



September 2, 2022

Via Email:

Chair Amy Worth and Commissioners
Bay Area Toll Authority
San Francisco, CA

Dear Chair Worth and Commissioners,

Bike East Bay, Marin County Bicycle Coalition, Rich City Rides and TRAC, the Trails for Richmond Action Committee, are sending this letter in response to the letters you received recently as part of the Bay Area Council's (BAC) advocacy program seeking to close the Richmond San Rafael Bridge Trail during weekday morning commute hours.

The BAC's June 1 Public Comment letter to you stated:

"An easy solution is to shift to all electronic tolling and remove the 1950's toll booths to clear the roadway, then shift the zipper-wall installed two-years ago as an experimental bike lane to the right in the morning, creating a third lane, plus some minor improvements at the bridge's touchdown on the west side. These improvements will cut 11-16 minutes of traffic a day, or an hour a week, or 50 hours a year, per driver."

This statement is misleading and false in many ways.

First, the Richmond San Rafael Bridge Trail is disparaged as merely a "bike lane". In fact, it is 4.5 miles of the San Francisco Bay Trail authorized by State legislation as a two-way, multi-use trail for both transportation and recreation. There have been over 250,000 bicycle and pedestrian trips over the bridge since the trail opened with great fanfare in November 2019. The number of bicycle trips between the East Bay and North Bay is similar to the Bay Bridge East Span, based upon the 45-day moving average. However, there are only about one-fifth the number of walkers and joggers on the RSR Bridge Trail, because there are only a handful of places to park a car at the bridge trailheads in Richmond and San Rafael.

Second, the BAC's claim of "minor improvements" that would be "easy" strains credulity. The Transportation Agency of Marin (TAM) evaluated converting the RSR Bridge Trail to a third motor vehicle lane and concluded that it would only shift the morning commute backup to the western end of bridge, in part because there are only two receiving lanes on the San Rafael landing of the Bridge. To reduce this backup would require an

expenditure of \$70 to \$310 million for roadway improvements in Marin, likely significantly more given the recent spike in inflation. Perhaps in response to initial criticism, the BAC letter tacks on a suggestion in its final paragraph that a second moveable barrier could be installed on the bottom eastbound deck of the bridge in order to mitigate the loss of access for people walking and bicycling on the scenic top deck and states that this would cost “an approximate additional \$10 million”. We cannot comment on the feasibility or cost of this proposal, since it has not been studied by anyone to the best of our knowledge.

Third, even with these investments, commute time would not be reduced by the BAC’s claimed “11-16 minutes of traffic a day”. The source of the claimed 16-minute time saving is a mystery. According to TAM’s RSR Bridge West Bound Third Lane Traffic Study, an 11-minute reduction (from 43.0 to 32.0 minutes) would occur only during the peak traffic hour of 6:45 - 7:45 AM and only for the 79% of motorists heading northbound on US 101 after an investment of \$70 - 90 million for roadway improvements in Marin. The average weekday travel time saving for these northbound drivers during the commute period of 5 - 11 AM would be only 1.6 minutes (from 24.3 to 22.7 minutes). However, travel time would be increased by 2.9 minutes for the 21% of drivers going to US 101 southbound. This would represent a net overall travel time saving of only 40 seconds for all motorists combined and lead to a 4.9-mile traffic backup at the west end of the bridge. An investment of \$310 million would be required to achieve a significant reduction in commute time and eliminate this traffic backup.

The Bay Area Council deserves the opportunity to advocate for measures that would alleviate freeway congestion. However, they should do it in a way that does not misrepresent clear facts from MTC, Caltrans, and TAM or conflict with Plan Bay Area 2050.

The BAC letter greatly understates bicycle trips, ignores pedestrians on this multi-use trail and overstates the number of motor vehicle drivers affected by traffic delays. Weekday commute and daily average bicycle trips are several times greater than claimed by the BAC. The 82,610 cars and trucks cited amongst the “facts” represents the total of both westbound and eastbound traffic all day long on the both decks of the bridge, not the weekday westbound morning commute.

The BAC does not consider the cost effectiveness of their proposal. The \$70 - 90 million cost for a 40 second reduction in average commute time would represent an expenditure of \$280 to \$360 per hour of weekday morning commute time saved over the course of five years, assuming that their claim of 18,000 morning commuters is correct. This includes the cost of operating moveable barriers on the top deck and capital expenditures, but NOT operating and maintenance costs for the new and widened roadway measures on the bridge and in Marin nor the cost of providing a movable barrier on the lower deck during the weekday morning commute..

This modest 40-second commute time saving will erode as the five years pass. As Plan Bay Area 2050 states:

“... road projects may help reduce congestion temporarily, though they will likely increase vehicle miles traveled in the long term, with any congestion relief benefits disappearing by the year 2050.”

The academic consensus on roadway expansion is that, after several years, highways fill up to their pre-expansion level (especially on already-congested corridors), reducing any commute time benefits and any emissions improvements that the reduction in congestion might have brought about. Rather, you end up with slightly higher throughput at the expense of increased VMT and greenhouse gas (GHG) emissions (plus a significant capital expenditure and higher ongoing maintenance costs). A four-mile freeway expansion across the RSR Bridge would lead to a 23 - 34 million increase in annual vehicle miles traveled and increase motor vehicle CO2 emissions by 100,000 - 200,000 metric tons/year, according to the [Induced VMT Calculator](#) developed by RMI (formerly the Rocky Mountain Institute). Increasing VMT and GHG emissions is at odds with established state and regional policy.

In Summary, the BAC proposal would:

- require spending at least \$70 - 90 million for roadway improvements in Marin;
- achieve a short-term, 40-second average reduction in travel time during the morning commute period;
- cost \$280 to \$360 per hour of weekday morning commute time saved over the course of five years;
- increase motor vehicle CO2 emissions by 100,000 to 200,000 metric tons/year and also increase emissions of exhaust pollutants and
- do nothing to address equity, although we are glad to have BAC's agreement that equitable transportation improvements are important.

The serious and frustrating traffic jams occur when motorists run out of fuel or a vehicle breakdown or collision occurs in the toll plaza merge area or on the bridge. Eliminating the toll plaza structure and replacing the 3>7>2 lane merge with a simple 3>2 merge should reduce collision incidents.

The authors of this letter support the following:

- full implementation of MTC's [Richmond-San Rafael Forward program](#), which includes elimination of the toll plaza structure;
- measures to Improve Caltrans response time in identifying and clearing inoperable vehicles from the bridge;

- more frequent, convenient and affordable bus service between the East Bay & Marin and
- congestion toll pricing as recommended by Plan Bay Area 2050 stating:

“One of the most impactful long-term solutions to congestion is road pricing. Road tolls are a way to reflect the true cost of driving and motivate drivers to consider more sustainable options.”,

We believe that these measures would alleviate the westbound morning traffic problems in a cost effective manner without increasing GHG emissions or limiting the mobility of people traveling on foot and by bicycle..

Sincerely,



Bruce Beyaert, TRAC Chair



Dave Campbell, Bike East Bay Advocacy Director



Najari Smith, Rich City Rides Founding Executive Director



Warren Wells, Marin County Bicycle Coalition Policy Director