

SECTION 3.0

GENERAL RESPONSE TO COMMENTS

3.12 TRANSPORTATION AND CIRCULATION

3.12.1 FERRY SERVICE

Summary of Comments: Several comments were received related to the proposed ferry service on-site. Some commenters stated their belief that the ferry service is not “guaranteed” to operate and that there is no funding for ferry service to/from the project site. Other comments received questioned the analysis of potential impacts that the Proposed Project may have on eelgrass beds and the proposed Hercules and Richmond ferry services. Finally, some commenters stated that the number of patrons that would use the ferry service is overestimated in the analysis.

Response: Regular ferry service to the project site is a central component of the Proposed Project. As such, the analysis presented in the Draft EIS/EIR considers the reasonably foreseeable impacts and benefits associated with implementation of the various alternatives under consideration. Just as the Economic Impact study presented in **Appendix T** of the Draft EIS/EIR relies on proposed project components (e.g., gaming, retail, concerts, food service, etc.) to estimate total economic output, the transportation and air quality analyses are based on the understanding that ferry service would be the anchor of an intermodal transit hub that is integral to the project. Collaboration with regional ferry service providers has identified a large amount of capacity within the existing fleet on ferry runs in the reverse commute direction. During the morning hours ferries carry commuters from Vallejo and Tiburon to San Francisco; the return (or reverse commute) leg of the run is mostly devoid of passengers. By ferrying patrons to the project site the operators will develop a new revenue stream while incurring negligible increased operating expenses. The ferry service would be funded through fares subsidized by the Proposed Project and would not require any public financial assistance. The available capacity, existing and projected operating deficits of the ferry providers, and explicit interest in serving the project site (**Appendix S**) have established the feasibility of the ferry service. The Draft EIS/EIR would be referenced in association with any future environmental review that may be required before expansion of ferry service to the project site. This environmental review, should it be required, would be expected to take place during the project construction period.

With respect to the proposed Hercules and Richmond ferries, it is not expected that the Point Molate ferry service would compete for the same riders. As noted above and in the letter provided by Blue and Gold Fleet (**Appendix S**), the project site would be served primarily by ferries originating in San Francisco,

which would not serve the needs of the vast majority of commuters. Considering that it is the stated goal of virtually all surrounding municipalities to encourage the expansion of alternative modes of transportation in order to reduce congestion on regional streets and highways and reduce emissions, it stands to reason that expansion of regional ferry service, particularly when there would be no increased competition for scarce public funds, would have a beneficial impact. Additional discussion has been added to Final EIR **Section 1.3** to clarify the funding source.

Section 2.14 of the Transportation Impact Analysis (TIA) states there are 27 round trips throughout the day from Vallejo to San Francisco. It is conservatively estimated that ferries on the route to Point Molate are at half capacity (refer to **Appendix S**, Blue and Gold Fleet letter). Using a 400 passenger ferry, there would be approximately 200 seats per trip available for patrons to the project site, or 27 trips multiplied by 200 passengers (5,400 passenger trips daily). While the TIA and information provided by the Blue and Gold Fleet service provider indicate that 5,000+ daily passenger trips to Point Molate are within reason, a more conservative estimate was used in the Draft EIS/EIR that assumes 15 percent of average daily trips to the site would be made by ferry.

Refer to **General Response 3.9.1** for a discussion of potential environmental impacts associated with the proposed ferry service.

3.12.2 TRIP GENERATION RATES

DOWLING STUDY

Summary of Comments: Some commenters cited the traffic study titled *Phased Transportation Study for Proposed Urban Casinos in West Contra Costa County* (Dowling, 2007) and noted that the study reached different conclusions than the studies cited in the Draft EIS/EIR.

Response: The Dowling (2007) study was reviewed by the engineers that prepared the transportation analyses presented in the Draft EIS/EIR and Final EIR. A reference to the study has been added to **Section 4.8** of the Final EIR. The Dowling (2007) study is a report detailing predictions regarding transportation impacts in the event that three tribal casinos operated in the greater Richmond area. As discussed below, careful review of the Dowling (2007) study indicates that application of its findings to the present analysis would be inappropriate and misleading.

The Dowling (2007) study used very different assumptions as it relates to: the mode of transportation used by patrons and employees to reach the project site; how many daily vehicle trips would be generated by the Proposed Project; where the vehicle trips originate from; and what roadways vehicles accessing the project site would use. Furthermore, it appears that the Dowling (2007) study arrived at erroneous conclusions due to methodological flaws as discussed below.

The Dowling (2007) study is predicated on a number of inaccurate assumptions. First, the study does not acknowledge that the Proposed Project is different from other tribal casinos in California which were used

as a basis for comparison. As described in **Section 2.0** of the Draft EIS/EIR, the Proposed Project would function as a destination resort, offering amenities that are not found anywhere else in the California resort and gaming market. Unlike several of the existing casinos that cater to a local market, roughly 95 percent of the Proposed Project's patronage would originate outside of the Richmond area (**Appendix T**). The Dowling (2007) study also mentions taking driveway counts at an existing tribal casino in west Contra Costa County. It is unclear where, if at all, this information is used in the analysis. Nevertheless, the other casino is not an appropriate comparable destination since the facility cited is more properly considered a "stand alone" urban casino without retail, entertainment, parkland, lodging, and other resort amenities. The Dowling (2007) study's assumption to the contrary skews the resulting trip generation and distribution.

Secondly, the Dowling (2007) study does not consider the benefits of serving the project site with alternative modes of transportation. The direct ferry link to the project site is not included in the Dowling (2007) analysis and a vehicle trip reduction is not provided for this amenity. As discussed above, a conservative estimate of a 15 percent reduction was used in the analysis which has a significant effect on the estimated daily vehicle trips to the project site. In addition, the Dowling (2007) study does not provide a reduction for the planned transit and shuttle service to the project site, which is conservatively estimated to reduce daily vehicle trips to the project site by 15 percent. Furthermore, it appears that the Dowling (2007) study did not apply any trip reductions for diverted link trips. The combined ferry and transit services, aggressive Transportation Demand Management (TDM) measures outlined in **Section 5.0** of the Final EIR (**Mitigation Measure 3-20**), as well as diverted link trips would result in a significant reduction in vehicle trips compared to that which was estimated in the Dowling (2007) study.

A third methodological flaw in the Dowling (2007) study is that it relies on a casino market model developed by ECONorthwest to determine the level of trip generation for each of the three casinos it assumed to be in operation. The model takes into account drive times, income, age and seasonal population patterns. The ECONorthwest model, which is based on studies conducted in Oregon, is in stark contrast to the targeted studies completed for Point Molate which use a combination of empirical data and existing environmental documents (primarily from California) to establish reasonable trip generations rates. The non-casino trip generation rates used in the Final EIR are taken directly from the Institute of Transportation Engineers (ITE) trip generation manual.

Another significant methodological issue is that the Dowling (2007) study does not acknowledge the large internal trip reduction that would result from casino patrons utilizing the range of amenities within the project site such as retail, restaurants, and overnight lodging. The analysis presented in the Draft EIS/EIR projects a 50 percent internal capture rate between retail and casino uses. In contrast, the Dowling (2007) study projects a 20 percent internal capture rate. Such an assumption would hold true only if the amenities proposed for the project site were consistent with a typical mixed use development primarily serving the needs of local residents, such as typical "big box" stores (i.e., Home Depot, Wal-

Mart, etc.). Moreover, the transportation studies used in the Draft EIS/EIR project a 70 percent internal capture rate between hotel and casino uses, which is not accounted for in Dowling (2007) study.

For the long-term analysis, the Dowling (2007) study assumes that project generated automobile trips grow significantly over time. This approach is not substantiated by any cited documentation. A more widely accepted approach assumes that while the background traffic (non-project) grows over time, project-related trips would peak early-on, level off, and remain static. If long-term transportation infrastructure improvements are considered, project trips may even drop as a result of expanded and improved public transportation over time.

As a result of the issues cited above, it appears that the Dowling (2007) study significantly over-estimates project-related automobile trips to the project site, and therefore the Final EIR analysis has not been modified in this area.

STUDIES USED TO DETERMINE TRIP GENERATION

Summary of Comments: Several commenters inquired if the studies used to determine the trip generation rate used in the Draft EIS/EIR are independent of one another, are approved projects or are otherwise comparable to the Proposed Project.

Response: The studies used to determine the trip generation rate for the Proposed Project were in fact independent of one another. Each of the six studies cited in the TIA (**Appendix S**) represents a unique and independent look at trip generation, distribution, and reduction for tribal casinos.

INTERSECTION/ROADWAY SCOPE OF ANALYSIS

Summary of Comments: Several commenters inquired if all intersections and roadways, which had the potential to add 50 project-related trips were analyzed in the TIA, STIA, and within the Draft EIS/EIR.

Response: The TIA and STIA analyzed all intersections and roadways within the study area that had the potential to receive 50 or more trips as a result of the Proposed Project.

Prior to beginning the analysis trips were traced from each geographic region based on facility class, traffic volumes, congestion and travel times to determine the most likely travel paths for each “origin-destination” pair. Based on the trip distribution percentages, project trips were then assigned to the most applicable roadway(s). Any intersection found to carry 50 or more peak hour trips (as per county guidelines) was included as part of the projects overall assessment. This criterion does not apply to freeway segments. There is no specific criterion that determines which segments should be included in the analysis. Based on engineering judgment and comments received during the scoping phase of the analysis (**Appendix B**), the study area (intersections and freeway segments) was identified for thorough analysis.

However, in response to comments received on the Draft EIS/EIR, State Route 4 (SR-4) and four intersections in the City of Larkspur along Sir Francis Drake Boulevard were analyzed and are included in the Final EIR (**Appendix HH**). The analysis of SR-4 was incorporated into the Final EIR in **Sections 3.8, 4.8, and 4.15**. This facility was analyzed following the agreement between Contra Costa County and the Tribe, which provides for a goal of sourcing 70 percent of initial hires from within the County. Based on this consideration, it was deemed reasonable to include this artery despite its significant distance from the project site. It was determined, using *Traffix* traffic modeling software, that project-related traffic would not degrade the level of service (LOS) on SR-4 below LOS D, nor would project-related traffic increase by two percent on any roadway segment that is currently operating below LOS D (refer to **Appendix HH** of the Final EIR).

The following intersections were studied in the City of Larkspur:

- U.S. 101 Southbound Off-Ramp at Sir Francis Drake Boulevard
- U.S. 101 Northbound On- and Off-Ramp at Sir Francis Drake Boulevard
- Larkspur Landing Circle (Ferry Terminal) at Sir Francis Drake Boulevard
- Larkspur Landing Circle (East) at Sir Francis Drake Boulevard

The existing and cumulative traffic volumes for the above referenced intersection analysis were determined from the 2009 San Quentin State Prison Central Health Services Center Project Draft EIR, and the SMART Train Project EIR. It was determined that the intersections of U.S. 101 Southbound Off-Ramps at Sir Francis Drake Boulevard and Larkspur Landing Circle (East) at Sir Francis Drake Boulevard would operate at an acceptable LOS D or better in the background and under all alternative conditions. It was also determined that the intersections of U.S. 101 Northbound On- and Off-Ramps at Sir Francis Drake Boulevard and Larkspur Landing Circle (Ferry Terminal) at Sir Francis Drake Boulevard would operate at a LOS E and F in the background and under all alternative conditions. Therefore, **Mitigation Measures 7-24 and 7-25** would be implemented to reduce vehicle trips to and from the project site. Intersection analysis is provided in **Sections 4.8, 4.15 and 5.7** of the Final EIR and in **Appendix GG** (Abrams Associates Traffic Engineering Memorandum). With implementation of **Mitigation Measures 7-24 and 7-25** impacts to U.S. 101 Northbound On- and Off-Ramps at Sir Francis Drake Boulevard and Larkspur Landing Circle (Ferry Terminal) at Sir Francis Drake Boulevard would be *less-than-significant*.

CONFERENCE CENTER

Summary of Comments: Several commenters pointed out that the conference center proposed under Alternatives A – D was not assigned project related trips.

Response: Trips for the Conference Center were appropriately accounted for in the hotel trip generation rate. The trip generation rate for the hotel was derived from the ITE manual (ITE land use 310). This land use is described by the ITE manual as following: “Hotels are places of lodging that provide sleeping

accommodations and supporting facilities such as restaurants, cocktails lounges, meeting and banquet rooms or *convention facilities* (emphasis added).” The hotel land use trip generation rate includes ancillary facilities such as a conference center and thus captures the trips that would be generated by this facility.

The concern was raised by one commenter that, even with the potential for internal capture between the hotel and convention facility, that the said convention facility would likely generate trips from local residents. While it is true that the convention facility may generate trips from local residents, the conclusion that this would not be covered by the hotel trip generation land use is not as evident. It is asserted that the hotels, and their corollary convention facility and meeting spaces, studied for the derivation of the ITE Hotel trip generation rate would also have a similar tendency to attract local residents, and therefore, the trip generation rate used for the proposed hotels would also account for this concern.

3.12.3 TRIP DISTRIBUTION

Summary of Comments: Several commenters stated that the trip distribution was not well defined and requested that a figure be included in the TIA which more clearly shows the trip distribution used in the traffic analysis.

Response: **Appendix GG** of the Final EIR contains a revised trip distribution figure, which depicts the trip distribution found in Table 5-3 of the TIA (**Appendix S**).

3.12.4 TRIP REDUCTIONS

TRAFFIC DEMAND MANAGEMENT

Summary of Comments: Several commenters requested clarification of how a 15 percent trip reduction from Transportation Demand Management (TDM) would be achieved.

Response: A 15 percent reduction in automobile traffic was applied to the trip generation from the casino portion of the Proposed Project. Under Alternative A, this equates to a reduction of approximately 200 trips during the critical PM peak hour. The TDM reduction is intended to account for patrons and employees who would utilize transit and shuttle buses to access the project site. This reduction would apply to patrons and employees who would utilize the various methods of transit to travel to Richmond and then transfer to a private shuttle bus or an extended AC Transit line. The TDM reduction also accounts for charter bus trips from outlying areas and employees who park in offsite parking lots and use the Point Molate shuttle. The following is a list of factors that are pertinent to the effectiveness of the Point Molate TDM program:

Effectiveness of Employee TDM Measures - The project proposes to provide economic incentives for employees to use transit, as described in **Section 5.2.3** of the Final EIR. This is in addition to the other

major provisions for transit including subsidizing public buses, providing shuttle buses to and from off-site employee parking areas and BART, as well as providing charter bus service for outlying areas.

The ITE Trip Generation Handbook contains a detailed summary of surveys and studies on the effects of TDM and transit on trip generation. This is provided for overall project traffic and particularly for traffic from employees. Based on detailed surveys of various TDM programs, the ITE Trip Generation Handbook has provided a summary of the benefits to transportation (both perceived and actual).

For employees, the Trip Generation Handbook provides extensive data to support the effectiveness of various TDM measures. It is important to note that the project is proposing all of the key components that are typically part of a successful TDM program (according to ITE) including support measures, economic incentives, and transportation services; these TDM programs are outlined in **Section 5.2.3** of the Final EIR. Support measures to the TDM programs include employee transportation coordinators, promotional activities, rideshare matching, on-site dependent care, and alternative work schedules. Economic incentives are any steps taken by an employer to provide a monetary incentive to use an alternate travel mode. Transportation services include employer based efforts such as van-pool programs, shuttle bus service to off-site transit stations, guaranteed ride home programs, and the provision of on-site showers and changing facilities all of which are provided by mitigation measures in **Section 5.2.3** of the Final EIR.

According to ITE the combination of economic incentives with transportation services (such as those proposed by the project) produced an average reduction in commuter vehicles of 24 percent at the survey sites. At a typical employment location that operates during normal business hours, there can be up to 85 percent of the employees arriving and/or departing during the peak hour. However, at a casino resort with 24-hour operations, there are normally three shifts per day so that the maximum number arriving during the peak hours would be no more than about a third of the employees. In addition, since most employees work a five day work week it was assumed that two sevenths of the employees would not be working on any given day. Also, the percent arriving would typically be reduced by another 10 percent to account for absences due to vacations, illness, etc.

The resort is estimated to have roughly 4,000 employees. Thus, assuming a vehicle occupancy rate for employees of 1.5 persons per vehicle (due to ridesharing) the above mentioned reductions equate to an estimated potential for 635 vehicle trips (due to employees) during the PM peak hour. This is based on a scenario where no transit service or TDM programs are provided. Based on the ITE surveys the 24 percent reduction for the TDM measures should readily equate to an overall reduction to the casino traffic of about 150 PM peak hour trips. Information gathered at other California tribal casinos indicates that the average occupancy of vehicles with resort patrons is about 2.4 persons per vehicle.

Therefore, based on this analysis the Proposed Project's shuttle services and public bus transit subsidies would only need to serve about 120 resort patrons during the peak hour to meet the 15 percent TDM

reduction assumed in the project trip generation. This would equate to about 7 percent of the resort patrons estimated to arrive during the PM peak hour. This was determined to be a reasonable assumption given the direct connection to BART and the effects of other transportation services such as charter buses.

Overall Effectiveness of the TDM Measures – The ITE Trip Generation Handbook also contains a detailed summary of surveys and studies on the overall effects of TDM and transit on the total traffic generation of a project. Since the Proposed Project would construct both a bus transit center and a ferry terminal, the ITE survey results indicate these features should result in an overall reduction in vehicle trip generation of 20 percent.

Applying a 20 percent TDM reduction to the entire project would be reasonable because employees from the hotels and the retail areas would also be provided incentives to use transit and they would certainly be expected to utilize the on-site transit options available to them. This reduction would therefore apply to the entire project which results in an estimated reduction of 270 peak hour trips. This is greater than the 200 trip reduction used in the analysis and validates the assumptions used. This difference is largely due to the fact that the TDM reductions were only applied to the casino portion of the project.

INTERNAL CAPTURE

Summary of Comments: Several commenters noted that the 50 and 70 percent internal capture reduction in retail and hotel trips is too aggressive and not supported.

Response: Point Molate is an all inclusive “destination resort.” As such the retail uses are primarily being provided as amenities for the resort and gaming patrons. The retail uses are envisioned to be small high-end boutique retail facilities. The location of the project site is somewhat isolated and can only be accessed by one roadway or via ferry. Vehicular access to the retail facilities would require potential patrons to mix with casino, hotel and event traffic to access the site. Moreover, the central parking design would discourage short shopping trips where patrons would not take advantage of the other amenities offered. It is unlikely that this scenario would garner greater than a 50 percent share of non-casino/resort destined customers. The TIA specifically states, “Similarly, it is expected that a majority of the retail patron’s primary reason for visiting the project would be to utilize the gaming and recreational components of the project”. It was determined that a 50 percent reduction to the retail trip generation would accurately reflect this interaction between the gaming and retail facilities.”

In addition to these factors a review of trip reduction rates for mixed use developments among cities in San Mateo, Alameda, and Santa Clara counties was performed. The 50 percent reduction for retail use was a blend of adopted rates utilized within the aforementioned jurisdictions, the interaction of land uses within the Point Molate development and isolated nature of the proposed land use. A 50 percent reduction in retail use due to internal capture is appropriate and conservative.

In reviewing traffic studies for similar tribal casino/hotel complexes it was found that a greater than 70 percent internal capture rate between the casino and hotel components was often used in the transportation studies. The high internal capture rate is a result of the general isolation of most tribal casinos and the fact that the vast majority of patrons that use the hotel and retail establishments also use the casino. As an inclusive “destination resort,” it is anticipated that a much higher internal capture rate would be achieved than stand alone rural gaming properties with fewer amenities. The basis for this reduction is the *Mississippi Gulf Coast Transportation Management Plan for Waterfront Development* (Gulf Regional Planning Commission, 1993), which determined that there is a 100 percent internal capture rate when there is a casino/hotel complex. While the two casinos used in the Gulf study had different room to casino square feet ratios, they had the same reduction due to internal capture. Finally, the 70 percent internal capture rate is consistent with the rate in the Gaming Market Assessment, which estimates a 70.6 percent internal capture rate (**Appendix T**). A 70 percent internal capture rate is therefore appropriate.

3.12.5 GEOGRAPHIC SCOPE OF ANALYSIS

Summary of Comments: Some commenters stated that the geographic scope of the analysis presented in the Draft EIS/EIR was not extensive enough.

Response: The geographic scope of analysis presented in the Final EIR includes intersections and roadway segments in the City of Richmond, City of San Pablo, Contra Costa County, Marin County, City of San Rafael, Pinole, and the City of Larkspur (refer to **Appendix HH** of the Final EIR regarding transportation analysis along Sir Francis Drake Boulevard). All intersections were analyzed that had the potential to receive 50 or more new trips as a result of implementation of the Proposed Project.

During the scoping process completed for the Proposed Project, public agencies, businesses, and concerned citizens were given an opportunity to comment on the range of environmental issues to be addressed in the analysis, the types of project effects to be considered, the geographic and temporal scope of analysis, and the range of alternatives to be included in the Draft EIS/EIR (**Appendix B**). During the scoping process more than 140 comment letters were received, many of which were from governmental agencies charged with regional transportation planning. Entities that provided written comments during scoping include the California Department of Transportation (Caltrans), California Highway Patrol, County of Marin, Contra Costa County (2), West Contra Costa Transportation Advisory Committee (WCCTAC), Marin County Board of Supervisors, El Cerrito Community Development Department, and the Town of Fairfax. Numerous commenters recommended specific facilities, roadways, and intersections to be included in the analysis. The scope of analysis for the transportation study was further refined through consultation with the lead agencies, including transportation planners from the City of Richmond, as well as cooperating agencies. The scope was somewhat revised and expanded following review of the Administrative Draft EIS/EIR by the lead and cooperating agencies. The ultimate scope of analysis for the transportation analysis presented in Final EIR was slightly expanded following release of

the Draft EIS/EIR on the basis of new information provided by commenters that demonstrated that other facilities required analysis for a comprehensive review.

In a couple of instances, comments received on the Draft EIS/EIR questioned why a segment of I-80 south of the I-580 split was not included in the analysis. While a significant portion of I-80 is included in the transportation studies, the segment south of the I-580 split in Alameda County was excluded from full analysis in the TIA and Final EIR because it was not identified by any agency or municipality during the scoping period or during scoping consultation with WCCTAC, Caltrans, and the City of Richmond as a segment warranting detailed analysis. This segment of I-80, which is located a significant distance from the project site (approximately 8 miles by the most direct route), is outside of the region that may reasonably be expected to be adversely impacted by traffic generated by the Proposed Project.

3.12.6 BICYCLES ON THE RICHMOND – SAN RAFAEL BRIDGE

Summary of Comments: Several comments were received that noted bicycles would not be allowed on the Richmond – San Rafael Bridge if the decking were re-stripped to allow for three lanes of travel in each direction.

Response: There is currently no bicycle lane on the Richmond-San Rafael Bridge and bicycles are not allowed on the Bridge. At the time that the Draft EIS/EIR was distributed for public comment, there was no approved plan to provide bicycle lanes on the Bridge, nor is there currently such a plan. As such, a bicycle lane on the Bridge was not considered part of the existing or baseline conditions. Therefore, if the Bridge decking were re-stripped to allow for three lanes of travel in each direction, bicycle facilities would not be impacted.

3.12.7 BART SHUTTLE ACCOMMODATION

Summary of Comments: Several commenters commented on the shuttle bus to Richmond and El Cerrito BART stations and the ability of these stations to handle the increase in loading and unloading of passengers.

Response: The El Cerrito del Norte BART station will not be served by project-sponsored shuttles. The focus of project shuttles will be at the multi-modal Richmond BART station. The Richmond BART station provides easy access to BART trains, Amtrak, and AC Transit. The commenter has provided a reasonable concern and therefore, additional study has been included in the Final EIR regarding bus loading/unloading at the Richmond BART station. The additional analysis is discussed in **Section 4.8** of the Final EIR and concludes that the addition of project shuttles at the Richmond BART Station would have a less than significant impact.

3.12.8 TRANSPORTATION MITIGATION

Summary of Comments: Some commenters questioned where the matching funds (to the Tribe's fair share contributions) to complete transportation mitigation measures would come from.

Response: Funds in addition to the Tribe's fair share contribution would be required to complete some of the transportation improvements described in mitigation measures presented in **Section 5.0** of the Final EIR. For improvements located within the City of Richmond for which the Tribe is not paying 100 percent, additional funds would be provided by the City. The IGA between Contra Costa County and the Tribe provides a framework and funding mechanism for improvements required within the County's jurisdiction (**Appendix BB**). Other required improvements that are identified in Region Transportation Plans (RTP) have established funding sources to which the Tribe's fair share would supplement (refer to **Section 4.8** or **4.15** of the Final EIR). Mitigation measures for which there is currently no plan to fund, or that fall within the responsibility and jurisdiction of a public agency other than the City of Richmond for which there is no existing plan to implement or fund are considered infeasible and associated significant impacts are disclosed (**Section 4.15**). It is anticipated that other regional development projects would also make fair share contributions to several of the mitigation measures identified.

3.12.9 WESTERN DRIVE

Summary of Comments: Several San Pablo Yacht Harbor residents commented that the increased traffic along Western Drive would negatively impact their commute time.

Response: **Section 2.0** of the Draft EIS/EIR proposes that the Project widen Western Drive from two lanes to five lanes, which would reduce traffic impacts under all alternatives to a less than significant level (refer to **Sections 4.8** and **4.15** of the Final EIR). It should be noted that peak hour casino traffic does not coincide with commuter traffic; generally peak hour casino traffic occurs between 9:30 am to 10:30 am and 6:30 pm to 7:30 pm. Nonetheless, **Mitigation Measure 7-2** of the Final EIR has been supplemented to require that "Western Drive shall remain passable to through traffic 24 hours a day, seven days a week to provide access to and from other land uses located on the San Pablo Peninsula. In the event that portions of Western Drive must be closed temporarily, reasonable detours shall be provided such that access to the San Pablo Yacht Harbor and other adjacent land uses is not restricted."

WESTERN DRIVE/EASTBOUND I-580 ON-RAMP

Summary of Comments: Some commenters contend that the Western Drive/eastbound I-580 on-ramp poses safety hazard due to a poor level of service at the Marine Street off-ramp and high speeds of vehicles coming off the Richmond-San Rafael Bridge.

Response: Vehicles using the Western Drive eastbound ramp on to I-580 are prohibited from crossing the solid white line that begins at the on-ramp and continues beyond the Marine Street exit. Once eastbound traffic that has entered the roadway from the Western Drive on-ramp has passed the Marine

Street off-ramp, vehicles may merge into the right hand lanes and use the Canal Street off-ramp, which is 0.68 miles east of the Marine Street off-ramp. As I-580 is currently striped (the solid white line from Western Drive on-ramp to beyond the Marine Street off-ramp) there would be no immediate interaction between Western Drive on-ramp traffic and through traffic coming off the Richmond-San Rafael Bridge. It should also be noted that I-580 between the Marine Street and Canal Street off-ramps is a straight roadway; thus, Western Drive traffic can safely merge onto eastbound I-580.

DRAFT

SECTION 4.0

RESPONSE TO INDIVIDUAL COMMENTS

COMMENT A13 (CITY OF PINOLE)

RESPONSE A13-1

SURFACE TRANSPORTATION

Please refer to **General Response 3.12.2**, *Intersection/Roadway Scope of Analysis*, regarding the scope of analysis presented in the Draft EIS/EIR.

Please refer to **General Response to Comment 3.12.4** regarding the trip reductions used in the transportation analysis.

Please refer to **General Response to Comment 3.14.1** regarding emergency ingress and egress at the project site.

FERRY SERVICE

Please refer to **General Response 3.12.1**, which covers a range of issues associated with the proposed ferry service.

As clearly stated in the Draft EIS/EIR, and expanded in the general response cited above, the proposed ferry service would be funded by fares and supplemented by the Proposed Project, and would *not* be operated by the Water Emergency Transportation Authority (WETA). As discussed in detail in **General Response 3.12.1**, the proposed ferry service is not expected to draw commuters to the project site to catch the ferry since it will generally be operating in the reverse commute direction. While a negligible number of commuters may choose to use the on-site ferry service (primarily those who routinely travel from Richmond to Vallejo or Tiburon), they would have access to plentiful on-site parking provided in two garages (7,500 spaces total). The trips generated by the rare ferry commuter would be off-set by an equal number of vehicle trips that would be eliminated from surrounding roadways. Furthermore, all potential impacts associated with modifications to the pier and operation of the ferry are addressed in the Final EIR. Please refer to **General Response 3.9.1** for a discussion of potential biological impacts associated with the reuse of the on-site pier.

COMMENT A16 (WCCTAC)

RESPONSE A16-1

MEASURE J GROWTH MANAGEMENT PLAN

From the Proposed Project's inception, the lead agencies and representatives have actively engaged in cooperative, multi-jurisdictional planning efforts. Measure J requires that new projects provide a Traffic Study in consultation with affected localities. Two traffic studies have been produced in consultation with the City of Richmond, Contra Costa County, the West Contra Costa Transportation Authority (WCCTAC) and Caltrans. The traffic studies and associated Draft EIS/EIR and Final EIR comply with four key objectives of Measure J's Growth Management Plan:

1. *Assure that new commercial growth pays for the facilities required to meet the demands resulting from that growth:* this is clearly accomplished by the transportation improvements proposed as part of the Project as well as mitigation measures that require fair share contributions (in some cases paying 100 percent of costs associated with improvements).
2. *Require cooperative transportation and land use planning among local jurisdictions:* a host of agencies, service providers, and other stakeholders (including WCCTAC) have been consulted at the various stages of the Project's design and analysis. Such entities include: City of Richmond, Point Richmond Neighborhood Council, Contra Costa County, AC Transit, BART, Blue and Gold Fleet, as well as the surrounding local jurisdictions represented by WCCTAC. In fact, the City and its representatives have met with WCCTAC Board of Directors on several occasions.
3. *Support land use patterns within Contra Costa County that make more efficient use of the transportation system, consistent with the General Plans of local jurisdictions:* the Proposed Project includes a number of progressive design elements and mitigation measures designed to promote alternative modes of transportation such as the use of excess capacity on BART in western Contra Costa County, enhancement of the safety and usability of the Richmond BART Station, promotion of ridesharing, extension of bus routes in the vicinity of the project site, improvements to bus stops in the vicinity of the project site, provision of free shuttles, etc. Please refer to **Sections 2.2.2** of the Final EIR for an exhaustive accounting of the progressive design components and **Section 5.0** for a list of mitigation intended to reduce vehicle miles traveled and to make efficient use of the existing transportation system
4. *Support infill and redevelopment in existing urban and Brownfield areas:* as a former Naval fuel depot serving an industrial purpose, the Project proposes to redevelop a highly degraded Brownfield situated in an urban setting.

ROUTES OF REGIONAL SIGNIFICANCE

All routes of regional significance outlined in the comment are included in the Draft EIS/EIR, either as study intersections and/or roadway segments, with the exception of I-80 south of the I-580/I-80 split, SR-4, Central Avenue, and El Portal Drive. Based on the trip distribution patterns developed for the

Proposed Project by the traffic engineers, as well as consultation undertaken during scoping for the analysis presented in the Draft EIS/EIR, it was determined that the Proposed Project would not add 50 or more trips to Central Avenue or El Portal Drive in the peak hour; thus, these roadways were not subject to further analysis in the TIA, STIA, or Draft EIS/EIR. Refer to **General Response 3.12.5** regarding I-80 south of the I-580/I-80 split. An analysis of State Route 4 (SR-4) is provided in **Sections 4.8** and **4.15** of the Final EIR. It was determined that project-related traffic would have a less than significant impact on SR-4.

I-580 EASTBOUND MERGE FROM WESTERN DRIVE

The merge maneuver described by the commenter is both illegal and unlikely given the accessibility of a preferable route that does not require crossing two lanes of travel in a quarter mile. Where the Western Drive / eastbound I-580 on-ramp enters the freeway, it is initially separated by a concrete barrier. Beyond the barrier, the on-ramp lane is separated from the other lanes of traffic by a solid white line for over a quarter of a mile, which ends after the Marine Street off-ramp. It is anticipated that patrons and employees traveling to points east would access the Richmond Parkway via the first off-ramp after Marine Street, which is Canal Boulevard. Canal Boulevard provides a direct link to the Richmond Parkway, thus eliminating the need to perform the merge maneuver described by the commenter.

RICHMOND INTERMODAL STATION

Mitigation Measure 3-17(d) provides for shuttles to operate at least twice per hour to and from the project site to the Richmond Intermodal Station (served by BART and Amtrak). The El Cerrito del Norte BART station will not be served by project shuttles. The Richmond Intermodal Station provides easy access to BART trains, Amtrak, and AC Transit. As noted by the commenter, trains serving the Richmond BART Station have “significant capacity” which would be utilized by patrons and employees of the Proposed Project. The bus/shuttle loading area of the Richmond Intermodal Station has sufficient existing capacity, provided in three parallel passenger loading zones. On-site parking will be greatly enhanced by the time the Proposed Project begins operating with the construction of a five story parking garage to serve the station. Moreover, as provided in the Intergovernmental Agreement with Contra Costa County, the “Tribe will work with the City Police Department, Contra Costa County Sheriff and BART to implement enhanced security at the Richmond BART station, which the Parties agree will be a benefit to County residents and will encourage greater usage of BART facilities in the evenings.” (**Appendix BB**).

PROPOSED FERRY SERVICE

Please refer to **General Comments 3.12.1** and **Response A13** above regarding ferry service, potential impacts to other proposed ferry services, and analysis of potential environmental impacts. Providing ferry service and no cost shuttle service to and from the site, as well as providing direct access to the main public transportation node in Richmond is unique among redevelopment projects of this scale in the Bay Area and California.

VEHICLE MILES TRAVELED

It may be deduced that implementation of the Proposed Project and associated mitigation measures would considerably reduce overall vehicle miles traveled (VMT) by providing a proximate alternative to other northern California and western Nevada resorts, gaming facilities, and entertainment venues. While estimating the precise reduction in vehicle miles travelled with implementation of the Proposed Project would be speculative, such infill projects are widely recognized as conveying such benefits. In addition, project features and mitigation measures such as ferry service and the creation of a new shuttle route connection to an intermodal transit station go well beyond traditional TDM provisions.

TRIP GENERATION

Please refer to **General Response 3.12.2** for a general discussion of trip generation rates used in the analysis. The following discussion supplements the general response cited above.

The size differences between the components of Alternatives A, B, and C are due to the fundamental differences inherent in each alternative. As shown in Draft EIS/EIR **Table 2-2**, the total gaming floor is the same size for Alternatives A-C. Hotel sizing and the inclusion of residential units constitute the main differences between the alternatives. There are two project components in the TIA (**Appendix S**) and **Section 2.2** of the Draft EIS/EIR that have an aggregated size difference. First, the entertainment facility includes 500 additional seats in the TIA over and above what is proposed as part of the Project. The analysis presented in the Draft EIS/EIR uses trip generation calculations based on the higher number of seats, resulting in a conservative (overestimation) estimate of trips generated by this component. Second, the Winehaven Building is estimated at 118,220 square feet (sq. ft.) in the TIA and 120,000 sq. ft. in **Section 2.2** of the Draft EIS/EIR, a difference of 1,780 sq. ft. This is due to a slight reduction in square footage in the TIA to account for non-trip generating components.

Trip generation rates for the non-casino components of the Proposed Project (e.g., lodging, retail, office, residential, entertainment, conference, restaurant, etc.) were developed using empirical data on trip generation published by the Institute of Transportation Engineers (ITE) publication Trip Generation, 7th Edition. For the casino component, for which the ITE Trip Generation Manual has not established a standardized rate, data was collected from multiple proposed and existing gaming facilities found to be similar to the Proposed Project. Each casino study used in determining the Proposed Project's trip generation rate is described in detail in the TIA (**Appendix S**) on pages 5-3 and 5-4. Although none of the casinos studied are exactly like the Proposed Project, as a group they give a representative cross section of the projects with similar gaming amenities. This methodology for determining trip generation rate is consistent with the methodology used in the ITE Trip Generation Manual. Please also refer to **General Response 3.12.2** regarding trip generation methodology.

The traffic engineers at AECOM (formerly DMJM Harris) confirmed that the trip generation rates used to determine the Proposed Project's trip generation rates *did not* include a reduction for a Transit Demand

Management plan. Furthermore, the engineers confirmed that the studies used to determine the Proposed Project's trip generation rate are independent of one another. However, like the studies used in the ITE manual to determine average trip generation rates, the studies used to determine the Project's trip generation rates had similar components which used similar trip generation rates or reductions.

Gaming positions were not used in determining the project's trip generation rate. The use of square footage is an accurate and common methodology for determining trip generation for tribal casino projects. The number of gaming positions is only one of several components of an overall project that serve as an attraction to visitors. Also, in this case the propriety of using square footage rather than the number of gaming positions is reinforced by the facts. We can plan and therefore know the square footage involved, but, at this stage, we do not know the number of gaming positions that will be operated. That number will be the subject of negotiations between the Governor of California and the Tribe in connection with a compact to be submitted to the Legislature and the Tribal Council for approval prior to submission to the Secretary of the Interior for final approval. 25 U.S.C. § 2710(d)(3)(B). Therefore, given the various factors governing trip generation rate and the uncertainty surrounding the number of gaming positions, it makes the most sense to base the trip rate on overall square footage. The referenced 1998 ITE study, while providing a rate based on gaming positions, also provides square footage, so a square footage-based calculation was made for comparison purposes.

The Gaming Market Analysis (Innovation Group, 2007) provides an estimate of visitation and revenues, but does not provide an estimate for trip generation. Therefore, the Gaming Market Analysis was properly used to develop the trip distribution, rather than trip generation. Nonetheless, the trip generation estimate for the Proposed Project is conservative in that it would tend to overestimate trips when compared with the visitation estimate from the Gaming Market Analysis. Specifically, the Gaming Market Analysis estimates 7,025,719 visits to the project facilities over the course of a year. The corresponding visitation estimate calculated from the traffic study trip generation estimate projects 12,831,975 visitors. This includes visitors arriving via alternative transportation and automobiles. For automobiles, an average vehicle occupancy rate of 1.3 is assumed, which is a conservative assumption given the latest MTC projection for social/recreation trips (1.576) and given recent surveys at a nearby destination tribal casino resort (2.3 weekday; 2.6 weekend) (MTC, 1998).

Please refer to **General Response 3.12.2** regarding the *Phased Transportation Study for Proposed Urban Casinos in West Contra Costa County* (Dowling, 2007). A reference to the study has been added to **Section 4.8** of the Final EIR.

TRIP REDUCTIONS

Please refer to **General Response 3.12.4** for a discussion of trip reductions used in the analysis. The following discussion supplements the general response cited above.

PASS-BY / DIVERTED LINK TRIPS

It is acknowledged that the trips referred to in the Draft EIS/EIR as “pass-by” trips can more accurately be described as “diverted link” trips. Thus, Final EIR **Section 4.8** has been revised to change references to “pass-by” trips to “diverted link” trips. The visible nature of the site, high profile in the media, proposed marketing campaign, and its close proximity to I-580 indicate that a significant number of existing automobile trips would be diverted to the project site. Historically, Indian casinos rely heavily on pass-by and/or diverted link traffic; for instance the Shingle Springs, Thunder Valley, Cowlitz, and Scotts Valley casinos traffic studies provided a 20 percent or greater pass-by/diverted link assumption. As such the 15 percent diverted link assumption is viewed as conservative by the traffic engineers that completed the associated studies.

TRANSPORTATION DEMAND MANAGEMENT

Please refer to **General Response 3.12.4** for a discussion of the reductions taken as a result of the transportation demand management strategies outlined in the Final EIR.

CONFERENCE CENTER

Please refer to **General Response 3.12.2** regarding the conference center.

ENTERTAINMENT CENTER – SPECIAL EVENT TRAFFIC

Section 2.2.2 of the Draft EIS/EIR describes the proposed entertainment facility under Alternatives A and B as having 2,500 seats, whereas the TIA describes this component as having 3,000 seats. This is due to the fact that the entertainment center’s intensity was reduced after the TIA was issued. However, no adjustment to the TIA was made because it provided a more conservative estimation of the entertainment center's trip generation by assuming an additional 500 seats.

For the Project Event Conditions, the proposed entertainment facility was analyzed to determine if this component would generate any new impacts above and beyond what was analyzed in the Project Conditions analysis. The analysis was completed assuming a 3,000 seat entertainment facility for an 85th percentile event, with trips arriving with 1.6 passengers per vehicle. The use of the 85th percentile and 1.6 passengers per vehicle are both industry standard numbers. Furthermore, it is asserted that the use of 1.6 passengers per vehicle is a very conservative assumption for the nature of this type of generator, where it is reasonable to assume that the majority of patrons to an event would not be coming alone (the 1.6 occupancy rate assumes 2 out of every 5 cars has one occupant and the remaining 3 vehicles have only two passengers). By comparison, the Thunder Valley Casino assumed 2.4 persons per vehicle in their environmental assessment of the project’s Performing Arts Center (Thunder Valley, 2008). Additionally the 3,000 seat entertainment facility initially assumed for the entertainment facility was subsequently been reduced to 2,500 seats for Alternatives A and B. This means that the 85th percentile of the 3,000 seat facility would account for slightly over 100 percent of the now smaller 2,500 seat facility.

As part of the Project Event Conditions, the TIA assumed that 20 percent of the trips generated by the entertainment venue would arrive during the PM peak hour. Due to the nature of this land use, standard practices are not available for the derivation of numbers to use for the purpose of analysis, and therefore, professional judgment on the part of the traffic engineers was an important factor in the analysis.

As part of the TIA other similar casinos were reviewed, including the Cowlitz Indian Tribe Casino Project Traffic Impact Study. This study had similar proposed land uses, including an entertainment facility. Data was included in this study from a traffic audit done at the Mohegan Sun Casino in Connecticut, which includes a 10,000 seat entertainment facility. Upon reviewing the data obtained from this traffic audit, it was found that around 14.5 percent of the event traffic occurred over its PM peak hour. The Thunder Valley Casino Expansion Tribal EIR assumed only 10 percent of patrons would arrive during the peak hour for events that were scheduled to begin at 7 or 8 pm. Therefore, the use of 20 percent of the event traffic occurring during the PM peak hour for the proposed facilities is a fair and conservative assumption.

Alternatives A and B have the same intensity with regards to the Entertainment Center; therefore, either alternative would result in the same impacts. As described in detail in **Section 2.0** of the Draft EIS/EIR, a proposed residential housing component in the southern portion of the project site for Alternative B is the only difference compared to Alternative A. Furthermore, as described in **Section 2.2.2** of the Draft EIS/EIR, and supplemented by mitigation measures, residents on-site would be served by a free shuttle to take them to the Winehaven entertainment district located a short distance to the north. Alternative C is a less intense alternative than A; since Alternative A would not require additional mitigation related to special events, no such mitigation would be warranted for Alternative C either. Furthermore, since no additional event center trips were identified, no adjustment is needed in fair share contributions.

TRIP DISTRIBUTION

The trip distribution Table shown in Table 5-3 of the TIA was derived from a Gaming Market Assessment (Innovation Group, 2007). The full report is not included in the Draft EIS/EIR as it does not contain relevant information related to the environmental analysis and the Tribe considers it confidential information. As **Table 4-1** illustrates, the study calculated the total “gamer” population in several regions surrounding the project site and determined the percentage of that population that would be likely to patronize the Proposed Project, which was used as a basis for establishing the trip distribution used in the TIA. A trip distribution figure is provided in **Appendix HH** of the Final EIR that provides a visual depiction of the data presented in Table 5-4 of the TIA.

Table 4-1
REGIONAL MARKET GAMER VISITS

Market Segments	Proportion of Pt. Molate Patronage
Santa Rosa	0.90%
San Rafael	11.40%
Napa	6.40%
Stockton / Modesto	2.50%
Sacramento	7.00%
Concord	10.90%
Primary	5.10%
Tertiary	0.10%
Castro Valley	9.40%
Oakland	9.20%
Fremont	3.20%
San Francisco	17.20%
San Mateo	8.30%
Santa Cruz	0.80%
San Jose	7.60%
Total	100%

Source: The Innovation Group, 2007

Note: Primary and Tertiary were combined as "Richmond" in TIA

Based on the professional experience of the traffic engineers that completed the TIA, it was determined that distribution patterns and mode splits would be similar between alternatives. Considering the availability of transit and ferry, after the application of reductions, distribution patterns are expected to be very similar. Obviously the inbound/outbound percentages are different for the land uses proposed under Alternatives D and E, however, by utilizing the same trip distribution pattern the analysis is conservative. For instance, it is reasonable to assume that the residential trips (Alternative D) are going to be more local in nature, for commuting to jobs on-site and at surrounding land uses. As residents would fill jobs on a regional basis (i.e., Richmond, Oakland, Marin, Berkeley, San Francisco, etc.), the trip lengths would likely be shorter in comparison to the gaming trips, but the overall patterns would be very similar.

CONSTRUCTION TRAFFIC

Construction traffic impacts presented in **Section 4.8** of the Draft EIS/EIR have been re-analyzed in the Final EIR using truck trips converted to passenger car trips as suggested by the commenter. Please refer to **Section 4.8** of the Final EIR, which concludes that there would be no change in significance using the revised methodology. Distribution patterns related to the delivery of building materials, limited export of soil, and construction personnel are not expected to diverge in any significant way from the operational trip distribution. Given that there is one road into and out of the project site and only a few arterial routes

suitable to handle construction trucks, the construction trip distribution was determined to be similar to the operational trip distribution.

BACKGROUND SCENARIO

Since the publication of the Notice of Intent and a Notice of Preparation in 2005, and the subsequent release of the TIA in December 2008, publication of the Draft EIS/EIR was delayed by a series of administrative issues, not the least of which was the change in executive administrations at the federal level. As a result, the TIA and Draft EIS/EIR use the year 2010 in the analysis of the near-term traffic background scenario. The commenter suggests that as a result of the delay of publication of the Draft EIS/EIR that the transportation analysis is invalid and that a “growth factor should be applied to through-trips” on the regional transportation network. While such an approach could be reasonable in the context of traffic volumes that are growing and congestion worsening over the short-term, all indications suggest that traffic volumes on Bay Area roadways have been decreasing since the TIA was completed, resulting in less congestion. John Goodwin, spokesman for the Metropolitan Transportation Commission was quoted recently as stating, “One of the most dramatic changes we have seen since the end of 2008 is on 101 in Marin County. North- and southbound congestion has virtually disappeared. I wouldn't be surprised if [U.S. 101 in Marin County] falls off the Top 10 list altogether next year (Payne, 2009).” Such is the case elsewhere in the greater Bay Area as well. In fact, the significant drop in traffic has prompted, in part, the need to raise tolls on area bridges to compensate for the decrease in volume. “In the past year [2008], traffic counts have dropped 4 percent, driven by high gas prices, the weak economy and construction on bridges. Toll authority officials do not anticipate an increase in traffic (Cabanatuan, 2008).” Thus, given the fact that traffic volumes have dropped since completion of the TIA, there is no indication that the background scenario presented in the analysis underestimates the background conditions. As such, no change in the analysis is warranted.

CCTA CONSULTATION AND CUMULATIVE SCENARIO

DMJM (now AECOM) consulted with Martin Engelmann, Deputy Director of the Contra Costa Transportation Authority (CCTA), regarding the Richmond Parkway growth rate in August 2007. The consultation was used as an opportunity to communicate preliminary findings and convey the approach to the analysis.

There are two important factors that must be considered in the evaluation of the CCTA's projected growth rate. First, a casino land use is not included in the CCTA model. Secondly, as a matter of standard practice, the transportation engineers who completed the TIA do not use “raw” model output in their analysis. Instead, they generally take the delta between the baseline and horizon year and apply it to the “existing ground counts.” As such, the future volumes are developed based on the growth obtained from the model. In this case of the Richmond Parkway, the growth projected for the Richmond Parkway was extremely high (3.5%), which could not be correlated to any predictable phenomenon. Other recently completed traffic studies were reviewed that included Richmond Parkway in their analysis. The proposed Scotts Valley Band of Pomo Indians Sugar Bowl Casino Traffic Impact Study was chosen for its

similarities in land use and study intersections in order to obtain a traffic growth projection along the Richmond Parkway. This study used a growth rate of approximately 1.7 percent annually on the Richmond Parkway in the peak traffic flow directions. A growth rate of 1.7 percent annually is still a relatively high growth rate, but is considered reasonable due to the regional importance of the Richmond Parkway.

The traffic volume forecasts for the Sugar Bowl Project were based on information from the countywide traffic model prepared for the 2004 Contra Costa Countywide Comprehensive Transportation Plan and information provided by the CCTA staff. A summary of the overall traffic model results utilized in the Sugar Bowl traffic forecasts was also summarized in the Contra Costa Decennial Model Update - Model Documentation Addendum (officially adopted by the CCTA on July 20, 2005). This addendum summarizes the results of the 2004 model and states that traffic in Western Contra Costa County is forecast to increase by about 42 percent between 2000 and 2025. It should be noted that a 1.7% increase in traffic compounded yearly for 20 years (2005 - 2025) equates to about a 40 percent increase in traffic, which was generally consistent with the 2004 model results.

BAY TRAIL

Please refer to **General Response 3.4** as well as the response to Comment I4 below regarding the Bay Trail.

RESTRIPING THE RICHMOND - SAN RAFAEL BRIDGE

Please refer to **General Response 3.12.6** regarding bicycles on the Richmond – San Rafael Bridge. Regarding the potential loss of the breakdown lane on the Bridge, a variance would be required from Caltrans, such as that which has been granted for the San Francisco – Oakland Bay Bridge. However, as noted in the Draft EIS/EIR, restriping of the Richmond – San Rafael Bridge is considered infeasible at this time and the associated impact in the cumulative year is considered significant.

REVISIONS TO THE TRAFFIC, AIR QUALITY, AND NOISE IMPACT ANALYSES

Based on the discussion provided above, no significant revisions (other than those outlined) are warranted in the traffic, air quality, or noise impact analyses.