



September 21, 2021

Board of Commissioners  
Transportation Authority of Marin (TAM)  
900 Fifth Avenue, Suite 100  
San Rafael, CA 94901

Dear TAM Commissioners:

At the September 23rd, 2021 meeting, the TAM Commissioners will review the findings from a recent study to evaluate the costs and benefits of replacing the current multi-use pathway on the top deck of the Richmond-San Rafael Bridge with a third automobile lane during commute hours. We—the Marin County Bicycle Coalition (MCBC), Bike East Bay, and Trails for Richmond Action Committee (TRAC)—feel that important costs and drawbacks of the project alternatives have been ignored.

While the proposal suggests short-term benefits to reducing westbound traffic congestion, we point out that this project will result in increased greenhouse gas emissions and vehicle miles travelled at a cost of \$70M-\$320M while diminishing access via sustainable transportation modes, such as biking and walking. Additionally, the project removes a multi-use path that closed a 4.5-mile gap in the San Francisco Bay Trail network and complies with the McAteer-Petris Act<sup>1</sup>.

Any decision involving such a crucial piece of our transportation infrastructure needs to thoroughly consider environmental impacts on neighboring communities, multimodal access, and greenhouse gas reduction.

The study falls short on several fronts:

- The only alternatives evaluated are ones that expand automotive capacity, with **no consideration given to alternative policy-based interventions** (beyond those already included in Richmond-San Rafael Forward), such as congestion tolling or additional transit service.
- Decades of transportation research shows that increasing auto capacity leads to increased greenhouse gas emissions. **No accounting of the costs of this project can be complete without estimates of additional emissions induced.** An Environmental Impact Report would need to be prepared, in compliance with California Public Resources Act Code §21000 et seq.

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<sup>1</sup> Under the McAteer-Petris Act, the Bay Conservation and Development Commission must assure that every project requiring Commission approval provides maximum feasible public access, consistent with the proposed project.

- While the 2025 model predicts time savings for commuters, those benefits are unlikely to hold up in the long term. Like nearly all capacity-increasing projects before it, the travel time benefits of this project would diminish over time as traffic volumes increase.
- While the peak-hour third westbound auto lane may be framed as a win-win, accommodating both automotive and active modes, five of the of the bridge's six lanes are already allocated for cars at all hours. Closing the pathway for an additional 30 hours per week will diminish pathway ridership and significantly affect its utility.

We fully acknowledge the challenges of transportation planning on the Richmond-San Rafael Bridge. Due to the jobs-housing imbalance between Marin and East Bay communities, there is significant travel demand over the bridge, and auto congestion no doubt diminishes the quality of life for people with already-lengthy commutes.

We ask that TAM find ways of addressing the real issue of peak-hour congestion in a manner that does not clearly increase GHG emissions while cutting off zero-emission active transportation. This could include, but is not limited to, studying the effect of congestion pricing tolls, improving transit connectivity and frequency, and finishing the much-needed bikeway connections on the Marin side, which remain usable by the only most confident riders and discouraging to anyone else.

The scientific community is united that our climate change goals can *only be met* by reducing overall driving. Any strategy that ignores driving reduction should be looked at with significant skepticism and adopted only as a last resort, rather than a first option. We at MCBC, Bike East Bay, and TRAC are confident that the stewards of our transportation system, through creativity and zeal, can address the problems we face without turning once again to the old, polluting, and ultimately discredited scheme of ever-widening highways.

Respectfully yours,



Tarrell Kullaway  
Executive Director  
Marin County Bicycle  
Coalition



Dave Campbell  
Advocacy Director  
Bike East Bay



Bruce Beyaert  
Chair  
Trails for Richmond Action  
Committee