extend from 4:41pm to 7:01pm—over 2-hours!

The abovementioned BART blackouts for bicyclists represents a significant and unaddressed conflict between the proposed project and the need to support an adopted program to provide alternative transportation as required by CEQA Transportation/Traffic criteria, subsection (g). If the project is to exclude consideration of full uninterrupted provision of the BART-Bike program originally adopted in 1974, then the finding of “no impact” must be replaced with a potentially significant impact finding. As well, the blackouts for bicycle travel on BART represent a significant “cumulatively considerable” impact under CEQA’s Mandatory Findings of Significance.

Indirect access for bicyclists that does not involve BART was also not adequately addressed in the DEIR. One example of transit and bicycle service that should receive consideration is



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bicycle-on-board bus travel. Currently during the BART restriction periods or overnight closure of the BART system, the options for bicyclists to traverse the corridor greatly diminish. Recent inauguration of AC Transit's "All-Nighter" bus service on line #820 linking BART Stations between Oakland and Concond offers hourly service between roughly 1am and 4am. This valuable, yet infrequent, service carries bicycles on outside racks, plus bicycles may be allowed inside. Otherwise, bicyclists must either abandon their bicycle and risk theft or vandalism by parking at a transit stop or ride over the hill during service blackouts.

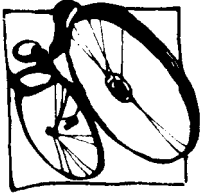
We request full consideration of indirect access between Alameda and Contra Costa Counties. At the very least a mitigation measure should offer 24-hour transit service that carries bicycles. This service would need guaranteed sustainable funding that would not allow it to be discontinued as is the risk with shuttles or buses.

BART stations on either side of the hills need to provide secure bike parking as either a component of any Caldecott Improvement Project, or secondarily, as a mitigation for the traffic impacts of the project on bicyclists.

Safe Routes to Transit projects to improve access to transit on either side of the hills for bicyclists, pedestrians and the disabled need to be included as either components of any Caldecott Improvement Project, or secondarily, as a mitigation for the traffic impacts of the project on bicyclists.

Earlier comments from the EBBC, dated Jan. 30, 2003, make it clear the current DEIR statement regarding "lack of community support" (p. x) for a separate bikeway tunnel is inaccurate (See Appendix, Item #2). In preliminary scoping studies, Caltrans, along with the CCTA, CMA and MTC, failed to examine the most feasible direct-access options for bicyclists in their Route 24/Caldecott Tunnel Corridor Study (Jan. 5, 2001). At the subsequent Public Scoping Sessions in Orinda and Oakland in Dec. 2002, numerous individuals noted that the simplistic assessments of widening the tunnel bore to accommodate bicyclists were absurd when more cost-effective ways of providing direct access had been widely discussed among the bicycling community and shared with the MTC Project Manager, Doug Kimsey. The attached EBBC letter makes this inadequacy clear, along with calls for augmented indirect access (i.e., SR2T bicycle-transit).

Provision of bicycle access in the same tunnel with traffic noise and pollution is not what the bicycling community asked for. We always promote comfort from such bothersome detractions that would deter bicycle travel on the public right-of-way. The costly alternatives presented in the scoping proposals cast aspersion on bicyclists needs and resulted in the unfair dismissal of any additional assessment of bicycle access. The EBBC is not promoting a cost-is-no-object ideal. Yet, if "community support" is to be a factor in building the project, we first ask to review whatever votes the DEIR preparers used in making such a statement; second, we suggest that the voters in Alameda and Contra Costa Counties be allowed to consider the overall project; and third, if such a costly overall project is deemed necessary, the provision of non-motorized access must be included as a matter of fairness for environmental justice and social equity principles.



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Potentially feasible direct access options for non-motorized travel need to be examined in the DEIR. Access in the 15-1/2 foot wide fresh air duct above the third bore was not considered in the DEIR. Some published background information on this option suggests the ventilation needs are at best infrequent and make this an inviting low-cost option to study. “Since the new tunnel [Third Bore completed in 1964] is used only for downhill traffic, ventilation requirements are practically nill,” according to Caltrans’ *The Caldecott Tunnel Sixtieth Year Anniversary 1937-1997* document provided to visitors who tour the facility. The present DEIR discussion of the proposed fourth bore appears to support this intriguing assessment by noting that “because of the tunnel profile, there would be significant natural ventilation during normal traffic conditions, and mechanical ventilation will not be required” (p. xii).

Another overlooked potential direct access option is the emergency walkway proposed to be built as part of the project. We note the following statement: “Emergency walkways are planned to be built between a new fourth bore and the existing third bore (p. xx).

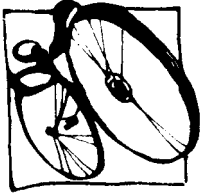
Beside low cost, another reason to examine bicycle access through either the Fresh Air Duct or the Emergency Walkways is that these options offer full separation from the traffic and noise that the earlier *Route 24/Caldecott Tunnel Corridor Study* (2001) failed to propose in its cursory examination of building bikeways adjacent to the travel lanes of the proposed Fourth Bore.

In summary, with full examination of all of the direct- and indirect-access options for bicyclists, the project would result in Potentially Significant Impacts, rather than “no impact,” as reported in the CEQA assessment in Appendix A (p. A-12) for Section XV. Transportation/Traffic, subsection (g). Other significant impacts result as a consequence of the proposed project’s failure to address adopted policies for non-motorized travel, project conflicts with adopted plans for bicycle access, and the fact that DEIR does not consider programs that transit agencies offer to encourage linking bicycles and transit to enhance the overall mobility in the corridor.

## **TRAFFIC AND TRANSPORTATION/PEDESTRIAN AND BICYCLE FACILITIES**

Members of the EBBC have participated with the Alameda County Congestion Management Agency (ACCMA) in “developing a feasibility study to address various ways to improve bicycle and pedestrian access in the vicinity of the Caldecott Tunnel” (p. xx). While we are appreciative of this effort, we note that access and safety issues for non-motorized travel exist on both sides of the Caldecott Tunnel. Why is the Contra Costa County side excluded from examination? Furthermore, why are the measures being studied by the ACCMA not discussed in a substantive manner in the DEIR?

Current traffic conditions make it unsafe for bicyclists to follow the Skyline Regional Bikeway or to approach the Skyline Regional Bikeway from Berkeley on Tunnel Road. The increased traffic induced by the Fourth Bore will significantly diminish the access and safety for bicyclists and pedestrians on this route and popular nearby approaches. The following bicycle/pedestrian



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improvements need to be included as components of the overall Caldecott Improvement Project, or as mitigations for the project as proposed:

A. The existing Kay overcrossing represents an inconvenient route for bicyclists or pedestrians. In comparison with the Landvale overcrossing that was removed as part of the earlier Third Bore construction and widening of the SR 24 tunnel approach in Alameda County, the Kay overcrossing entails 1-1/2 miles of out-of-direction travel and a climb to approximately 690-feet above sea level. The elevation near the remaining Landvale bridge abutment immediately northeast of Lake Temescal is about 450-feet. Replacement of the Landvale overcrossing is needed to connect Lake Temescal with the Oakland and Berkeley neighborhoods north of SR 24. This freeway crossing is called for in the *Alameda Countywide Bicycle Masterplan* (2001).

By perpetuating the physical division of an established Oakland/Berkeley community along the hills separated by SR 24, the project poses a significant impact on Land Use and Planning. We contest the finding of “no impact” for this CEQA category. Failure to replace the Landvale overcrossing as part of the Caldecott Improvement Project further represents a significant impact that is “cumulatively considerable” and needs to be addressed under CEQA’s “mandatory findings of significance.”

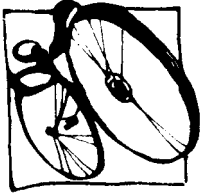
Again, the obstacle represented by SR 24 to non-motorized access was mentioned in writing in the Jan. 30, 2003 letter to Cristina Ferraz (Appendix, Item #2), and was inspected on October 8, 2003 and noted in a follow-up e-mail to Cristina Ferraz (See: Appendix, Item #3) that describes the remaining Landvale overcrossing abutment.

B. The existing Kay overcrossing approach from Broadway does not allow bicyclists to safely turn left over the freeway in front of uncontrolled traffic to the eastbound SR 24 onramp. Increased traffic at this intersection represents a significant traffic impact on non-motorized travel. This barrier requires traffic controls to permit bicycle and pedestrian crossings.

C. Keith Avenue intersection with Broadway is an approach to Lake Temescal and the Sports Field used by bicyclists who live in upper Rockridge and near Broadway. For this sizable neighborhood, it is not convenient to backtrack down the hill to the beginning of the Skyline Regional Bikeway starting at Rockridge BART. Delineation of a through bike lane is needed to reduce conflict with vehicles exiting SR 24.

D. Upper Broadway from Keith Avenue needs bicycle lanes and sidewalks to connect schools and recreational facilities.

E. Many signs for the Skyline Regional Bikeway are missing and need replacement at Rockridge BART, along Class III route on College, at Chabot, at Golden Gate underpass, on Broadway to provide direction to/from Tunnel Road, and on Tunnel Road to/from Skyline Boulevard. At a minimum, we recommend G-93 plates with directional arrows and liberal use of destination plates that include mileages to popular destinations (Rockridge BART, Lake Temescal, Sports Field, Tunnel Road, Skyline Boulevard).



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F. Bicyclists riding on Tunnel Road from Ashby/Claremont or Roble Rd, to the Skyline Regional Bikeway, must cross SR 13 ramps to turn left onto Caldecott Lane. Traffic controls and traffic calming are needed to safely permit bicycle travel through this intersection. This approach from Berkeley to the Skyline Regional Bikeway should also be signed as recommended above.

G. Provide continuous bike lanes on Tunnel Road from the Hiller traffic light to Claremont Avenue in the westbound (climbing) direction and provide either full bike lanes or generous shoulder area in the eastbound direction.

H. Continuous pedestrian sidewalks and signalized or grade-separated crossings are needed along Tunnel Road and Caldecott Lane from the Kay overcrossing on one side and the Parkwoods on the other side to existing sidewalks that extend toward Claremont Avenue. Incomplete sidewalks and absence of crosswalks represent hazards to students and faculty at nearby Kaiser and Bentley Schools.

I. Fish Ranch Road and Claremont Ave need to provide bicyclists with separation from traffic through either bike lanes, particularly in the climbing direction, or wide curb lanes and generous shoulders. Bikeway signage reduced speed limits on these routes are needed as mitigation to warn motorists seeking to bypass the tunnel to expect to encounter bicyclists.

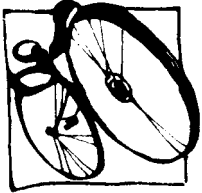
J. Bicycle access between Fish Ranch Road and the Orinda off ramp must be retained or replaced with a dedicated multi-use path that will provide uninterrupted access in perpetuity.

## MITIGATIONS NEEDED OUTSIDE OF IMMEDIATE PROJECT LOCATION

Bicycle riding along arterials is not too difficult where motorist speeds are not greater than 15 mph above typical bicycle speeds or where adequate room is provided for bicyclists to share the road. However, crossing busy arterials is really challenging for bicyclists and will only become worse as more traffic is encouraged by the project. Significant traffic impacts on bicycle and pedestrian movements are expected over a broad area on either side of the tunnel. We further note that the impacts of traffic from the Caldecott Improvement Project are either not adequately analyzed, are underestimated, or are erroneous (See below under “Inconsistencies...”).

A. Currently, in order to cross Alcatraz Avenue at Colby while following a signed bikeway in Oakland, the bicyclist must “jog” along busy Alcatraz Avenue without benefit of signalized traffic controls. Our members report great difficulty in finding a good place to cross Alcatraz Avenue. Any traffic increases from the project on Alcatraz will result in significant impacts that hamper safe bicycle and pedestrian crossings. Signals are needed to mitigate this hazard at the Alcatraz/Colby (Class III Bike Route) and Alcatraz/California (Class II Bike Lane) intersections.

B. Ashby Avenue presents similar difficulties for bicycle and pedestrian crossings as Alcatraz that will worsen to represent significant impacts with the projected traffic increases. As



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mitigations, we recommend installing a traffic signal at the intersection of Ashby and Hillegass (Class III Bike Boulevard) and analyze ways to limit cut-through vehicular traffic. Other needed Ashby Avenue projects include: traffic control at intersection with California (Class II Bike Lane); traffic control at Ninth St. (Class III Bike Boulevard); and convenient bike/ped access thru the Ashby/I-80 interchange.

C. Claremont Avenue presents similar difficulties for bicycle and pedestrian crossings as Alcatraz that will worsen to represent significant impacts with the projected traffic increases. At the Claremont intersection with Forest and Colby, the signal phase is too short for slower bicyclists to cross. As mitigations for the projected traffic increases, we recommend that a thorough study of traffic calming measures be conducted and funding set aside to implement resulting bicycle and pedestrian crossing improvements.

D. Bicycle and pedestrian access and safety across SR 24 ramps at Camino Pablo in Orinda is significantly impacted by existing traffic and will further degrade with increased vehicle trips. In addition, the project will impact alternative modes of traveling to Orinda BART. Mitigations to accommodate non-motorized travel to BART and conduct non-motorists across SR 24 are needed.

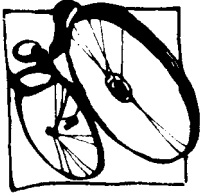
## NOISE

The project would result in significant noise exposure impacts that were not addressed in the DEIR. The project will permanently increase ambient noise levels for passengers waiting on BART platforms located in freeway medians on either side of the tunnel (MacArthur, Rockridge, Orinda, and Lafayette). Existing traffic noise levels on these platforms preclude normal conversation, telephone conversation, and contribute to anxiety. We also note the danger that emergency station information broadcasts on the loudspeakers cannot be understood in this environment.

By diminishing the comfortable use of BART, many potential transit passengers will elect to drive and thus contribute to the congestion the project seeks to relieve. As such, the noise impact would also potentially result in a significant impact on the use of the region's considerable investment in the BART transit system. This impact further represents a significant "cumulatively considerable" impact due to its incremental and unmitigated nature at multiple BART stations.

## INCONSISTENCIES IN THE DEIR ANALYSIS

The DEIR would have you believe that the addition of a Fourth Bore would result in smooth-flowing 50-65mph traffic on SR 24 would be at all times (even peak hours). Meanwhile, the DEIR predicts large delays on nearby routes that are roughly parallel to SR 24. For example, on Ashby Avenue a 6-minute delay to travel through the intersection with Claremont is estimated.



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Because SR 24 mostly parallels Ashby Ave (SR 13), these two predictions are contradictory. After all, why sit through a 6-minute delay at just one intersection, when you could drive all the way to Martin Luther King Jr. Way in half the time on SR 24 if we are to believe the estimates?

Note also that "Table 2.1.5-19 Year 2032 Alternative 2N Intersection LOS" says the Claremont/SR 24 onramp has LOS of "A". However, a few pages earlier, "Table 2.1.5-9 Alternative 2N Westbound p.m. Peak Period (2032)" says the exact opposite—giving the Claremont/SR 24 onramp an LOS ranging from C-F.

The above fundamental analytical flaws call into question the DEIR's other assessments that are based on traffic and congestion. For example, Air Quality impacts are closely tied to traffic and congestion projections. We therefore question the DEIR findings that the project would result in no impacts or less than significant impacts on the CEQA air pollution criteria. Overall, the geographic shift of congestion from a sparsely populated part of Contra Costa County to a densely populated part of Alameda County represents a significant impact on Air Quality that would result in substantial pollution concentrations.

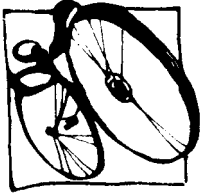
## **OTHER SIGNIFICANT IMPACTS NOT ADDRESSED IN THE DEIR**

The Caldecott Improvement Project will have potentially significant cumulatively considerable impacts in the following areas:

A. By making driving relatively more convenient than travel by BART in the reverse peak direction, we can expect a drop in BART ridership in the reverse peak direction as transit riders are diverting to the highway. More East Bay city residents could be expected to drive to suburban jobs. BART currently has tremendous excess capacity in the reverse peak direction that can fulfill this travel need well into the future. Reduced BART ridership represents lost fare-box revenues for the transit agency and lost opportunities for increasing the transit mode share in the Caldecott Corridor. This conflict with the existing BART transit program represents a significant impact to alternative transportation under the CEQA Transportation/Traffic, subsection (g).

B. The Caldecott Fourth Bore nexus to congestion on Bay Bridge was legally established with the passage of Regional Measure 2 to help fund the project. Ironically, the project will increase congestion on the Bay Bridge, perhaps leading to a proposal to restripe one of the new bridge "shoulders" as an additional travel lane. This probable future impact will further result in adverse impacts by adding to pollution upwind of sizable East Bay populations.

C. The project is in conflict with the MTC's policy to promote transit-oriented development. The traffic analysis shows that the project will result in increased traffic--not transit. Therefore, the project will promote auto-oriented land-use developments. Under the CEQA Land Use and Planning criteria, we contest that the finding of "no impact" for "b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project."



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We appreciate your consideration of our comments and look forward to a fair and responsive planning process.

Sincerely,

Robert Raburn  
Executive Director  
(510) 530-3444