

Submitted via Project Public Comment Web Portal

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Veronica Pearson
Project Manager, Senior Ecological Restoration Planner
Marin County Parks
3501 Civic Center Drive, Suite 260
San Rafael, Ca 94903

Response to CEQA Public Comment Period for: *Draft Initial Study/Mitigated Negative Declaration for the proposed Bolinas Lagoon Wye Wetlands Resiliency Project*

Ms. Pearson,

Thank you for discussing the above-reference project document with me and making available the referenced materials that I requested. While I support the overall project goals, especially the hydrologic and ecological elements, I am concerned about increased traffic safety risk from the project. Moreover, verbal comments made in response to your project summary presentation during the July 19, 2023, Board of Directors meeting for the Bolinas Community Public Utility District indicate that the wider Bolinas community shares my concern. At that meeting, all five Directors (four attending in-person and one by video conference) as well as several community members expressed similar concerns. In every instance, the concern focused on traffic safety implications of the project for the intersection of Olema-Bolinas Road and State Route 1¹.

Traffic Safety Implications of the Project

Current ingress and egress for Bolinas along Olema-Bolinas Road includes use of two intersections at the Bolinas Wye: 1) the intersection of Olema-Bolinas Road and State Route 1 generally used by traffic coming from Olema as well as points north and east, and 2) the intersection of the Bolinas-Fairfax Crossover Road and State Route 1 generally used by traffic coming from Stinson Beach as well as points south and east. These intersections are low angle (on the order of 45 degrees) and there are no traffic controls (i.e., flashing lights, turn lanes or stop signs). As a result, traffic tends to exit State Route 1 quickly.

Based on personal experience driving and bicycling these roads for more than 30 years, motorized vehicles tend to accelerate on this part of State Route 1. Drivers travelling from the north have just emerged from a winding and wooded section of the roadway. Drivers travelling from the south have just completed the winding portion of the road around the Bolinas Lagoon. In both cases, the drivers see open road ahead and very often gain speed.

¹ Another clear indication of community concern is the Nextdoor thread for Bolinas-Dogtown regarding a fatal collision that occurred on or about April 1, 2023. In that forum, 22 different community members express great concern about current traffic safety conditions at the intersections considered for this project. It is reasonable to conclude that these community members are also concerned about the potential for increased risk in the same area posed by the project.

The proposed project entails 1) combining flows from the two current intersections with State Route 1 into a single new intersection, 2) increasing the intersection angle to approximately 90 degrees and 3) including no traffic controls. One of the proposed benefits of the intersection reconfiguration is reducing the speed of vehicles that are exiting State Route 1 and entering Olema-Bolinas Road (see Initial Study page 198, second paragraph - Section XVI. Q., Subsection CEQA Context, Item c). This project outcome would be desirable except that no traffic controls are proposed. As currently planned and during times when vehicles are following each other on State Route 1 (a very common occurrence), throughgoing traffic moving at speed would be impeded by vehicles slowing ahead of them to exit at the new intersection.

The safety implications of forcing exiting vehicles to slow down on this stretch of State Route 1 without the benefits of traffic control include those outlined below.

Safety Implications of Intersection Reconfiguration without Traffic Controls

- Traffic travelling from the north
 - Pressure from behind as throughgoing vehicles gain speed
 - Unsafe passing by throughgoing vehicles on State Route 1
 - Unsafe speeds by exiting vehicles
- Traffic travelling from the south
 - Pressure from behind as throughgoing vehicles gain speed
 - Unsafe passing by throughgoing vehicles on State Route 1
 - Unsafe speeds by exiting vehicles
 - Rushed lefthand turns across oncoming State Route 1 traffic by exiting vehicles
 - Cutting corner into oncoming Olema-Bolinas Road traffic by exiting vehicles

The dangerous behaviors listed above already occur along this stretch of road and, without traffic control, the proposed road configuration changes (combining two intersections in to one and increasing the intersection angle) would make an already dangerous stretch of road even more dangerous. Local drivers may become accustomed to the changes after some time; however, visitors to the area would be subject to the more difficult driving conditions without warning and create dangers for both local and visiting drivers. This would be especially true during heavy use periods, generally summers and weekends, and increase as visitation to the coast trends upward over time.

Flawed Basis for Conclusion that No Traffic Controls are Warranted

The Initial Study determines that no mitigating measures for traffic safety are warranted based on analysis that includes consideration of potential for congestion and accidents. In addition to the Initial Study, details of the analysis are contained in two referenced technical memoranda: 1) Traffic Engineering Assessment and 2) Intersection Control Evaluation. Review of the documents reveals three critical flaws.

First, supporting data for the Traffic Engineering Assessment are not representative of current conditions during periods that are critical to traffic safety. Traffic count data were collected in June of 2015 and December of 2021. The June 2015 data are outdated given the ever-increasing traffic load on our local

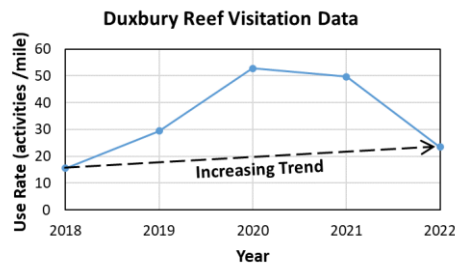
roads², and the December 2021 do not represent the high demand that generally occurs outside the winter season. Moreover, the data collection efforts for weekends miss the early morning period of heavy use by groups of motorcycles, vehicles transporting surfers, and bicyclists riding the roads. As a result, the data do not include many of the visitors to the coast that would be unaware of the increased demands of negotiating the new intersection configuration.

Second, the collision history analysis is logically inconsistent. The analysis entails comparing collisions history data³ for the area to Caltrans quantitative thresholds used to justify implementation of traffic controls. This approach does not make sense for the project under consideration because it uses accident history data for the current intersection configuration (two low-angle intersections) to evaluate the need for safety enhancements under a radically different intersection configuration (single combined high-angle intersection). As a result, this analysis fails to consider the increased traffic risks outlined in the previous section of this letter.

Third, the line-of-sight analysis, which essentially evaluates the maximum speed at which a stop may be achieved for a given sight distance, is not applicable. As stated above, the dangerous condition created by the change in intersection configuration would occur when vehicles are following each other (extremely common occurrence) and the lead vehicle slows down to exit. The vehicles will be separated by far less than the line-of-sight distance and the analysis becomes meaningless. Additionally, the speeds supported by the analysis and discussed in the text of the Initial Study (e.g., page 198, third and fourth paragraphs - Section XVI. Q., Subsection CEQA Context, Item c) are too low to represent the high speeds that lead to accidents on this roadway.

Overall, deficiencies in the data and assumptions used for the analysis result in the incorrect conclusion that traffic controls are not warranted. The Negative Declaration is also incorrect since it relies upon a flawed analysis.

² While analysis based on the 2015 data did include a one-percent annual growth rate for traffic, experience indicates that the rate of growth is far greater. As an independent and quantitative indication of what community members understand through experience, consider the visitation data for the Agate Beach part of the Duxbury Reef Marine Conservation Area located in Bolinas. Data collected and tabulated by Marine Protection Area Watch (<https://mpawatch.org/reports/>) demonstrate a general increasing trend with time as well as increased use patterns related to the COVID period (see plot below). Using the year 2018 as a baseline and considering only years outside of the peak COVID period, the data indicate a 90-percent annual growth rate for 2019 and a 13-percent annual growth rate for 2022.



³ Please note that the accident data used for the analysis does not include the fatal collision that occurred on or about April 1, 2023.

Project Modifications to Address Traffic Safety

The Bolinas community and visitors to the coast must have traffic controls at the proposed reconfigured intersection to create conditions that are safer than those currently proposed for the project. There may be complications integrating traffic control with the overall project details; however, project planning difficulties are no excuse for inadequately providing for public safety. It appears that impediments to project improvements regarding traffic safety may include: 1) differences in County and Caltrans roadway jurisdictions that result in a poorly-integrated approach for addressing traffic safety implications of the project, 2) restrictions on use of allocated funds for traffic control that constrain project options and 3) possible funding expiration dates that decrease the ability to spend the time required to integrate County plans with Caltrans operations. These and other limitations should be surmounted by combining the efforts of County and State officials that represent West Marin to apply pressure where it is needed to achieve the critical public benefit of traffic safety.

The County should engage with Caltrans to add traffic controls for the intersection to be reconfigured by the project. Perspectives regarding the best traffic control approach might be gained by considering examples of traffic control at other intersections along State Route 1 in nearby West Marin towns. In Stinson Beach, there are two controlled intersections – one four-way stop and one left turn lane. In Olema, there is one controlled intersection – a three-way stop. Furthermore, the planning should favor protecting drivers who are risk-averse, less capable and less confident. This approach would benefit all community members, as well as visitors to the coast, and may especially benefit new/learning and older drivers.

Finally, inspiration for addressing this necessary project improvement can be found in elements of the planning efforts already performed for this project. In response to verbal comments on your earlier project summary presentation during the December 16, 2020, Board of Directors meeting for the Bolinas Community Public Utility District, creative thinking was applied to address requested improvement for bicycle safety (see Initial Study page 39 - third bullet of Section X. D.). I truly appreciate that effort, as well as the resulting project improvement, and look forward to the additional project improvement requested in this letter.

Respectfully submitted,



Robert M. Gailey
rob@rmgailey.com

cc via email:

Bolinas Community Public Utility District General Manager Jennifer Blackman (jblackman@bcpud.org)
Marin County Supervisor Dennis Rodoni (bos@marincounty.org)
Marin County Department of Public Works Director Rosemarie Gaglione (rgaglione@marincounty.org)
California State Assembly Member Damon Connolly (assemblymember.connolly@assembly.ca.gov)
California State Senate Member Mike McGuire (senator.mcguire@senate.ca.gov)