

**FINAL
VOLUME II - RESPONSE TO COMMENTS**

CEQA ENVIRONMENTAL IMPACT REPORT
**SIR FRANCIS DRAKE BOULEVARD REHABILITATION PROJECT MARIN
COUNTY, CALIFORNIA**

STATE CLEARINGHOUSE # 2016122032

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March 2018

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1.0 INTRODUCTION

1.1 PURPOSE OF THE RESPONSE TO COMMENTS DOCUMENT

This report has been prepared to respond to comments submitted on the September 2017 Draft Environmental Impact Report (Draft EIR) for the proposed *Sir Francis Drake Boulevard Rehabilitation Project* (proposed project). The Draft EIR identifies the likely environmental consequences associated with construction and operation of the proposed roadway improvements. The evaluation in the Draft EIR for each topical issue found that there are no significant environmental impacts that cannot be mitigated to a less-than-significant level.

This document responds to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to these comments or to clarify any previous errors, omissions, or misinterpretations of material in the Draft EIR.

1.2 FINAL EIR

This document, together with the Draft EIR, will constitute the Final EIR if the Marin County Board of Supervisors certifies the Final EIR as complete and adequate under the California Environmental Quality Act (CEQA).

1.3 ENVIRONMENTAL REVIEW PROCESS

According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project, and to provide the general public with an opportunity to comment on the Draft EIR.

The Draft EIR was made available for public review in hard copy form on October 11, 2017 and distributed to local and State responsible and trustee agencies. The Notice of Availability (NOA) of the Draft EIR was provided in compliance with State Law and the County's procedures. The Draft EIR was also posted on the project's website at <https://www.marincounty.org/depts/pw/divisions/transportation/transportation/sir-francis-drake-boulevard-rehabilitation> beginning October 11, 2017. CEQA mandates a minimum 45-day public comment period on the Draft EIR, which ended on December 6, 2017.

Copies of all written and oral comments received on the Draft EIR during the comment period are contained in this report.

The Response to Comments document, together with the Draft EIR, will constitute the Final EIR. Notice of the availability of the Final EIR will be provided in compliance with the Marin County Environmental Review Guidelines. Marin County's guidelines provide a period of 14 days for written comments to be submitted on the Final EIR. After the close of the 14-day comment period, a meeting will be scheduled before the Marin County Board of Supervisors to consider certification of the Final EIR. Notice of the public meeting to consider certification of the Final EIR will be provided in compliance with State law and Marin County's procedures.

1.4 DOCUMENT ORGANIZATION

This Response to Comments document consists of the following chapters:

- *Chapter 1.0: Introduction.* This chapter discusses the purpose and organization of this document.
- *Chapter 2.0: List of Commenting Agencies, Organizations, and Persons.* This chapter contains a list of agencies, organizations, and persons who submitted written comments or offered oral comments on the Draft EIR.
- *Chapter 3.0: Master Responses.* This chapter contains a series of Master Responses that address common concerns that were shared in a number of the comment letters. These Master Responses are referred to in the responses to the individual comment letters included in Chapter 4.0.
- *Chapter 4.0: Comments and Responses.* This chapter contains reproductions of all comment letters received on the Draft EIR, as well as oral comments received on the Draft EIR. A written response for each CEQA-related comment received during the review period is provided. Each response is keyed to its respective comment.
- *Chapter 5.0: Draft EIR Text Revisions.* Corrections to the Draft EIR necessary in light of comments received and responses provided, or necessary to clarify any minor errors, omissions or misinterpretations, are contained in this chapter.
- *Chapter 6.0: Report Preparers and References.* A summary of those involved in report preparation and a list of the references cited are contained in this chapter.

2.0 LIST OF COMMENTING AGENCIES, ORGANIZATIONS, AND PERSONS

Comments on the Draft EIR were submitted to the Marin County Department of Public Works (County) during the public review period by those agencies, organizations, and individuals listed below. The comments are grouped by the affiliation of the commenting entity as follows: federal, State, regional, and local agencies (A), organizations (B), individuals (C), and public hearing participants (PH).

2.1 FEDERAL, STATE, REGIONAL, AND LOCAL AGENCIES

A1. California Department of Transportation (Caltrans), District 4; Patricia Maurice, District Branch Chief (November 15, 2017).

2.2 ORGANIZATIONS

B1. Kentfield Planning Advisory Board; Anne Peterson (December 5, 2017).

2.3 INDIVIDUALS

C1. Adiosnibbor¹, Local Resident (November 17, 2017)

C2. Allen L. Appell, Ph.D., Local Resident (November 17, 2017)

C3. Kirstin Asher, Local Resident (November 17, 2017)

C4. George Baranoff, Local Resident (December 4, 2017).

C5. Andrew Barry, Local Resident (November 27, 2017)

C6. Ann Peckenpaugh Becker, Local Resident (November 27, 2017)

C7. Frances Collins, Local Resident (November 26, 2017)

C8. George Collins, Local Resident (November 26, 2017)

C9. Margaret E. Deedy, Local Resident (November 20, 2017)

C10. Laura Effel, Local Resident (November 26, 2017)

C11. Joel and Brenda Fugazzotto, Local Resident (November 13, 2017)

C12. Barbara Geisler, Local Resident (November 28, 2017)

C13. Mallory Geitheim, Local Resident (November 18, 2017)

¹ Commenter's name was not included in their communication.

- C14. Ghostlightmater², Local Resident (October 17, 2017)
- C15. Arlene Hansen, Local Resident (December 4, 2017)
- C16. Arlene Hansen, Local Resident (December 2, 2017)
- C17. Arlene Hansen, Local Resident (December 6, 2017)
- C18. Matthew Hansen, Local Resident (November 26, 2017)
- C19. Carole and Ed Harkins, Local Resident (November 20, 2017).
- C20. Russ Holdstein, Local Resident (November 29, 2017)
- C21. Chris Hunt, Local Resident (November 27, 2017)
- C22. Richard Hymns, Local Resident (November 26, 2017)
- C23. Mary and Peter Jacobi, Local Resident (November 20, 2017)
- C24. Peter Jacobi, Local Resident (November 27, 2017)
- C25. Stephen Jaffe, Local Resident (October 12, 2017)
- C26. Helena Kozler, Local Resident (November 17, 2017)
- C27. Dee Lawrence, Local Resident (November 17, 2017)
- C28. Richard Lawrence, Local Resident (November 30, 2017)
- C29. Dana Marotto, Local Resident (October 13, 2017)
- C30. Joanne Miller, Local Resident (November 17, 2017)
- C31. Robin Miller, Local Resident (December 6, 2017)
- C32. Ron Naso, Local Resident (November 24, 2017)
- C33. Diana Perdue, Local Resident (November 18, 2017)
- C34. Bill and Mary Poland, Local Resident (December 2, 2017)
- C35. Bob Silvestri, Local Resident (November 1, 2017)
- C36. Bob Silvestri, Local Resident (December 1, 2017)

² Commenter's name was not included in their communication.

C37. David Steckler, Local Resident (November 26, 2017)

C38. Ellen Whalen, Local Resident (December 6, 2017)

C39. Richard Willis, Local Resident (November 18, 2017)

C40. Edward Yates, Local Resident (November 2, 2017)

C41. Edward Yates, Local Resident (December 1, 2017)

2.4 PUBLIC HEARING

PH. Anne Peterson, Local Resident (November 7, 2017). ‘

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3.0 MASTER RESPONSES

A number of comments and letters received on the Draft EIR addressed the same topic. The most common topic for which comments were received was traffic, including impacts associated with lane widths, intersection modifications and the addition of a third lane on eastbound SFDB. Other recurrent concerns included impacts to public safety and to emergency services access. These recurrent themes are addressed in a series of Master Responses. In Chapter 4.0, individual comments that are addressed by these Master Responses are referred back to the appropriate master response (i.e., “Please see Master Response 4”).

3.1 LIST OF MASTER RESPONSES

The following Master Responses are discussed in Section 3.2:

Master Response 1 – Merits/Opinion-Based Comments

Master Response 2 – Lane Widths

Master Response 3 – Addition of the Third Lane from El Portal Drive to Highway 101

Master Response 4 – Installation of the At-Grade Crosswalk at Wolfe Grade

Master Response 5 – Addition of a Second Left Turn Lane at College Avenue

3.2 MASTER RESPONSES

3.2.1 Master Response 1- Merits/Opinion-Based Comments

A number of comments received during the public comment period express an opinion for or against the project, a component of the project (i.e., widened sidewalks, additional turn lane), or a project alternative, but do not pertain to the adequacy of the Draft EIR. These comments relate to the merits of the proposed project and not to the environmental impacts and mitigation measures identified in the Draft EIR. Therefore, no response to these comments is required, per *CEQA Guidelines* Section 15132, which states that a Final EIR shall include “the responses of the Lead Agency to significant environmental points raised in the review and consultation process.”

Section 15204(a) of the CEQA Guidelines provides further guidance for reviewing environmental documents:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated....When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

In accordance with Section 15024(a), the County is not required to respond to comments that express an opinion about the project, but do not relate to the environmental analyses provided in the Draft EIR. The merits of the project are topics that will be considered by the Board of Supervisors in the decision of what action to take on the proposed project. If this Final EIR is certified as adequate, the County will consider the recommendations in these comment letters as well as information presented in the EIR, when it makes its decision regarding whether to approve the project as proposed, adopt one of the project alternatives described in the Draft EIR, or agree to some combination thereof. These comments are included in the EIR to be available for consideration by the decision-makers at the merits stage of the process.

3.2.2 Master Response 2- Lane Widths

Many comments relate to the width of travel lanes along the project corridor. Comments contend that lanes would be narrowed, and that this was not sufficiently analyzed in the EIR; that the potential for narrower lanes would create safety concerns for travelers; and that the project description included in the EIR is inadequate because it does not explicitly identify the lane widths proposed as part of the project. This response addresses these three issues.

The traffic analysis provided in the EIR was prepared by Parisi Transportation Consulting (Parisi), a Marin-based company that provides services in traffic engineering, transportation planning, bicycle and pedestrian planning, and Complete Streets planning and design. Parisi was founded in 1999 by David Parisi, a professional civil and traffic engineer with over 30 years of experience in multi-modal planning and design. Parisi staff includes well-qualified, technical experts with expertise in assessing traffic impacts and planning multi-modal transportation systems.

Analysis. As described in the Section 4.12, Traffic and Circulation, of the Draft EIR, Parisi acquired existing traffic volumes at various segments along the corridor and collected turning movement volumes in the AM and PM peak hours for vehicles, bicycles and pedestrians at twelve intersections. Existing travel times were obtained from Inrix, based on real-time data from GPS locator devices. Synchro/SimTraffic 9.0 computer software was used to determine the Level of Service at intersections based on the existing traffic volumes and the Transportation Research Board of the National Academies of Science's *Highway Capacity Manual* (HCM)³ 2010 methodology described in the Draft EIR (page 323 of the Draft EIR). The traffic Project opening year (2020) and Countywide Plan horizon year (2040) traffic volumes were analyzed with existing intersection geometrics and proposed intersection geometrics to identify future travel times and intersection delay. The results of this analysis are summarized in Section 4.12 of the Draft EIR, with the detailed analysis provided in Appendix H.

As part of the project, vehicular travel lanes may be 11 feet wide along specific segments of Sir Francis Drake Boulevard (SFDB), including in the eastbound direction between El Portal Drive and the on-ramp to southbound Highway 101 and in the westbound direction between Ash Avenue and College Avenue. The use of 11-foot wide lanes would enable provision of project features such as a

³ Transportation Research Board. 2010. *HCM 2010: Highway Capacity Manual*.

third eastbound travel lane between El Portal Drive and Highway 101 and an additional left-turn lane from westbound SFDB onto southbound College Avenue.

Eleven-foot wide travel lanes meet design standards, and compared to 12-foot wide lanes, provide the same vehicular capacity and reduce excessive speeding. Eleven-foot wide lanes result in similar or reduced collision rates as 12-foot lanes.

The use of 11-foot wide lanes is an acceptable width in California for arterial roadways. The *California Highway Design Manual*⁴ states that 11-foot wide lanes are applicable for the design of city streets and county roads, and the California Department of Transportation encourages flexibility in design and has adopted National Association of City Transportation Officials guidance for the use of 11-foot wide lanes. The national American Association of State Highway Transportation Officials' *Geometric Design of Highways and Streets* states that "in urban areas where pedestrian crossings, right of way, or existing development become stringent controls, the use of 11-foot lanes is acceptable."⁵

The same roadway capacity is provided with the use of 11-foot and 12-foot wide lanes. Historic level of service methods developed in the 1950s, assumed that for every one-foot in lane width reduction (to about 10 feet), intersection lane capacity was reduced by 3.33 percent. In the 2000s comprehensive studies undertaken by the Transportation Research Board and others concluded that 10-, 11- and 12-foot wide lanes actually provide the same capacity on urban roadways. When lane widths are less than 10 feet, the capacity decreases; capacity increases when lanes become wider than 13 feet.

As long as other geometric and traffic signalization conditions remain constant, there is no measurable decrease in urban street capacity whether through lane widths are 11 feet or 12 feet. Thus, the Draft EIR's level of service analysis and travel time assessments, which assumed use of 11-foot wide lanes, are valid.

Safety. According to research, there is no statistically significant difference in collision frequency along urban or suburban arterial roadway segments or intersections where lane widths are 11 feet rather than 12 feet.^{6,7,8}

⁴ California Department of Transportation. 2006. Highway Design Manual Sixth Edition. September.

⁵ American Association of State Highway and Transportation Officials. 2011. *Geometric Design of Highways and Streets*.

⁶ Potts, Harwood, and Richard, 2007. Transportation Research Board Annual Meeting. *Relationship of Lane Width to Safety for Urban and Suburban Arterials*. Available online at: www.smartgrowthamerica.org/documents/cs/resources/lanewidth-safety.pdf (Accessed January 2018).

⁷ Theodore Petritsch, PE, PTOE. *The Influence of Lane Widths on Safety and Capacity: A Summary of the Latest Findings*. Available online at: www.nacto.org/docs/usdg/lane_widths_on_safety_and_capacity_petritsch.pdf (Accessed January 2018).

⁸ Federal Highway Administration, 2014. Mitigation Strategies for Design Exceptions. *Lane Width*. Available online at: https://safety.fhwa.dot.gov/geometric/pubs/mitigationstrategies/chapter3/3_lanewidth.cfm (Accessed January 2018).

In 2016, the Marin County Civil Grand Jury reviewed the status of the SFDB Rehabilitation Project and summarized the results of its findings in a report titled, “Traffic Congestion in Marin, the Sir Francis Drake Boulevard Project Deconstructed.” One of the subject areas evaluated in depth by the Grand Jury was the proposed use of 11-foot wide lanes. As stated in the Grand Jury’s report: “The use of 11-foot traffic lane widths on SFDB is safe, will not materially slow traffic flow, is commonly used for roads with much higher traffic volumes and speeds and abides by standard guidance.”⁹

Project Description. Several comments express confusion over the width of lanes proposed for the project and a perceived lack of clarity regarding lane widths in the project description in the Draft EIR. Some of these comments ask that project description figures include an indication of lane widths along the length of the proposed project corridor.

Regarding the project description, Section 15124 of the *CEQA Guidelines* states:

The description of the project shall contain the following information but should not supply excessive detail beyond that needed for evaluation and review of the environmental impact.

(a) The precise location and boundaries of the project...

(b) A statement of the objectives sought by the project.

(c) A general description of the project’s technical, economic, and environmental characteristics...

(d) A statement briefly describing the intended uses of the EIR..

Consistent with Section 15124 of the *CEQA Guidelines*, Section 3.5, *Project Description*, of the Draft EIR fully and adequately describes the proposed project. The Project Description includes a description of the specific improvements proposed as part of the project, including diagrams showing intersection modifications, roadway configuration, and sidewalk widening. The project description is based on concept-level drawings, as is appropriate in an EIR. Where design details are uncertain, minimum standards are used. If, as the design process proceeds, project improvements are proposed that are beyond the scope of the project described in the Draft EIR, additional CEQA review may be required. However, as described above and further clarified below, the potential for 11- and 12-foot travel lanes through the project corridor was included in the traffic analysis conducted for the proposed project and analyzed as part of the Draft EIR.

As described in Section 3.4.1 (page 44), the portion of SFDB within the project limits has a right-of-way (ROW) varying from 100 feet in width between Wolfe Grade and College Avenue to only 60 feet near the westerly limit, with existing travel lane widths varying between 10 and 20 feet. To

⁹ 2015/2016 Marin County Civil Grand Jury. 2016. Traffic Congestion in Marin, The Sir Francis Drake Boulevard Project Deconstructed. 23 June. Available online at: <https://www.marincounty.org/~media/files/departments/gj/reports-responses/2015/traffic-congestion-in-marin.pdf?la=en> (Accessed March 2, 2018).

accommodate proposed improvements within the existing roadway ROW, travel lanes along the corridor may be narrowed in some locations, compared to the current lane configuration. However, the proposed project would result in all through lanes within the project corridor having widths of 11 to 12 feet. Existing ten-foot turn lanes would remain; no new 10-foot lanes are proposed as part of the project. Detailed plans and cross sections will be prepared as part of the design phase. Concept plans and sections were presented at community meetings and can be found in the project documents available on the County website.¹⁰

As described above, proposed lane widths are consistent with adopted design standards in the *California Highway Design Manual*¹¹, which specifies a minimum lane width of 11 feet and allows for 10-foot lanes under certain limited circumstances, such as turn lanes as are currently provided at several intersections along the SFDB corridor. As described above, the same roadway capacity is provided with the use of the 11-foot and 12-foot wide lanes with no measurable decrease in urban street capacity whether lanes are 12 or 11 feet wide.

As described above, the traffic analysis provided in the Draft EIR included the use of 11-foot wide lanes as part of the proposed project improvements. Therefore, the assertion that the County failed to assess the impacts of the 11-foot lanes is incorrect. The proposed 11 to 12-foot lane widths are consistent with adopted standards, would not create safety hazards, and would not impact vehicular circulation through the corridor.

3.2.3 Master Response 3- Addition of the Third Lane from El Portal Drive to Highway 101

Several comments raised issues related to the addition of the third lane from El Portal Drive to Highway 101 proposed as part of the project. Comments ranged from questioning the need for the additional third lane to stating that the third lane would actually increase traffic congestion rather than alleviate it. Some comments also suggested that the addition of a third lane would impact emergency service providers. As described in Section 3.5.1 (page 55) of the Draft EIR, SFDB would be striped to add a third vehicular travel lane to eastbound SFDB between El Portal Drive and the on-ramp to southbound Highway 101.

Traffic Operations. As described in Section 4.12, *Transportation* of the Draft EIR, the additional lane would contribute to reducing motorist delays along SFDB, including at the intersections with El Portal Drive, La Cuesta Drive, and Eliseo Drive/Barry Way. The additional lane would assist in reducing travel times between Bon Air Road and Highway 101. In combination with the proposed intersection enhancements and the planned improvements to East SFDB¹² and the San Rafael-

¹⁰ County of Marin. 2018. Sir Francis Drake Boulevard Rehabilitation (Highway 101 to Ross) project website. Available online at: <https://www.marincounty.org/depts/pw/divisions/transportation/transportation/sir-francis-drake-boulevard-rehabilitation>

¹¹ California Department of Transportation. Highway Design Manual Sixth Edition.

¹² City of Larkspur, 2017. City of Larkspur Staff Report, September 20, 2017 City Council Meeting. Available online at: <http://cityoflarkspur.org/DocumentCenter/View/7675> (last accessed October 6, 2017).

Richmond Bridge¹³, year 2020 AM peak hour eastbound travel times would decrease by three minutes. In 2040, eastbound travel times would be reduced by over five minutes (see Draft EIR Tables 4.12.D and 4.12.F, pp: 330 and 333).

During the AM peak hour when southbound Highway 101 experiences recurring congestion, the third lane would provide additional storage capacity for vehicles east of Eliseo Way/Barry Drive before they merge to one lane at the on-ramp and would decrease vehicular queuing along eastbound SFDB. The shorter eastbound vehicle queues would provide space for vehicles turning onto the arterial roadway from Eliseo Drive, Barry Way, La Cuesta Drive, and El Portal Drive. Today, turning vehicles often face intersection gridlock due to downstream queuing during peak periods.

Provision of the proposed third eastbound lane on SFDB between El Portal Drive and Highway 101 would contribute to reduced delays along the eastern segment of the project corridor. Without the third eastbound lane, but with the other proposed improvements to the El Portal Drive, La Cuesta Drive, and Eliseo Drive/Barry Way intersections, these intersections would experience improved conditions compared to the No Project condition; however, these intersections would not benefit from the additional delay reductions resulting from inclusion of the proposed third eastbound lane. For example, during the 2020 weekday PM peak hour, average delay at the SFDB/Eliseo Drive/Barry Way intersection would be approximately 59 seconds per motorist (LOS E) under No Project conditions and approximately 39 seconds per motorist (LOS D) under proposed project conditions with the third eastbound lane (as shown in Table 4.12.E on page 333 of the Draft EIR). Without the third eastbound lane, motorist delays would be about 55 seconds per motorist (LOS E) under 2020 conditions and 85 seconds per motorist (LOS F) under 2040 conditions, as shown in Tables 3.A and 3.B below.

Table 3.A: 2020 SFDB Intersection LOS and Delay With Project (Except Third Eastbound Lane)

Study Area No.	Intersection	With Project Except Third Eastbound Lane			
		AM Peak Hour		PM Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
9	El Portal Drive/SFDB	15	B	15	B
10	La Cuesta Drive/SFDB	61	E	50	D
11	Eliseo Drive/SFDB	90	F	55	E

¹³ Metropolitan Transportation Commission, 2017. Metropolitan Transportation Commission website. Available online at: <https://mtc.ca.gov/our-work/plans-projects/major-regional-projects/richmond-sanrafael-bridge-access-improvements> (last accessed October 6, 2017).

Table 3.B: 2040 Sir Francis Drake Boulevard Intersection LOS and Delay With Project Except Third Eastbound Lane

Study Area No.	Intersection	With Project Except Third Eastbound Lane			
		AM Peak Hour		PM Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
9	El Portal Drive/SFDB	21	C	15	B
10	La Cuesta Drive/SFDB	>100	F	71	E
11	Eliseo Drive/SFDB	96	F	85	F

Emergency Service Impacts. As stated in the Draft EIR, operational impacts of the proposed project on fire and police protection services would be less than significant (pp. 318-319). The proposed project would not increase the population in the area; therefore, the demand for fire and police protection services would be similar to the existing condition. Implementation of the proposed project would not generate additional vehicle trips along SFDB; would have a long-term beneficial effect to emergency response times by improving traffic conditions within the project corridor; and would not require the fire departments/districts or police departments in the area to construct or expand stations, hire additional staff, or purchase additional equipment.

Based on the traffic analyses conducted for the proposed project (see Appendix H) and the additional analysis provided above, the addition of a third lane along SFDB between El Portal and the on-ramp to southbound Highway 1010 would not result in more congested conditions or interference with emergency access on this section of SFDB.

3.2.4 Master Response 4- Installation of the At-Grade Crosswalk at Wolfe Grade

Several comments raised safety concerns related to the installation of the proposed at-grade crosswalk at Wolfe Grade. As described in Section 3.5.1 (page 63) of the Draft EIR, given that SFDB would be repaved, intersections with existing crossings must be modified to provide accessible curb ramps and crossings in compliance with the Americans with Disabilities Act (ADA).¹⁴ The existing pedestrian overcrossing at Wolfe Grade is currently non-compliant and it is infeasible to make it compliant under current circumstances, including lack of sufficient right of way for the necessary ramp structures on each side.

As described in Section 3.5.1 (page 63 of the Draft EIR), the proposed project would install an at-grade crosswalk at the west side of the SFDB/Wolfe Grade intersection. To maintain existing traffic capacity through the intersection, the project would widen the sidewalk, thereby reducing the width of the street crossing, and minimizing the time required for the pedestrians to cross the street. In addition, the intersection’s signal phasing would be modified to be more efficient. For further clarification on the signal phasing the following information is provided. Under Project conditions,

¹⁴ The Americans with Disabilities Act of 1990 (ADA) is a federal law that prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. In 2013, the Departments of Justice and Transportation issued a directive that requires agencies to provide curb ramps when streets, roads, and highways are altered through resurfacing.

the phasing sequence of the traffic signal at the SFDB/Wolfe Grade intersection would be modified to include a new pedestrian signal for the proposed crosswalk across the western leg of the intersection. When activated, the crosswalk signal would appear several seconds in advance of the traffic light serving southbound traffic egressing from Wolfe Grade. This leading interval would enable crossing pedestrians to enter the crosswalk without vehicular traffic making right turns across the crosswalk. Later in the traffic signal cycle, the light serving traffic exiting from Bacich Elementary School would turn green. The modified signal phasing would minimize the potential for conflicts between crossing pedestrians and turning vehicular traffic.

As shown in Tables 4.12.E and 4.12.G (pages 333 and 336 of the Draft EIR), the proposed enhancements at the SFDB/Wolfe Grade intersection, including provision of a pedestrian crosswalk, curb changes, and traffic signal phasing modifications, would improve traffic operations by reducing average motorist delays.

The current overpass would remain in place for those wishing to avoid crossing SFDB at-grade. The proposed at-grade crosswalk provides an accessible alternative route for those individuals who make an informed choice to use it. The proposed at-grade crossing would occur at a signalized intersection, which incorporates pedestrians crossing into the signal timing to provide ample time for pedestrians to cross. Pedestrian crossings at signalized intersections are common along the SFDB corridor. Therefore, the proposed project would not result in a significant new pedestrian safety impact compared to existing conditions and no changes to the Draft EIR are required.

3.2.5 Master Response 5- Addition of a Second Left Turn Lane at College Avenue

Several comments raised concerns related to the addition of a second left turn lane at College Avenue, stating that a second left turn lane would increase traffic congestion. As described in Section 3.5.1 (page 63) of the Draft EIR, the proposed project would provide dual left turn pockets to accommodate the volume of vehicles, reducing backup into the through travel lanes, and reducing congestion in the intersection.

Under current conditions, over 500 vehicles per hour often turn from the single left-turn lane on westbound SFDB to College Avenue. Typically, two left-turn lanes are warranted when traffic volumes exceed 300 vehicles per hour.

Currently, the left-turn movement at this intersection operates at over-capacity conditions at various times, including during the weekday AM and PM peak hours, after-school traffic peaks, and occasionally on weekends. Motorists turning left may wait through multiple traffic signal cycles, and vehicle queues often extend to the east within the left-hand through traffic lane along SFDB, blocking through vehicles and resulting in delays and collisions along the arterial roadway. Many westbound rear-end collisions have occurred in the left-hand through lane between College Avenue and McAllister Avenue, and due to the vehicle spillbacks and traffic congestion, motorist visibility of pedestrians crossing at Ash Street can be compromised, leading to collisions with pedestrians. The third highest collision location on the study corridor is near Ash Avenue (after Eliseo Drive/Barry Way and La Cuesta Drive).

As stated in the Draft EIR, the project would reconfigure the intersection to provide an additional (second) left-turn lane from westbound SFDB to southbound College Avenue, substantially decreasing motorist delays and vehicle queuing along westbound SFDB, reducing the potential for rear-end collisions along the arterial roadway, and improving safety for pedestrians crossing at Ash Avenue.

With implementation of the proposed project, the level of service (LOS) at the College Avenue intersection would improve by up to one service level grade, and overall motorist delays would decrease. For example, in year 2020 and 2040 AM peak hour conditions, the College Avenue intersection would improve from LOS D to LOS C, and motorists would experience 17 seconds less delay, on average (see Draft EIR Tables 4.12.E and 4.12.G; pp. 333 and 336).

While the intersection's overall service level would improve and motorist delays would decrease, the most substantial benefit would be for motorists turning left from SFDB on to College Avenue. For example, in year 2020 AM peak hour conditions the left-turn movement's service level would improve from LOS F to LOS C. In 2040 AM peak hour the left-turn service level would improve from LOS F to LOS E. Motorists turning left would experience substantially less delay and vehicular queuing would decrease along westbound SFDB between McAllister Avenue and College Avenue.

As part of the proposed project, two southbound lanes would be provided along College Avenue extending approximately 400 feet south of SFDB. This distance would be adequate for accommodating traffic turning from dual left-turn lanes on westbound SFDB onto southbound College Avenue. Vehicles would merge into a single traffic stream while traveling south along College Avenue.

3.2.6 Master Response 6 – Project Alternatives

Several comments made recommendations about which improvements should be included in the proposed project or made suggestions regarding other improvements that are not currently included in the proposed project or any of the project alternatives. Some of these suggestions include: retaining the left hand turn lane opposite 919 SFDB, providing school bus transport from all neighborhoods surrounding Kent School, making the light on College Avenue at Kent School a smart light, and keeping the existing guard rail along SFDB. These comments may be construed as alternatives to the proposed project, which were not included in Section 6.0 of the Draft EIR.

Section 15125(a) of the *CEQA Guidelines* states:

An EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. There is no ironclad rule governing the nature of scope of the alternatives to be discussed other than the rule of reason.

Section 15125(f) of the *CEQA Guidelines* describes the rule of reason guiding alternative development as such:

The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In developing the alternatives to be analyzed in the Draft EIR, the County applied the rule of reason to identify a range that would allow for informed decision making and public participation. The alternatives reflect careful consideration by County staff of the need to minimize environmental impacts while achieving project objectives. The County believes that the alternatives presented in Chapter 5 of the Draft EIR are sufficiently different from one another to provide meaningful comparison to the proposed project and to one another, and that they represent a reasonable range. As described in Chapter 5 of the Draft EIR, each of the alternatives presented includes a different combination of roadway improvements, which when implemented together, are intended to achieve a specific project objective (e.g. pavement rehabilitation, congestion relief, pedestrian improvements). Proposed suggestions for alternative project elements do not address project impacts or are related to the adequacy of the EIR. As described in Master Response 1, if this Final EIR is certified as adequate, the County will consider the recommendations in these comment letters as well as information presented in the EIR, when it makes its decision regarding whether to approve the project as proposed, adopt one of the project alternatives described in the Draft EIR, or agree to some combination thereof.

4.0 COMMENTS AND RESPONSES

This chapter includes a reproduction of each letter that commented on the Draft EIR, grouped by the affiliation of the commenting entity as follows: Federal, State, regional and local agencies (A), organizations (B), individuals (C), public hearing comments on the Draft EIR (PH), and letters which cited or mentioned the Draft EIR, but which had no comments on the Draft EIR (E). The comments are numbered consecutively following the A, B, C, or PH. The letter number (for example A1, the first agency comment letter) is shown in a box in the upper right-hand corner of each page of the letter. Individual comments within the letters are numbered consecutively and are annotated in the margin of each letter.

When cross-referenced in the text, the comment is referred to as A#-# where the number following the letter refers to the letter number, and the number following the hyphen refers to the comment number within that letter. For example, comment C3-8 refers to the eighth comment within the third letter submitted by an individual.

Written letters received during the public comment period on the Draft EIR are provided in their entirety in the following pages. Oral comments delivered at the public hearing appear in the notes from the public hearing, which is treated as one comment letter (letter PH). Each letter is immediately followed by responses keyed to the specific comments.

4.1 FEDERAL, STATE, REGIONAL, AND LOCAL AGENCIES

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



*Make Conservation
a California Way of life.*

November 15, 2017

SCH# 2016122032
04-MRN-2016-00071
GTS ID 2504

Mr. Dan Dawson
County of Marin
Department of Public Works
3501 Civic Center Drive, Suite 304
San Rafael, CA 94903

Sir Francis Drake Boulevard Rehabilitation – Draft Environmental Impact Report (DEIR)

Dear Mr. Dawson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans *Strategic Management Plan 2015-2020* targets aim to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR. Additional comments may be forthcoming pending final review.

Project Understanding

The proposed project will provide several traffic flow, pavement, and safety improvements, as well as water main replacement and installation along Sir Francis Drake Boulevard between US 101 and the Ross Town limits. Proposed improvements include:

- Repaving of the roadway within the project limits;
- Intersection geometric modifications, including adding or reconfiguring turn lanes;
- Modernization of traffic signals, phasing, and synchronization in the corridor;
- Striping modifications to increase circulation efficiency;
- Sidewalk widening, school connectivity improvements, and crosswalk enhancements;
- Replacement and installation of water supply mains in portions of the corridor in conjunction with Marin Municipal Water District (MMWD);
- Accessibility improvements compliant with the Americans with Disabilities Act (ADA);
- Replacement of landscaping and irrigation systems disrupted by the project; and
- Installation of drainage improvements and conduits for future projects, including adaptive signal controls and a fiber optic spine for data transmission;

Access to the project would be provided via the US 101 on- and off-ramps at Sir Francis Drake Boulevard.

Lead Agency

1 As the lead agency, the County of Marin is responsible for all project mitigation, including any needed improvements to the STN or reduction in VMT. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Traffic Management

- 2 • Access to and from US 101 must be maintained and any work or construction area signs within State Right-of-Way (ROW) must be approved.
- 3 • Construction work should be scheduled to minimize operational impacts to the ramp terminals at US 101 and Sir Francis Drake Boulevard.

Sea Level Rise

4 The document states that, "the proposed project is not located in an area that is susceptible to inundation from sea-level rise." However, the very western edge of the project (near the interchange with US 101) is in an area that is projected to be inundated at about 55 inches of sea level rise, which is projected to occur around the year 2100. The DEIR should evaluate potential adaptation measures to reduce any potential flood risks from sea level rise.

Transportation Permit

5 Project work that requires movement of oversized or excessive load vehicles on the STN requires a transportation permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to: Caltrans Transportation Permits Office, 1823 14th Street, Sacramento, CA 95811-7119. See the following website for more information: <http://www.dot.ca.gov/hq/traffops/permits>.

Encroachment Permit

6 The applicant will be required to apply for and obtain an encroachment permit for any work within Caltrans ROW prior to construction. As part of the encroachment permit process, the applicant must provide the appropriate California Environmental Quality Act approval, where applicable, for potential environmental impacts within the ROW. The applicant is responsible for quantifying the environmental impacts of the improvements within Caltrans ROW (project-level analysis) and completing appropriate avoidance, minimization and mitigation measures.

To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-

Mr. Dan Dawson, County of Marin
November 15, 2017
Page 3

related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Should you have any questions regarding this letter, please contact Stephen Conteh at 510-286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pat M.', is positioned above the typed name.

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Commenter A1**California Department of Transportation (Caltrans), District 4; Patricia Maurice, District Branch Chief (November 15, 2017).**

- A1-1:** Comment noted. If the County certifies the EIR, then the County would adopt the Mitigation Monitoring and Reporting Program in approving the proposed project to ensure appropriate implementation of mitigation measures identified in this Draft EIR.
- A1-2:** As described in the Draft EIR, Mitigation Measure TR-1 requires preparation and implementation of a Traffic Control Plan (TCP) to maintain peak period travel times to the extent possible during construction. Access to and from Highway 101 will be maintained and any work or construction area signs within Caltrans' ROW will be approved by Caltrans prior to installation/start of construction activities.
- A1-3:** As described in the Draft EIR, Mitigation Measure TR-1 requires preparation and implementation of a Traffic Control Plan (TCP) to maintain peak period travel times to the extent possible during construction, including minimizing operational impacts to the ramp terminals at U.S.101 and SFDB.
- A1-4:** As described in the Draft EIR, the current draft State of California Sea-Level Rise Guidance Document recommends that state agencies plan for a maximum expected sea level rise of 3.4 feet (40.8 inches) by the year 2100. This level supersedes the previous projection of 55 inches considered in earlier guidance documents. However, according to sea-level rise inundation areas mapped by the National Oceanic and Atmospheric Administration,¹⁵ neither sea-level rise scenario (40.8 or 55 inches by 2100) would result in inundation on the western edge of the project site. By the year 2100, sea-level rise could potentially inundate an area below the elevated on-ramp for Highway 101, which is located approximately 350 feet southwest of the project footprint and would not be affected by the proposed project.
- A1-5:** Comment acknowledged. Prior to conducting any work requiring the movement of oversized or excessive load vehicles on Highway 101, the County will request a transportation permit from Caltrans consistent with Caltrans' requirements.
- A1-6:** The County does not intend to encroach within the Caltrans ROW; however, the proposed project would include a merge of the proposed third lane near the Highway 101 on-ramp, just before Caltrans' ROW. If the proposed project extends into Caltrans ROW, the County will request an encroachment permit from Caltrans for any proposed work within Caltrans ROW. The encroachment permit would cover any proposed roadway improvements or pipeline installation within Caltrans ROW.

¹⁵ National Oceanic & Atmospheric Administration (NOAA), 2017. *Sea Level Rise Viewer*. Available online at: <https://coast.noaa.gov/digitalcoast/tools/slr>. (Accessed on June 22).

4.2 ORGANIZATIONS

From: [Anne Petersen](#)
To: [sdrakeimprovements](#)
Cc: [Rice, Katie](#); ["Ann Thomas"](#); [Dawson, Dan](#); [Vernon, Nancy](#)
Subject: Comment on SFD project EIR
Date: Tuesday, December 05, 2017 4:06:09 PM
Attachments: [SFD Draft EIR Comments 120517.pdf](#)

B1

Dan,

Thank you very much for the opportunity to comment. Please confirm that this letter has been received.

Best regards,

Anne Petersen

Kentfield Planning Advisory Board

B1 (cont.)

P.O. Box 304, Kentfield, California 94914

December 5, 2017

Dan Dawson, Principal Transportation Planner
Marin County Department of Public Works
3501 Civic Center Drive
San Rafael, CA 94903
Via email: sfdimprovements@marincounty.org

RE: SIR FRANCIS DRAKE BLVD REHABILITATION PROJECT DEIR

Dear Mr. Dawson:

The Kentfield Planning Advisory Board has noted text and data errors that should be corrected, followed by comments on incompleteness and suggestions for additional information.

Text and Data Corrections

1. 3.0, Page 39: Ross Terrace is in the community of Kentfield and is not within the city limits of the Town of Ross.
2. 3.3.2, Page 42: 3.3.2 Commercial uses are also along the North Side of SFD at Wolfe Grade.
3. Multifamily housing exists along SFD from McAllister Avenue to the Ross City Limits.
4. Figure 3.18. There is no office called Marin Senior Care in the building on SFD near Ash. No organization that would expect a more-than-average number of seniors to visit is in this building.
5. 5.0, Page 298, Table 4.10.C. The table states that there are 13,300 average daily trips, SFD Ash to Laurel Grove. It should be 23,300.
6. 4.11.1.3, Page 315: College of Marin should be listed in the “Schools” section.
7. 4.11.2.1 Page 316: The Kentfield Greenbrae Community Plan is a “Local Plan and Policy” which is not mentioned here. The Kentfield Planning Advisory Board is tasked with reviewing major public works projects within the plan jurisdiction. The conclusions in the Circulation section should be considered.
- 8.

General Issues and Incompleteness

9. The EIR appears to focus only on impacts and mitigation measures during construction and does not sufficiently study the negative impacts post construction.

Section 5.0, Alternatives Analysis

- 10 The brief descriptions of the alternatives are not sufficient for members of the public to understand exactly what activities would be done under each alternative. Provide a table listing all the components of the proposed project and indicate in the table which of these would be included in each of the alternatives. If there is any other relevant information, such as estimated cost or timing of work, please also provide.

Public Services and Recreation

- 11 3.0, Table 2.11.A, Page 34. 4.11. The table only refers to impacts during construction and does not provide information about how response time for emergency services (fire, ambulance, sheriff, CHP) could be affected upon completion of the project, especially between El Portal and Eliseo where there would be three eastbound traffic lanes, and on College Avenue where a new turn lane would be a traffic lane between SFD and the College Avenue Bridge. Please provide information.

College Avenue/SFD intersection

- 12 1. Table 2.11.A, page 34, indicates that there would be less than significant impacts on College of Marin and Kent Middle School. Would there be any increased risk of accidents resulting from the addition of the second left turn lane from SFD to College in the area where two traffic lanes would merge into the single through lane, including the proximity to a well-used crosswalk?
- 13 2. Table 2.11.A, Page 36-37 Impact on local businesses. Although it is stated that there is no loss of parking, changes near the College/SFD intersection appear to require a loss of parking on the north side of SFD where 2-hour parking in this area near the businesses and away from the College students is necessary. Please confirm no parking spaces or red zones for site distance would be lost on the north side of SFD.
- 14 3. Figures 3.5 and 3.16. The existing parking seems a bit inaccurate. Four cars park near the fire station. It would appear that at least one of those 4 parking spaces would be lost after construction. To move parking back would seem to require a retaining wall of 12 to 18 inches due to the slope. Passengers will need to open the car doors and exit the vehicles. Please provide a cross section of that area.
- 15 4. If the EIR is referring to the loss of the 4 large trees between Stetson and Terrace, those trees are a requirement of the development of the 5 unit condominium parcel they front and their loss would be a significant impact to the community.
- 16 5. It is known that at the Barry Way Intersection with Sir Francis Drake, which has two left-hand turn lanes from SFD to Barry Way, more cars tend to stay in the right-hand turn lane when making the turn. The angle of that turn is approximately 65 degrees. There are no markings on the pavement on Barry Way to encourage people in the right lane to merge left. Contrast that to the turn from Sir Francis Drake onto College Avenue. The angle of that turn is about 120 degrees. The cars in the left lane of the turn are forced to make a decision within a few feet after they negotiate the turn. For example, will they turn left into one of the several driveways, or will they merge right to avoid the stopped cars in front of them or to

16 (cont.)

approach the one lane at the Corte Madera Creek crosswalk? Or will they race on College Avenue to get ahead of the lane of traffic on their right? Anyone in the left lane should use a turning signal, one way or another, because they are leaving their lane. Would this slow down traffic? Would a likely scenario be that someone making the left hand turn, SFD to College, with a destination anywhere beyond the College Avenue Bridge or on the right side before the bridge, avoid the left hand turn lane and make the turn from the right hand lane; this would be similar to what any vehicle with a long wheel base (buses, trucks) would do. COM students and Kentfield residents will catch on quickly. Those who don't stay right will probably have to slow down to let in the people merging. This combination of issues indicates that the two left turns onto College will not reduce the stacking lane on Sir Francis Drake, and in fact, might increase it due to the lane restriction on the turn.

17

6. No apparent study was done of College Avenue and its ability to receive two lanes of traffic in an area with a center left hand turn lane during pending major construction on the College of Marin Kentfield campus. Please provide information on how the reconfigured road pattern would work during college construction.

18

7. Figure 3.16: What is impact on pedestrian safety and ambience on SFD of modifying driveways and narrowing the sidewalk frontage?

Bon Air to Terrace Avenue

19

8. Page 69: How will getting rid of the left turn and U-turn lane at Ash, and moving u-turns to Terrace, impact the eastbound left turn lanes at Terrace, including visibility for left and U-turners?

20

9. Figure 3.15. Because of the sharper angle of the westbound turn SFD to Wolfe Grade, and the increased pedestrian movement, will it not slow traffic westbound turning right and back it up on SFD even farther than it does now (currently it often backs up to Bon Air Road in the afternoons)?

21

10. Figure 3.21. The east bound left turn lane on SFD at Wolfe Grade is currently not long enough and cars back into the moving traffic lane on a red light. How and where would the trees that are removed from the front of Bacich School be replaced?

22

11. Figure 3.15. It is noted that crosswalks at Wolfe Grade are ADA requirements. During school hours there would probably be crossing guards available. However, during the summer, and when school is not in session, the crossing, directly across from a school with playgrounds and play equipment, will be unmanned. This is of great concern and safety measures should be provided.

23

12. Was traffic speed westbound between Laurel Grove and College Avenue studied? At Ash Avenue there is a pedestrian crossing, and traffic must be prepared to slow for the intersection.

24

What specifically is proposed to slow down traffic in this segment of SFD? Is there any device that would caution the WB drivers approaching Ash of possible pedestrians crossing the road or change in traffic speed and conditions?

Highway 101 to Bon Air

- 25 13. Although the DEIR states that project goals include reducing congestion by reducing travel time, it is not clear how this would be accomplished. The addition of the 3rd lane does not decrease congestion, but increases congestion in the three-lane portion of the road by bunching more vehicles into the stretch of road that was previously striped for two lanes.
- 26 14. Provide an explanation in lay terms of how increased bunching up of vehicles on SFD eastbound from EL Portal to Hwy 101 reduces travel time. Would there be more lane changing needed with three lanes as vehicles work to get into either the eastbound SFD lane, into the Bon Air Center, or onto 101 south or northbound? Where would this merging take place, and how would it affect safety and travel time?
- 27
- 28 15. Currently large trucks park on SFD in front of the offices between El Portal and La Questa to unload. Is there sufficient turning radius and access within the parking lots for these trucks to unload without obstructing parking and out of the moving traffic lane?

Additional Comments

- 29 16. Referring to the Kentfield/Greenbrae Community Plan, the draft EIR does not explain how the project would comply with the Plan Goals 1, 4 and 7 on page I-3.
- 30 17. In the most recent winter storms, curbside inlets for storm water runoff in the area of SFD and Laurel Avenue were inadequate to handle the runoff from the surrounding higher elevation. The result increased the flood level in Granton Park. Storm drains in this area should be improved as a part of this project.
- 31 18. Please note all bus stops. Some spots are noted and some are not. Please indicate which are in pull-off areas and which are planned to be in a moving traffic lane.
- 32 19. There should be analysis of how vehicles move entering a choke point or a merge, and how the choke point or merge affects capacity. This happens when the third lane is created east of El Portal, when traffic from those lanes exit via the single lane accessing Hwy 101 or the single lane EB under the freeway. What examples are there of similar road changes in the Bay Area, and what has been the experience following the changes?
- 33 20. Following changes at the College/SFD intersection the lights on College Avenue may need to be reconfigured.
- 34 21. Page 51. Intercept surveys were conducted on two days in April only, one of which was a minimum day in the Kentfield District. This seems inadequate.

KPAB thanks you for this opportunity to comment. We look forward to reviewing the final EIR.

Yours truly,

Anne Petersen
Anne Petersen, Chairman

CC: Supervisor Katie Rice
KRice@marincounty.org

Commenter B1

Kentfield Planning Advisory Board; Anne Peterson (December 5, 2017).

B1-1: Page 39 of the Draft EIR has been revised as follows to address this comment:

The section of SFDB under study is a 2-mile segment located west of Highway 101 in the City of Larkspur extending to Ross Terrace ~~in~~at the Town of Ross town limits (Figure 3.1).

B1-2: Page 42 of the Draft EIR has been revised as follows to address this comment:

Commercial uses are located on the south side of SFDB between Eliseo Drive and El Portal Drive, at the Bon Air Road intersection, and between West McAllister Avenue and Ross Terrace and on the north side of SFDB at Wolfe Grade.

B1-3: Page 42 of the Draft EIR has been revised as follows to address this comment:

Multifamily housing exists near the intersection of College Avenue and along SFDB from McAllister Avenue to the Ross Town limits.

B1-4: The comment asserts that Figure 3.18 in the Draft EIR is incorrectly labelled. Figure 3.18 has been revised to address this comment. The revisions to this figure do not result in any changes to the environmental analysis included in the Draft EIR.

B1-5: The comment asserts that Table 4.10.C should be revised to show that the average daily trips on SFDB from Ash to Laurel Grove should be 23,300. The County is not sure how the commenter arrived at this value. Based on the traffic information prepared by Parisi Consulting, Inc., the correct figure is 13,300 for that segment of the project, as stated in the Draft EIR.

B1-6: Section 4.11.1.3 has been revised as follows to address this comment:

Three school districts provide public education services in the project area: 1) Ross School District; 2) Kentfield School District; and 3) Tamalpais School District. The College of Marin is also located within the project corridor.

College of Marin. The College of Marin is a community college with campuses in Kentfield and Novato. The College of Marin has a total enrollment of 13,091 with 11,555 students in Kentfield and 2,446 at the Indian Valley campus in Novato.

B1-7: The following has been added to Section 4.11.2.1 to address this comment:

Kentfield/Greenbrae Community Plan (1987). Goals relevant to the provision of public services and recreation include:

Goal 6. Maintain and preserve the community's public services.

- B1-8:** Relevant goals, policies and recommendations from the Kentfield/Greenbrae Community Plan, including those pertaining to circulation, are listed in Section 4.9.2.3 (pp 289-290 of the Draft EIR).
- B1-9:** The Draft EIR addresses the potential short-term construction and long-term operational impacts of the proposed project for each environmental topic. For some of the environmental topics (e.g., biological resources, and cultural resources), impacts would be limited to the construction period when ground disturbance would occur, as the roadway would continue to operate within the ROW once the project is implemented. Nevertheless, the County assessed the operational and construction impacts of the proposed project for each environmental topic. For example, Section 4.2.4 describes the potential for operational emissions associated with the proposed project to result in a violation of air quality standards; Section 4.8.4 assesses the potential for project operations to degrade water quality; and Section 4.12.2.4 analyzes traffic operations with implementation of the proposed project under year 2020 and year 2040 conditions. No changes to the Draft EIR are required.
- B1-10:** Table 5.A has been added to the Draft EIR to address this comment. Table 5.A is provided on page 186 of this Response to Comments document.
- B1-11:** The long-term operations impacts on emergency services are addressed in Section 4.11.4. Table 2.11.A provides a summary of environmental impacts. The commenter is correct that the discussion in Table 2.11.A focuses on the construction impacts to fire and police protection services because those impacts were determined to be significant and mitigation measures are proposed to reduce impacts to less than significant. Please see Master Response 3 for further discussion related to the addition of the third lane and the potential impacts on emergency service providers.
- B1-12:** Please see response to Master Response #5.
- B1-13:** The comment indicates that changes near the College/SFDB intersection appear to require a loss of parking. The intent of the conceptual design is to have a zero net loss of parking at the west end of SFDB near College Avenue.
- B1-14:** The comment indicates that the figures in the Draft EIR do not accurately show the parking areas on SFDB. The number of parking stalls shown on Figure 3.5 is based on the current California Manual on Uniform Traffic Devices (2014 Edition).¹⁶ Since SFDB is not striped for

¹⁶ California Department of Transportation. 2018. 2014 California Manual on Uniform Traffic Control Devices, Revision 3. 9 March.

individual parking stalls, more cars may park in this area depending on the size of the vehicles.

B1-15: The comment refers to the potential loss of four trees on the north side of SFDB between Stetson Avenue and Terrace Avenue to accommodate the proposed project improvements and preserve the existing parking. The comment is noted. The design for this area is still being determined; however, if the four trees must be removed to accommodate proposed roadway improvements, replacement trees could be planted between the parking stalls. In addition, Mitigation Measure BIO-7 requires replacement of native trees protected under the Marin County Tree Protection Ordinance, the Town of Ross Municipal Code Section 12.24.080(d) (replacement tree requirements), and the City of Larkspur Municipal Code (Ordinances 968, 906, 862, 877, and 772). The four trees referenced in this comment are non-native species, and not protected under the Marin County Tree Protection Ordinance. Therefore, replacement of these trees is not required. However, the overall intent of the project is to replace any landscaping removed as part of project construction.

B1-16: Please see Master Response 5.

B1-17: The comment asserts that no study was done of College Avenue and its ability to receive two lanes of traffic during pending construction on the College of Marin Kentfield campus. As described in Section 6.3 of the Draft EIR, construction activities associated with the proposed project could result in traffic delays, safety concerns and pavement damage created by construction traffic. The majority of the projects considered in the cumulative analysis would be completed prior to construction of the proposed project (e.g., prior to 2019). Those projects with construction periods occurring simultaneously with the project, could compound construction-related traffic delays and/or congestion. However, construction-related traffic impacts would be localized to the project area and would be reduced to less-than-significant levels with implementation of Mitigation Measure TR-1.

Like the proposed project, any major construction work at the College of Marin would require preparation of a Traffic Control Plan (TCP) that specifies measures to be implemented to maintain peak period travel time to the extent possible during construction. The County would review travel patterns and potential impacts when the College of Marin project reaches the phase for temporary traffic control design to ensure that appropriate measures are implemented to reduce construction-related delays associated with projects on the College of Marin Kentfield campus.

B1-18: As shown in the DIER, Figure 3.16, the sidewalk width along the north side of SFDB would remain the same and the parking area and trees would buffer pedestrians from traffic on SFDB. As described in Section 4.12.4 of the Draft EIR (pp. 338), upon completion of construction, the project would not increase hazards within the project area. The proposed project would improve pedestrian safety by widening sidewalks in locations along the project corridor and reconfiguring intersections to reduce time needed for pedestrians to cross.

B1-19: The sight distance available for motorists making a U-turn at Terrace Avenue and looking west at eastbound SFDB traffic and for motorists traveling eastbound on SFDB approaching the Terrace Avenue intersection meets sight distance standards. The prohibition of U-turns at Ash Avenue would re-route about 25 vehicles per hour during the weekday AM and PM peak periods to Terrace Avenue, which is equivalent to an additional vehicle making a U-turn every two minutes. This additional traffic can be accommodated within the turning pocket at Terrace Avenue and would not lead to additional delay to eastbound traffic on SFDB.

B1-20: The angle of the right-turn from westbound Sir Francis Drake Boulevard onto Wolfe Grade would remain the same as it is today. The turning radius would be reduced, however, to improve pedestrian safety within the crosswalk across the Wolfe Grade approach. The extended curb would assist in slowing down right-turning vehicles turning at excessive velocity but would continue to accommodate vehicle turns at reasonable travel speeds.

Right turns are expected to remain heaviest during the weekday PM peak hour. The project would include other enhancements, including modification of the intersection's signal phasing. Overall, right-turn delays would be reduced during PM peak hour, with right-turn service levels improving from LOS D to LOS C conditions in year 2020 and from LOS E to LOS D conditions in year 2040 (please see Appendix H).

B1-21: As stated in the Draft EIR, if trees are removed to install the proposed improvements, they will be replaced as required by Mitigation Measure BIO-7 and final placement of these replacement trees would be coordinated with the school district during the design phase.

B1-22: Please see Master Response 4.

B1-23: Vehicular travel times were estimated for weekday peak hours along two segments of SFDB: 1) between College Avenue and Bon Air Road, and 2) between Bon Air Road and Highway 101. The travel times were estimated for year 2020 and 2040 conditions under No Project and Project conditions. Tables 4.12.B, 4.12.D, and 4.12.F (pages 323, 330 and 333 of the Draft EIR) report estimated travel times along two segments of the SFDB corridor (i.e., between College Avenue and Bon Air Road and between Bon Air Road and Highway 101). The proposed project would improve travel times most substantially along the segment from Bon Air Road to Highway 101, the section of the corridor that experiences the greatest level of traffic congestion. The following tables convert travel times to travel speeds along this latter segment.

Table 4.A: 2020 Sir Francis Drake Boulevard Travel Speed

	Direction	Distance (mi)	No Project	With Project
			Average Speed (mph)	Average Speed (mph)
AM Peak Hour				
College Avenue to Bon Air Road	Eastbound	0.88	24	24
	Westbound		17	21
PM Peak Hour				
College Avenue to Bon Air Road	Eastbound	0.88	28	28
	Westbound		10	16

Table 4.B: 2040 Sir Francis Drake Boulevard Travel Speed

	Direction	Distance (mi)	No Project	With Project
			Average Speed (mph)	Average Speed (mph)
AM Peak Hour				
College Avenue to Bon Air Road	Eastbound	0.88	22	22
	Westbound		11	16
PM Peak Hour				
College Avenue to Bon Air Road	Eastbound	0.88	25	28
	Westbound		7	10

B1-24: Between Laurel Grove and College Avenue, the proposed 11-foot wide travel lanes would encourage motorists to drive at safer speeds. Roadways with 12-foot or wider lanes are associated with higher relative travel speeds and can promote speeds higher than posted speed limits. Please refer to Master Response 2.

At the Ash Avenue crossing, a pedestrian-activated, lighted crosswalk would encourage or require vehicles to stop, depending on the system chosen during design. During the design phase, the County would explore advanced flashing beacon options to warn vehicles they are approaching a crosswalk around the curve east of the intersection.

B1-25: Please refer to Master Response 3. Estimated travel time reductions expected with the implementation of the proposed project, which include the additional third eastbound travel lane between El Portal Drive and Highway 101, are provided in Tables 4.12.B and 4.12.F (pages 323 and 333 of the Draft EIR). Estimated intersection service level improvements and reductions in motorist delay at the El Portal Drive, La Cuesta Drive, and Eliseo Drive/Barry Way intersections are shown in Tables 4.12.E and 4.12.G (pages 333 and 336 of the Draft EIR).

B1-26: Please see Master Response 3.

B1-27: Please see Master Response 3.

B1-28: An assessment of turning radius and existing driveways will be completed during the design phase to evaluate that the driveways are consistent with Marin County Standards.

B1-29: Section 4.9.4 provides a discussion of the project's compliance with applicable plans and regulations, including the Marin Countywide Plan, City of Larkspur General Plan, and the Kentfield/Greenbrae Community Plan (pp. 291). Specifically, the proposed project is consistent with Kentfield/Greenbrae Community Plan goals 1, 4, and 7 as follows:

Goal 1: Achieve high quality in the natural and built environment through a balanced system of land use, transportation, and open space.

The proposed project would rehabilitate and improve an existing roadway within the roadway ROW. The proposed project would include pavement rehabilitation, intersection reconfigurations, and bicycle and pedestrian improvements, which would improve operation of the roadway for all modes of transportation and safety for bicyclists and pedestrians. Implementation of the proposed project would enhance the built environment by improving the condition of the roadway and providing a more balanced transportation system for all modes. Therefore, the proposed project would be consistent with Goal 1.

Goal 4: Encourage land use modifications, circulation improvements and community organizations which further a sense of neighborhood and community identity.

As described above, the proposed project would rehabilitate and improve an existing roadway within the roadway ROW. It would not result in land use modifications that would change the character of the community. The proposed project would have a beneficial effect on the visual quality of the roadway corridor by improving the pavement condition, replacing the existing guardrail and enhancing pedestrian features (e.g., crosswalks, sidewalks). Therefore, the proposed project would be consistent with Goal 4.

Goal 7: Limit changes in land use and circulation to those which do not: 1) generate substantial additional traffic; 2) conflict with and congest intra-community travel; and 3) endanger pedestrian and bicycle movement.

As described in the Draft EIR and further clarified in Master Responses #2, 3, 4, and 5, the proposed project would not generate additional traffic, would ease congestion through the project corridor and improve safety for pedestrians and bicyclists; therefore, the proposed project would be consistent with Goal 7.

B1-30: As part of the design phase, storm drain inlets along SFDB within the project limits, including the intersection of Laurel Avenue and SFDB, will be reviewed and the approved designs will include drainage improvements, as needed to ensure adequate drainage.

B1-31: The comment requests additional information related to the bus stops along the corridor. The location of bus stops is as follows:

- Westbound: Maple/Elm (pullout), Ash (pullout), Oak (pullout), Laurel Grove (pullout), Wolfe Grade (pullout), Bon Air Road (pullout), El Portal (pullout), La Cuesta (pullout), and Eliseo (pullout).

- Eastbound: Maple (pullout), Ash (pullout), Rosebank (pullout), McAllister (pullout), Wolfe Grade (pullout), Bon Air Road (pullout), El Portal (stop in third lane), La Cuesta (pullout), and Barry (14 foot shared lane).

If the third lane eastbound is not implemented, the El Portal and Eliseo bus stops would be within the existing, approximately 20-foot shared lane.

- B1-32:** The comment requests an analysis of how vehicles move entering a merge and examples of similar road changes in the Bay Area. This comment relates to the addition of the third lane from El Portal to Highway 101. Please see Master Response 3.
- B1-33:** The comment asserts that the signal lights on College Avenue may need to be reconfigured once the proposed project is implemented. College Avenue beyond the intersection with SFDB is outside of the project limits. The provision of two left turn lanes onto College Avenue would increase traffic flow during left turn phase. However, the total traffic would not change over the entire cycle. Therefore, the proposed project would not create a significant traffic impact. The County will monitor the signal timing to determine if changes should be made to accommodate traffic patterns associated with second left turn lane from SFDB.
- B1-34:** The intercept surveys were conducted on a sunny day when school was in session, when pedestrian and bicycle volumes are typical. Based on observations over the last two years, four community meetings, two walking tours, and several focus groups, observation and feedback from users of the corridor are consistent with the results of these surveys. This comment does not relate to the adequacy of the EIR; therefore, no further response is required. Please see Master Response 1.

4.3 INDIVIDUALS

From: [Rice, Katie](#)
To: [Adiosnibbor](#)
Cc: [Dawson, Dan](#)
Subject: RE: SFD
Date: Friday, November 17, 2017 5:12:02 PM

C1

Thank you for your email. By way of cc I am forwarding to Dan Dawson, project manager for the SFD project for inclusion in the EIR project comment phase.

Katie Rice

Katie Rice | District 2
Marin County Supervisor
3501 Civic Center Drive, Suite 329
San Rafael, CA 94903
(415) 473.7825

-----Original Message-----

From: Adiosnibbor [mailto:lulinada1@gmail.com]
Sent: Friday, November 17, 2017 4:10 PM
To: Rice, Katie <KRice@marincounty.org>
Subject: SFD

- 1 This is so ridiculous. I know no one who is in favor of this project! Who will benefit from this and are they contributing to your campaign? The construction industry? Contractors?
- 2 Analyze the impact of narrowing vehicle lanes – Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated "benefit" of narrowing these lanes was to slow down traffic. That's not a benefit! We want the County to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Narrowing is necessary in some spots but not all the way from Ross to the highway. (From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety.) We recommend that the County re-do the study to include the impact of narrowing of lanes – or they shouldn't narrow any lanes west of El Portal.
- 3 2. Eliminate the additional left turn lane from westbound SFD onto College — This is ill-advised at best. To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd. westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. which may cause vehicles to collide with each other or with pedestrians. An independent traffic engineer has found that the Level of Service change is minimal. So, a lot of change for no good reason. We recommend that they not add the second left turn lane at College Ave.

4

3. Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives — Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This is despite the fact that a child was killed and others injured in a crosswalk at this location. The County says that the current overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby? While Safe Routes to School and parents will direct kids to continue to use the overhead crossing structure, there's no guarantee that they will. This puts our children at risk of injury or even death, and the County (i.e., us) legally liable. We recommend that the County continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. somewhere in that corridor.

5

4. Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101 – The County proposes to narrow the two existing eastbound lanes in front of Bon Air Center in order to make room for a third narrow vehicle lane. This won't improve vehicle flow. The back-up is caused by the constricted ramp onto Highway 101. We recommend that the County not spend the money to insert a third eastbound lane from El Portal to the highway.

Sent from my iPad

Commenter C1

Adiosnibbor¹⁷, Local Resident (November 17, 2017)

- C1-1:** The intent of the proposed project is to improve the existing roadway for the benefit of local residents, as well as, regional travelers who use the SFDB corridor to access western Marin County. This comment relates to the merits of the proposed project and not to the environmental impacts and mitigation measures identified in the Draft EIR. Therefore, no response to this comment is required. See Master Response 1.
- C1-2:** The request for additional information related to proposed lane widths is acknowledged. Please see Master Response 2.
- C1-3:** Please see Master Response 5.
- C1-4:** Please see Master Response 4.
- C1-5:** Please see Master Response 3.

¹⁷ Commenter's name was not included in their communication.

From: [Vernon, Nancy](#)
To: [sdrakeimprovements](#)
Subject: FW: Drake Blvd. Rehabilitation
Date: Monday, November 20, 2017 3:27:29 PM

C2

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473.7351

From: Vernon, Nancy **On Behalf Of** Rice, Katie
Sent: Monday, November 20, 2017 3:10 PM
To: Dawson, Dan <DDawson@marincounty.org>
Subject: FW: Drake Blvd. Rehabilitation

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473.7351

From: Allen Appell [<mailto:alappell@gmail.com>]
Sent: Sunday, November 19, 2017 2:13 PM
To: sfdimprovements@marincounty.org
Cc: Rice, Katie <KRice@marincounty.org>
Subject: Drake Blvd. Rehabilitation

Dear Dan Dawson & Katie Rice,

1 I have followed with great interest the studies and recommendations of the Drake Blvd. Rehabilitation project because I use Drake Blvd. daily. The first order of business should be to do no wrong and the narrowing of lanes, additional crosswalks where there is an overpass, and additional turn lanes will make traffic conditions worse, not better.

Please leave things alone until research proves that traffic will be improve through steps taken.

2 How about opening the existing third lane on the San Rafael Bridge? That would improve traffic conditions immeasurably at little cost.

--

Allen L Appell, Ph.D.

[415-308-9565](tel:415-308-9565)

alappell@gmail.com

Commenter C2**Allen L. Appell, Ph.D., Local Resident (November 17, 2017)**

C2-1: The County disagrees with the commenter's conclusion. As described in Section 4.12 of the Draft EIR and further clarified in Master Responses 2, 4, and 5, the proposed project has been designed to improve traffic conditions and to enhance safety for pedestrians and bicyclists. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C2-2: The comment suggests that opening the third lane on the San Rafael Bridge would improve traffic conditions at little cost. The configuration of the San Rafael Bridge is managed by Caltrans and is not under the County's jurisdiction. Further, improvements to the San Rafael Bridge are not part of the scope of the proposed project. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sdrakeimprovements](#)
Subject: FW: Comment on Sir Francis Drake Blvd. Rehabilitation Project
Date: Tuesday, November 21, 2017 1:25:53 PM

C3

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: Kirstin Radasch-Asher [mailto:photobykir@aol.com]
Sent: Friday, November 17, 2017 7:13 PM
To: Rice, Katie <KRice@marincounty.org>
Subject: Comment on Sir Francis Drake Blvd. Rehabilitation Project

To: Supervisor Katie Rice -

Sir Francis Drake Blvd. Rehabilitation Project:

1

1) Please analyze the Narrowing of Lanes on Sur Francis Drake. Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated "benefit" of narrowing these lanes was to slow down traffic. That's not a benefit!

We want the County to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Slowing down traffic is not a benefit to commuters!

I want the County to investigate the impact. Some narrowing is necessary, but not all the way from Ross to the highway. From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety. *I recommend the County re-do the study to include the impact of the narrowing **of any lanes west of El Portal.***

2

2) Eliminate the additional left turn lane from westbound SFD onto College. This is ill-advised at best. To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd,

2 (cont.)

westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. which may cause vehicles to collide with each other or with pedestrians. An independent traffic engineer has found that the Level of Service change is minimal. This represents change and cost for no good reason. *I recommend they not add the second left turn lane at College Ave.*

3

3) Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives.

Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This, despite the fact that a child was killed and others injured in a crosswalk at this location.

The County says the current overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby?

While Safe Routes to School and parents will direct kids to continue to use the overhead crossing structure, there's no guarantee that they will. This puts our children at risk of injury or even death, and the County legally liable. *I recommend that the County continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. along that corridor.*

4

4) Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101. The County proposes to narrow the two existing eastbound lanes in front of Bon Air Center in order to make room for a third narrow vehicle lane. This won't improve vehicle flow. The backup of traffic is caused by the constricted ramp onto Highway 101. *I recommend that the County not spend the money to insert a third eastbound lane from El Portal to the highway.*

Thank you,
Kirstin Asher
[3 Rocca Drive](#)
[Fairfax, Ca. 94930](#)

Commenter C3

Kirstin Asher, Local Resident (November 17, 2017)

C3-1: Please see Master Response 2.

C3-2: Please see Master Response 5.

C3-3: Please see Master Response 4.

C3-4: Please see Master Response 3.

From: [George Baranoff](#)
To: [sdrakeimprovements](#)
Cc: [Rice, Katie](#)
Subject: SFDB rehab - EIR comments
Date: Monday, December 04, 2017 10:26:15 PM
Attachments: [Dan Dawson 12 4 2017.pdf](#)

C4

Dan,

Comments on the project.

Thanks,

George Baranoff

GEORGE BARANOFF

C4 (cont.)

December 4, 2017

VIA EMAIL and FIRST CLASS MAIL

Dan Dawson

sfdimprovements@marincounty.org

Principal Transportation Planner

Marin County DPW

Box 4186

San Rafael, CA 94913-4186

RE: SFDB Rehabilitation Project

Draft EIR public hearing

Dear Mr. Dawson,

Those of us who travel on Sir Francis Drake Boulevard ("**SFDB**") daily witness the traffic congestion issues on this roadway, particularly during the peak travel times of the day. It is commendable that our elected officials are aware of the problem and have advanced a solution. However, I believe that if all elements of this solution are implemented, the desired results will not be achieved as the scope of the project does **not** address the greatest congestion cause, namely the junction of SFDB and US101 that is just beyond the proposed scope of this project and the lack of an adequate interstate junction in San Rafael.

The real problem is not the capacity of SFDB. It is clear for those of us who use SFDB that the backup going east is not only the lack of a smart Adaptive Traffic Signalization Synchronization ("**ATSS**"), but more so the impediments of the junction with Highway US101, which is not included in the study nor addressed in the project. The major cause in the westbound congestion may well be adequately addressed with an ATSS as proposed in the studies, however extending the synchronization infrastructure to cover the intersection of SFDB and Lagunitas Road in Ross should be considered, as the successful implementation of the proposed ATSS will likely push the congestion further to the west.

SFDB does need to be resurfaced so implementing the following work identified in the EIR at this time makes sense:

- Roadway pavement rehabilitation within the project limits.

3 (cont.)

- Modernization of traffic signal equipment, including revisions to traffic phasing, timing, and improved synchronization along the corridor.
- Installation of conduits and related appurtenances for a future adaptive traffic signal system and a broadband communication network.
- Replacement of water supply mains operated by MMWD in portions of the project corridor

4

Until the 580/101 junction issue is addressed, all of the proposed lane reconfigurations, intersection changes and other physical roadway adjustments will not increase overall traffic throughput and waste tax payer dollars.

5

Unfortunately the EIR glosses over the Alternative Analysis that make the most economic and practical sense at this time. Namely the *NO Project Alternative* or a slightly modified *General Maintenance Alternative* in which the only work would be the MMWD waterline project and the infrastructure for the ATSS. This limited scope of work , which now is essential a roadway resurfacing project, should not trigger ADA compliance issues as related to Federal dollars. Since the cost of the project as proposed is already expected to be well over the currently allocated dollars, to reduce the scope and to postpone the major work until the real congestion issues are addressed will allow for a better real result and may even preserve enough funding to install the complete ATSS as part of this phase.

In today's economic climate, more government agencies are using Return on Investment ("**ROI**") analysis results as one of the criteria for moving ahead with a project or even the scope of a project. I believe a quick ROI analysis will likely show that a reduced scope of work, at least until the junction with US101 issue is resolved, will yield the most beneficial outcome for both taxpayers and residents of the community.

6

Please reconsider the scope of the work, particularly since the overall cost estimate is in excess of the available funding and it is clear that improvements beyond the project area are required for a long term satisfactory resolution to the traffic congestion.

Sincerely

George Baranoff, PE

cc Supervisor Katie Rice KRice@marincounty.org

Commenter C4

George Baranoff, Local Resident (December 4, 2017)

C4-1: The comment states that the proposed project does not address the greatest congestion cause, namely the junction of SFDB and Highway 101. As the commenter correctly states, the SFDB/Highway 101 interchange is beyond the scope of this project. Further, the interchange is part of the state highway system under the jurisdiction of Caltrans. Any proposed improvements to the interchange would need to be initiated and approved by Caltrans.

As described in Section 4.12 of the Draft EIR and further clarified in Master Responses 2, 4, and 5, the proposed project has been designed to improve traffic conditions and to enhance safety for pedestrians and bicyclists. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C4-2: As part of the proposed project, the County would stub the conduits for future installation of adaptive signals to the County line at Ross Terrace. The proposed project does not preclude the Town of Ross from installing adaptive signals to the Lagunitas intersection at some time in the future. The County and Transportation Authority of Marin will continue to coordinate the potential future installation of conduits for adaptive signals beyond the project limits with the Town of Ross.

C4-3: The comment identifies the project elements that should be implemented, including pavement rehabilitation, signal modernization, installation of adaptive signal technology and water main replacement. As stated in the Draft EIR, in conjunction with any asphalt repair, the County must update curb ramps at intersections to comply with the Americans with Disabilities Act. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C4-4: The comment states that until the 580/101 junction issue is addressed, implementation of the proposed project would not address traffic congestion and would waste tax payer dollars. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C4-5: The commenter's support for the No Project Alternative or a slightly modified General Maintenance Alternative, in which the only work would be the MMWD waterline project and the infrastructure for the Adaptive Traffic Signalization Synchronization (ATSS), is noted. The comment also requests a Return on Investment (ROI) analysis be conducted to determine the appropriate scope for the project. An ROI analysis is beyond the scope of the Draft EIR. This comment relates to the scope of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

- C4-6:** The comment requests that the County reconsider the scope of the proposed project. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Andrew 85](#)
To: [sdrakeimprovements](#)
Subject: Don't cause more slow downs please
Date: Monday, November 27, 2017 5:28:03 PM

C5

Tell the County to...

- 1 **1. Analyze the impact of narrowing vehicle lanes** – Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated "benefit" of narrowing these lanes was to slow down traffic. That's not a benefit! We want the County to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Narrowing is necessary in some spots but not all the way from Ross to the highway. (From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety.) **We recommend that the County re-do the study to include the impact of narrowing of lanes – or they shouldn't narrow any lanes west of El Portal.**
- 2 **2. Eliminate the additional left turn lane from westbound SFD onto College** — This is ill-advised at best. To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd. westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. which may cause vehicles to collide with each other or with pedestrians. An independent traffic engineer has found that the Level of Service change is minimal. So, a lot of change for no good reason. **We recommend that they not add the second left turn lane at College Ave.**
- 3 **3. Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives** — Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This is despite the fact that a child was killed and others injured in a crosswalk at this location. The County says that the current overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby? While Safe Routes to School and parents will direct kids to continue to use the overhead crossing structure, there's no guarantee that they will. This puts our children at risk of injury or even death, and the County (i.e., us) legally liable. **We recommend that the County continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. somewhere in that corridor.**
- 4 **4. Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101** – The County proposes to narrow the two existing eastbound lanes in front of Bon Air Center in order to make room for a third narrow vehicle lane. This won't improve vehicle flow. The back-up is caused by the constricted ramp onto Highway 101. **We recommend that the County not spend the money to insert a third eastbound lane from El Portal to the highway.**
- 5 | Environmental impact studies suggest more damage from proposed plans than

C5 (cont.)

5 (cont.)

I leaving the roads as is or even making them faster. The plans for larkspur in effective have already damaged the environment and caused more aggressive drivers It's time to build bridges over the roads and keep the roads subject to minimal slow downs. Sign permeant Ross citizen

Sincerely, Andrew Barry

Sent from my iPhone

Commenter C5

Andrew Barry, Local Resident (November 27, 2017)

C5-1: Please see Master Response 2.

C5-2: Please see Master Response 5.

C5-3: Please see Master Response 4.

C5-4: Please see Master Response 3.

C5-5: Please see Master Response 1.

From: [Ann Becker](#)
To: [sfdrakeimprovements](#)
Subject: Sir Francis Drake Blvd. Rehabilitation Project -- Comments on Draft EIR
Date: Monday, November 27, 2017 4:36:43 PM

C6

Dear Dan and County Officials:

I would like to register the following concerns about the Sir Francis Drake Blvd. Rehabilitation Project Draft EIR:

1

1. You need to analyze the impact of narrowing vehicle lanes. Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated "benefit" of narrowing these lanes was to slow down traffic. That's not a benefit! The County needs to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Narrowing is necessary in some spots but not all the way from Ross to the highway. (From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety.) **Please re-do the study to include the impact of narrowing of lanes – or you shouldn't narrow any lanes west of El Portal.**

2

2. You need to eliminate the additional left turn lane from westbound SFD onto College. This lane addition is ill-advised at best. To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd. westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. which may cause vehicles to collide with each other or with pedestrians. An independent traffic engineer has found that the Level of Service change is minimal. So, a lot of change for no good reason. **Please do not add the second left turn lane at College Ave.**

3

3. Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives. We've been told repeatedly that an ADA-compliant crosswalk needs to be installed at Wolfe Grade. Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This is despite the fact that a child was killed and others injured in a crosswalk at this location. The County says that the current overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby? While Safe Routes to School and parents will direct kids not to use the street-level crosswalk, there's no guarantee that they won't. This puts our children at risk of injury or even death, and the County (i.e., us) legally liable. **Please continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. somewhere in that corridor.**

Thank you,

Ann Peckenpaugh Becker
100 Idlewood Rd.
Kentfield, CA 94904
415-609-6004

Commenter C6

Ann Peckenpaugh Becker, Local Resident (November 27, 2017)

C6-1: Please see Master Response 2.

C6-2: Please see Master Response 5.

C6-3: Please see Master Response 4.

From: [Frances Collins](#)
To: [sdrakeimprovements](#)
Cc: [Rice, Katie](#)
Subject: Comments re the Sir Francis Drake "Rehabilitation Project" EIR and TRAFFIC PROBLEMS!
Date: Sunday, November 26, 2017 6:32:18 PM

C7

Comments re the Sir Francis Drake "Rehabilitation Project" EIR

Regarding proposals to narrow lanes on SFD:

- 1 How is narrowing the lanes, proposed so as a way to *slow* traffic (!!), any sort of benefit/solution to the increased traffic congestion problems we face?!!
I urge the county to re-evaluate the impact of narrowing any lanes.

Re adding a second left turn lane onto College Avenue from westbound SFD: It would be a disaster, for many reasons!

- 2 *I use that left turn daily, and there is NO *need* for a second lane turning left. It is not a 'high demand' left turn.
*There is inadequate space for cars in a new second lane to flow smoothly into College Ave.
*Cars westbound on SFD, when turning right onto College, would find themselves colliding with oncoming 'new second lane' cars. If new turn restrictions were put in place to handle these problems, those restrictions would in themselves slow traffic!

Regarding the need for ADA compliant crossing of SFD near Bacich School, I encourage further research into ways the existing overhead crossing could be modified, vs adding a new ground level crosswalk at Wolfe Grade, as it is already a very complicated multi-turn intersection. Dangerous!

3

Regarding a proposal to narrow lanes to deal with congestion eastbound, approaching Hwy 101:

- 4 The slow down is clearly due to problems with the yet unfinished (how long is it going to take?) onramp to 101 South. Narrowing the existing 2 lanes of SFD, in order to squeeze in a new 3rd lane, is not the solution.
Eastbound traffic backs up because of:
1.) Poor Hwy 101 southbound access
2.) Because of vehicles merging from northbound 101 onto SFD, to then go eastbound to the Richmond Bridge, SFD backs up on the side of 101 west of the freeway. The bridge needs to open up the currently mothballed additional existing lane, asap!

Commenter C7

Frances Collins, Local Resident (November 26, 2017)

C7-1: Please see Master Response 2.

C7-2: Please see Master Response 5.

C7-3: Please see Master Response 4.

C7-4: The comment states that narrowing the existing two lanes of SFDB to provide a new third lane east of Bon Air would not reduce congestion eastbound, approaching Highway 101. The County disagrees. Please see Master Response 3 for further discussion related to the congestion relief anticipated from implementation of the third lane.

From: [george.collins](#)
To: [sdrakeimprovements](#)
Cc: [Rice, Katie](#)
Subject: Comments re the Sir Francis Drake "Rehabilitation Project" EIR
Date: Sunday, November 26, 2017 7:02:06 PM

C8

1 | Please listen to your constituents: (Meanwhile, don't your own families use these roads?!!!!)

Regarding proposals to narrow lanes on SFD:

2 | How is narrowing the lanes, proposed so as a way to slow traffic (!!), any sort of benefit/solution to the increased traffic congestion problems we face?!!

I urge the county to re-evaluate the impact of narrowing any lanes.

3 | Re adding a second left turn lane onto College Avenue from westbound SFD: It would be a disaster, for many reasons!

*I use that left turn daily, and there is NO *need* for a second lane turning left. It is not a 'high demand' left turn.

*There is inadequate space for cars in a new second lane to flow smoothly into College Ave.

*Cars westbound on SFD, when turning right onto College, would find themselves colliding with oncoming 'new second lane' cars. If new turn restrictions were put in place to handle these problems, those restrictions would in themselves slow traffic!

4 | Regarding the need for ADA compliant crossing of SFD near Bacich School, I encourage further research into ways the existing overhead crossing could be modified, vs adding a new ground level crosswalk at Wolfe Grade, as it is already a very complicated multi-turn intersection. Dangerous!

Regarding a proposal to narrow lanes to deal with congestion eastbound, approaching Hwy 101:

5 | The slow down is clearly due to problems with the yet unfinished (how long is it going to take?) onramp to 101 South. Narrowing the existing 2 lanes of SFD, in order to squeeze in a new 3rd lane, is not the solution.

Eastbound traffic backs up because of:

1.) Poor Hwy 101 southbound access

2.) Because of vehicles merging from northbound 101 onto SFD, to then go eastbound to the Richmond Bridge, SFD backs up on the side of 101 west of the freeway. The bridge needs to open up the currently mothballed additional existing lane, asap!

George Collins

Kentfield resident for over 42 years

Commenter C8

George Collins, Local Resident (November 26, 2017)

C8-1: Since the start of the planning process in 2014, the public has had multiple opportunities to provide input on the proposed project. The County has conducted several community workshops to solicit community input on the proposed project elements, including the most recent open house conducted on January 30, 2018 to prioritize the various project components. Additionally, as part of the CEQA environmental review process, the County held a scoping session on January 10, 2017 to gather input on the environmental issues to be addressed in the EIR. A public hearing was also held before the Marin County Board of Supervisors on November 7, 2017 to receive comments on the adequacy of the Draft EIR. This comment relates to the planning process and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C8-2: Please see Master Response 2.

C8-3: Please see Master Response 5.

C8-4: Please see Master Response 4.

C8-5: Please see Master Response 3.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: Sir Francis Drake Rehabilitation Project
Date: Monday, November 20, 2017 3:24:46 PM

C9

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473.7351

From: Deedy, Margaret [mailto:Margaret.Deedy@cbnorcal.com]
Sent: Monday, November 20, 2017 2:44 PM
To: sfdimprovements@marincounty.org
Cc: Rice, Katie <KRice@marincounty.org>
Subject: Sir Francis Drake Rehabilitation Project

Mr Dawson: Having attended numerous public hearings on the SFD Rehabilitation Project, as you near the deadline for public comment, I still have some grave concerns about some of the issues that are being proposed. I drive SFD all day almost every day in my business. I am keenly acquainted with the traffic patterns, that vary during the day and at different times. The issues that give me the greatest concern are:

1. The impact of Narrowing vehicle lanes. As far as I can determine, the DEIR has not carefully analyzed the impact of such a change. Narrowing lanes creates more congestion - it does not reduce it - and it prolongs the time cars must be on the road to get to their destination.
2. Putting a third vehicle land from El Portal to the highway is absolutely "crazy" - that is one of the most congested and dangerous stretches of SFD with businesses/offices/families coming onto that portion of the road from their respective locations. You will create not only more congestion with this plan BUT open the area to the possibility - and probability - of more accidents. Numerous ones all ready have happened at the four way stop light section at 500 SFD...
3. To install a second left hand turn off SFD onto College Ave WITHOUT adjusting College Ave for the additional side by side traffic onto a single lane street makes absolutely no sense. This should be scrapped - it would barely have any impact on the reduction of SFD traffic.
4. Finally - inserting a third eastbound lane from El Portal to Highway 101 is absolutely ridiculous with the strong possibility of horrendous results...The back up on this stretch of SFD is caused by the constricted ramp onto Highway 101 - until this ramp (which has been under construction for almost a year with no

Margaret E. Deedy

Broker

GRI, SRES, Global Luxury Property Specialist

Awards: Past President Marin Association of Realtors

Corte Madera Business Citizen of the Year

REALTOR® of the Year for the Marin Assoc. of Realtors

Business Woman of the Year for the Marin Women's Council
of Realtors



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C O L D W E L L B A N K E R R E S I D E N T I A L B R O K E R A G E

500 Sir Francis Drake Blvd. | Greenbrae, California 94904

P 415.464.3540 | F 415.925.0962 | mdeedy@coldwellbanker.com | CalBRE #00628197

This email may be confidential. If you are not the intended recipient, please notify us immediately and delete this copy from your system. Nothing in this email creates a contract for a real estate transaction, and the sender does not have authority to bind a party to a contract via written or verbal communication.

Commenter C9**Margaret E. Deedy, Local Resident (November 20, 2017)**

C9-1: Please see Master Response 2.

C9-2: Please see Master Response 3.

C9-3: Please see Master Response 5.

C9-4: Please see Master Response 3.

From: [Laura Effel](#)
To: [Rice, Katie](#); [sdrakeimprovements](#)
Subject: Sir Francis Drake Draft EIR
Date: Sunday, November 26, 2017 2:06:54 PM

C10

Supervisor Rice, Mr. Dawson,

1

The plan for the Sir Francis Drake Rehabilitation Project has many things wrong with it, but I am particularly disturbed by the portion of the plan that adds a street-level crosswalk at Wolfe Grade. This has long been a dangerous intersection, and the addition of a street level crosswalk would only make matters worse. I hope you will find another way to provide an ADA-compliant crossing.

Laura Effel
Larkspur

Commenter C10**Laura Effel, Local Resident (November 26, 2017)**

C10-1: The comment expresses concern regarding the at-grade crossing proposed at Wolfe Grade. Please see Master Response 4.

From: fuga@aol.com
To: sfdrakeimprovements
Subject: Sir Francis Drake Improvements are questionable
Date: Monday, November 13, 2017 5:15:43 PM

C11

1

We question the fact that the proposed improvements to Sir Francis Drake Boulevard will improve the traffic congestion. Basically, almost everything that has been proposed does absolutely nothing to ease congestion on SFD Boulevard. There are two problems: First, the two bottle necks: the 101 on-ramp and the two lanes that go through the Town of Ross. The second problem lies with hiring consultants that use their best practices cad programs and a couple on-site surveys to generate a plan that does not take into consideration day-in and day-out use of the street. These consultants and even your county planners do not live along the corridor much less use it everyday. Yet they come up with a plan that looks good on paper but with no real world experience and are even fueled by county supervisor who is more worried about the aesthetic beauty of the plantings in the medium than easing traffic congestion.

Here's what you should do:

2

Just repave and re-stripe the street and install and implement Adaptive Signal Control Technology, which will help smooth the flow of traffic on SFD and hopefully relieve some of the congestion. Or at the very least, properly time the existing signaling system. A county representative once said the signaling system now being used works perfectly fine, it just has to be timed properly. If that is the case, what's the hold up? It's that easy.

Here's what you shouldn't do:

3

Do not narrow lanes! Your proposal of narrowing lanes to 11 feet to calm traffic during off peak hours is absolutely ridiculous. One of your county representatives told me that 11 feet was a lot of room and would slow traffic. As an example, he stated that the Golden Gate Bridge lanes are only 10 feet wide. Obviously the representative has not crossed the bridge lately, because those 10-foot lanes surely have not slowed traffic across the bridge. 60 miles per hour in a 45 per hour zone seems to be the norm. So leave the lanes as they are because you won't calm traffic, you'll make the lanes harder to navigate and probably cause accidents. Stop wasting our money on silly cad program ideas!

4

Do not widen sidewalks! Widening the sidewalks along the north side of SFD across from the shopping center up to Wolf Grade again is a ridiculous waste of money. There's plenty of room for pedestrians to walk and even for a bicycle to past. Hardly anyone uses the sidewalks. On a good day according to your county

4 (cont.)

representative maybe 35 people use the sidewalks. And you want to spend \$1.4 million to widen the sidewalks for at most 35 people. Another big waste of money!

5

Do not get rid of slip lanes! You are proposing to get rid of the slip lanes. All you will do is create more congestion. The slip lanes were originally installed to allow cars to exit and enter SFD smoothly without blocking traffic. Another benefit is that it allows drivers a better view of on-coming SFD traffic without having to nose out into traffic. Squaring off those corners will slow down traffic and make it harder to make a right hand turn. We've used the SFD/Laurel Grove Ave. slip lanes for 36 years and have never had problems during school hours with children crossing. If you happen to use the slip lane when children are present, you simply wait for the children to clear the lane. It's that easy. As the old saying goes, "If ain't broken, don't fix it." Again another waste of money!

6

Do not install a street level crossing at SFD and Wolfe Grade! As you well know, the pedestrian bridge on SFD at Wolfe Grade was erected because two children were killed using an existing crosswalk across SFD many years ago. Now you are proposing reinstalling that crosswalk. Again, a ridiculous idea that will again put children in harms way. It will also slow traffic on SFD because there will be an addition crosswalk signal and wait time. Children have no problem now either using the bridge or walking or biking down to the Laurel Grove cross walk. There is no need for a street level crossing at SFD at Wolfe Grade!

7

Do not add sidewalks to the south side of SFD! Again, this is another ridiculous waste of taxpayer dollars at the expense of narrowing lanes. Pedestrians can simply use the sidewalk on the north side. It's that simple.

8

Do not add a second turning lane from SFD to College Avenue! Your proposal will take away much-needed parking spaces on SFD and think about it, you would then have two turning lanes of traffic filtering into one lane. Doesn't make sense because you will then have to clear two lanes of turning cars when the light turns in order not to block East bound SFD rush hour traffic.

9

Do not replace existing guardrails! The guardrails are perfectly fine and usable. Again, if it ain't broken, don't fix it.

10

Do not replace landscaping! What's this? You want to make everything look more beautiful while people are stuck in traffic because you did nothing to relieve congestion?

11

Do not create bike lanes! Cyclists can use the creek path. Just connect the missing part. And by the way, let the Bicycle Coalition pay for it.

12

By the way, one of your county representatives had the audacity to suggest that we can do all of this under the \$13.2 million in allocated federal funds with nothing coming out of our pockets. Where does he think that federal money came from?

Joel and Brenda Fugazzotto

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Commenter C11**Joel and Brenda Fugazzotto, Local Resident (November 13, 2017)**

- C11-1:** The comment states that the proposed project will not improve traffic congestion and does not address the key issues on SFDB. The County does not agree with the comment's conclusion. As described in Section 4.12 of the Draft EIR and further clarified in Master Responses 2, 4, and 5, the proposed project has been designed to improve traffic conditions and to enhance safety for pedestrians and bicyclists. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C11-2:** The comment identifies the project elements that should be implemented, including pavement rehabilitation and installation of adaptive signal technology. As stated in the Draft EIR, in conjunction with any asphalt repair, the County must update curb ramps at intersections to comply with the Americans with Disabilities Act. Therefore, modifications needed to bring the roadway into compliance with the ADA must be part of any pavement rehabilitation efforts along the corridor. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C11-3:** The comment expresses concern over the potential narrowing of lanes to 11 feet. As stated in Master Response 2, in some areas 11-foot lanes, as proposed, are consistent with *California Highway Design Manual*,¹⁸ would not decrease roadway capacity, would serve to slow traffic and would not increase safety hazards. Please see Master Response 2 for additional analysis related to the lane narrowing.
- C11-4:** The commenter requests that the sidewalks along the north side of SFDB not be widened. As described in the Draft EIR, the purpose, in part, for the sidewalk widening is to maintain existing traffic capacity by minimizing the time required for pedestrians to cross the street at several key intersections along the project corridor. In addition, sidewalk widening would improve the safety of pedestrians choosing to walk rather than drive. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C11-5:** The commenter requests that the slip lanes along the project corridor not be removed. The proposed project would modify several intersections along the corridor to operate as a standard intersection in order to improve traffic flow through the intersection, as well as safety for pedestrians and bicyclists. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

¹⁸ California Department of Transportation. Highway Design Manual Sixth Edition.

- C11-6:** The comment requests that the at-grade crosswalk not be installed. As described in Master Response 4, any rehabilitation of the pavement along the project corridor requires that all crossings be brought into compliance with the ADA. Further, the existing overcrossing cannot be made ADA compliant due to ROW constraints. Therefore, the at-grade crossing must be done as part of any roadway improvements. Please see master Response 4 for additional information related to the at-grade crossing at Wolfe Grade.
- C11-7:** The commenter requests that the sidewalks along the south side of SFDB not be widened. Please see Response to Comment C11-4.
- C11-8:** The commenter requests that a second turn lane to College Avenue not be added, as it would remove needed parking and would not improve traffic conditions. The County does not agree with the commenter's conclusions. As described in the Draft EIR (pp. 63), to accommodate the second left turn lane and maintain the existing number of on street parking stalls along SFDB, up to four trees would be removed along the north side of the road. The proposed project would provide dual left turn pockets to accommodate the volume of vehicles, reducing backup into the through travel lanes, and reducing congestion in the intersection. Please see Master Response 5 for further information related to the addition of the second left turn lane at College Avenue.
- C11-9:** The commenter requests that the guard rail along the project corridor not be replaced. As described further in Response to Comment C38-3, the existing guardrail does not meet current standards; therefore, the proposed project includes a cable fence to prevent pedestrians from entering the street. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C11-10:** The commenter requests that landscaping along the project corridor not be replaced. As part of the proposed project, landscaping that is removed or disturbed would be replaced in order to maintain the existing landscaping through the corridor. In addition, as required by Mitigation Measures BIO-5a and BIO-5b, any riparian plants, such as willows, impacted by the proposed project must be replaced at a 3:1 ratio. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C11-11:** The commenter requests that bike lanes not be constructed along the project corridor. No bike lanes are proposed along SFDB as part of the project. If funding is available, a shared use path would be provided along the north side of SFDB between Eliseo Drive and Bon Air Road within the existing public ROW, which could be used by both pedestrians and bicyclists. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C11-12:** This comment relates to the proposed funding for the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: SFD rehab
Date: Tuesday, November 28, 2017 4:40:22 PM

C12

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: Barbara Geisler [mailto:geislerbarbara@gmail.com]
Sent: Monday, November 27, 2017 10:47 AM
To: Rice, Katie <KRice@marincounty.org>
Subject: SFD rehab

Dear Supervisor Rice,

I am concerned about a number of things about the proposal for the SFDrake rehab project;

1. -Please scrap the proposed street-level cross walk at Wolfe Grade. Too many kids will choose to take it because it is a pain to take a bike up the present overpass and we thereby risk kids lives.
2. An added left turn on college is useless. It will just increase congestion.
3. There has not been any analysis that proves that narrowing lanes on SFD will help congestion. It will just slow it and increase congestion, making it start further back.
4. A third lane at El Portal cannot decrease congestion. The problem is 101 and the Richmond San Rafael bridge.

Respectfully submitted,
Barbara R. Geisler
405 Redwood Road
San Anselmo

Commenter C12

Barbara Geisler, Local Resident (November 28, 2017)

C12-1: Please see Master Response 4.

C12-2: Please see Master Response 5.

C12-3: Please see Master Response 2.

C12-4: Please see Master Response 3.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: SIR FRANCIS DRAKE
Date: Monday, November 20, 2017 3:22:33 PM

C13

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: mallory gabriel [mailto:mal7799@yahoo.com]
Sent: Saturday, November 18, 2017 1:12 PM
To: sfdimprovements@marincounty.org
Cc: Rice, Katie <KRice@marincounty.org>
Subject: SIR FRANCIS DRAKE

Dear Mr Dawson

- 1 | Please don't allow the changes. this will cause further congestion. Please hire a
- 2 | panel of professional consultants to REDO THE STUDY and make
- 3 | recommendations about not narrowing the roads- and find out where the real
problem lies (101 on ramp) based on existing traffic flow. do not eliminate the left
turn lane on SFD.

Sincerely, Mallory Geitheim.

Commenter C13

Mallory Geitheim, Local Resident (November 18, 2017)

C13-1: This comment requests that no changes be made to the roadway. This comment relates to the proposed funding for the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C13-2: This comment requests that the County hire a panel of consultants to redo the study and make recommendations about not narrowing the roads. Parisi Transportation Consulting was contracted by the County to conduct the traffic analysis for the proposed project. The results of the analysis indicate that the narrowing of the lanes would not negatively impact traffic flow, but would improve safety by providing uniform lane widths and encouraging vehicles to travel at a consistent speed. Please see Master Response 2 for further information related to the lane narrowing.

C13-3: The comment requests that the left turn lane on SFDB not be eliminated. This comment relates to the proposed funding for the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: ghostlightmater@yahoo.com
To: sfdrakeimprovements
Subject: Project updates and construction updates
Date: Tuesday, October 17, 2017 4:22:27 PM

C14

sfdrakeimprovements@marincounty.org would like information about:

1 | Hi I would like to sign up for project updates and construction updates regarding the Sir Francis Drake Boulevard Improvements Project

Commenter C14

Ghostlightmater¹⁹, Local Resident (October 17, 2017)

C14-1: The commenter's request to receive updates regarding the SFDB project is acknowledged. This comment does not relate to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

¹⁹ Commenter's name was not included in their communication.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sdrakeimprovements](#)
Subject: FW: ?NARROWING LANES SFD?
Date: Monday, December 04, 2017 9:42:22 AM

C15

Nancy Vernon iAide
Office of Supervisor Katie Rice
(415) 473.7351

-----Original Message-----

From: arlene hansen [<mailto:nana4r8@yahoo.com>]
Sent: Saturday, December 02, 2017 4:00 PM
To: Rice, Katie <KRice@marincounty.org>
Subject: ?NARROWING LANES SFD?

I cannot find the letter i wrote to you & whomever is in charge of this repaving job.....

- 1 DO NOT MAKE LANES NARROWER ON SFD.... GRAVE MISTAKE.....
INSTEAD teach the drivers to drive more sanely
teach people to leave sooner for work, appointments, etc
teach people SFD is NOT A FWY!!!!!!
teach people that speeding, abrupt lane changes- usually without signaling! often leads to accidents!
teach people to use patience when behind the wheel!
- 2 NO 2nd lane turning L onto College ave.... people run the light there BADLY often!!!!
teach students, parents picking up kids at Kent..... leave allowing plenty of time. People would just have jam up mess when 2 lanes go to one & make jam up worse at intersection....
- 3 JUST REPAVE THE ROAD - IF PG & E, PHONE, SEWER, ETC ETC have taken care of updating their underground stuff.

Just repave, just repave!

I didn't go to any meetings held on this manner due to my deafness.
Thank you.... Arlene Hansen, 17 Cedar Ave, Kentfield

Commenter C15

Arlene Hansen, Local Resident (December 4, 2017)

C15-1: The commenter requests that the lanes not be narrowed. Please see Master Response 2 related to the lane widths.

C15-2: The commenter requests that a second turn lane to College Avenue not be added. Please see Master Response 5 for further information related to the addition of the second turn lane at College Avenue.

C15-3: The commenter's recommendation to limit project work to repaving the existing roadway is acknowledged. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [arlene hansen](#)
To: [sdrakeimprovements](#)
Subject: crosswalk
Date: Saturday, December 02, 2017 4:03:28 PM

C16

- 1 that would be a disaster to have crosswalk at Wolf Grade/SFD..... i recall many accidents there, children killed/injured!! Best to give the affected students ride to school, if they can't manage the steps/overpass.
- 2 I am AGAINST any of the proposed "fixing" of SFD. Have lived here 52 y!!! Just repave, once the utilities, sewer etc have done their updating underground!!!

Commenter C16

Arlene Hansen, Local Resident (December 2, 2017)

C16-1: The comment expresses concerns related to the proposed at-grade crosswalk at Wolfe Grade is acknowledged. Please see Master Response 4 for additional information related to the at-grade crosswalk.

C16-2: The commenter's opposition to the proposed project is noted. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Arlene Hansen](#)
To: [sdrakeimprovements](#)
Subject: Re: crosswalk
Date: Wednesday, December 06, 2017 11:26:57 AM

C17

1 If I didn't say it before- make all signals more "friendly" & SMART- it would move traffic better...
When no one is in Lturn lane signal should be smart, turn green for the folks waiting for nothing!
If no cross traffic touches the smart strip/camera, then keep traffic moving!
Arlene Hansen

Let there be peace on earth and let it begin with me.....

> On Dec 5, 2017, at 1:26 PM, sdrakeimprovements <sdrakeimprovements@marincounty.org> wrote:
>
> Thank you for reviewing the Sir Francis Drake Boulevard Draft EIR and providing your comments. All
comments received on the DEIR during the public comment period will be compiled and responded to in
the final EIR document.
>
> -----Original Message-----
> From: arlene hansen [<mailto:nana4r8@yahoo.com>]
> Sent: Saturday, December 02, 2017 4:03 PM
> To: sdrakeimprovements
> Subject: crosswalk
>
> that would be a disaster to have crosswalk at Wolf Grade/SFD..... i recall many accidents there,
children killed/injured!! Best to give the affected students ride to school, if they can't manage the
steps/overpass.
> I am AGAINST any of the proposed "fixing" of SFD. Have lived here 52 y!!! Just repave, once the
utilities, sewer etc have done their updating underground!!!
>
> Email Disclaimer: <http://www.marincounty.org/main/disclaimers>

Commenter C17

Arlene Hansen, Local Resident (December 6, 2017)

C17-1: The commenter's support for smart signal technology is acknowledged. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Matthew Hansen](#)
To: [sdrakeimprovements](#)
Subject: SFDB
Date: Sunday, November 26, 2017 6:20:07 PM

C18

1 PLEASE DO NOT MESS WITH THIS CORRIDOR!!! Literally EVERYTHING that I have read about the indended project rubs me ALL wrong. I have lived in the Ross Valley for 57 years now, and narrowing lanes, etc., is just plain counterproductive. Don't pursue this boondoggle, PLEASE. And TWO left turn lanes onto College Avenue?!! RIDICULOUS. There isn't any "there" for two lanes to "go to"!!!

Matthew Hansen
Kentfield

Commenter C18

Matthew Hansen, Local Resident (November 26, 2017)

C18-1: This comment expresses opposition to the proposed project, in particular the addition of a second turn lane onto College Avenue. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1. For additional information on the addition of the second turn lane at College Avenue, please refer to Master Response 5.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: Sir Francis Drake Blvd. improvements
Date: Monday, November 20, 2017 3:22:48 PM

C19

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: C & E Harkins [mailto:kalolae@sbcglobal.net]
Sent: Saturday, November 18, 2017 1:52 PM
To: sfdimprovements@marincounty.org; Rice, Katie <KRice@marincounty.org>
Subject: Sir Francis Drake Blvd. improvements

Hello Dan and Katie,

- 1 We agree with Marin Against Density regarding the following issues:
We recommend that the county redo the study to include the impact of narrowing lanes. Today's aging drivers need all the width they can get.
- 2 We believe that adding a second left turn lane at College Ave. is unnecessary. a sufficiently long left hand turn light is sufficient.
- 3 Look for an alternative ADA-compliant way, other than a crosswalk at Wolfe Grade, which would just gum up traffic at that busy intersection.
- 4 We think that the insertion of a third eastbound lane from El Portal to the highway does nothing to mitigate the traffic congestion to the freeway south due to a one lane entrance, and nothing to mitigate the traffic to the freeway north or to Sir Francis Drake heading east to the bridge.
- 5 The most dire need is an appropriate northbound exit onto 580. The current situation is a daily nightmare.

All the best,

Carole and Ed Harkins

Commenter C19

Carole and Ed Harkins, Local Resident (November 20, 2017)

C19-1: Please see Master Response 2.

C19-2: Please see Master Response 5.

C19-3: Please see Master Response 4.

C19-4: Please see Master Response 3.

C19-5: The comment indicates that the greatest need on the corridor is an appropriate northbound exit onto I-580. The County acknowledges that the ramp is in need of upgrades for the region. However, the SFDB/Highway 101 interchange is beyond the scope of this project. Further, the interchange is part of the state highway system under the jurisdiction of Caltrans. Any proposed improvements to the interchange would need to be initiated and approved by Caltrans. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Russ Holdstein](#)
To: [sfdrakeimprovements](#); [Rice, Katie](#)
Subject: Fwd: Comment on the Sir Francis Drake Blvd. Draft EIR before 12/6/17
Date: Wednesday, November 29, 2017 9:02:36 PM

C20

I am in full agreement with the points made by this group. They make perfect sense to me, someone who drives SFD multiple times a day.

Russ Holdstein

Begin forwarded message:

From: Susan Holdstein <susan@holdstein.com>
Subject: Fwd: Comment on the Sir Francis Drake Blvd. Draft EIR before 12/6/17
Date: November 17, 2017 at 3:32:09 PM PST
To: Russ Holdstein <russ@holdstein.com>

Begin forwarded message:

From: MarinAgainstDensity <marinagainstdensity@gmail.com>
Date: November 17, 2017 at 3:03:43 PM PST
To: <susan@holdstein.com>
Subject: Comment on the Sir Francis Drake Blvd. Draft EIR before 12/6/17
Reply-To: <marinagainstdensity@gmail.com>

View this email in your browser



MAD ACTION ALERT

Wednesday December 6 is the deadline for public comment on the Sir Francis Drake Blvd. Rehabilitation Project.

Send in your comments now – even if you've commented at previous stages of the project and even if you aren't sure they are “environmental” concerns.

Important points to make in your Comment Letter:

Tell the County to...

1

1. Analyze the impact of narrowing vehicle lanes – Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated “benefit” of narrowing these lanes was to slow down traffic. That's not a benefit! We want the County to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Narrowing is necessary in some spots but not all the way from Ross to the highway. (From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety.) **We recommend that the County re-do the study to include the impact of narrowing of lanes – or they shouldn't narrow any lanes west of El Portal.**

2

2. Eliminate the additional left turn lane from westbound SFD onto College — This is ill-advised at best. To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd. westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. which may cause vehicles to collide with each other or with pedestrians. An independent traffic engineer has found that the Level of Service change is minimal. So, a lot of change for no good reason. **We recommend that they not add the second left turn lane at College Ave.**

3

3. Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives —

Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This is despite the fact that a child was killed and others injured in a crosswalk at this location. The County says that the current overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby? While Safe Routes to School and parents will direct kids to continue to use the overhead crossing structure, there's no guarantee that they will. This puts our children at risk of injury or even death, and the County (i.e., us) legally liable. **We recommend that the County continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. somewhere in that corridor.**

4

4. Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101 – The County proposes to narrow the two existing eastbound lanes in front of Bon Air Center in order to make room for a third narrow vehicle lane. This won't improve vehicle flow. The back-up is caused by the constricted ramp onto Highway 101. **We recommend that the County not spend the money to insert a third eastbound lane from El Portal to the highway.**

Send Comment Letters to:**Via Email –**

To Dan Dawson at sfdimprovements@marincounty.org
CC Supervisor Katie Rice at KRice@marincounty.org

Via Postal Mail – (Mail several days ahead of December 6)

Dan Dawson
Principal Transportation Planner
Marin County DPW
Box 4186
San Rafael, CA 94913-4186

For your information:

Read the entire 400+ page DEIR document here:

https://www.marincounty.org/~media/files/departments/pw/transportation/proj_sfdb/1sfdb_prdeir_main.pdf?la=en

Read the public comments received about the project so far, in the "Appendices":

https://www.marincounty.org/~media/files/departments/pw/transportation/proj_sfdb/1sfdb_prdeir_appendices_all.pdf?la=en

Look at the Presentation Materials from the final public meeting, "Community Open House (6/1/16)" on the project webpage: <https://www.marincounty.org/depts/pw/divisions/transportation/transportation/sir-francis-drake-boulevard-rehabilitation>



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Commenter C20

Russ Holdstein, Local Resident (November 29, 2017)

C20-1: Please see Master Response 2.

C20-2: Please see Master Response 5.

C20-3: Please see Master Response 4.

C20-4: Please see Master Response 3.

From: [Rice, Katie](#)
To: [Christopher Hunt](#)
Cc: [Dawson, Dan](#)
Subject: RE: The SFD "Improvement" Plan
Date: Tuesday, November 28, 2017 12:45:30 PM
Attachments: [image002.png](#)

C21

Chris,

Thank you for your email and comments regarding the EIR for the SFD corridor plan. I am cc'ing Dan Dawson, project planner so as your comments are included, and responded to as a part of the formal CEQA process.

As you know, the EIR purpose is to analyze impacts of a proposed project and alternatives. This EIR covers the entire scope of improvements derived from an extensive design, community outreach/input process. Inclusion of an element studied in the EIR does not require its inclusion in final project design.

Again, my appreciation for taking the time to study the CEQA document and provide comment. That said, I wish that you could do so without the negative slurs and tone directed at staff, or any of the folks involved with this project.

Sincerely,
Katie Rice

Katie Rice | District 2
Marin County Supervisor
3501 Civic Center Drive, Suite 329
San Rafael, CA 94903
(415) 473.7825



[Website](#)
[Newsletter](#)
[Facebook](#)
[@SupervisorRice](#)

From: Christopher Hunt [mailto:chunt94957@gmail.com]
Sent: Monday, November 27, 2017 10:14 PM
To: Rice, Katie <KRice@marincounty.org>
Subject: The SFD "Improvement" Plan

1 | Katie - I remain concerned about the County's process and the conclusions

1 (cont.)

of its planners with regard to the Sir Francis Drake "Improvement" Plan. (In this circumstance "improvement" appears to be a misnomer.) The plan is fundamentally flawed with its lane narrowing strategy, and the Planning Department is using disingenuous tactics and obfuscation in its failure to truly address the impacts of lane narrowing. This would not be the first time that Marin County planners have rammed their personal agendas through the County. Maybe it's time that they be held to a higher standard of accountability instead of their running roughshod over the process in order to achieve their own personal, ill-conceived visions.

2

Specifically, in its EIR, the County has failed to provide detailed, specific information about what the changes to traffic actually entail in terms of traffic speed, flow and volume. (Of note, I have asked several times for lane dimensions and other specifics about how much lane narrowing will actually occur and precisely where it will occur. A nameless bureaucrat with whom I have corresponded refuses to answer with specifics via email. As well, the EIR fails to provide substantial analysis of the potential impacts of the proposed traffic lane narrowing and intersection changes, and for some

3

reason the County is attempting to illegally avoid addressing CEQA requirements by claiming a bogus exemption.

I would like you to require that Dan Dawson and his tone-deaf crew of planners do the following:

4

- **Analyze the impact of narrowing vehicle lanes** – Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated "benefit" of narrowing these lanes was to slow down traffic. (Note to File: **That's not a benefit.**) We want the County to investigate the impact. While narrowing is necessary in some spots, it is NOT necessary all the way from Ross to the highway. The County **should re-do the study to include the impact of narrowing of lanes – or they shouldn't narrow any lanes west of El Portal.**

5

- **Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101** – The County proposes to narrow the two existing eastbound lanes in front of Bon Air Center in order to make room for a third narrow vehicle lane. This won't improve vehicle flow. The back-up is caused by the constricted ramp onto Highway 101. **We recommend that the County not spend the money to insert a third eastbound lane**

5 (cont.) | **from El Portal to the highway.**

6 | Katie - You have personal daily experience with the effects and additional safety issues associated with narrowed lanes - that's what you/we drive on in front of Drake High School, and it is a narrow, dangerous and unpleasant section of SFD. Why on earth would we want more stretches of SFD to be like that?

7 | Please rein in this these County planners who feel minimal obligation to actually address the concerns of real people who drive these roads every day. It's time for the County to measure the real impacts of lane narrowing, and then make a plan that benefits the daily users as opposed to satisfying the often impractical wishes of its Central Planners.

Thank you for your attention to this matter, and best regards,

Chris Hunt
1111 Butterfield

--

Chris Hunt
1111 Butterfield Road
San Anselmo, CA 94960
415-310-3297 (c)

Commenter C21

Chris Hunt, Local Resident (November 27, 2017)

C21-1: The comment expresses concern about the County's process and the project itself, particularly the potential for lane narrowing. Since the start of the planning process in 2014, the public has had multiple opportunities to provide input on the proposed project. The County has conducted several community workshops to solicit community input on the proposed project elements, including the most recent open house conducted on January 30, 2018 to prioritize the various project components. Additionally, as part of the CEQA environmental review process, the County held a scoping session on January 10, 2017 to gather input on the environmental issues to be addressed in the EIR. A public hearing was also held before the Marin County Board of Supervisors on November 7, 2017 to receive comments on the adequacy of the Draft EIR. This part of the comment relates to the planning process and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

As described in Master Response 2, 11-foot lanes, as proposed, are consistent with *California Highway Design Manual*,²⁰ would not decrease roadway capacity, would serve to slow traffic and would not increase safety hazards. Please see Master Response 2 for additional analysis related to the lane narrowing.

C21-2: The comment states that the Draft EIR does not provide specific information regarding the traffic impacts of the proposed project. The County does not agree with the comment's conclusion. As described in Section 4.12 of the Draft EIR (pp. 322-324 and 330-339), Parisi Transportation Consulting (Parisi) acquired existing traffic volumes and turning movement volumes in the AM and PM peak hours for vehicles, bicycles, and pedestrians at twelve intersections along the corridor. Synchro/SimTraffic 9.0 computer software was used to determine the LOS at intersections based on the existing traffic volumes and the HCM 2010 methodology. An assessment of the project's impacts was conducted using the County's travel demand model to predict future traffic volumes in 2020 and 2040. The results of these analyses are presented in the Draft EIR (pp. 330-337). Further information related to the potential narrowing of lane widths through the corridor is provided in Master Response 2.

C21-3: The comment claims that the EIR fails to provide substantial impacts of the proposed traffic lane narrowing and intersection changes and that the County is attempting to illegally avoid addressing CEQA requirements by claiming a bogus exemption. The County does not agree with the commenter's statement. Please see Master Response 2, which provides information related to the lane narrowing.

C21-4: Please see Master Response 2.

²⁰ California Department of Transportation. Highway Design Manual Sixth Edition.

C21-5: Please see Master Response 3.

C21-6: The comment expresses concerns regarding potential lane narrowing, in particular safety. Please see Master Response 2, which provides information related to the lane narrowing.

C21-7: The commenter requests that the Supervisor “rein in these County planners” and make a plan that benefits daily users. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Richard Hymns](#)
To: [sdrakeimprovements](#)
Subject: Sir Francis Drake Blvd. Rehabilitation Project
Date: Sunday, November 26, 2017 6:51:31 PM

C22

Sir Francis Drake Blvd. Rehabilitation Project.

- 1** **After reviewing available information I suggest the County analyze the impact of narrowing vehicle lanes** Narrowing the vehicle lanes will slow down traffic. That's not a benefit. We want the County to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Narrowing is necessary in some spots but not all the way from Ross to the highway. (From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety.) **We recommend that the County re-do the study to include the impact of narrowing of lanes – or they shouldn't narrow any lanes west of El Portal.**
- 2** **Eliminate the additional left turn lane from westbound SFD onto College.** To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd. westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. An independent traffic engineer has found that the Level of Service change is minimal. **We recommend that they not add the second left turn lane at College Ave.**
- 3** **Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives** — Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This is despite the fact that a child was killed and others injured in a crosswalk at this location. The County says that the current overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby? While Safe Routes to School and parents will direct kids to continue to use the overhead crossing structure, there's no guarantee that they will. This puts our children at risk of injury or even death, and the County (i.e., us) legally liable. **We recommend that the County continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. somewhere in that corridor.**

Sincerely

Richard Hymns

Commenter C22**Richard Hymns, Local Resident (November 26, 2017)**

C22-1: Please see Master Response 2.

C22-2: Please see Master Response 3.

C22-3: Please see Master Response 4.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: Sir Francis Drake renovation project comments for Dec 6 deadline
Date: Monday, November 20, 2017 3:24:19 PM

C23

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: maryjacobi@comcast.net [mailto:maryjacobi@comcast.net]
Sent: Monday, November 20, 2017 2:14 PM
To: sfdimprovements@marincounty.org
Cc: Rice, Katie <KRice@marincounty.org>
Subject: Sir Francis Drake renovation project comments for Dec 6 deadline

Mr. Dawson:

- 1 We recommend that the County re-do the study to include the impact of narrowing of lanes. Please analyze the impact of narrowing vehicle lanes...do we really need to slow down traffic? I do understand that narrowing is necessary along this corridor for increased sidewalk safety and 3rd lane construction but to "slow down traffic?" It always seem to creep when I am there...
- 2 Please eliminate the additional left turn lane from westbound SFD onto College.
- 3 Cancel the plans for an on-stsreet crosswalk at WolfeGrade and identify ADA-compliant alternatives.
- 4 If after studying the effects of narrowing lanes for improved traffic flow in front of Bon Air Center eastbound, we support the addition of that lane for approach to 101 South.

Thank you for your attention to this matter and for your continued diligent service to our community,

Mary and Peter Jacobi
11 Via Vandyke
Mill Valley

Commenter C23**Mary and Peter Jacobi, Local Resident (November 20, 2017)**

C23-1: Please see Master Response 2.

C23-2: Please see Master Response 5.

C23-3: Please see Master Response 4.

C23-4: The comment expresses support for the addition of a third lane in front of Bon Air Center, if the analysis of lane narrowing shows improved traffic flow. This comment is acknowledged. Please see Master Response 2 and Master Response 3, which address the potential lane narrowing and the addition of the third lane, respectively.

From: [Peter Jacobi](#)
To: [sdrakeimprovements](#)
Cc: [Rice, Katie](#)
Subject: Reaction to proposed changes to Sir Francis Drive Blvd.
Date: Monday, November 27, 2017 2:13:31 PM

C24

To Whom it May concern:

I have reviewed the plans for the proposed changes to Sir Francis Drake Blvd. and have the following thoughts:

1 **Reaction to the narrowing vehicle lanes:** Narrowing the vehicle lanes is a very controversial aspect of this project, yet the DEIR doesn't analyze it at all. At the public workshops, the stated "benefit" of narrowing these lanes was to slow down traffic. That's not necessarily a benefit! I want the County to investigate the impact. At one point, lanes were to be narrowed in order to add a Bike Lane, but the Bike Lane has been eliminated. Narrowing is necessary in some spots but not all the way from Ross to the highway. (From El Portal to the highway, on the eastbound side, narrowing is necessary because a third vehicle lane is being installed without widening the roadway. From the highway to El Portal, on the westbound side, narrowing is necessary because the sidewalk is being widened for increased pedestrian safety.) **I recommend that the County re-do the study to include the impact of narrowing of lanes – or they shouldn't narrow any lanes west of El Portal.**

2 **Reaction to Eliminating the additional left turn lane from westbound SFD onto College** — This is ill-advised at best. To insert an additional lane, the County will eliminate parking spaces or trees along SFD Blvd. westbound. With two lanes of cars turning onto College, this will cause a merging problem on College Ave. which may cause vehicles to collide with each other or with pedestrians. An independent traffic engineer has found that the Level of Service change is minimal. So, a lot of change for no good reason. **I recommend that you not add the second left turn lane at College Ave.**

3 **Reaction to the scrapping of plans for an on-street crosswalk at Wolfe Grade and identifying ADA-compliant alternatives** — Supposedly the addition of a street-level crosswalk is required by the ADA because the intersection is being re-paved. This is despite the fact that a child was killed and others injured in a crosswalk at this location. The County says that the current

3 (cont.)

overhead crossing structure cannot be modified, but one citizens group believes it can be. There is no space in the footprint of the current overhead crossing structure to build a new, ADA-compliant version -- it will remain -- but what about nearby? While Safe Routes to School and parents will direct kids to continue to use the overhead crossing structure, there's no guarantee that they will. This puts our children at risk of injury or even death, and the County (i.e., us) legally liable. **I recommend that the County continue to look for an alternative ADA-compliant way to get children across Sir Francis Drake Blvd. somewhere in that corridor.**

4

Reaction to eliminating the plan to insert a third eastbound lane from EI Portal to Highway 101 – The County proposes to narrow the two existing eastbound lanes in front of Bon Air Center in order to make room for a third narrow vehicle lane. This won't improve vehicle flow. The back-up is caused by the constricted ramp onto Highway 101. **We recommend that the County not spend the money to insert a third eastbound lane from EI Portal to the highway.**

Sincerely,
Peter Jacobi
11 Via Vandyke
Mill Valley, CA

Commenter C24

Peter Jacobi, Local Resident (November 27, 2017)

C24-1: Please see Master Response 2.

C24-2: Please see Master Response 5.

C24-3: Please see Master Response 4.

C24-4: Please see Master Response 3.

From: [Steve and Helene Jaffe](#)
To: [sdrakeimprovements](#)
Subject: Sir Francis Drake Blvd. project
Date: Thursday, October 12, 2017 5:38:06 PM

C25

Dan Dawson,

I received an email with links to the proposed Drake Blvd. project. I have several concerns that I would like to address. While I am not a traffic engineer nor project manager, I have lived in Greenbrae for 50 years and in our current house for 44 years.

- 1 The idea to form 3 lanes East on Drake toward 101 has a problem unless CalTrans changes access to the highway. If three lanes go East plus one lane from East Drake going South onto 101, a huge back up will be a certainty. I look at 101 going South when the Golden Gate Bridge goes to 2 lanes. In that scenario the 4 lane highway backs up to the tunnel and beyond. This idea would have 4 lanes merging into one lane South onto 101. The back up on both sides of Drake Blvd will be beyond anything you can imagine.
- 2 An eight foot bike/pedestrian path on the North side of Drake is unnecessary. Our current bike path could be widened to 6 feet comfortably without impacting the auto lane width as proposed. Eleven foot auto lanes are too tight for comfort and will result in more accidents.
- 3
- 4 Your idea to have only one left turn lane from La Cuesta onto Drake will cause cars to miss the signal. Cars will probably use the center lane to turn left to avoid that. Currently we have a dedicated left turn lane and a left/go straight lane and a right turn lane. Most cars turn right or left coming out of La Cuesta and few go straight in Bon Air.

The same problem will occur coming out of Bon Air at La Cuesta. Your proposed middle lane should allow drivers to go left or straight as it currently does. If you make left, straight and right dedicated lanes, traffic will back up causing frustration and illegal turns.
- 5 The roundabout at Barry and Drake is just a bad idea. Why is it necessary? Is it change for changes sake or does it improve the present situation?
- 6 Some of the proposed changes make sense. Making 2 left turn lanes at Drake and College and making the dedicated lanes longer is a great idea. Also adding a merge lane coming out of Manor will make that turn a safer prospect.
- 7 Please go over these complaints with the traffic engineers and rethink the project. Smart traffic signals will help but traffic now is Marin's biggest problem.

Thank you for hearing me.

Stephen Jaffe

318 Los Cerros Dr.
Greenbrae

Commenter C25**Stephen Jaffe, Local Resident (October 12, 2017)**

- C25-1:** The comment expresses concern over the addition of a third lane on SFDB toward Highway 101. Please see Master Response 3 for information related to the third lane.
- C25-2:** The comment asserts that an 8-foot path on the north side of SFDB is unnecessary and that the path could be widened to 6 feet without impacting the lane width. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C25-3:** The comment asserts that 11-foot travel lanes are too narrow. Please see Master Response 2 for information related to the potential lane narrowing.
- C25-4:** The comment questions the proposed intersection configurations at La Cuesta/SFDB and La Cuesta/Bon Air. As stated in the Draft EIR, the project would reconfigure the La Cuesta Drive intersection to allow for simultaneous left-turn movements from both the northbound and southbound approaches to SFDB. By allowing for concurrent left-turn movements, additional capacity and increased efficiency is provided to the intersection enabling a single southbound left-turn lane (without added southbound delays compared to current conditions) and increased green light time for SFDB traffic.
- C25-5:** The comment questions the necessity of the proposed roundabout at Barry Way. Based on observations of the Barry Way and SFDB intersection, cars entering the shopping center at Bon Air often stack up into the intersection of SFDB. The roundabout is one of the two options to improve roadway conditions on Barry Way. The roundabout allows two cars to turn right into the Bon Air Shopping Center thus allowing the left turn movements on SFDB to rebalance. Based on observations of existing traffic operations, the outside left-turn lane often has more traffic in it than the inside left-turn lane due to the outside lane serving both the fueling station at the intersection's southeast quadrant as well as the Bon Air Center.
- C25-6:** The commenter's support for the second turn lane at College Avenue and a merge lane at Manor Road is noted. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.
- C25-7:** The commenter's request to consider his concerns is acknowledged. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: Sir Francis Drake Blvd Rehabilitation Project
Date: Monday, November 20, 2017 3:21:55 PM

C26

FYI

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: helena Kozler [mailto:helenakozler@sbcglobal.net]
Sent: Friday, November 17, 2017 9:40 PM
To: sfdimprovements@marincounty.org; Rice, Katie <KRice@marincounty.org>
Subject: Sir Francis Drake Blvd Rehabilitation Project

To Dan Dawson at sfdimprovements@marincounty.org
CC Supervisor Katie Rice at KRice@marincounty.org

Dear Dan and Katie,

1

there is only one remedy. County has to obtain 10 feet strip of land on each side of the road.

Helena Kozler
176 Corte Anita, Greenbrae

Commenter C26**Helena Kozler, Local Resident (November 17, 2017)**

C26-1: The commenter's assertion that the only solution is to have the County obtain 10-feet of land on each side of SFDB is noted. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sfdrakeimprovements](#)
Subject: FW: Comments on Sir Francis Drake Blvd
Date: Tuesday, November 21, 2017 1:27:00 PM

C27

Not sure if I sent you this one...

Nancy Vernon |Aide
Office of Supervisor Katie Rice
(415) 473.7351

-----Original Message-----

From: Dee Lawrence [<mailto:rndlawrence@comcast.net>]
Sent: Friday, November 17, 2017 4:47 PM
To: sfdimprovements@marincounty.org; Rice, Katie <KRice@marincounty.org>
Subject: Comments on Sir Francis Drake Blvd

Dear Dan, Dear Katie,

Following are suggestions with regard to the SFD improvements:

1. Please do not eliminate the left hand turn lane opposite 919 Sir Francis Drake and Colonial Liquors. These relieves traffic at the College/Drake light and allows easy access to a retail store and offices from west bound Drake traffic. From eastbound on Drake there are very few places where a U turn can be made to return to a westbound direction without going a considerable distance and encountering a lot more traffic.
2. Provide school time bus transport from all neighborhoods surrounding Kent School to Kent School (Woodlands, Wolf Grade, Larkspur Apartments to name a few). Use the college of Marin parking lot for drop offs which allows easy access to Kent and is empty during school drop off and pick up hours.
3. Make the light on College at Kent School a smart light so that when school is not in session it allows for more traffic to pass.
4. For Northbound College Ave, add a short second lane for right hand turns into Kent School to allow more northbound traffic to continue on College.
5. Analyze the impact of narrowing the lanes on Drake to slow down traffic. Slowing down is not what is needed.
6. Eliminate the proposed second left turn lane from Westbound SFD onto College unless 2 lanes can be carried on along College.
7. Scrap plans for an on-street crosswalk at Wolf Grade. Direct pedestrian traffic further west bound on Drake to the main crosswalk at Laurel which already has a light and crossing guard. It's not even a block up the road!
8. Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101. The current back up is from access to 101.
9. Could you please advise as to when all the work be completed on the Drake/101 interchange? There are no lane markings, there are no merge signs, the traffic lights are not coordinated and continued presence of the large cement blocks along the narrow roadway is unacceptable for a county of our size and wealth. We don't have an alternative Ghilardi that can do this job faster and cheaper? Is this what we can expect from the Drake improvements?

10

Why wait to improve the timing on the lights on Drake? See what improvements that brings and then improve your plans from there. Is there a reason why that hasn't been done already as it would seem to have a strong majority endorsing the idea.

Sincerely,

Dee Lawrence

Commenter C27

Dee Lawrence, Local Resident (November 17, 2017)

C27-1: The comment requests that the left hand turn lane opposite 919 SFDB not be eliminated as it relieves traffic at the College Avenue/SFDB intersection and allows easy access to the adjacent uses. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1 and Master Response 6.

C27-2: The commenter's request to provide school bus transport from all neighborhoods surrounding Kent School is noted. The provision of school bus transport is beyond the scope of this project. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1 and Master Response 6.

C27-3: The commenter's request to make the light on College Avenue at Kent School a smart light is acknowledged. This location is outside the project limits and therefore, not part of the current project. Please see Master Response 6.

C27-4: The commenter's request to add a short second lane for right turns into Kent School is acknowledged. This location is outside the project limits and therefore, not part of the current project. Please see Master Response 6.

C27-5: Please see Master Response 2.

C27-6: Please see Master Response 5.

C27-7: Please see Master Response 4.

C27-8: Please see Master Response 3.

C27-9: The comment relates to the proposed work on the SFDB/Highway 101 interchange. The SFDB/Highway 101 interchange is outside of the limits of the proposed project. The current construction project is on the east side of Highway 101, is managed by Caltrans, and is separate from the proposed project (west of Highway 101). For the proposed project, the County would be managing project construction according to Marin County standards and has provisions to measure contractor performance. In addition, during the review of the competitive bid process, the county can verify the contractor's previous performance. This comment does not relate to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C27-10: The comment questions the timing of the traffic light synchronization. Updating the signal timing is an expensive project that does not have funding as a separate project. Since construction for this project is anticipated to begin in 2020, any synchronization completed now would have to be redone when the proposed project is implemented.

From: [Richard Lawrence](#)
To: [sdrakeimprovements](#)
Subject: Sir Francis Drake & 101 Intersection
Date: Thursday, November 30, 2017 6:02:14 PM

C28

Dear Marin County Officials,

1 The work on the overpass at the intersection of Sir Francis Drake and 101 reminds me of a deserted construction site I once saw in Bangladesh. Half built, garbage spread around the site, never a worker in sight and suffering from complete mismanagement and neglect. If this were not a government project in California in 2017 I would say the the developer had gone bankrupt, as would be common in Bangladesh. But this is Marin at the time when an expensive study of SFD is ongoing that has aroused a great deal of interest from the community. SFD is one of our major problems but minor repairs go neglected for months on end.

How can this be possible? Is the Government unaware of the dangerous merge on the southbound entry that is caused by this delay? The delay in completion defies reason so I thought I should ask the Government directly.

Can you explain this to me? Can you put an explanation in the Marin IJ for all the other commuters who see this inactivity day after day?

If this is an example of our government leadership, might it not be a good idea to delay all plans for the reconstruction of SFD? Let's not make bad problems worse.

Thank you for your attention to this matter and I look forward to hearing your thoughts on this matter.

Richard Lawrence
Kentfield

Commenter C28

Richard Lawrence, Local Resident (November 30, 2017)

C28-1: The comment raises concerns about the status of work at the SFDB/Highway 101 interchange and recommends delaying the current project until that work is complete. See response to comment C27-9.

From: [Dana Marotto](#)
To: [sfdrakeimprovements](#)
Subject: Sir Francis Drake Rehabilitation Project EIR
Date: Friday, October 13, 2017 8:39:50 PM

C29

1 Thank you for the in depth EIR report.

I am happy to know that the county is working on a solution to make SFD a "safe" route for kids (and adults) to travel as well as more efficient for cars to travel up and down to get to 101 and beyond. As a parent of kids at Kent, I want to make sure that their safety - as well as those of all kids - is always the priority. As someone who needs to commute down SFD to get to 101, I want to make sure that it is a safe passage way that doesn't bottleneck, especially during the rains - which then causes a hazard for pedestrians and cars alike with cars trying to game the lights while kids walking across intersections are at risk. I trust that the county is addressing all of these issues.

Thank you,
Dana

Dana Marotto
c: 415-722-9775

Commenter C29

Dana Marotto, Local Resident (October 13, 2017)

C29-1: The commenter's support of the project is acknowledged. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Rice, Katie](#)
To: [Joanne Orion Miller](#)
Cc: [Dawson, Dan](#)
Subject: RE: SFD comments
Date: Friday, November 17, 2017 5:15:04 PM
Attachments: [image002.png](#)

C30

Joanne,

Thank you for taking the time to formally comment on the SFD project EIR. I am ccing project manager, Dan Dawson, to ensure their inclusion in the document and response, and our consideration as we move forward with final project design.

Sincerely,
Katie Rice

Katie Rice | District 2
Marin County Supervisor
3501 Civic Center Drive, Suite 329
San Rafael, CA 94903
(415) 473.7825



[Website](#)
[Newsletter](#)
[Facebook](#)
[@SupervisorRice](#)

From: Joanne Orion Miller [mailto:jorionmiller@gmail.com]
Sent: Friday, November 17, 2017 3:35 PM
To: Rice, Katie <KRice@marincounty.org>
Subject: SFD comments

1

Narrowing vehicle lanes – the stated “benefit” of narrowing these lanes was to slow down traffic. Seriously? I live in this corridor and the traffic is already backed up. Speed is not the problem, too few ways to get to the freeway are the problem. Narrowing the lanes will make it worse! And please don't suggest adding more lanes--that would require knocking out businesses and homes and making SFD into an adjunct freeway. That's not why we bought homes here. The stink and pollution of auto exhaust morning and evening will only increase for those of us who live along this route. Want to trade homes with me? Whose bright idea was this? **Do not narrow any lanes west of El Portal.**

2

2. Eliminate the additional left turn lane from westbound SFD onto College — This is nuts! We don't need an extra lane. Is this somebody's idea of make-work? Do any of you actually

live along here?

3. Scrap plans for an on-street crosswalk at Wolfe Grade and identify ADA-compliant alternatives —

There are crosswalks all along the SFD corridor, and MOST of them are safe, with the exception of Ash Ave. We've already seen deaths at Wolfe Grade (kids running across the street) and Ash (crossing in the crosswalk, but hit by cars coming west around the curve), and have been petitioning for years for a flashing light at Ash Ave. How can children be persuaded to use the overpass at Wolfe - that's the question (by the way, pushing and tugging a bike up and over that overpass is hard!). **AND WE STILL NEED THE FLASHING LIGHT AT ASH!**

4. Eliminate the plan to insert a third eastbound lane from El Portal to Highway 101 — IF the problem is caused by the constricted ramp onto Highway 101, how will bunching up cars in front of the shopping center help? **No third eastbound lane from El Portal to the highway.**

Joanne Miller
2 Ash Ave., #6
Kentfield, CA 94904

Commenter C30**Joanne Miller, Local Resident (November 17, 2017)****C30-1:** Please see Master Response 2.**C30-2:** Please see Master Response 5.**C30-3:** Please see Master Response 4.**C30-4:** Please see Master Response 3.

From: Robtone@aol.com
To: sfdrakeimprovements
Cc: [Rice, Katie](#)
Subject: Sir Francis Drake
Date: Wednesday, December 06, 2017 5:06:51 PM

C31

- 1 The County has not adequately analyzed the Sir Francis Drake Blvd. Rehabilitation Plan and the impact the proposed changes will make.
- 2 1. Adding a second left hand turning lane from Sir Francis Drake Blvd. to College is hazardous as soon car/cars complete the turn. Where do the cars end up safely?
- 3 2. Spending money to insert a third eastbound lane from El Potal to Highway 101 is not the answer to the congestion caused by the off ramp. Narrowing lanes is a potential hazard to cars, trucks and
- 4 buses.
- 5 3. The proposed way for an ADA compliant crossing of Sir Francis Drake Blvd. at Wolfe Grade is extremely dangerous for children and adults. Analysis of another place to cross in the area should be studied.

Robin Miller
33 North Ridgewood Rd.
Kentfield

Commenter C31**Robin Miller, Local Resident (December 6, 2017)**

C31-1: The County does not agree with the commenter's conclusion. Section 4.0 of the Draft EIR addresses the potential effects of the proposed project for all of the environmental topics considered under CEQA and identifies appropriate mitigation measures to reduce potential impacts to a less than significant level. These mitigation measures have been developed by technical experts based on technical expertise and factual evidence.

C31-2: Please see Master Response 5.

C31-3: Please see Master Response 3.

C31-4: Please see Master Response 2.

C31-5: Please see Master Response 4.

From: [Ron Naso](#)
To: sdimprovements@marincounty.org
Cc: [Rice, Katie](#); [Dawson, Dan](#)
Subject: Sir Francis Drake Rehab EIR Input
Date: Friday, November 24, 2017 1:57:12 PM

C32

-
- 1 > 1). It would be a major mistake which will result in accidents, injuries and death if a pedestrian crosswalk is built at Wolfe Grade and Sir Francis Drake in Kentfield to meet ADA compliance but Marin County from day one has refused to address the issue. What is needed is modification of both ramps so that wheel chair bound persons can cross the overpass along with school aged children. Some underground utilities between Wolfe and Manor may have to be relocated. A pedestrian crosswalk to comply with ADA laws will result in some very serious consequences.
- >
- 2 > Any existing traffic signal changes at Wolfe Grade and Sir Francis Drake should be made with input coming from Kentfield Fire, the RVPA, CHP, Sheriff's Department but not Parisi Associates.
- >
- 3 > 2). Two left turn lanes from Sir Francis Drake onto College Avenue is unthinkable. There is only one lane of traffic on College towards Kent Avenue. In addition, it will slow down first responders driving to
- 4 emergency calls.
- >
- 5 > 3) 3 lanes off traffic on Sir Francis Drake would be too narrow. For example what happens when a big truck is on one lane, in the next lane a Golden Gate Transit Bus to avoid a motorist who swerves from the 3rd lane. More importantly, there would be no room for motorists to pull over for emergency traffic to pass.
- >
- >
- >
- >

Commenter C32**Ron Naso, Local Resident (November 24, 2017)**

C32-1: The comment expresses concerns related to the at-grade crosswalk at Wolfe Grade. Please see Master Response 4.

C32-2: The commenter's request that traffic signal changes at Wolfe Grade and SFDB be made with input from Kentfield Fire, the Ross Valley Paramedic Authority (RVPA), California Highway Patrol (CHP) and the Marin County Sheriff's Department is acknowledged. As stated in the Draft EIR (pp. 318), the Ross Valley Fire Department, Larkspur Fire Department and Kentfield Fire Protection District have reviewed the proposed project. Other emergency service providers will have the opportunity to comment on the proposed project as part of the final design.

C32-3: Please see Master Response 5.

C32-4: The comment asserts that a second left turn lane at College Avenue will slow down first responders. The project, by providing two left-turn lanes from westbound SFDB to College Avenue instead of one left-turn lane, would decrease overall motorist delays and vehicle queuing at the intersection, thereby decreasing emergency vehicle travel times through and near the intersection. Please see Master Response #5.

C32-5: The comment raises concerns related to the additional third lane, including narrow travel lanes, and insufficient space for motorists to pull over for emergency vehicles. Please see Master Responses 2 and 3.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sdrakeimprovements](#)
Subject: FW: SFD in Kentfield
Date: Tuesday, November 21, 2017 1:25:11 PM

C33

Nancy Vernon |Aide
Office of Supervisor Katie Rice
(415) 473.7351

-----Original Message-----

From: Diana Perdue [<mailto:dperdue199@gmail.com>]
Sent: Saturday, November 18, 2017 9:59 AM
To: Rice, Katie <KRice@marincounty.org>
Subject: SFD in Kentfield

Supervisor Rice,

can you leave nothing alone??

Do not spen our tax dollars on an unnecessary project such as reconfiguring SFD in Kentfield.

1

It is fine and works well. Do not mess this intersection up.

Resist the urge.

Diana Perdue
fairfax

formerly a Kentfield resident x 30 years and still a person that uses that intersection daily.

Commenter C33**Diana Perdue, Local Resident (November 18, 2017)**

C33-1: The commenter's opposition to the proposed project is acknowledged. This comment relates to the merits of the proposed project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sdrakeimprovements](#)
Subject: FW: Sir Francis Drake Boulevard EIR
Date: Monday, December 04, 2017 9:43:31 AM
Attachments: [Sir Francis Drake EIR.docx](#)

C34

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473.7351

From: Bill Poland [mailto:BPoland@baywestgroup.net]
Sent: Saturday, December 02, 2017 2:31 PM
To: Rice, Katie <KRice@marincounty.org>
Cc: Mary Poland <mary@polandfam.com>
Subject: Sir Francis Drake Boulevard EIR

Dear Supervisor Rice

Please see the attached letter from my wife Mary and me. We certainly look forward to your thorough and thoughtful conclusions. All the best, Bill

Bill R. Poland
Bay West Group
2 Henry Adams Street
Suite 450
San Francisco, CA 94103
Phone 415-552-7700
Fax 415-552-7760
bpoland@baywestgroup.net

Bill and Mary Poland
4 Dewitt Dr, PO Box 1454
Ross, CA 94957

December 2, 2017

Dan Dawson
Principal Transportation Planner
Marin County DPW
PO Box 4186
San Rafael, CA 94913 – 4186

Subject: Sir Francis Drake EIR

Dear Mr. Dawson,

We've been in Ross since 1976. I'm very active in business and both of us are very active in several nonprofits that require a lot of meetings and car travel. I'm currently the chairman of the Board of Trustees at the Buck Institute.

We are very concerned about several of the changes that are being considered for Sir Francis Drake Blvd. between US Highway 101 and College Avenue.

- 1 • The lanes should not be narrowed. There simply no reason to try to slow down the speed of the traffic. The speed limits are very appropriate for the flows that occur throughout the various periods of the day. We certainly favor EXPERIMENTING with narrowing of the lanes east of El Portal funneling onto 101
- 2 • Adding a 2nd left turn lane onto College Avenue will only create a WORSE problem because cars will be expected to merge immediately on turning left. There will be backups clogging eastbound SFD traffic. Further, the westbound traffic will still be backed up during obvious periods of the day.
- 3 • Please make sure bike lanes do not reappear in this stretch of SFD. I am a biker and we have many bike routes that work extremely well.

We know this process takes time and we look forward to you making the right decisions.

All the best,

Bill R. Poland

Commenter C34

Bill and Mary Poland, Local Resident (December 2, 2017)

C34-1: Please see Master Response 2.

C34-2: Please see Master Response 5.

C34-3: The commenter requests that bike lanes not be constructed along the project corridor. No bike lanes are proposed along SFDB as part of the project; however, if funding is available, a shared use path would be provided along the north side of SFDB between Eliseo Drive and Bon Air Road, which could be used by both pedestrians and bicyclists. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [bsilvestri](#)
To: [Dawson, Dan](#)
Subject: Sir Francis Drake Boulevard Rehabilitation DEIR - existing v proposed data
Date: Wednesday, November 01, 2017 9:45:54 AM

C35

Dear Dan:

Thank you for your response.

1

In reviewing the DEIR document and its attachments, we find two diagrams that show the dimensioned cross-sections of the existing street. These are noted on the diagrams following pages 44 through 48 (Figure 3.3 and Figure 3.4) - which show lane widths at typical existing street sections--typically 14' to 12' wide.

However, we do not find any corresponding engineering drawings, plans, cross-sections or other dimensioning data for the *proposed* plans, "modifications," or alternatives, in the documents published on the County website for the DEIR (i.e., before and after conditions compared).

If I am in error and those engineering plans, cross-sections or other dimensioning data do exist for the proposed plan and its alternatives, can you please point me to that information / documents?

As time is of the essence, I would appreciate as complete a response as possible.

Thank you,

Bob Silvestri

On 10/31/2017 3:55 PM, Dawson, Dan wrote:

Mr. Silvestri,

Once again, for the purposes of your inquiry, you can assume that lane widths will be modified throughout the corridor, varying between 11' and 12'. All of the analysis conducted is contained in the DEIR and appendices and includes current conditions (baseline) and the project plus the various alternatives. If there is something in the DEIR analysis you feel is inadequate or lacking, you are encouraged to submit comments with your concerns by the close of the comment period on December 6.

Dan Dawson, AICP
Principal Transportation Planner
Marin County Department of Public Works
1600 Los Gatos Drive, Suite 350
San Rafael, CA 94903
415-473-6287
415-473-7847 (fax)

From: bsilvestri [communityventurepartners@comcast.net]
Sent: Monday, October 30, 2017 5:46 PM
To: Dawson, Dan
Subject: Re: Sir Francis Drake Boulevard Rehabilitation DEIR

Dan:

C35 (cont.)

2

For the second time you've declined to answer my simple questions.

1 - Does the new plan reduce the width of existing vehicle travel lanes?

2 - If yes, can you please indicate in what sections of the street this narrowing occurs?

In addition, you now say that these changes "do not alter vehicle throughput." Can you please point me to the analysis in the DEIR that makes this determination.

Thank you,
Bob Silvestri

On 10/30/2017 3:33 PM, Dawson, Dan wrote:

The current lane widths, which vary throughout the corridor, and the multiple proposed lane modifications are both within adopted standards, do not alter vehicle throughput, and are thus analysis is not necessary under CEQA. If you disagree with that finding, you are encouraged to submit a comment relating your concerns during the public comment period. The EIR team will be reviewing and responding to all comments, and updating the EIR as may be appropriate. For the purposes of your inquiry, you can assume that lane widths will be modified throughout the corridor.

Dan Dawson, AICP
Principal Transportation Planner
Marin County Department of Public Works
1600 Los Gamos Drive, Suite 350
San Rafael, CA 94903
415-473-6287
415-473-7847 (fax)

From: bsilvestri [<mailto:communityventurepartners@comcast.net>]
Sent: Monday, October 30, 2017 2:55 PM
To: Dawson, Dan
Subject: Re: Sir Francis Drake Boulevard Rehabilitation DEIR

Dan:

3

Thanks for the quick response. However, you did not answer my question. Is the plan proposing to reduce lane widths from the present lane widths (which constitute the basis of the baseline data). CEQA does not provide an exemption from analysis simply because a design follows a "design standard." CEQA requires analysis that is project specific.

So, to ask this again, does the proposed design reduce lane widths to less than the current lane widths in any section of Sir Francis Drake Boulevard? That is a yes or no question. If so, please provide me with information on exactly where that occurs.

I appreciate your cooperation in this matter.

Sincerely,

Bob Silvestri

On 10/30/2017 2:48 PM, Dawson, Dan wrote:

Lane widths were not analyzed in the DEIR as the project does not propose constructing any lanes at a width less than adopted design standards in the Caltrans Highway Design Manual which specifies a minimum lane width of 11'. The HDM does allow 10' lanes under certain limited circumstances but no 10' travel lanes are included in the project.

For a more detailed discussion of lane widths, please see the Grand Jury report on the project, starting on Page 10 and in Appendix E, as it discusses lane widths in the corridor:

<https://www.marincounty.org/depts/gj/reports-and-responses/reports-responses/2015-16/traffic-congestion-in-marin>

Dan Dawson, AICP
Principal Transportation Planner
Marin County Department of Public Works
1600 Los Gatos Drive, Suite 350
San Rafael, CA 94903
415-473-6287
415-473-7847 (fax)

From: bsilvestri [<mailto:communityventurepartners@comcast.net>]
Sent: Monday, October 30, 2017 7:37 AM
To: Dawson, Dan
Subject: Sir Francis Drake Boulevard Rehabilitation DEIR

Dear Dan:

Our traffic engineers are in the process of reviewing the Sir Francis Drake DEIR

(<https://www.marincounty.org/depts/pw/divisions/transportation/transportation/sir-francis-drake-boulevard-rehabilitation>), and we hope to submit our comments, shortly.

3 (cont.)

I'm writing to ask if you could please provide me with clarification on one point. When I had attended some of the preliminary planning workshops of the boulevard redesign, there was talk of reducing lane widths in certain sections of Sir Francis Drake Boulevard. However, the final rehabilitation plans do not appear to include any changes to

3 (cont.)

vehicular travel lane widths. In addition, the DEIR does not note or otherwise acknowledge or analyze any changes to any lane widths or the potential impacts of such changes. The DEIR analysis assumes the present vehicular traffic lane widths remain.

Can you please confirm that this is accurate and that the final plans do not change the existing vehicular lanes widths in any section of Sir Francis Drake Boulevard?

If that is not the case, and vehicular lanes are reduced or otherwise changed in any sections of the boulevard, can you (1) please point me to that information in the documentation, and (2) explain why the DEIR does not include any analysis is the potential impacts of such changes.

A quick response would be extremely helpful to us, so that we might submit our comments prior to your deadline.

Thank you.

Best regards,
Bob Silvestri
President

Community Venture Partners

A Catalyst for Sustainable Solutions

415.381.3887 Office

415.342.7877 Cell

<http://www.communityventurepartners.org>

<https://marinpost.org>

Email Disclaimer:

<http://www.marincounty.org/main/disclaimers>

Email Disclaimer: <http://www.marincounty.org/main/disclaimers>

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Commenter C35**Bob Silvestri, Local Resident (October 30, 2017-November 1, 2017)**

C35-1: The comment requests engineering drawings, plans, cross-sections or other dimensional diagrams showing the proposed project and the alternatives. Detailed plans and cross sections are a part of design phase. Concept plans and sections were presented at community meetings and can be found in the project documents available on the County website.²¹

C35-2: The comment asks if the proposed project would reduce the width of existing vehicle travel lanes and if so, along which portions of the project corridor would this occur. Please see Master Response 2.

The Draft EIR defines the study area as the potential area of effect, which for most environmental topics included the roadway ROW and areas within the public ROW beyond the roadway edge. As described in Master Response 2, Section 4.12 of the Draft EIR identifies current traffic conditions, future traffic conditions (2020) and plus project conditions (2040), including the proposed narrower lane widths. For additional information related to the lane widths proposed as part of the project, please see Master Response 2.

C35-3: The comment again asks about the lane widths along the project corridor and whether the change in lane widths was addressed in the Draft EIR. Please see Response to Comments C35-1 and C35-2 and Master Response 2.

²¹ <https://www.marincounty.org/depts/pw/divisions/transportation/transportation/sir-francis-drake-boulevard-rehabilitation>

From: [bsilvestri](#)
To: [Dawson, Dan](#)
Cc: [Rice, Katie](#); [Rodoni, Dennis](#); [Hymel, Matthew](#)
Subject: Comment letter on the Draft Environmental Impact Report for the proposed Sir Francis Drake Rehabilitation Plan
Date: Friday, December 01, 2017 12:29:45 PM
Attachments: [120117 - CVP Comment Letter on SFD Rehabilitation DEIR.pdf](#)
[112917 Harrison - CVP - SFD Rehab Traffic Analysis Comment.pdf](#)
[112917 GHornek-CVP - SFD Blvd DEIR.pdf](#)
[110217 - Yates - D Dawson re CEQA for SFD Rehab.pdf](#)
[EY Comment Letter to Marin County re SFD DEIR 12-1-17.pdf](#)

C36

Dear Mr. Dawson:

Attached please find our comment letter on the Draft Environmental Impact Report for the proposed Sir Francis Drake Rehabilitation Plan. Attached also please find supporting comment letters and documentation by independent traffic and air quality experts, Robert Harrison and Geoffrey Hornek, respectively, as well as a copy the letter you received from our legal counsel, Edward Yates, dated November 2, 2017. Finally, a DEIR comment letter by our legal counsel Edward Yates, dated 12-01-17, is also attached for your reference.

If you have any questions, please do not hesitate to contact me at your earliest convenience.

Sincerely,

Bob Silvestri
President
Community Venture Partners
A Catalyst for Sustainable Solutions
73 Surrey Avenue
Mill Valley, CA 94941
415.381.3887 Office
415.342.7877 Cell
<http://www.communityventurepartners.org>

December 1, 2017

Dan Dawson
Principal Transportation Planner
Marin County DPW
Box 4186
San Rafael, CA 94913-4186
By email: DDawson@marincounty.org

Re: Draft CEQA Environmental Impact Report: Sir Francis Drake Boulevard Rehabilitation Project, Marin County CA

Dear Mr. Dawson:

We have reviewed the SFD DEIR and respectfully submit the following comments:

1 As you know, Sir Francis Drake Boulevard is one of the most important thoroughfares in the county and it is well known for its intolerable traffic congestion. After reviewing the DEIR, CVP questions whether the improvements being proposed won't in fact make traffic congestion even worse. The proposed changes to the roadway include reconfiguration of all the major intersections and per your descriptions, "modifications" (narrowing) of the vehicular traffic lane widths for the entire length of the roadway included in the project.

Our review of the DEIR and its attachments finds them to be deficient and in violation of the California Environmental Quality Act ("CEQA").

The findings from our review are numerous. In summary, the County has:

- 2 (1) Violated CEQA by failing to provide an adequate "project description" containing specific information about what the "modifications" of vehicular traffic will actually entail, i.e., the DEIR provides no dimensions or other design specifics about how much lane narrowing will actually occur or where it will occur, though from your correspondence with us, we are informed it will be "throughout the corridor";
- 3 (2) Violated CEQA by failing to provide any credible analysis of the potential significant impacts of the proposed traffic lane narrowing and intersection changes, as required, because all traffic projections are based on the existing roadway design/configurations not the proposed new design/configurations;
- 4 (3) Used data and analysis in the DEIR that is incorrect, inconsistent, contradictory to professional standards and based on erroneous assumptions; and

5

(4) Illegally avoided addressing any CEQA requirements for such analysis by claiming a fictitious exemption based on adherence to an unrelated highway design standard published by Caltrans.

These CEQA violations are noted in our comments herein, and in comments by independent traffic and air quality experts (see comment letters by Robert Harrison and Geoffery Hornek, attached). In addition, in our correspondence you have confirmed these CEQA violations.

6

1 – The DEIR fails to provide adequate information about the proposed project design violates the CEQA requirement for a complete “project description.”

The Sir Francis Drake DEIR fails to provide a complete project description. CEQA requires that the project description be complete and that it clearly articulate and explain the total scope of the proposed rehabilitation. The DEIR provides no dimensioned plans or cross sections showing the proposed dimensions of lanes, sidewalks, islands or other changes in each particular section of the boulevard. The DEIR simply contains what might be called preliminary concept sketches of the roadway and intersections, without any engineering specifics.

In response to my query regarding this issue, on October 30, 2017, you wrote:

Lane widths were not analyzed in the DEIR as the project does not propose constructing any lanes at a width less than adopted design standards in the Caltrans Highway Design Manual, which specifies a minimum lane width of 11.’ The HDM does allow 10’ lanes under certain limited circumstances but no 10’ travel lanes are included in the project.

For a project description for a proposal of this magnitude, the DEIR documents must provide *fully dimensioned and adequately notated plans, cross-sections and other engineering drawings* that depict the specific changes being proposed, showing the traffic lane widths for the entire length of the section of the Boulevard being rehabilitated, both “before” and “after” that rehabilitation. Without such information neither the public nor independent analysts have a way to be informed of the true scope of the work, nor can they assess or comment intelligently on potentially significant impacts.

For example, if a person drives on certain sections of Sir Francis Drake Boulevard and they have a history of experiencing very bad traffic congestion, it would be important to them to know that the section they typically drive on is going to be significantly narrower than it presently is-- e.g., some of the existing vehicular traffic lanes that are presently 15 feet wide will apparently be reduced to as narrow as 11 feet wide. Without this information they cannot form an opinion or comment intelligently. This is why CEQA requires a project description to be complete.

Further, you have admitted that under the standard the County has chosen to use, lane widths could be as narrow as 10 feet. But, you only provide your personal assurance that this is not the case. However, in the absence of any dimensions on the plans this assurance amounts to no more than "trust me." CEQA does not recognize that as an adequate project description.

7 2 – The DEIR fails to provide adequate analysis of the potential significant impacts of the proposed traffic lane narrowing and intersection changes, including but not limited to increased traffic congestion, air quality impacts and public safety impacts, violates the requirements of CEQA

Traffic congestion has been the number one concern expressed by the public throughout the public workshop and design scoping process. The Sir Francis Drake Boulevard Rehabilitation DEIR does not contain or otherwise acknowledge any assessment or analysis of the potential impacts resulting from the proposed changes to traffic lane widths.

In response to my query on this matter, on October 30, 2017, you wrote

The current lane widths, which vary throughout the corridor, and the multiple proposed lane modifications are both within adopted standards, do not alter vehicle throughput, and are thus analysis is not necessary under CEQA.

Your admission that no analysis has been done by the County is an acknowledgment that the County has violated CEQA. As explained in more detail below and in the comment letter by our legal counsel Edward Yates, dated December 1, 2017, the County has no legal authority under CEQA to defer analysis based on any “adopted standard,” as you suggest. Further, without specific analysis of potential impacts of the proposed project, the DEIR, by your own admission, provides no analysis to substantiate its claim that the new design modifications “do not alter vehicle throughput.”

The essential requirement of CEQA is that decisions must be evidence-based (i.e., based on project specific analysis) and not based on conjecture or opinion or unrelated design standards.

8 Of greater concern is that the DEIR bases its decisions entirely on the data, traffic volumes and traffic flow rates of the *existing roadway configurations* and vehicular traffic lane widths, *not those* for the proposed plan. In doing so, the County is attempting a “bait and switch,” using the performance of the existing lane widths as the basis for the proposed plan’s projected congestion performance--even though the proposed design has narrower lanes.

Lane narrowing is a well-known tool planners use to implement “traffic calming,” a euphemism for slowing traffic down. But, there is no question that slower traffic what Sir Francis Drake Boulevard is not what is needed.

9 In addition, it is an indisputable fact that increased traffic congestion can have significant air quality and public safety impacts. Under CEQA, these must be projected and analyzed for the proposed design. This would also require a baseline study be performed to assess the existing conditions.

The DEIR lacks both of these.

10 3 – The County used data and analysis in the DEIR that is incorrect, inconsistent, contradictory to professional standards and based on erroneous assumptions.

a – Traffic:

Attached please find the Memorandum by independent traffic engineer and transportation expert Robert L. Harrison, dated October 29, 2017. In that document, Mr. Harrison points out major flaws in the data and methodologies used by the County's DEIR consultants in analyzing the potentially significant traffic congestion impacts of the Sir Francis Drake Rehabilitation Plan. Among those are:

- The DEIR does not contain a complete project description or adequate information required to undertake a credible traffic congestion, traffic flow or LOS assessment of the proposed design;
- the existing traffic count data is not consistent;
- The projected 2040 traffic volumes are not consistent;
- Peak hour factors are not consistent; and
- LOS calculations are based on existing conditions not the proposed design.

This independent finding is consistent with your written admission in our email exchanges that the "Lane widths were not analyzed in the DEIR," and therefore any potential impacts of those changes in lane widths were also not analyzed, nor were significant impacts determined in any logical way, which in turn indicates that no assessment of potentially required mitigation was properly considered.

Among one of the egregious flaws noted, which corroborates our comments "1" and "2" above, is that "the DEIR LOS calculations assume no change in lane width from the existing widths." This directly contradicts the rest of the information provided in the DEIR, further confirming the inadequacy of the project description. It appears the County's own traffic consultant couldn't understand what the project entailed.

In summary, with regard to traffic congestion and required environmental assessments, the DEIR's conclusion of less than significant impacts is baseless because the County has admitted to having done no traffic analysis based on the proposed design. Therefore, there remains the possibility that the impacts are significant and in need of mitigation. Without such analysis no conclusions can be drawn or relied upon.

At minimum complete project description information and all associated data – i.e., the basis for traffic projections and analysis -- needs to be provided and otherwise made consistent, and a Revised DEIR must then be recirculated for public review and comment.

11

b – Air Quality:

Attached please find the Memorandum by independent air quality expert Geoffrey Hornek, dated November 29, 2017. In that document, Mr. Hornek points out major flaws in the data and methodologies used by the County's DEIR consultants, with regard to analyzing the potentially significant air quality impacts of the Sir Francis Drake Rehabilitation Plan.

Among those are:

- Without a proper project description or adequate data and analysis of the potentially significant impacts of increased traffic congestion resulting from the Plan, no credible air quality analysis can be undertaken;
- The DEIR did nothing substantive (i.e., quantitative) to address the ambient air quality consequences of either the construction of the proposed roadway improvements or of the modified traffic flows after project construction is complete;
- There is no assurance that a program of roadway modifications merely following the specifications of Caltrans' *Highway Design Manual* will always be beneficial to local air quality;
- The DEIR contains no quantitative analysis, only summary conclusions about the project not having adverse impacts on ambient pollutant levels. (DEIR p. 125 – 127); and
- Bay Area Air Quality Management District (BAAQMD) *California Environmental Quality Act Air Quality Guidelines* (CEQA Guidelines) includes methodology for analyzing the ambient air quality impacts of stationary and mobile source projects. However, these guidelines were not followed.

In summary, with regard to air quality and its associated environmental and public safety impacts, the DEIR's conclusions of less than significant impacts are baseless because the County has failed to do proper quantitative analysis. To that point, Mr. Hornek comments

The DEIR does not include dimensioned plans of project-related lane width changes or other roadway configuration changes or traffic link levels of service or of idling times at intersections. The lack of information about lane widths and similar design data makes impossible to perform dispersion modeling of air quality impacts; consequently, the DEIR's air quality conclusions are unsupported. Given the DEIR's failure to do proper quantitative analysis, as noted herein, there remains the distinct possibility that project impacts on ambient air quality and health risk will be significant and unmitigated.

12 4 – The County is illegally avoiding addressing CEQA requirements by claiming a fictitious exemption based on adherence to an unrelated highway design standard published by Caltrans .

You have claimed an exemption from CEQA required analysis of potentially significant traffic congestion impacts due to your reliance on the guidelines noted in the Caltrans Design Manual. This claim is patently false. CEQA does not grant any such legal authority for exemption.

We provided you with an opportunity to substantiate this claim. On November 2, 2017, our legal counsel, Edward Yates, wrote to you, explaining why such authority does not exist and requesting that you please provide the legal authority “for the County’s position that where a project’s proposed lane widths are within Caltrans or other agency adopted standards, a complete project description and environmental analysis are not required by CEQA.” (Letter attached)

You ignored our request and failed to provide any citation of legal authority. CEQA does not provide any such exemption from analysis simply because an agency follows an arbitrary "design standard" of its own choosing. CEQA requires analysis that is project specific.

Summation of Comments on the Sir Francis Drake Boulevard Rehabilitation Plan DEIR

In your most recent response to my continued questioning of your claims of exemption from CEQA, you wrote:

Environmental review is done at the Preliminary Engineering phase. Detailed construction drawings and bid specifications would be prepared once the EIR is certified and the Board of Supervisors adopts a final project.

While this may be true if the preliminary engineering phase is complete and includes a complete project description and adequate assessment and analysis of potentially significant impacts, in this instance that is not the case.

It appears that the County’s approach here is to (1) rely on data of the existing performance of the street to defend the performance of the proposal, then (2) circulate a DEIR without any detailed or dimensioned drawings, or any analysis or other evaluation to determine if there are any significant impacts that required mitigation, then (3) close the public comment period and issue responses, which may simply disagree with opposing opinions, then finally, (4) move on to the Board of Supervisors with essentially the same documents we now have in hand, which will then be called the Final EIR, in order to get that FEIR and design proposal certified... *a design, which the public will never actually have the opportunity to see or comment on.*

What is greatly concerning here is that nowhere in this entire process will the public have the opportunity to fully comprehend the final plan, much less comment on it. This violates the primary purpose of CEQA.

13

It appears that your agency is attempting to have the Board of Supervisors certify the final EIR before the actual streetscape design (e.g., lane widths) is decided. Since no specifically dimensioned design exists in the DEIR documentation, how will the Board of Supervisors, our decision making body, be properly informed what that final design and its impacts will be *before* they are asked to certify the Final EIR?

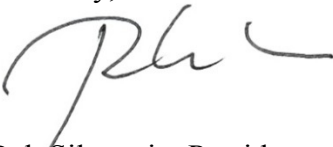
It is simply inconceivable that LSA, the highly paid consultant that created the DEIR documents, could be this ignorant of the legal requirements for analysis and evidence, under CEQA.

Furthermore, once the FEIR is certified and the 30 day statutory period for a legal challenge has expired, the Department of Public Works could essentially engineer and build *any traffic lane sizing* they chose to and neither the Board of Supervisor nor the public will even know about it until the roadway rehabilitation construction is completed.

Not only is this lack of transparency a violation of the letter and spirit of the law, but uncontested, it would set an extremely bad precedent for public process in Marin, going forward.

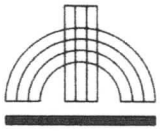
For these and the other reasons stated herein, the County must immediately withdraw the DEIR, complete the project description, undertake the assessments and analysis required under CEQA, then recirculate a Revised Draft Environmental Impact Report for public comment.

Sincerely,



Bob Silvestri – President

Cc: Matthew H. Hymel, Katie Rice, Dennis Rodoni



MEMORANDUM

To: Bob Silvestri, President
Community Venture Partners
From: Bob Harrison
Date: November 29, 2017
Re: Review of Sir Francis Drake Boulevard Rehabilitation Project DEIR Traffic Analysis

This is in response to your request to review the traffic analysis prepared for the Draft Environmental Impact Report (DEIR) on the Sir Francis Drake Boulevard Rehabilitation Project (the project). I have briefly reviewed the traffic section of the project DEIR including Appendix H, Traffic Modeling Results. The traffic analysis appears to have been professionally prepared but does include several points of questionable assumptions and findings as described below.

- 14 **Project Description Not Adequate.** The DEIR's project description does not include dimensioned plans for the proposed lane width narrowing or other roadway configuration changes. Without this information, it is not possible to accurately assess the significance of the project's impact on traffic congestion that may be caused by the proposed changes. This lack of information on lane widths makes it impossible to properly undertake quantitative modeling of traffic impacts. The conclusion of the DEIR that the project would not have a significant adverse impact on traffic congestion and would therefore not require mitigation cannot be verified without study of a fully competent detailed project description.
- 15 **Existing Traffic Count Data Not Consistent.** The traffic count data presented in Appendix H is not the same as used in the Level of Service (LOS) capacity analysis calculations. The largest differential between the count and the LOS calculation data is shown for the Westbound through traffic. In the AM peak hour the actual count is about 200 cars lower at Wolfe and about 300 cars lower at Barry Way. In the PM peak hour the actual Eastbound count is about 200 cars lower at Wolfe and 160 cars higher at Barry Way.
- 16 **Projected 2040 Traffic Volumes Not Consistent.** The traffic count projections for 2040 as shown in the DEIR Figures 4.12-5 and 4.12-6 are not the same as are used in the LOS capacity analysis calculations for 2040. These differences do not appear sufficient to alter the findings of the analysis.
- 17 **Peak Hour Factors Not Consistent.** The intersection traffic Peak Hour Factors used in the LOS calculations are not the same as reported in the traffic count data presented in Appendix H. The same Peak hour Factors were used for both the AM and PM peak hours in the LOS calculations. Peak hour factors are rarely the same in both AM and PM peak hours.

18

Intersection Level of Service (LOS) Analysis. I have reviewed LOS for four of the eight intersections studied in the DEIR. I have recalculated service level for these intersections using software different from that used in the DEIR capacity analysis. A comparison of the results of the capacity analysis from Appendix H of the DEIR with my (Harrison) calculations is shown in the tables below. The tables note where apparent anomalies exist in the LOS results. It is also noted that the DEIR LOS calculations assume no change in lane width from existing widths.

Existing Traffic Volumes Intersection Level of Service (LOS)					
AM Peak Hour					
Intersection of Sir Francis Drake Boulevard with:	Level of Service				Notes
	DEIR Appendix ¹		Harrison		
	Delay ²	LOS	Delay ²	LOS	
College Avenue	37.5	D	36.1	D	DEIR result appears reasonable.
Wolfe Grade	77.5	E	57.1	E	DEIR appears to overstate delay. DEIR Incremental delay factor (d_2) appears to be too high.
Bon Air Road	21.1	C	25.3	C	DEIR result appears reasonable.
Barry Way / Eliseo Drive	83.7	F	63.9	E	DEIR appears to overstate delay. DEIR delay factor d_2 again may be too high.
PM Peak Hour					
Intersection of Sir Francis Drake Boulevard with:	Level of Service				Notes
	DEIR Appendix ¹		Harrison		
	Delay ²	LOS	Delay ²	LOS	
College Avenue	23.3	C	24.1	C	DEIR result appears reasonable.
Wolfe Grade	33.1	C	37.6	C	DEIR result appears reasonable.
Bon Air Road	24.7	C	26.2	C	DEIR result appears reasonable.
Barry Way / Eliseo Drive	49.8	D	49.3	D	DEIR result appears reasonable.
Notes: 1 -- Delay from DEIR Appendix H Capacity Analysis. May not be the same as in DEIR Tables 4.12-C, 4.12-E and 4.12-G. 2 -- Average delay in seconds per vehicle.					

Summary of Findings. Most LOS results as shown in the DEIR are reasonable.

1 – The DEIR may estimate excessive delay at the intersections of Sir Francis Drake Boulevard at Wolfe Grade and at Barry Way. The incremental delay factor (d_2) as shown the DEIR capacity analysis calculations appears to be larger than would be expected. Neither of these estimates led to inappropriate recommendations in the DEIR.

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Cumulative 2040 Traffic Volumes Intersection Level of Service (LOS) Includes Proposed Project Improvements					
AM Peak Hour					
Intersection of Sir Francis Drake Boulevard with:	Level of Service				Notes
	DEIR Appendix ¹		Harrison		
	Delay ²	LOS	Delay ²	LOS	
College Avenue	34.5	C	30.4	C	DEIR result appears reasonable. Assumes two lane Westbound Left Turn. See discussion below.
Wolfe Grade	84.5	F	64.7	E	DEIR appears to overstate delay. EIR delay factor (d_2) appears too high. Potential for added improvements
Bon Air Road	23.7	C	27.7	C	DEIR result appears reasonable.
Barry Way / Eliseo Drive	46.4	D	41.2	D	DEIR result appears reasonable.
PM Peak Hour					
Intersection of Sir Francis Drake Boulevard with:	Level of Service				Notes
	DEIR Appendix ¹		Harrison		
	Delay ²	LOS	Delay ²	LOS	
College Avenue	27.8	C	26.0	C	DEIR result appears reasonable. Assumes two lane Westbound Left Turn. See discussion below.
Wolfe Grade	44.0	D	45.9	D	DEIR result appears reasonable.
Bon Air Road	27.9	C	28.1	C	DEIR result appears reasonable.
Barry Way / Eliseo Drive	51.8	D	45.4	D	DEIR result appears reasonable.
Notes: 1 -- Delay from DEIR Appendix H Capacity Analysis. May not be the same as in DEIR Tables 4.12-C, 4.12-E and 4.12-G. 2 -- Average delay in seconds per vehicle.					

2 – From the LOS analysis, it is clear that the existing island on the southbound approach at the intersection of Wolfe Grade with Sir Francis Drake Boulevard limits the efficiency of the intersection. It appears that removing this island and restriping the approach to provide a southbound left, left-through and right turn lanes would improve intersection operations. It is recommended that this improvement should be studied.

3 -- The future year excessive delay found in the DEIR analysis for the intersection of Drake at College Avenue led to a recommendation for a double westbound (WB) left turn lane. The incremental delay factor (d_2) as calculated for the WB left turn appears higher than would be expected. This calculation should be reviewed to insure the double left turn would be needed.

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4 -- The number of vehicles making a right turn on the red traffic signal (RTOR) used in the DEIR calculation of LOS is between 62% and 87% of the northbound total approach volume at the intersections of Drake with College Avenue and with Bon Air Road. This proportion of RTOR is higher than found at most intersections.

19

Westbound Left Turn Lane at College Avenue. Questions have been raised on the need for and efficacy of the proposed double left turn lane from Sir Francis Drake Boulevard into College Avenue. LOS was calculated for this review by assuming both the double and single left turn lane configurations. The result of that analysis is shown in the table below.

Assuming 2040 cumulative traffic volumes, the intersection would operate at LOS C with the proposed double left turn lane in both the AM and PM peak hours. With a single left turn lane the operation of the intersection would be LOS D in the AM peak hour and LOS C in the PM peak hour.

Under 2040 traffic loads, with two westbound left turn lanes, the average delay per left turning vehicle would be about 38 seconds and 34 seconds in the AM and PM peak hours respectively. The evaluation of a single left run lane found the delay would be 56 seconds and 32 seconds in the AM and PM peak hours respectively. As compared to a single left turn lane, the double left turn lane would reduce the 2040 AM peak hour average delay for left turning traffic by about 18 seconds per vehicle or by about one-third (32%).

The LOS calculation software attempts to provide the maximum efficiency for the traffic signal. This means that, even with the added lane, in the PM peak hour the double left turn would provide no reduction in delay for the left turning traffic. However, green time would be added on the traffic signal for the other traffic movements such that the total delay for all traffic would be reduced by about 4 seconds per vehicle.

The delay for the single left turn lane as shown in the DEIR would be much greater as compared to my calculations. This result appears to be due to the higher than expected incremental delay factor (d_2) estimated in the DEIR. Assuming the results as shown in the DEIR, the two-lane left turn improvement would provide a significant improvement in intersection operations.

Capacity of College Avenue. There appears to sufficient pavement on College Avenue to accept a double left turn from Sir Francis Drake Boulevard. A 250-foot long merge area would occur about 300 feet south of the intersection. While the distances available are not ideal, this merge design would provide acceptable service. A reworking of the street could extend these distances and improve the operation of the merge.

Sir Francis Drake Boulevard at College Avenue Evaluation of Westbound (WB) Dual Left Turn Lane Assumes 2040 Cumulative Traffic Volumes									
AM Peak Hour									
Westbound Left Turn Lane Configuration	Intersection Level of Service				WB Left Turn Level of Service				
	DEIR Appendix ¹		Harrison		DEIR Appendix ¹		Harrison		
	Delay ²	LOS	Delay ²	LOS	Delay ²	LOS	Delay ²	LOS	LOS
1 WB Left Turn Lane	51.8	D	47.4	D	134.3	F	56.0	E	
2 WB Left Turn Lanes	34.5	C	30.4	C	56.7	E	37.7	D	
PM Peak Hour									
Westbound Left Turn Lane Configuration	Intersection Level of Service				WB Left Turn Level of Service				
	DEIR Appendix ¹		Harrison		DEIR Appendix ¹		Harrison		
	Delay ²	LOS	Delay ²	LOS	Delay ²	LOS	Delay ²	LOS	LOS
1 WB Left Turn Lane	42.3	D	30.4	C	137.3	F	31.5	C	
2 WB Left Turn Lanes	27.8	C	26.0	C	52.4	D	34.4	C	
Notes: 1 -- Delay from DEIR Appendix H Capacity Analysis. May not be the same as in DEIR Tables 4.12-C, 4.12-E and 4.12-G. 2 -- Average delay in seconds per vehicle.									

GEOFFREY H. HORNEK

Environmental Air Quality and Acoustical Consulting
1032 Irving Street, #768
San Francisco, CA 94122
(414) 241-0236
ghornek@sonic.net

C36 (cont.)
Attachment 2

November 29, 2017

Bob Silvestri
Community Venture Partners, Inc.
73 Surrey Avenue
Mill Valley, CA 94941

Subject: Comments on the air quality analysis done for the *Sir Francis Drake Boulevard Rehabilitation Project Draft Environmental Impact Report*

Dear Mr. Silvestri:

Thank you for asking me to review the *Sir Francis Drake Boulevard Rehabilitation Project Draft Environmental Impact Report* (DEIR – October 2017) prepared and recently released for public comment by the Marin County Department of Public Works (DPW). As a consultant in environmental air quality and acoustics, I have more than 20 years of experience in the preparation and review of environmental technical reports for a wide variety of commercial, transportation, and urban development projects in California.

This letter responds to the DEIR’s failure to adequately address all air quality issues of importance, specifically the following:

- 20 • The DEIR did nothing substantive (i.e., quantitative) to address the ambient air quality consequences of either the construction of the proposed roadway improvements or of the modified traffic flows after project construction is complete. It includes only summary conclusions about the project not having adverse impacts on ambient pollutant levels and toxic air contaminant (TAC) health risks (DEIR p. 125 – 127).
- 21 • There is no assurance that a program of roadway modifications merely following the specifications of Caltrans’ *Highway Design Manual* will always be beneficial to local air quality. In contrast, the Bay Area Air Quality Management District (BAAQMD) *California Environmental Quality Act Air Quality Guidelines (CEQA Guidelines)* includes methodology and significance criteria for analyzing the ambient air quality impacts and

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TAC health risks of stationary and mobile source projects. But the DEIR did not follow the *CEQA Guidelines* to address such air quality impacts.

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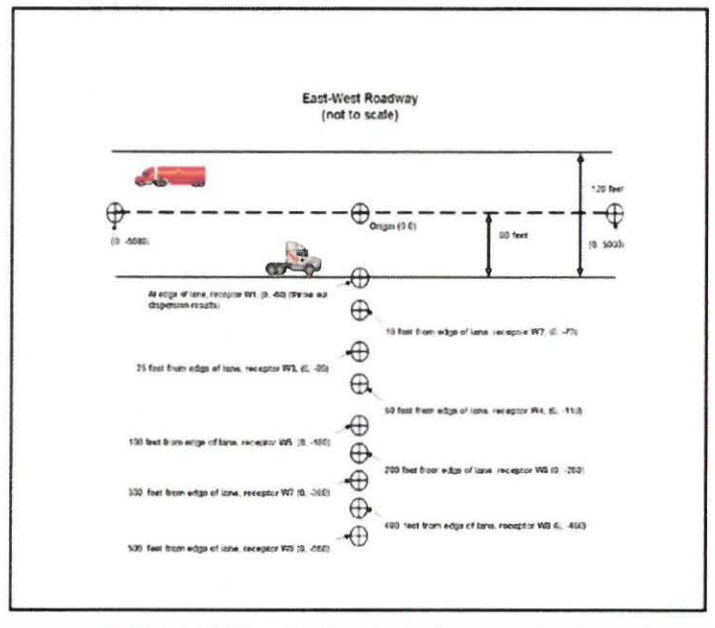
The DEIR's proposed "Basic Construction Mitigation Measures" (Mitigation Measure AIR-1, DEIR p. 124) are only effective at reducing fugitive dust from project construction, not PM2.5 from equipment diesel engine exhaust. The DEIR has quantified the construction PM2.5 but has not modeled their ambient impacts on the identified local sensitive receptors. The BAAQMD has recommended the dispersion model SCREEN3 (see *Recommended Methods for Screening and Modeling Local Risks and Hazards* – p. 45) for determining project construction PM2.5 increments and TAC health impacts at the identified local sensitive receptors that it identifies near project construction sites.

The BAAQMD's dispersion model of choice for roadway projects is CAL3QHCR, which can be set up to be sensitive to the effects of increased traffic volumes (i.e., more cars = more pollutant sources), increased traffic congestion (i.e., slower traffic emits more pollutants per vehicle mile and additional emissions come from increased idling near signalized intersections) and changes to roadway configuration (e.g., narrowed travel lanes concentrate pollutants initially, so they disperse more slowly with potentially higher concentrations downwind). CAL3QHCR is specifically identified for ambient concentration and TAC risk analysis in *Recommended Methods for Screening and Modeling Local Risks and Hazards* (see excerpts below from it, p. 70 – 74)

"The US EPA's CAL3QHCR model is an air dispersion model for predicting air quality impacts of pollutants near roadways. The CAL3QHCR is a refined version of the original California Line Source Dispersion Model (CALINE) that was developed as a modeling tool to predict roadside carbon monoxide (CO) concentrations. The CAL3QHCR model not only predicts CO concentrations, but also can be used to estimate ambient PM2.5 concentrations from idling or moving motor vehicles ...

"Figure 27 [from Risk Modeling Approach, copied below] illustrates the example scenario described in this section ... The District recommends using a receptor grid that encompasses the length of the roadway and has receptors spaced every 50 to 100 meters."

Figure 27 Example Scenario East-West Roadway and Receptors Placements for CAL3QHCR



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The *CEQA Guidelines* also recommend quantitative significance criteria for assessing ambient air quality and TAC impacts at the project-specific and cumulative levels. These criteria include health risk/hazard/concentration thresholds addressing ambient pollutant concentrations. The DEIR lists these ambient/risk thresholds, which are particularly important for roadway projects (see DEIR p. 121, its text quoted below), but does not use them with SCREEN3 to determine project construction impacts, nor with CAL3QHCR to determine project operational impacts.

“For new sources of Toxic Air Contaminants (TACs), during either project construction or project operation, expose sensitive receptors to substantial levels of TACs under project conditions resulting in (a) an increase in cancer risk level greater than 10 in one million, (b) a non-cancer risk (chronic or acute) hazard index greater than 1.0, or (c) an increase of annual average PM2.5 of greater than 0.3 micrograms per cubic meter; or, under cumulative conditions, resulting in (a) a cancer risk level greater than 100 in a million, (b) a non-cancer risk (chronic or acute) hazard index greater than 10.0, or (c) annual average PM2.5 of greater than 0.8 micrograms per cubic meter³³”

“³³ Pursuant to the BAAQMD CEQA Guidelines, when siting new TAC sources consider receptors located within 1,000 feet. For this threshold, sensitive receptors include residential uses, schools, parks, daycare centers, nursing homes, and medical centers. The cumulative analysis should consider the combined risk from all TAC sources.”

A quantitative analysis is necessary considering the importance of Sir Francis Drake Boulevard to Marin’s transportation system and by the many people living along it, and other sensitive uses, that could suffer from possible increased pollutant exposures consequent to the project

design. The DEIR must use CAL3QHCR to look at the PM_{2.5} levels at sensitive receptors in the roadway corridor by modeling the proposed roadway configuration changes potentially affecting average speeds, idling times at intersections and changes to traffic lane widths.

The DEIR does not include dimensioned plans of project-related lane width changes or other roadway configuration changes or traffic link levels of service or of idling times at intersections. There is no quantitative air quality modeling using actual data, only summary conclusions about the project not having adverse impacts on ambient pollutant levels (see text below from DEIR p. 125 – 127). The lack of information about lane widths and similar design data makes it impossible to perform dispersion modeling of air quality impacts; consequently, the DEIR's air quality conclusions are unsupported. Given the DEIR's failure to do proper quantitative analysis, as noted herein, there remains the distinct possibility that project impacts on ambient air quality and health risk will be significant and unmitigated.

*“(3) **Operational Emissions.** Long-term air emission impacts are associated with stationary sources and mobile sources. Stationary source emissions result from the consumption of natural gas and electricity. Mobile source emissions result from vehicle trips and result in air pollutant emissions affecting the entire air basin ... The proposed project includes roadway improvements that maintain and improve travel efficiency on Sir Francis Drake Boulevard; therefore, the proposed project would not result in an increase in vehicular trips through the project area. The project would not be a source of stationary source emissions. Therefore, operation of the project would not be expected to result in a violation of air quality standards.”*

“Single-family residences are located adjacent to the existing pavement. Other sensitive receptors within the project area include multi-family housing and Bacich Elementary School, Kent Middle School, Marin Catholic High School, College of Marin, and Marin General Hospital ... implementation of the Basic Construction Mitigation Measures required in Mitigation Measure AIR-1 would reduce construction-related emissions to a less-than-significant level, ... Once the project is constructed, the project would not be a source of substantial toxic emissions. The proposed project would not increase vehicle trips and would therefore not result in additional emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction or operation.”

The increase of vehicle trips on a roadway is not the only parameter affecting local pollutant levels near a roadway. Increased traffic flow congestion, increased idling at intersections, and increased initial pollutant concentrations in narrowed lanes can also lead to higher local pollutant concentrations. CAL3QHCR must be set up to reflect existing roadway conditions and the changes in configuration proposed by the project with model receptors placed at all the local sensitive receptors identified in the DEIR (see 2nd paragraph in the DEIR text quote above).


The DEIR air quality analysis as it stands now is inadequate to assure that local residents and

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other sensitive receptors in the Sir Francis Drake Boulevard corridor would not be exposed to unacceptable ambient pollutant levels and TAC health risks if the proposed project roadway reconfiguration is implemented. The DEIR must conduct dispersion modeling studies of project construction and operational ambient impacts and TAC health risks, then evaluate the need for exposure mitigations based on the findings. Such analysis in comparison with accompanying CEQA significance criteria is recommended by the BAAQMD *CEQA Guidelines* and mitigation of any identified project ambient air quality impacts is mandated by the *Marin Countywide Plan* (see Plan text below as quoted in the DEIR p. 119)

- ***“Policy AIR-2.1: Buffer Emission Sources and Sensitive Land Uses.*** *Consider potential air pollution and odor impacts from land uses that may emit pollution and/or odors when locating (a) air pollution sources, and (b) residential and other pollution-sensitive land uses in the vicinity of air pollution sources (which may include freeways, manufacturing, extraction, hazardous materials storage, landfill, food processing, wastewater treatment, and other similar uses).”*
- ***“Implementing Program AIR-2.b: Protect Sensitive Receptors Near High-Volume Roadways.*** *Amend the Development Code to require mitigation measures such as increased indoor air filtration to ensure the protection of sensitive receptors (facilities where individuals are highly susceptible to the adverse effects of air pollutants, such as housing, child care centers, retirement homes, schools, and hospitals) near freeways, arterials, and other major transportation corridors.”*

Sincerely,



Geoffrey Hornek

Law Office of Edward E. Yates

20 Skylark Drive, Suite 12

Larkspur, CA 94939

Ph: 415-990-4805 Fax: 415-891-8999

eyates@marinlandlaw.com

C36 (cont.)
Attachment 3 -
See Letter C40

November 2, 2017

Daniel Dawson
Marin County Public Works Department
County of Marin
San Rafael, CA

By email: DDawson@marincounty.org

Dear Mr. Mr. Dawson,

I represent Community Ventures Partners. In email correspondence between you and Bob Silvestri, you stated on Monday, October 30 that:

“The current lane widths, which vary throughout the corridor, and the multiple proposed lane modifications are both within adopted standards, do not alter vehicle throughput, and are (sic) thus analysis is not necessary under CEQA.”

I am not aware of any such authority under the California Environmental Quality Act (“CEQA) Pub. Res. Code § 21000 et seq. Specifically, CEQA provides no such exemption to omit either: 1) a project description for a project component; or 2) environmental analysis, based on adherence to an adopted technical standard. CEQA Guidelines 15064.7(c) allows agencies to establish thresholds of significance which consider previously adopted or recommended public agency environmental standards provided there is evidence to support that standard.

First, a state lane width standard is not an air quality, safety, circulation or any other standard related to environmental review. It is a technical standard for transportation planning and thus, does not qualify for the allowance in Section 15064.7 related to "environmental" effects. (See Citizens for Responsible Equitable Environmental Development v. City of Chula Vista (2011) 197 Cal.App.4th 327, 334.)

Second, the DEIR does not provide or rely on any such threshold of significance – even for traffic transportation planning - but instead simply fails CEQA’s basic mandate to provide project description detail and environmental analysis.

Page 2
Dan Dawson
Marin County DPW

C36 (cont.)
Attachment 3 -
See Letter C40

Please provide me with legal authority for the County's position that where a project's proposed lane widths are within Caltrans or other agency adopted standards, project description and environmental analysis are not required by CEQA.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Yates", with a horizontal line extending to the right.

Edward Yates

Cc: Raul Rojas

Law Office of Edward E. Yates

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Ph: 415-990-4805 Fax: 415-891-8999

eyates@marinlandlaw.com

C36 (cont.)
Attachment 4 -
See Letter C41

December 1, 2017

Dan Dawson
Principal Transportation Planner
Marin County DPW
Box 4186
San Rafael, CA 94913-4186
By email: DDawson@marincounty.org

Re: Draft CEQA Environmental Impact Report: Sir Francis Drake Boulevard Rehabilitation Project, Marin County CA

Dear Mr. Dawson:

I represent Community Venture Partners in regard to the California Environmental Quality Act (“CEQA”) Pub. Res. Code § 21000 et seq. compliance for the Sir Francis Drake Boulevard Rehabilitation Project (“SFD Project”).¹

Per my November 2, 2017 letter to you, the SFD Project Draft Environmental Impact Report (“DEIR”) improperly excludes basic project description information, regarding narrowing lane widths. Because of this lack of project information, the EIR also fails to provide required data and analysis, regarding impacts to traffic congestion and circulation.

Such basic inadequacies render the DEIR so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment have been precluded. *Therefore, to comply with CEQA, the EIR must be recirculated for public review.*

¹ This letter incorporates by reference a letter by Geoffrey H. Hornek, dated November 29, 2017 addressed to Bob Silvestri, CVP and a memo by Robert L. Harrison, dated November 30, 2017 addressed to Bob Silvestri, CVP.

1. The Project Description is Incomplete.

One of the primary flaws of the DEIR is its failure to provide an accurate project description. “An accurate, stable and finite project description is an essential element of an informative and legally sufficient EIR under CEQA.” (See CEQA Guidelines §15124, citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App.3d 185, 199 [139 Cal. Rptr. 396].) Several courts have invalidated EIRs for their failure to provide an adequate Project Description. For example, in *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal. App. 4th 859, the California Supreme Court found that an EIR was invalid because it omitted a meaningful discussion of the conditions in the northern part of the proposed water supply system. (See also *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal. 3d 376.)

In particular, with regard to the SFD Project, the CEQA Guidelines require that the project description contain a description of the projects’ technical’ characteristics and “consider the engineering proposals.” 14 Cal. Code Regs §15124(c) (“CEQA Guidelines.”) The change in lane width is both a technical characteristic and an engineering proposal and must be included in the Draft EIR so that the public can understand the project.

Other appellate court decisions on project description hold that where the project description makes public participation difficult, the EIR is not legally adequate.

These curtailed and inadequate characterizations of the Project were enough to mislead the public and thwart the EIR process. As noted in *County of Inyo v. City of Los Angeles*, supra, 71 Cal.App.3d 185, when an EIR contains unstable or shifting descriptions of the project, meaningful public participation is stultified. “A curtailed, enigmatic or unstable project description draws a red herring across the path of public input.” (Id. at pp. 197–198 [holding that although the “ill-conceived, initial project description” did not carry over into impacts section of EIR, the shifting description did “vitiate the city’s EIR process as a vehicle for intelligent public participation”].)

(*San Joaquin Raptor Rescue Center v. County of Merced*) (2007) 149 Cal.App.4th 645, 656.

Nor is there any exemption allowing the County to not disclose project description information. In previous email correspondence, Bob Silvestri of CVP asked why the project description did not include basic data or discussion of the lane width change. You stated in an email of Monday, October 30 that:

“The current lane widths, which vary throughout the corridor, and the multiple proposed lane modifications are both within adopted standards, do not alter vehicle throughput, and are (sic) thus analysis is not necessary under CEQA.”

And in a subsequent correspondence you wrote:

“Lane widths were not analyzed in the DEIR as the project does not propose constructing

any lanes at a width less than adopted design standards in the Caltrans Highway Design Manual,”

I am not aware of any such authority under CEQA that would exempt the County from providing the required “accurate, stable and finite project description.” Specifically, CEQA provides no such exemption to omit either: 1) a project description for a project component; or 2) environmental analysis, based on adherence to an adopted technical standard. CEQA Guidelines 15064.7(c) allows agencies to establish thresholds of significance which consider previously adopted or recommended public agency environmental standards, provided there is evidence to support that standard.

First, a state lane width standard is not an air quality, safety, circulation or any other standard related to environmental review. It is a technical standard for transportation planning and thus, does not qualify for the allowance in Section 15064.7 related to "environmental" effects. (See *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327, 334.

Second, the DEIR does not provide or rely on any such threshold of significance – even for traffic transportation planning - but instead simply fails CEQA’s basic mandate to provide project description detail and environmental analysis.

The County has not provided my client or me with any legal authority for the County’s position that where a project’s proposed lane widths are within Caltrans or other agency adopted standards, project description and environmental analysis are not required by CEQA.

2. DEIR Impact Assessment is Inadequate

An EIR must identify, analyze, and mitigate each and every significant environmental impact of a proposed project. Specifically, CEQA has a statutory mandate that requires that an EIR “shall include a detailed statement setting forth ... all significant effects on the environment of the proposed project.” (Pub. Res. Code §21100(b)(1), emphasis added.); see also CEQA Guidelines § 15126(a.)

CEQA Guidelines §§15126 and 15126.2 require that an EIR evaluate and classify impacts as to their severity. Impacts are normally measured against the existing environmental setting, which relates to the project description. A persistent problem is that the DEIR does not identify, evaluate or classify certain impacts. Part of the reason for this omission is that the project is not sufficiently described (e.g., due to missing details regarding lane width, etc.). That is, the SFD Project DEIR fails to properly measure the impacts against the existing environmental setting because the project description is incomplete and inaccurate.

Mitigation. An EIR must describe feasible mitigation measures which will avoid or substantially lessen each significant environmental effect to the maximum extent feasible. (CEQA Guidelines §15126.4(a)(1); *Save Our Peninsula Committee*, supra, 87 Cal.App.4th at 139.) A lead agency cannot approve a project if there are feasible alternatives or mitigation

measures that would avoid or substantially lessen significant impacts. (Pub. Res. Code §§21002 and 21081(a)(3); CEQA Guidelines §§ 15002(a)(3) and 15021(a)(2); *Mountain Lion Foundation*, supra, 16 Cal.App.4th at 134.)

The DEIR fails to comply with CEQA Guideline §15126, which requires analysis and mitigation of indirect impacts. Additionally, the DEIR misclassifies some impacts by improperly concluding that they can be mitigated to less than significant.

a. Traffic and Circulation Section Lacks Data and Basis for Assumptions

CEQA requires that where there are industry wide assessment models, an agency shall use those models. (See *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 CA 4th 357, 372.) CEQA further requires quantitative analysis where feasible and necessary to analyze a project impact. (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1381.)

In a memorandum by independent traffic engineer and transportation expert Robert L. Harrison, dated October 30, 2017, Mr. Harrison identifies several examples of the DEIR using an inadequate model to calculate traffic delays. For instance, Mr. Harrison opines that: “[t]he incremental delay factor (cfi) as shown the DEIR capacity analysis calculations appears to be larger than would be expected.

Mr. Harrison further points out major flaws in the data and methodologies used by the County’s DEIR consultants in analyzing the potentially significant traffic congestion impacts of the Sir Francis Drake Rehabilitation Plan. Among those are:

- The existing traffic count data is not consistent;
- The projected 2040 traffic volumes are not consistent; and
- Peak hour factors are not consistent.

Regarding the lack of completeness of the project description, Mr. Harrison opines that:

“The DEIR's project description does not include dimensioned plans for the proposed lane width narrowing or other roadway configuration changes. Without this information, it is not possible to accurately assess the significance of the project's impact on traffic congestion that may be caused by the proposed changes. This lack of information on lane widths makes it impossible to properly undertake quantitative modeling of traffic impacts. The conclusion of the DEIR that the project would not have a significant adverse impact on traffic congestion and would therefore not require mitigation, cannot be verified without study of a fully competent detailed project description.”

These are only some of the numerous DEIR inadequacies identified by Mr. Harrison. The DEIR must address these failures in order for the public to understand the consequences of the SFD Project. (Pub. Res. Code §21100(b)(1), emphasis added.); see also Guidelines §§ 15126(a); 15088.5.)

b. Air Quality Lacks Project Description Leaving DEIR Conclusions Unsubstantiated

Courts have held EIRs deficient where it failed to correlate adverse air pollution effects with indirect health effects. First, not including lane width project description information/data/analysis in the DEIR renders the underlying air quality assumptions and conclusions inadequate. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.) CVP has retained air quality expert, Geoffrey H. Hornek, to review the DEIR. Mr. Hornek states that:

“The DEIR does not include dimensioned plans of project-related lane width changes or other roadway configuration changes or traffic link levels of service or of idling times at intersections. There is no quantitative air quality modeling using actual data, only summary conclusions about the project not having adverse impacts on ambient pollutant levels (see text below from DEIR p. 125 - 127). The lack of information about lane widths and similar design data makes it impossible to perform dispersion modeling of air quality impacts; consequently, the DEIR's air quality conclusions are unsupported. Given the DEIR's failure to do proper quantitative analysis, as noted herein, there remains the distinct possibility that project impacts on ambient air quality and health risk will be significant and unmitigated.” See November 29, 2017 letter from Geoffrey H. Hornek to Bob Silvestri.

Thus, the lack of precise project description and the lack of accurate quantitative modeling mean the DEIR does not have the required evidence to support its conclusions.

Because the DEIR uses the wrong modeling methodology and the data for that modeling is incomplete, there is no required substantial evidence for the air quality assumptions and conclusions. Mr. Hornek opines:

“[t]he DEIR must use CAL3QHCR to look at the PM 2.5 levels at sensitive receptors in the roadway corridor by modeling the proposed roadway configuration changes potentially affecting average speeds, idling times at intersections and changes to traffic lane widths .”

Mr. Hornek further states that,

“the DEIR must conduct dispersion modeling studies of project construction and operational ambient impacts and TAC health risks, then evaluate the need for exposure mitigations based on the findings.”

Thus, the DEIR cannot and does not have the necessary data and analysis to consider mitigation measures as required by CEQA. CEQA Guidelines §§15126 and 15126.2. Finally, the DEIR is inadequate on its face because it does not follow BAAQMD CEQA Guidelines and thus, does not provide any mitigation of any identified project ambient air quality impacts as mandated by the Marin Countywide Plan.

It appears therefore that the County has simply not been willing to pay for the type of modeling and analysis that is necessary for a project of this scale. Such unwillingness shorts the public and the decision maker and is penny wise and pound foolish.

3. The EIR Must Be Recirculated

A draft EIR must be recirculated, where it is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment have been precluded. (CEQA Guidelines, §15088.5.; *Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043).

The DEIR fails to adequately provide a project description, provide accepted industry modeling to assess traffic impacts, and provide a project description and baseline information that provides evidence for its conclusions regarding traffic and circulation and air quality. These legal failures compromise the integrity of any conclusions concerning significance of impacts and identification of reasonable mitigation measures. Further, as shown in letters by technical experts, Mr. Harrison and Mr. Hornek, such lack of a specific project description, lack of baseline information and failure to use accepted modeling, renders experts, much less members of the public, unable to conduct inform and reasoned review of the DEIR.

Because these errors are so essential, CEQA requires that the DEIR be revised and recirculated to provide the decision maker and the public the opportunity to examine reasonable alternatives as required by CEQA.

Sincerely,



Edward Yates

Commenter C36

Bob Silvestri, Local Resident (December 1, 2017)

C36-1: The commenter's contention that the proposed changes to the roadway would make traffic congestion worse is noted. The County disagrees. As described in Section 4.12 of the Draft EIR and further clarified in Master Responses 2, 4, and 5, Parisi Consulting conducted traffic analyses under existing conditions (baseline) and future conditions (2020 and 2040) both with and without the project. The traffic analyses conclude that the proposed project would improve traffic conditions throughout the corridor.

Section 4.0 of the Draft EIR addresses the potential effects of the proposed project for all of the environmental topics considered under CEQA and identifies appropriate mitigation measures to reduce all identified significant impacts to a less-than-significant level. These mitigation measures have been developed by technical experts based on technical expertise and factual evidence.

C36-2: The comment contends that the Draft EIR violated CEQA by failing to provide an adequate project description containing specific information about the proposed modifications, specifically related to lane narrowing. This is incorrect. Section 3.5, *Project Description*, of the Draft EIR outlines fully and adequately describes the project. The Project Description includes a description of the specific improvements proposed as part of the project, including diagrams showing intersection modifications, roadway configuration, and sidewalk widening. Please see Master Response 2.

C36-3: The analysis included in the Draft EIR evaluated the proposed project, including the use of 11-foot wide lanes as part of the proposed project improvements. Thus, the Draft EIR's level of service analysis and travel time assessments are valid. Please see Response to Comment C36-18 and Master Response 2.

C36-4: The County does not agree with the commenter's conclusion. Section 4.0 of the Draft EIR addresses the potential effects of the proposed project for all of the environmental topics considered under CEQA and identifies appropriate mitigation measures to reduce all identified significant impacts to a less-than-significant level. These mitigation measures have been developed by technical experts based on technical expertise and factual evidence. As described further in Response to Comment C36-18, the Draft EIR's level of service analysis was performed using methodologies from the Transportation Research Board of the National Academies of Science's *Highway Capacity Manual*²² (please see response to comment C41-9).

C36-5: The County has not avoided addressing CEQA requirements and has made no claim that the project is exempt from CEQA. The proposed project, including the proposed lane widths,

²² Transportation Research Board. 2010. *HCM 2010: Highway Capacity Manual*.

was not exempted, but has been fully analyzed in this EIR, as described in Master Response 2.

The County refutes the statement that “in our correspondence you have confirmed these CEQA violations.” The County’s email response (provided as part of Comment Letter C35) indicates that the proposed lane modifications are within adopted standards, do not alter vehicle capacity, and do not require analysis under CEQA. This statement does not confirm or claim a CEQA exemption; however, it is incorrect in stating that CEQA analysis is unnecessary. The response was meant to convey that there is no measurable decrease in urban street capacity and no potential for any significant impact of any kind, whether through lane widths are 11 feet or 12 feet. As described in Master Response 2, the Draft EIR’s level of service analysis and travel time assessments, which assumed use of 11-foot wide lanes, are valid. The Draft EIR fully analyzed the potential for impacts associated with 11-foot wide travel lanes along portions of the project corridor.

C36-6: Please see Response to Comment C36-2.

C36-7: The analysis included in the Draft EIR evaluated the proposed project, including the use of 11-foot wide lanes as part of the proposed project improvements. Please see Response to Comment C36-5 and Master Response 2.

C36-8: For proposed project conditions, the Draft EIR used data, traffic volumes, and flow rates associated with project conditions, not current conditions as the commenter erroneously contends. As discussed in Master Response 2, the use of 11-foot wide lanes, where proposed, would not reduce vehicular throughput capacity or safety in comparison to the use of 12-foot wide lanes.

C36-9: As described in Section 4.12, *Traffic and Circulation*, implementation of the proposed project would maintain and improve travel efficiency on SFDB. Because the project would improve traffic congestion, it would not result in increases in vehicle emissions, as the commenter mistakenly contends. The Draft EIR fully analyzes the air quality and safety impacts of the proposed project as described further below in responses to comments C36-15 through C36-22.

C36-10: Section 4.12 of the Draft EIR addresses the potential effects of the proposed project for all of the environmental topics considered under CEQA and identifies appropriate mitigation measures to reduce potential impacts to a less than significant level. The environmental analysis included in the Draft EIR has been conducted by technical experts based on technical expertise, factual evidence, standard industry practices and adopted regulatory guidance. The County refutes the commenter’s assertion that the County used data and analysis in the Draft EIR that is incorrect, inconsistent, and contradictory to professional standards and based on erroneous assumptions. Please see responses to comments C36-15, C36-16, C36-17, C36-18, and C36-19, which address the specific comments from the independent traffic consultant that are summarized in this comment.

C36-11: The County refutes the commenter’s assertion that the County data and methodologies used to analyze the potentially significant air quality impacts are flawed. The environmental analysis included in the Draft EIR has been conducted by technical experts based on technical expertise, factual evidence, standard industry practices and adopted regulatory guidance. Please see responses to comments C36-20, C36-21, and C36-22, which address the specific comments from the independent air quality consultant that are summarized in this comment.

C36-12: The County has not claimed an exemption from CEQA-required analysis, as the commenter mistakenly claims. As described in Master Response 2, the EIR analysis is based on an assumption of 11-foot lane widths. Please see Master Response 2.

C36-13: As clarified in Master Response 2, vehicular travel lanes would be 11 feet wide along specific segments of SFDB, including in the eastbound direction between El Portal Drive and the on-ramp to southbound Highway 101 and in the westbound direction between Ash Avenue and College Avenue. The use of 11-foot wide lanes would allow for the provision of project features such as a third eastbound travel lane between El Portal Drive and Highway 101 and an additional left-turn lane from westbound SFDB onto southbound College Avenue. These lane widths are consistent with the *California Highway Design Manual*²³ and national guidance adopted by Caltrans. In addition, these lane widths are consistent with the design widths throughout the corridor, which currently vary between 10 and 20 feet.

As part of the design process, the County will determine the final lane widths; however, contrary to the commenter’s assertion, the County would not “build *any traffic lane sizing* they chose to.” Proposed lane widths would be consistent with adopted design standards (between 11 and 12 feet), which, as further described in Master Response 2, provide the same roadway capacity. The potential use of 11-foot wide lanes throughout the project corridor was analyzed in the Draft EIR and shown to improve traffic conditions as part of the roadway improvements included in the proposed project.

If, as the design process proceeds, project improvements are proposed that are beyond the scope of the project described in the Draft EIR, additional CEQA review may be required, as determined by the County at that time. However, as described above, the potential for 11- and 12-foot travel lanes through the project corridor was included in the traffic analysis for the proposed project and analyzed as part of the Draft EIR. Therefore, the Draft EIR need not be recirculated.

C36-14: The letter prepared by Bob Harrison states that he reviewed the traffic section and Appendix H of the Draft EIR; it does not indicate that he reviewed the project description. Therefore, Mr. Harrison apparently has no basis for stating that the project description is inadequate. Please see response to comment C36-2.

²³ California Department of Transportation. Highway Design Manual Sixth Edition.

C36-15: The existing traffic counts were adjusted and balanced for use in the intersection level of service analysis. Traffic volume counts vary intersection to intersection, and often intersections along a corridor experience different peak hour times (e.g., 4:45 to 5:54 PM vs. 5:15 to 6:15 PM) for the total maximum volumes traveling through an intersection. This difference can lead to a misbalance of traffic volumes between intersections when only considering each intersection's individual peak one-hour period. Therefore, traffic volumes are typically adjusted manually and/or within traffic models to replicate balanced flows between intersections for the similar peak one-hour travel periods. Adjusting the traffic volumes in this manner is a standard practice in traffic operations modeling.

The Draft EIR and Appendix H included figures showing counts before adjustments and balancing (Figures 4.12-1 and 4.12-2 in the Draft EIR and Figures 3 and 4 in Appendix H). These figures have been replaced in the FEIR with the adjusted and balanced counts that were used to perform intersection level of service calculations for existing conditions. Please see pages 192-195 of this Response to Comments document for the revised figures.

C36-16: The traffic count projections for year 2040 as shown in Figures 4.12-5 and 4.12-6 in the Draft EIR are the same as those used in the level of service analysis. The traffic volumes used in the analysis are the "Traffic Volume (vph)" numbers shown in the third row of the Synchro level of service sheets in Appendix H multiplied by the "Growth Factor (vph)" figure in the seventeenth row of the level of service sheets.

C36-17: Intersection peak hour factors were adjusted in the calibration of the Synchro/SimTraffic models to accurately replicate intersection operations and vehicular travel times along SFDB. In most cases the calibrated peak hour factors were reduced in value from those shown in the traffic counts sheets in Appendix H, resulting in models that better replicated congested conditions for the weekday AM and PM peak hours.

C36-18: The Draft EIR's level of service analysis was performed using methodologies from the Transportation Research Board of the National Academies of Science's *Highway Capacity Manual*²⁴ (please see response to Letter C41, Comment #9). The commenter does not state the method he used to estimate intersection service levels and motorist delays at the four intersections he reviewed.

The commenter states that the Draft EIR level of service calculations assumed no change in lane width from existing dimensions. According to the methodologies in the *Highway Capacity Manual*²⁵, however, the "lane width adjustment factor" should be 1.00 for intersection lane widths between 10.0 feet and 12.9 feet in width (in other words, no adjustment is necessary whether lanes are 11 or 12 feet wide). Therefore, the Draft EIR's level of service calculations correctly account for lane width variations.

²⁴ Transportation Research Board. *HCM 2010: Highway Capacity Manual*.

²⁵ Ibid.

For the four intersections reviewed by the commenter, the commenter stated that the Draft EIR's level of service and vehicular delay results appear reasonable for the College Avenue intersection during the AM and PM peak hours, the Wolfe Grade intersection during the PM peak hour, the Bon Air Road intersection during the AM and PM peak hours, and the Eliseo Drive/Barry Way intersection during the PM peak hour. The commenter stated that during the AM peak hour the Draft EIR's analysis appears to overstate motorist delay at the Wolfe Grade and Eliseo Drive/Barry Way intersections. According to the commenter's assessment, the Wolfe Grade intersection should operate at LOS E rather than LOS F, while the Eliseo Drive/Barry Way intersection operates at LOS D, consistent with the Draft EIR findings. The commenter did not disclose the methods he used to estimate intersection service levels and motorist delays at the four intersections he studied.

The commenter recommends removing the triangular islands on Wolfe Grade at SFDB. These islands would be removed as part of the proposed project. In addition, modified traffic signal timing would be provided. For additional information, please see Master Response 4.

The commenter questions the need for a double left-turn lane from SFDB onto College Avenue but stated that the results of the traffic analysis for the two lanes, as presented in the Draft EIR, appear reasonable. For additional information, please refer to Master Response 5.

- C36-19:** The Draft EIR's level of service analysis was performed using methodologies from the Transportation Research Board of the National Academies of Science's *Highway Capacity Manual*²⁶ (please see response to comment C41-9). The commenter does not state the method he used to estimate intersection turning movement delays. However, the commenter states that "the two-lane left turn improvement would provide a significant improvement in intersection operations" and "(t)here appears to sufficient pavement on College Avenue to accept a double left turn lane from SFDB."
- C36-20:** The commenter contends the Draft EIR did not substantiate the ambient air quality consequences of construction or operation of the project. Construction emissions were estimated for the proposed project and the results are shown in Table 4.2.E of the Draft EIR. Per BAAQMD Guidance, no single project is sufficient in size to by itself to result in an exceedance of ambient air quality standards. In developing the thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively conservable and would potentially contribute to ambient air quality impacts. As shown in Table 4.2.E of the Draft EIR, construction emissions associated with the project would be less than the significance threshold established by the BAAQMD, therefore, the project would not impact ambient air quality. Also, as identified on page 125 of the Draft EIR, once constructed, the project would not result in an increase in operational emissions. The project consists of roadway

²⁶ Transportation Research Board. *HCM 2010: Highway Capacity Manual*.

improvements that would reduce vehicle delay, which would improve air quality. The project consists of roadway improvements, including repaving and installation of pedestrian and bicyclist features. Once operational these project features would not have any effect on the ambient air quality. The project features that promote pedestrian and bicyclist travel and reduce intersection delay are recognized by the BAAQMD as beneficial to air quality and such projects are part of the BAAQMD's strategy to improve ambient air quality within the San Francisco Bay Area Air Basin.²⁷

C36-21: The comment states that the BAAQMD provides guidance for evaluating project impacts in their CEQA Guidelines. The County agrees and as noted on page 103 of the Draft EIR, the BAAQMD CEQA Guidelines were followed in the preparation of the Air Quality Analysis presented in the Draft EIR.

C36-22: Mitigation Measure AIR-1 as outlined in the Draft EIR would reduce fugitive dust as well as PM2.5 emissions associated with diesel engine exhaust. Mitigation Measure AIR-1 requires idling times to be minimized and all construction equipment would be required to be properly tuned and maintained which would reduce PM2.5 exhaust emissions. As shown in Table 4.2.E of the Draft EIR, average daily PM2.5 exhaust emissions associated with construction would be 2.0 pounds per day which is well below the BAAQMD significance threshold of 54 pounds per day. The commenter refers to the BAAQMD guidance document recommended methods for Screening and Modeling Local Risks and Hazards. The guidance document recognizes that the user should apply a screening process to determine whether air quality modeling is necessary. As shown in Table 4.2.E of the Draft EIR, the PM2.5 emissions are well below the significance thresholds; therefore, dispersion modeling is not required to determine health risks associated with construction of the project.

The project would add a third eastbound travel lane on Sir Francis Drake just west of US 101. This additional travel lane would be adjacent to commercial land uses, but would move the roadway closer to residential uses located approximately 120 feet from the roadway. The BAAQMD has provided a Roadway Screening Analysis Calculator for determining county specific estimates of risk and hazard impacts from roadways in the Bay Area.²⁸ If the screening tool shows a potential exceedance of the BAAQMD thresholds, air dispersion modeling as suggested by the commenter would be required. Using the BAAQMD roadway screening tables, the effect of the project locating the roadway 12 feet closer to a residence would result in an increase in cancer risk associated with roadway emissions of 0.12 cancer risk per million, which is well below the BAAQMD threshold of 10 in 1 million. The average annual PM2.5 concentration change would be 0.002 micrograms per cubic meter which would also be well below the

²⁷ BAAQMD, 2017. *Spare the Air – Cool the Climate, A Blueprint for Clean Air and Climate Protection in the Bay Area, Final 2017 Clean Air Plan*. April 19.

²⁸ BAAQMD, 2018. Website: www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools

BAAQMD threshold of 0.2 micrograms per cubic meter. The screening output is shown in Attachment A. The project passes the screening and additional modeling is not required.

This comment goes on to describe the BAAQMD's modeling process for new roadway projects, which is noted. However, the project would add sidewalks, curb ramps, crosswalks, and other roadway modifications as described in Section 3.0 Project Description of the Draft EIR. As shown Figure 3.11, Sir Francis Drake is an existing roadway. The project would not change the annual average daily traffic or roadway configuration other than the additional lane described above; therefore, as stated on page 127 of the Draft EIR, the project would not be expected to result in a significant impact. Following the screening procedures outlined in the referenced BAAQMD document, the project would screen out of additional modeling analysis requirements because the project would not result in a new roadway source of emissions. Dispersion modeling is not required.

The commenter indicates that idling times at intersections were not included. Table 4.12.E of the Draft EIR includes intersection delay with and without the project. As shown in Table 4.23.E, the project would reduce delay at intersections in the project vicinity. As stated on page 126 of the Draft EIR, implementation of the project would reduce traffic congestion and improve LOS, which would contribute to a reduction in CO concentrations at intersections.

The commenter indicates that the Draft EIR must conduct dispersion modeling studies of project construction and operational ambient impacts. However, as presented in the Draft EIR and as outlined above, the project would not result in a change in operational emissions and the project construction emissions would be well below the BAAQMD significance criteria. Therefore, the project would not result in significant health risks during operation or construction.

From: [David Steckler](#)
To: [sdrakeimprovements](#)
Subject: 2nd left turn lane onto college ave
Date: Sunday, November 26, 2017 8:22:54 PM

C37

1 | I have owned a home and lived in Kent Woodlands Since 1974 and I would ask that you don't add a 2nd left turn lane from SFD onto College ave.

David Steckler
50 Idlewood rd.
Kentfield, CA 94904

Commenter C37

David Steckler, Local Resident (November 26, 2017)

C37-1: The commenter's request to not add a second left turn lane from SFDB onto College Avenue is acknowledged. As stated in Master Response 5, the additional (second) left-turn lane from westbound SFDB to southbound College Avenue is proposed to decrease motorist delays and vehicle queuing along westbound SFDB, reduces the potential for rear-end collisions along the arterial roadway, and improve safety for pedestrians crossing at Ash Avenue. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Ellen Whalen](#)
To: [sfdrakeimprovements](#)
Cc: [Supervisor Katie Rice](#)
Subject: Sir Francis Drake Project
Date: Wednesday, December 06, 2017 7:43:32 PM

C38

Dear Marin County Planning Department and Supervisors,

As a lifelong resident of Marin County, who was raised in Greenbrae, I am disappointed by the changes proposed for Sir Francis Drake Blvd.

- 1 I attended several of the planning meetings with neighbors, friends and family. During early meetings, we were encouraged to write on the initial drawings and voiced opinions at concerns. However, it appears none of the input from residents resulted in changes they requested. Below are some of the frequent issues of concern:
- 2 1. Sir Francis Drake is a heavily used corridor that provides access to hospitals, schools and many residences. Narrowing the lanes will be a safety hazard for the emergency vehicles heading to and from our hospital and buses that transport children and commuters. There is no evidence narrowing the lanes would improve traffic.
- 3 2.- The guardrail along Sir Francis Drake Blvd. was installed following the tragic death of two sisters who were struck by a vehicle while walking to Bacich School. Residents of all ages use the Sir Francis Drake path from babies in strollers with their parents, to students riding their bicycles to and from school, along with seniors walking in our community. Replacing the guardrail with something less protective from cars traveling at the forty MPH speed limit is a frightening thought. Please leave the guardrail in place so that we never have a repeat of the terrible loss of the two young girls.
- 4 3.- I live on La Cuesta Drive in Greenbrae. Many of my neighbors expressed concern over the plan to remove the Westbound right turn lane on Sir Francis Drake at the La Cuesta Drive traffic light. Many days I am happy to have the right turn shoulder to slow down when the light is green. If that dedicated shoulder is removed and right turns are required at the light intersection, there could be many dangerous accidents when traffic is moving quickly through a green light.
- 5 Several residents had suggested moving the crosswalk to the opposite side of the street which would also be safer for the pedestrians going to and from Bon Air Shopping Center.

Please feel free to contact me with questions about my concerns. Also, consider that simpler plan would have less impact on the community and would be less expensive.

Best,
Ellen Whalen
71 La Cuesta Drive
Greenbrae
ellenwhalen@gmail.com

Sent from my iPhone

Commenter C38

Ellen Whalen, Local Resident (December 6, 2017)

C38-1: The comment asserts that the County has not incorporated any input received from residents during the planning process. As the commenter notes, the public has had multiple opportunities to provide input on the proposed project, including opportunities to comment on the environmental document. Input received from the public, including local residents has been considered, along with the results of the traffic analysis to determine the proposed project. This comment relates to the planning process and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

C38-2: Please see Master Response 2.

C38-3: The comment raises concerns that the proposed cable fence would provide less protection for pedestrians than the existing metal beam guardrail. The *California Highway Design Manual*²⁹ recommends the use of metal beam guardrails in the following cases:

- To prevent vehicles from hitting a fixed object such as a utility pole located within the clear recovery zone of the roadway; and
- There is a steep slope present along the roadway that if a vehicle goes over, it presents a larger hazard than hitting the guardrail.

Installation of guardrails requires consideration of the unintended consequences. For instance, if the guardrail is installed within the clear recover zone and a vehicle strikes it, it may result in a more serious accident to the driver, other motorists, or pedestrians located within the sidewalk. The currently installed along Sir Francis Drake Boulevard is designed to yield when struck by a vehicle. Depending on the direction and speed of impact, this could cause several hundred feet of guardrail to deflect and potentially injure pedestrians within the sidewalk.

The current standard barrier designed to protect pedestrians from vehicles is a concrete barrier. This barrier would require an area of about 2 feet behind the face of curb reducing the area designated for pedestrians. Based on outreach to the community during the project's planning phase, the purpose of a barrier between the road and the sidewalk is to act as a guide keeping pedestrians from inadvertently entering the street. Thus, the project features a cable railing, which offers the barrier, maximizes the area for pedestrians, and is inexpensive to maintain.

C38-4: The comment raises concerns regarding the removal of the westbound right turn lane on SFDB at the La Cuesta Drive traffic light. Figure 3.12 of the Draft EIR (pp. 64) shows the proposed intersection modifications at the La Cuesta intersection. As shown in Figure 3.12 and described on page 63 of the Draft EIR, the lane configuration on both the northwest and

²⁹ California Department of Transportation. Highway Design Manual Sixth Edition.

northeast corners of the La Cuesta/SFDB intersection would be modified to operate as a standard intersection. A dedicated right turn lane from La Cuesta onto westbound SFDB would be provided as part of this standard intersection configuration. The intent of standardizing the intersection is to maintain traffic capacity, improve intersection operations, and enhance safety for pedestrians by expanding sidewalks and reducing the width of street crossings.

- C38-5:** It is unclear to which crosswalk the commenter is referring. As shown in Figure 3.12, at the La Cuesta/SFDB intersection, crosswalks would be provided across La Cuesta north and south of SFDB and across SFDB to the east. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Vernon, Nancy](#) on behalf of [Rice, Katie](#)
To: [sdrakeimprovements](#)
Subject: FW: college ave
Date: Tuesday, November 21, 2017 1:24:11 PM

C39

FYI

Nancy Vernon | Aide
Office of Supervisor Katie Rice
(415) 473-7351

From: Richard Willis [mailto:richardwillis724@gmail.com]
Sent: Saturday, November 18, 2017 3:23 PM
To: Rice, Katie <KRice@marincounty.org>
Subject: college ave

1 | no extra lane is needed here, I have driven it 40 years.

--

Richard Willis
One Weatherly Drive Apt. 404
Mill Valley CA 94941
1-(415) 924 8999
website goosevamoose.com

Commenter C39**Richard Willis, Local Resident (November 18, 2017)**

C39-1: The commenter asserts that no extra lane is needed. This comment relates to the merits of the project and not to the adequacy of the Draft EIR; therefore, no further response is necessary. Please see Master Response 1.

From: [Edward Yates](#)
To: [Dawson, Dan](#)
Cc: [Rojas, Raul](#)
Subject: SFD Project CEQA Compliance
Date: Thursday, November 02, 2017 4:36:08 PM
Attachments: [Letter to D Dawson re CEQA for SFD.pdf](#)

C40

Dear Mr. Dawson,

Please see the attached letter.

Ed Yates

--

Law Office of Edward E. Yates
20 Skylark Drive, # 12
Larkspur, CA 94939
415-990-4805
www.marinlandlaw.com

This communication (including any attachments) contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive messages for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the communication. If you have received the communication in error, please advise the sender by reply e-mail and delete the communication.

Law Office of Edward E. Yates

20 Skylark Drive, Suite 12
Larkspur, CA 94939
Ph: 415-990-4805 Fax: 415-891-8999
eyates@marinlandlaw.com

C40 (cont.)

November 2, 2017

Daniel Dawson
Marin County Public Works Department
County of Marin
San Rafael, CA

By email: DDawson@marincounty.org

Dear Mr. Mr. Dawson,

I represent Community Ventures Partners. In email correspondence between you and Bob Silvestri, you stated on Monday, October 30 that:

1

“The current lane widths, which vary throughout the corridor, and the multiple proposed lane modifications are both within adopted standards, do not alter vehicle throughput, and are (sic) thus analysis is not necessary under CEQA.”

I am not aware of any such authority under the California Environmental Quality Act (“CEQA) Pub. Res. Code § 21000 et seq. Specifically, CEQA provides no such exemption to omit either: 1) a project description for a project component; or 2) environmental analysis, based on adherence to an adopted technical standard. CEQA Guidelines 15064.7(c) allows agencies to establish thresholds of significance which consider previously adopted or recommended public agency environmental standards provided there is evidence to support that standard.

2

First, a state lane width standard is not an air quality, safety, circulation or any other standard related to environmental review. It is a technical standard for transportation planning and thus, does not qualify for the allowance in Section 15064.7 related to "environmental" effects. (See Citizens for Responsible Equitable Environmental Development v. City of Chula Vista (2011) 197 Cal.App.4th 327, 334.)

3

Second, the DEIR does not provide or rely on any such threshold of significance – even for traffic transportation planning - but instead simply fails CEQA’s basic mandate to provide project description detail and environmental analysis.

Page 2
Dan Dawson
Marin County DPW

C40 (cont.)

4 Please provide me with legal authority for the County's position that where a project's proposed lane widths are within Caltrans or other agency adopted standards, project description and environmental analysis are not required by CEQA.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Yates", with a horizontal line extending to the right.

Edward Yates

Cc: Raul Rojas

Commenter C40**Edward Yates, Legal Representative for Bob Silvestri (November 2, 2017)**

C40-1: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C40-2: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C40-3: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C40-4: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

From: [Edward Yates](#)
To: [Dawson, Dan](#)
Cc: [Bob Silvestri](#)
Subject: SFD DEIR Comment
Date: Friday, December 01, 2017 12:19:48 PM
Attachments: [EY Comment Letter to Marin County re SFD DEIR 12-1-17.pdf](#)

C41

Mr. Dawson,

Please see the attached comment letter.

Ed Yates

--

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eyates@marinlandlaw.com

C41 (cont.)

December 1, 2017

Dan Dawson
Principal Transportation Planner
Marin County DPW
Box 4186
San Rafael, CA 94913-4186
By email: DDawson@marincounty.org

Re: Draft CEQA Environmental Impact Report: Sir Francis Drake Boulevard Rehabilitation Project, Marin County CA

Dear Mr. Dawson:

I represent Community Venture Partners in regard to the California Environmental Quality Act (“CEQA”) Pub. Res. Code § 21000 et seq. compliance for the Sir Francis Drake Boulevard Rehabilitation Project (“SFD Project”).¹

1 Per my November 2, 2017 letter to you, the SFD Project Draft Environmental Impact Report (“DEIR”) improperly excludes basic project description information, regarding narrowing lane widths. Because of this lack of project information, the EIR also fails to provide required data and analysis, regarding impacts to traffic congestion and circulation.

Such basic inadequacies render the DEIR so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment have been precluded. *Therefore, to comply with CEQA, the EIR must be recirculated for public review.*

¹ This letter incorporates by reference a letter by Geoffrey H. Hornek, dated November 29, 2017 addressed to Bob Silvestri, CVP and a memo by Robert L. Harrison, dated November 30, 2017 addressed to Bob Silvestri, CVP.

1. The Project Description is Incomplete.

2 One of the primary flaws of the DEIR is its failure to provide an accurate project description. “An accurate, stable and finite project description is an essential element of an informative and legally sufficient EIR under CEQA.” (See CEQA Guidelines §15124, citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App.3d 185, 199 [139 Cal. Rptr. 396].) Several courts have invalidated EIRs for their failure to provide an adequate Project Description. For example, in *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal. App. 4th 859, the California Supreme Court found that an EIR was invalid because it omitted a meaningful discussion of the conditions in the northern part of the proposed water supply system. (See also *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal. 3d 376.)

In particular, with regard to the SFD Project, the CEQA Guidelines require that the project description contain a description of the projects’ technical’ characteristics and “consider the engineering proposals.” 14 Cal. Code Regs §15124(c) (“CEQA Guidelines.”) The change in lane width is both a technical characteristic and an engineering proposal and must be included in the Draft EIR so that the public can understand the project.

Other appellate court decisions on project description hold that where the project description makes public participation difficult, the EIR is not legally adequate.

These curtailed and inadequate characterizations of the Project were enough to mislead the public and thwart the EIR process. As noted in *County of Inyo v. City of Los Angeles*, supra, 71 Cal.App.3d 185, when an EIR contains unstable or shifting descriptions of the project, meaningful public participation is stultified. “A curtailed, enigmatic or unstable project description draws a red herring across the path of public input.” (Id. at pp. 197–198 [holding that although the “ill-conceived, initial project description” did not carry over into impacts section of EIR, the shifting description did “vitiate the city’s EIR process as a vehicle for intelligent public participation”].)

(*San Joaquin Raptor Rescue Center v. County of Merced*) (2007) 149 Cal.App.4th 645, 656.

3 Nor is there any exemption allowing the County to not disclose project description information. In previous email correspondence, Bob Silvestri of CVP asked why the project description did not include basic data or discussion of the lane width change. You stated in an email of Monday, October 30 that:

“The current lane widths, which vary throughout the corridor, and the multiple proposed lane modifications are both within adopted standards, do not alter vehicle throughput, and are (sic) thus analysis is not necessary under CEQA.”

And in a subsequent correspondence you wrote:

“Lane widths were not analyzed in the DEIR as the project does not propose constructing

3
(cont.)

any lanes at a width less than adopted design standards in the Caltrans Highway Design Manual,”

I am not aware of any such authority under CEQA that would exempt the County from providing the required “accurate, stable and finite project description.” Specifically, CEQA provides no such exemption to omit either: 1) a project description for a project component; or 2) environmental analysis, based on adherence to an adopted technical standard. CEQA Guidelines 15064.7(c) allows agencies to establish thresholds of significance which consider previously adopted or recommended public agency environmental standards, provided there is evidence to support that standard.

4 First, a state lane width standard is not an air quality, safety, circulation or any other standard related to environmental review. It is a technical standard for transportation planning and thus, does not qualify for the allowance in Section 15064.7 related to "environmental" effects. (See *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327, 334.

5 Second, the DEIR does not provide or rely on any such threshold of significance – even for traffic transportation planning - but instead simply fails CEQA’s basic mandate to provide project description detail and environmental analysis.

6 The County has not provided my client or me with any legal authority for the County’s position that where a project’s proposed lane widths are within Caltrans or other agency adopted standards, project description and environmental analysis are not required by CEQA.

2. DEIR Impact Assessment is Inadequate

7 An EIR must identify, analyze, and mitigate each and every significant environmental impact of a proposed project. Specifically, CEQA has a statutory mandate that requires that an EIR “shall include a detailed statement setting forth ... all significant effects on the environment of the proposed project.” (Pub. Res. Code §21100(b)(1), emphasis added.); see also CEQA Guidelines § 15126(a.)

CEQA Guidelines §§15126 and 15126.2 require that an EIR evaluate and classify impacts as to their severity. Impacts are normally measured against the existing environmental setting, which relates to the project description. A persistent problem is that the DEIR does not identify, evaluate or classify certain impacts. Part of the reason for this omission is that the project is not sufficiently described (e.g., due to missing details regarding lane width, etc.). That is, the SFD Project DEIR fails to properly measure the impacts against the existing environmental setting because the project description is incomplete and inaccurate.

Mitigation. An EIR must describe feasible mitigation measures which will avoid or substantially lessen each significant environmental effect to the maximum extent feasible. (CEQA Guidelines §15126.4(a)(1); *Save Our Peninsula Committee*, supra, 87 Cal.App.4th at 139.) A lead agency cannot approve a project if there are feasible alternatives or mitigation

7
(cont.)

measures that would avoid or substantially lessen significant impacts. (Pub. Res. Code §§21002 and 21081(a)(3); CEQA Guidelines §§ 15002(a)(3) and 15021(a)(2); *Mountain Lion Foundation*, supra, 16 Cal.App.4th at 134.)

8

The DEIR fails to comply with CEQA Guideline §15126, which requires analysis and mitigation of indirect impacts. Additionally, the DEIR misclassifies some impacts by improperly concluding that they can be mitigated to less than significant.

a. Traffic and Circulation Section Lacks Data and Basis for Assumptions

9

CEQA requires that where there are industry wide assessment models, an agency shall use those models. (See *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 CA 4th 357, 372.) CEQA further requires quantitative analysis where feasible and necessary to analyze a project impact. (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1381.)

In a memorandum by independent traffic engineer and transportation expert Robert L. Harrison, dated October 30, 2017, Mr. Harrison identifies several examples of the DEIR using an inadequate model to calculate traffic delays. For instance, Mr. Harrison opines that: “[t]he incremental delay factor (cfi) as shown the DEIR capacity analysis calculations appears to be larger than would be expected.

Mr. Harrison further points out major flaws in the data and methodologies used by the County’s DEIR consultants in analyzing the potentially significant traffic congestion impacts of the Sir Francis Drake Rehabilitation Plan. Among those are:

- The existing traffic count data is not consistent;
- The projected 2040 traffic volumes are not consistent; and
- Peak hour factors are not consistent.

Regarding the lack of completeness of the project description, Mr. Harrison opines that:

“The DEIR's project description does not include dimensioned plans for the proposed lane width narrowing or other roadway configuration changes. Without this information, it is not possible to accurately assess the significance of the project's impact on traffic congestion that may be caused by the proposed changes. This lack of information on lane widths makes it impossible to properly undertake quantitative modeling of traffic impacts. The conclusion of the DEIR that the project would not have a significant adverse impact on traffic congestion and would therefore not require mitigation, cannot be verified without study of a fully competent detailed project description.”

These are only some of the numerous DEIR inadequacies identified by Mr. Harrison. The DEIR must address these failures in order for the public to understand the consequences of the SFD Project. (Pub. Res. Code §21100(b)(1), emphasis added.); see also Guidelines §§ 15126(a); 15088.5.)

10

b. Air Quality Lacks Project Description Leaving DEIR Conclusions Unsubstantiated

Courts have held EIRs deficient where it failed to correlate adverse air pollution effects with indirect health effects. First, not including lane width project description information/data/analysis in the DEIR renders the underlying air quality assumptions and conclusions inadequate. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.) CVP has retained air quality expert, Geoffrey H. Hornek, to review the DEIR. Mr. Hornek states that:

“The DEIR does not include dimensioned plans of project-related lane width changes or other roadway configuration changes or traffic link levels of service or of idling times at intersections. There is no quantitative air quality modeling using actual data, only summary conclusions about the project not having adverse impacts on ambient pollutant levels (see text below from DEIR p. 125 - 127). The lack of information about lane widths and similar design data makes it impossible to perform dispersion modeling of air quality impacts; consequently, the DEIR's air quality conclusions are unsupported. Given the DEIR's failure to do proper quantitative analysis, as noted herein, there remains the distinct possibility that project impacts on ambient air quality and health risk will be significant and unmitigated.” See November 29, 2017 letter from Geoffrey H. Hornek to Bob Silvestri.

Thus, the lack of precise project description and the lack of accurate quantitative modeling mean the DEIR does not have the required evidence to support its conclusions.

Because the DEIR uses the wrong modeling methodology and the data for that modeling is incomplete, there is no required substantial evidence for the air quality assumptions and conclusions. Mr. Hornek opines:

“[t]he DEIR must use CAL3QHCR to look at the PM 2.5 levels at sensitive receptors in the roadway corridor by modeling the proposed roadway configuration changes potentially affecting average speeds, idling times at intersections and changes to traffic lane widths .”

Mr. Hornek further states that,

11

“the DEIR must conduct dispersion modeling studies of project construction and operational ambient impacts and TAC health risks, then evaluate the need for exposure mitigations based on the findings.”

Thus, the DEIR cannot and does not have the necessary data and analysis to consider mitigation measures as required by CEQA. CEQA Guidelines §§15126 and 15126.2. Finally, the DEIR is inadequate on its face because it does not follow BAAQMD CEQA Guidelines and thus, does not provide any mitigation of any identified project ambient air quality impacts as mandated by the Marin Countywide Plan.

It appears therefore that the County has simply not been willing to pay for the type of modeling and analysis that is necessary for a project of this scale. Such unwillingness shorts the public and the decision maker and is penny wise and pound foolish.

12

3. The EIR Must Be Recirculated

A draft EIR must be recirculated, where it is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment have been precluded. (CEQA Guidelines, §15088.5.; *Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043).

The DEIR fails to adequately provide a project description, provide accepted industry modeling to assess traffic impacts, and provide a project description and baseline information that provides evidence for its conclusions regarding traffic and circulation and air quality. These legal failures compromise the integrity of any conclusions concerning significance of impacts and identification of reasonable mitigation measures. Further, as shown in letters by technical experts, Mr. Harrison and Mr. Hornek, such lack of a specific project description, lack of baseline information and failure to use accepted modeling, renders experts, much less members of the public, unable to conduct inform and reasoned review of the DEIR.

Because these errors are so essential, CEQA requires that the DEIR be revised and recirculated to provide the decision maker and the public the opportunity to examine reasonable alternatives as required by CEQA.

Sincerely,



Edward Yates

Commenter C41**Edward Yates, Legal Representative of Bob Silvestri (December 1, 2017)**

C41-1: The responses to comments made on the Draft EIR contained in this document, when combined with the Draft EIR, constitute the Final EIR for the proposed project. The information contained in this Response to Comments document clarifies that the proposed project analyzed in the Draft EIR includes all of the proposed improvements, including the potential narrowing of lane widths throughout the project corridor.

Included in this Response to Comments document in Section 5 are revisions to the Draft EIR that derive from comments provided by the public or minor corrections observed to be necessary by County staff or members of the EIR consultant team. In no case do the revisions represent new information of the type that the CEQA Guidelines refer to when discussing the need for recirculation of the EIR. They do not set forth a new significant environmental impact, nor an impact that would be more severe than set forth in the Draft EIR, nor a feasible project alternative or mitigation measure that would lessen environmental impacts of the project. Rather, the information contained in this Response to Comments document clarifies, amplifies and/or makes insignificant modifications to the Draft EIR. Therefore recirculation of the Draft EIR would not be required.

C41-2: Please see response to comment C36-2.

C41-3: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C41-4: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C41-5: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C41-6: Please see Master Response 2 and Response to Comment C36-2. The Draft EIR analyzed the impacts of the proposed project, including the potential 11-foot wide lanes.

C41-7: The County believes the impact analyses included in the Final EIR, consisting of the Draft EIR and this Response to Comments document appropriately identify the level of impact associated with the proposed project, including the potential narrowing of lane widths along the project corridor. Potentially significant impacts resulting from implementation of the proposed project have been identified and mitigated to less-than-significant levels with mitigation measures included in the Draft EIR.

C41-8: The comment asserts that the Draft EIR misclassifies some impacts by improperly concluding that they can be mitigated to less than significant. See response to comment C41-7.

C41-9: The Draft EIR's level of service analysis was performed using methodologies from the Transportation Research Board of the National Academies of Science's *Highway Capacity Manual*.³⁰ The *Highway Capacity Manual* contains concepts, guidelines, and computational procedures for computing the capacity and quality of service of various highway facilities, including freeways, highways, arterial roads, roundabouts, signalized and unsignalized intersections, rural highways, and the effects of mass transit, pedestrians, and bicycles on the performance of these systems. There are more than six decades of research behind the *Highway Capacity Manual*, and it is the standard level of service tool used in the traffic engineering profession.

C41-10: Please see response to comments C36-20 through C36-22.

C41-11: Please see response to comments C36-20 through C36-22.

C41-12: Please see response to comment C41-1.

³⁰ Transportation Research Board. 2010. *HCM 2010: Highway Capacity Manual*.

**Sir Francis Drake Boulevard Marin County Board of Supervisors Draft EIR Hearing
Tuesday, November 7, 2017
Marin Civic Center**

Start: 1:35pm

- Gather comments on draft EIR
- Staff Presentation (EIR process, project description)

Questions from Supervisors

Supervisor Connolly: Congestion relief alternative - please describe.

Supervisor Rodoni: Pedestrian safety, slide 20. Marin Senior Care. What are you doing about senior adults when it comes to pedestrian crossings?

Dan (Public Works) Answer: Only cross half the street at one time, pedestrian light/beacon/signal. This requires vehicles to stop instead of simply slow down.

Supervisor Rice: Retail stores around Marin Senior Care. Dangerous crossing area even with the improvement because of fast traffic. Drivers will be more aware after these improvements.

Supervisor Rice: The EIR covers everything that came out of community design process although not everything is funded. As community prioritizes and finds funding, specific projects will be prioritized.

Dan (Public Works) Answer: The intent of the EIR is to environmentally clear entire range of improvements instead of going back and having to re-do the environmental review

Supervisor Rice: No project alternative means no MMWD pipeline? And that has to happen? Impacts associated with construction. Working with construction plan that incorporates both roadwork and MMWD plan, maybe community is anticipating whole length of SFD is torn up at once. Work is segmented?

Dan (Public Works) Answer: Once final project is adopted, the County will look at how to best sequence the project. Entire roadway will not be torn up at once.

Open to public comment: 2:14 pm.

Public Comment

Ann Peterson, Chair of Kentfield Advisory Board

- Met on this EIR before drafted and submitted comments.
- Meeting tomorrow night to start "process". Meeting tomorrow night at 7 pm at College of Marin (COM). Anticipating representative from company that manages COM projects. COM

1
(cont.)

reconstruction projects. Several of these impact College Ave-removal of corp yard behind Kent School, deliveries will be moved across College Ave. Learning Resource Center and Student Center on north side of creek will be reconstructed to be earthquake safe. Access taken from north side of creek. Bridges are not adequate for heavy weight. This will impact College Ave. Construction will start in next couple of years.

2

- How would 3 lanes impact emergency services? Three lanes of stuck traffic in mornings, would people be able to exit road easily to permit fire trucks, etc. to get to the freeway? Please address in EIR.

3

- EIR also lacking what happens beyond project limits. How do lanes merge from Del Monte/Drake's Landing. Cars trying to get across there to go north on the freeway. Need graphics to show beyond limits. COM section: 120 degree intersection.

4

- Barry intersection coming off freeway people stay in right lane to make 'that turn' to go to gas station.

5

- College Avenue, west bound on SFDB will stay in right hand lane to avoid dealing with merges. What are drivers thinking when they make that turn? They will stay in the right lane. Will not get in left lane behind someone

6

- Describe what type of parking? Need two hour parking in this area for businesses. It's critical. More pressure from the students to park in public spaces on the street. South side should be 40 minutes, north side should be 2 hours to accommodate retail.

Public Comment Period Closes.

No comments from staff.

Meeting over: 2:40 pm

Public Hearing Comments

Anne Peterson, Local Resident (November 7, 2017)

PH-1: Section 6.3 of the Draft EIR addresses the cumulative impacts of the proposed project, in conjunction with other past, present and probable future development projects in the area. The comment indicates that additional projects at the College of Marin would be under construction concurrent with the proposed project. According to the Measure B Program Update,³¹ several projects are proposed at the College of Marin over the next several years. Section 6.3 of the Draft EIR (pp. 375) has been revised to include those projects at the College of Marin that may be constructed concurrent with the proposed project, as follows:

- Using Measure B funds, the College of Marin proposes to replace the existing maintenance complex, located east of Kent Middle School adjacent to Corte Madera Creek. Construction of this project is anticipated to be completed in 2019.³²
- Using Measure B funds, the College of Marin proposes to demolish the maintenance facilities along Kent Avenue. The demolition of these structures is anticipated to be completed by summer 2018.³³
- The College of Marin proposes to renovate, demolish or construct new facilities at the Learning Resources Center, located on College Avenue south of SFDB. Proposed improvements are still being designed, with construction anticipated from May 2020 to December 2021.

As described in Section 6.3 of the Draft EIR, construction activities associated with the proposed project could result in traffic delays, safety concerns and pavement damage created by construction traffic. The majority of the projects considered in the cumulative analysis would be completed prior to construction of the proposed project (e.g., prior to 2019). Those projects with construction periods occurring simultaneously with the project, could compound construction-related traffic delays and/or congestion. However, construction-related traffic impacts would be localized to the project area and would be reduced to less-than-significant levels with implementation of Mitigation Measure TR-1. Therefore, the proposed project's incremental contribution to transportation and circulation impacts would not be cumulatively considerable and the cumulative impact would be less than significant. No changes to the cumulative analysis are required.

³¹ College of Marin, 2017. Measure B Program Update. Citizens' Bond Oversight Committee presentation. 22 August. Available online at: <http://measurebcom.org/wp-content/uploads/2016/07/COM-CBOC-Program-Update-Presentation-August-22-2017.pdf> (Accessed February 19, 2018).

³² Gilbane, 2017. Roll-Up Schedule as of November 30, 2017. Available online at: <http://measurebcom.org/wp-content/uploads/2017/12/COM-Schedule-11.30.17-Roll-Up.pdf> (Accessed February 19, 2018).

³³ Ibid.

PH-2: Please see response to comment B1-11.

PH-3: The County disagrees with the commenter's assertion that the Draft EIR should address what happens beyond the project limits. For most of the environmental topics (e.g., visual, biological resources, cultural resources), the study area for impacts is limited to those areas that would be disturbed or impacted from project activities (e.g., construction, staging). For other environmental topics (e.g., air quality, traffic), the study area extends beyond the immediate project limits.

The County believes the scope of the traffic analysis prepared for the proposed project is appropriate. The scope, or how large an area surrounding the site should be included, will determine the roadways and intersections to be specifically studied in the traffic analysis. Beyond a reasonable distance, the amount of traffic on a particular route attributable to a specific project is insignificant in proportion to the total traffic on that route. For a project of this type and size, the scope of the traffic analysis prepared for the proposed project is both appropriate and consistent with County practice.

PH-4: The comment regarding traffic at the Barry Way intersection is noted. It is unclear what the commenter is requesting in terms of clarification or additional information. Therefore, no further analysis is required.

PH-5: Please see Master Response 5.

PH-6: As stated in the Draft EIR, the total number of parking stalls is not proposed to be changed. Figure 3.5 in the Draft EIR shows the existing on-street parking counts. During the design phase, the design drawings will specify the location of all on-street parking.

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5.0 DRAFT EIR TEXT REVISIONS

Chapter 5.0 presents specific changes to the text of the Draft EIR that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR in response to comments received during the public review period. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated by underlined text. Text deleted from the Draft EIR is shown in ~~strikeout~~. Page numbers correspond to the page numbers in the Draft EIR. This Response to Comments document, in conjunction with the Draft EIR, constitutes the Final EIR.

Page 39 of the Draft EIR has been revised as follows:

The section of SFDB under study is a 2-mile segment located west of Highway 101 in the City of Larkspur extending to Ross Terrace ~~in~~ at the Town of Ross town limits (Figure 3.1).

Page 42 of the Draft EIR has been revised as follows:

Commercial uses are located on the south side of SFDB between Eliseo Drive and El Portal Drive, at the Bon Air Road intersection, and between West McAllister Avenue and Ross Terrace and on the north side of SFDB at Wolfe Grade.

Page 77, Figure 3.18 has been revised. Please see following page.

Section 4.11.1.3 has been revised as follows:

Three school districts provide public education services in the project area: 1) Ross School District; 2) Kentfield School District; and 3) Tamalpais School District. The College of Marin is also located within the project corridor.

College of Marin. The College of Marin is a community college with campuses in Kentfield and Novato. The College of Marin has a total enrollment of 13,091 with 11,555 students in Kentfield and 2,446 at the Indian Valley campus in Novato.

Section 4.11.2.1 has been revised as follows to address this comment:

Kentfield/Greenbrae Community Plan (1987). Goals relevant to the provision of public services and recreation include:

Goal 6. Maintain and preserve the community's public services.

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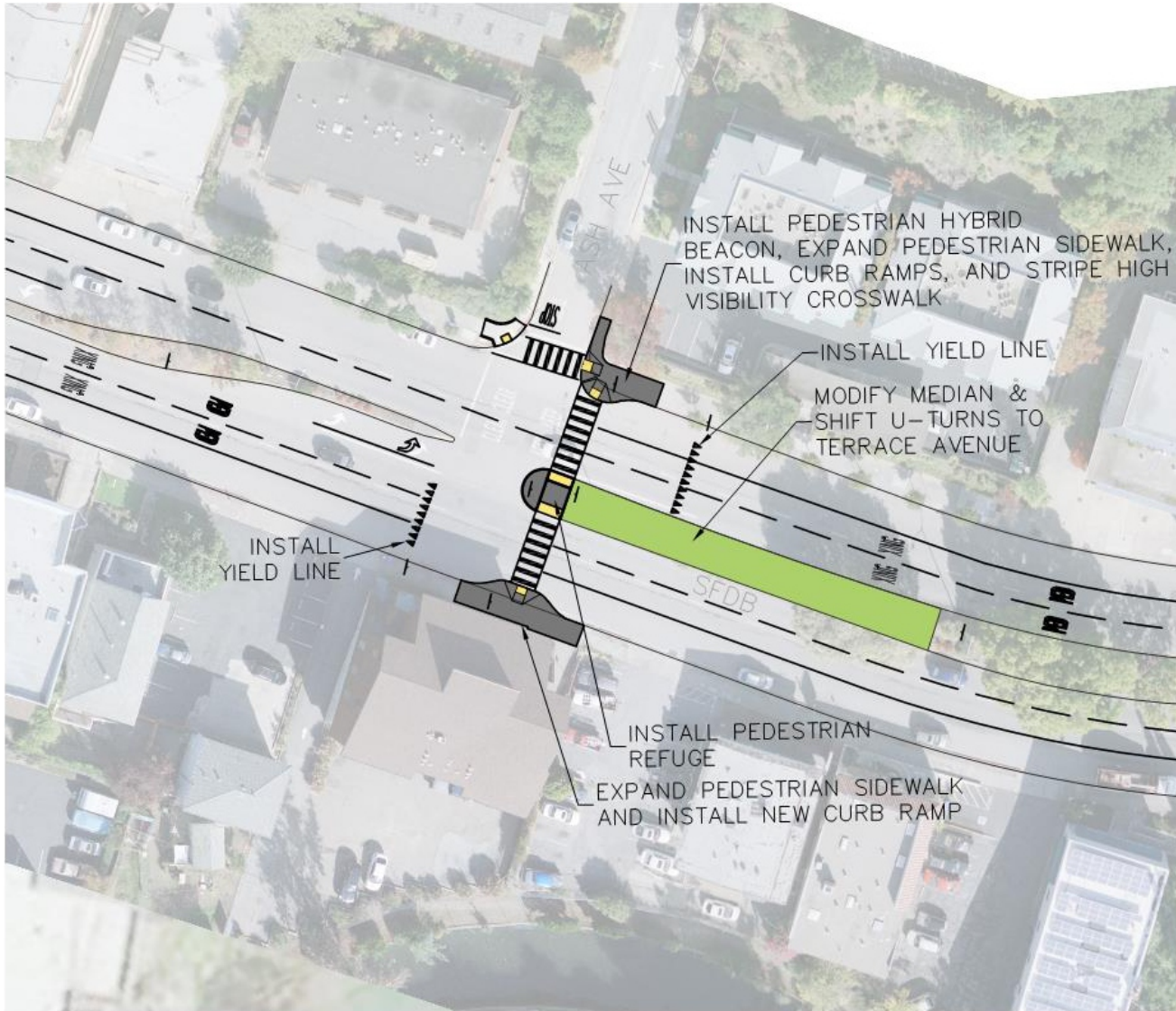


FIGURE 3.18

LSA



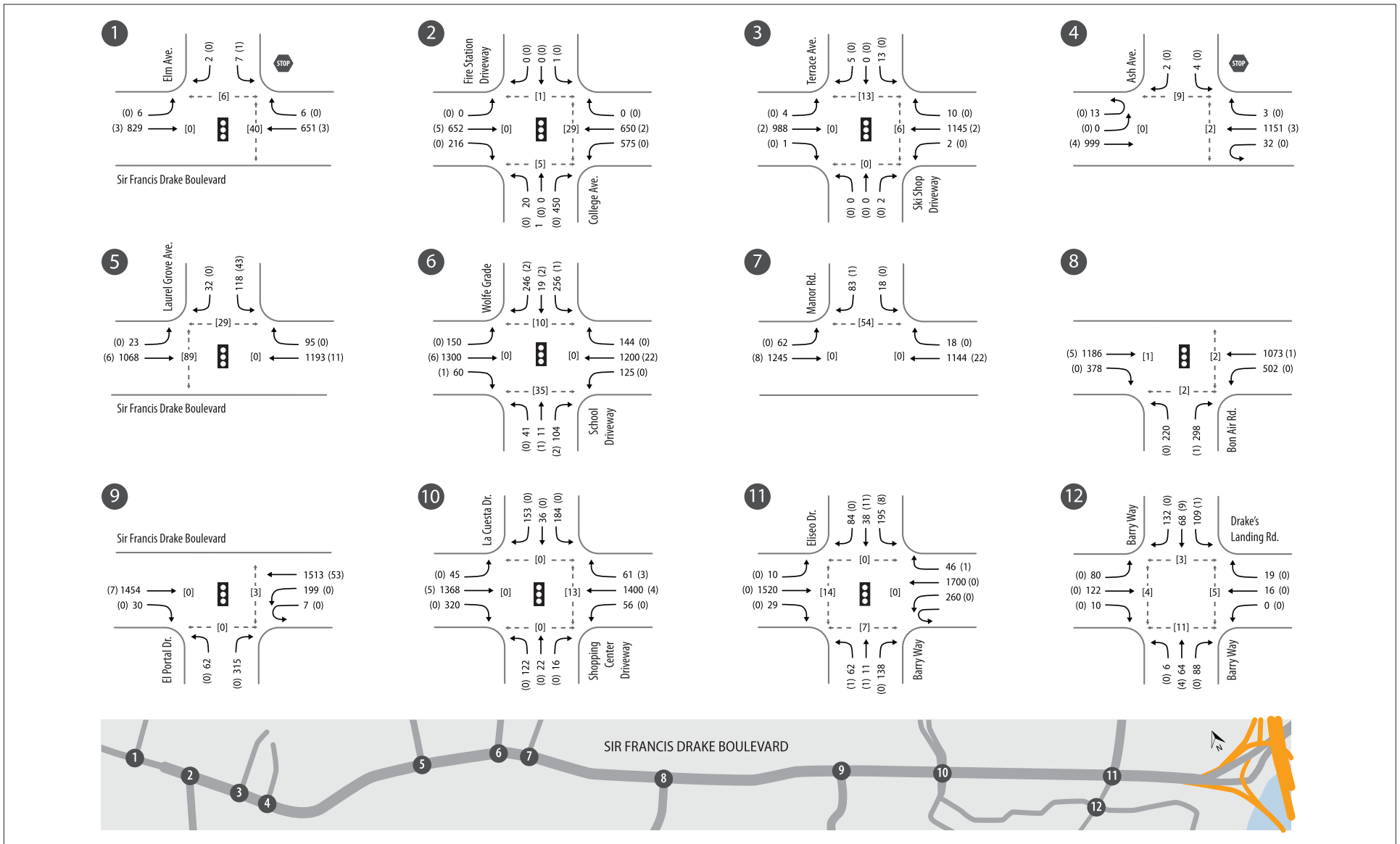
FIGURE NOT TO SCALE
 SOURCE: BKF Engineers, 2017

Sir Francis Drake Boulevard Rehabilitation Project
 Proposed Ash Avenue Intersection Modifications

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As stated in Response to Comment C36-15, Figures 4.12-1 and 4.12-2 in the Draft EIR, as well as Figures 3 and 4 in Appendix H have been replaced with the adjusted and balanced counts that were used to perform intersection level of service calculations for existing conditions.

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LSA

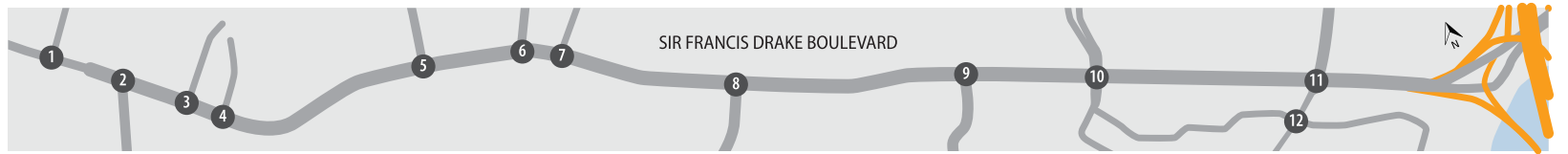
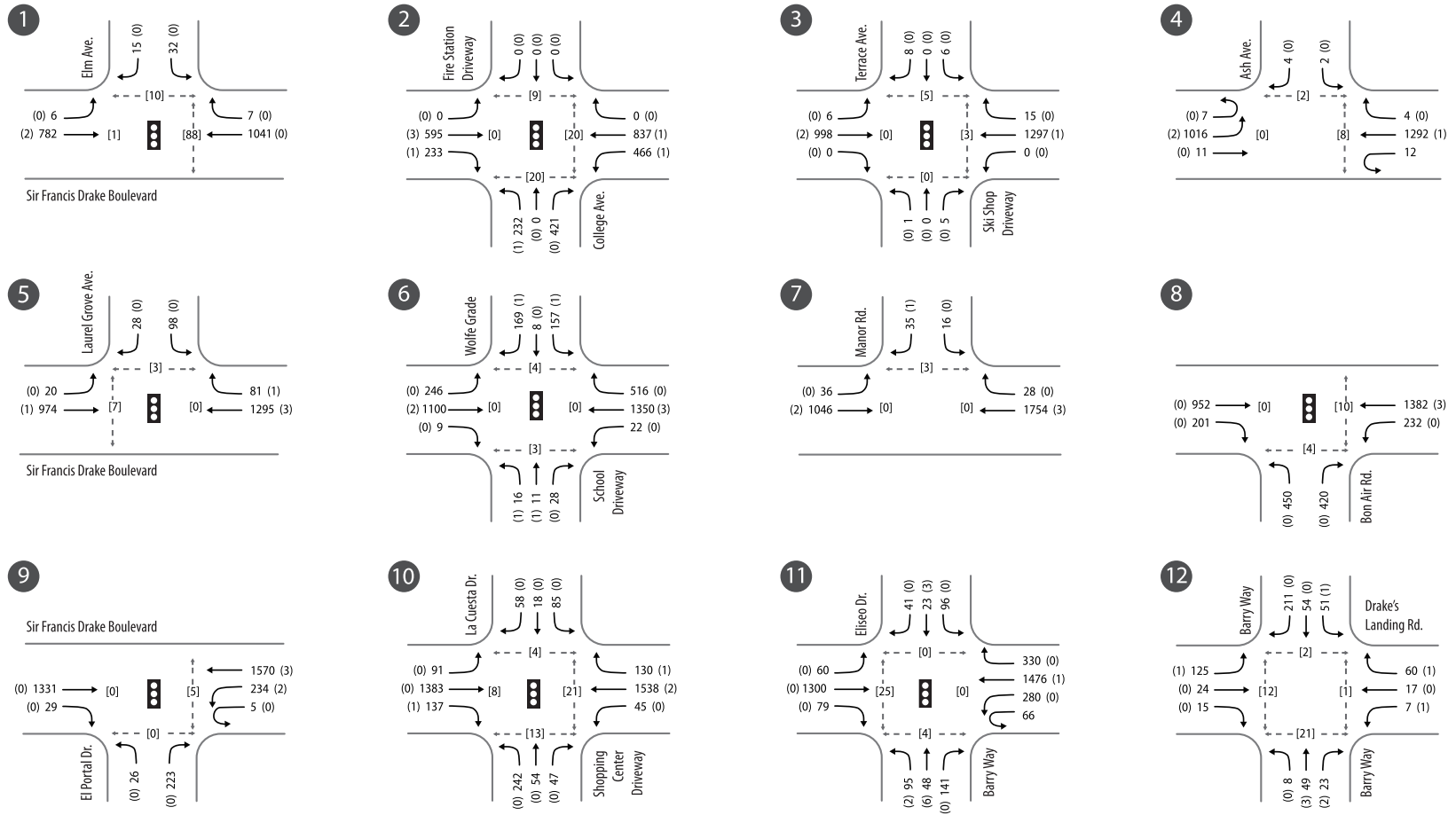
LEGEND
 xx Vehicles (xx) Bicycles [xx] Pedestrians

FIGURE 4.12-1

FIGURE NOT TO SCALE
 SOURCE: Parisi, 2018

Sir Francis Drake Boulevard Rehabilitation Project
 Existing AM Vehicular Peak Hour Volumes

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LSA

LEGEND
 xx Vehicles (xx) Bicycles [xx] Pedestrians

FIGURE 4.12-2

FIGURE NOT TO SCALE
 SOURCE: Parisi, 2018

Sir Francis Drake Boulevard Rehabilitation Project
 Existing PM Vehicular Peak Hour Volumes

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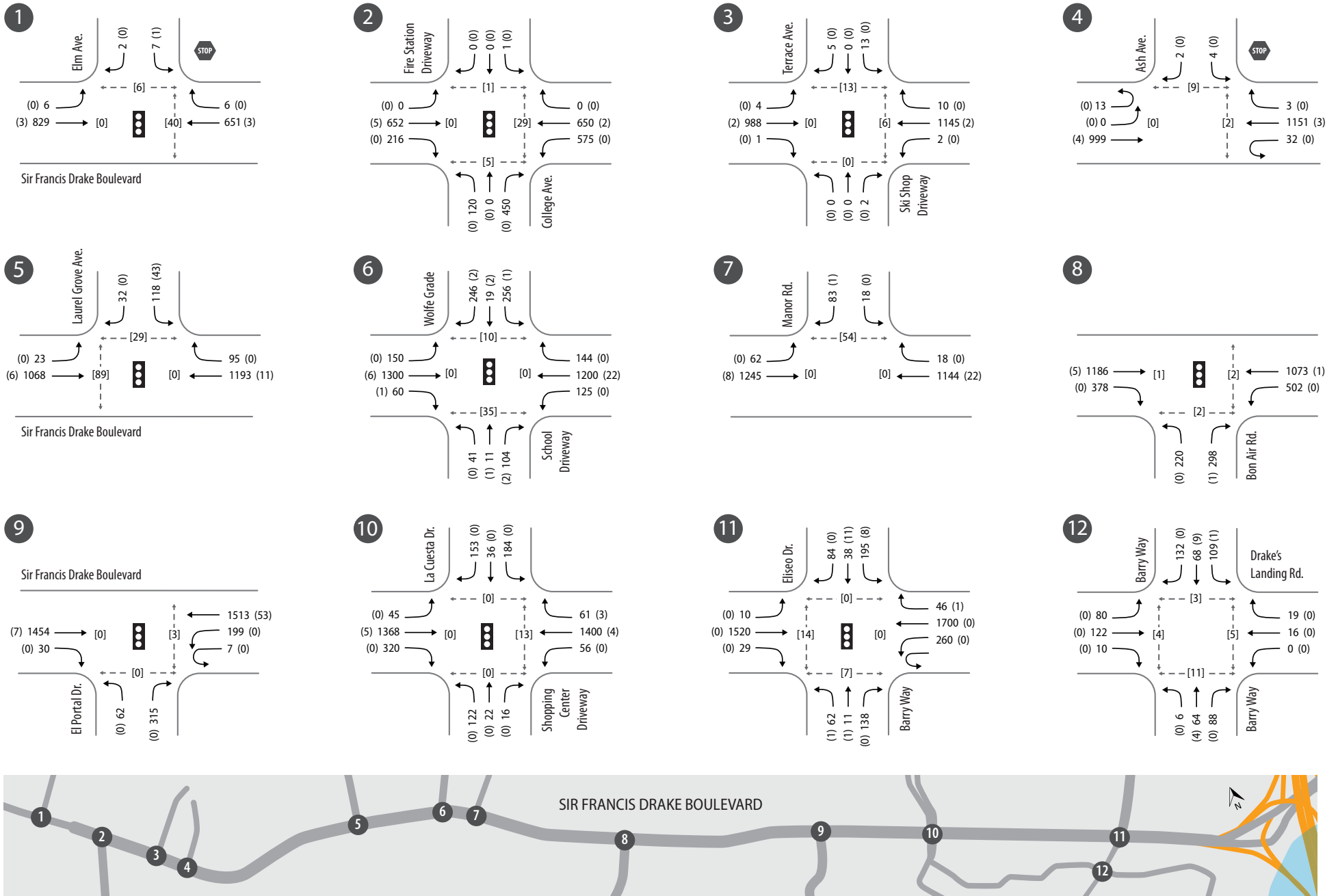


Figure 3
Sir Francis Drake Boulevard
AM Vehicular Peak Hour Volumes

LEGEND
 xx Vehicles (xx) Bicycles [xx] Pedestrians



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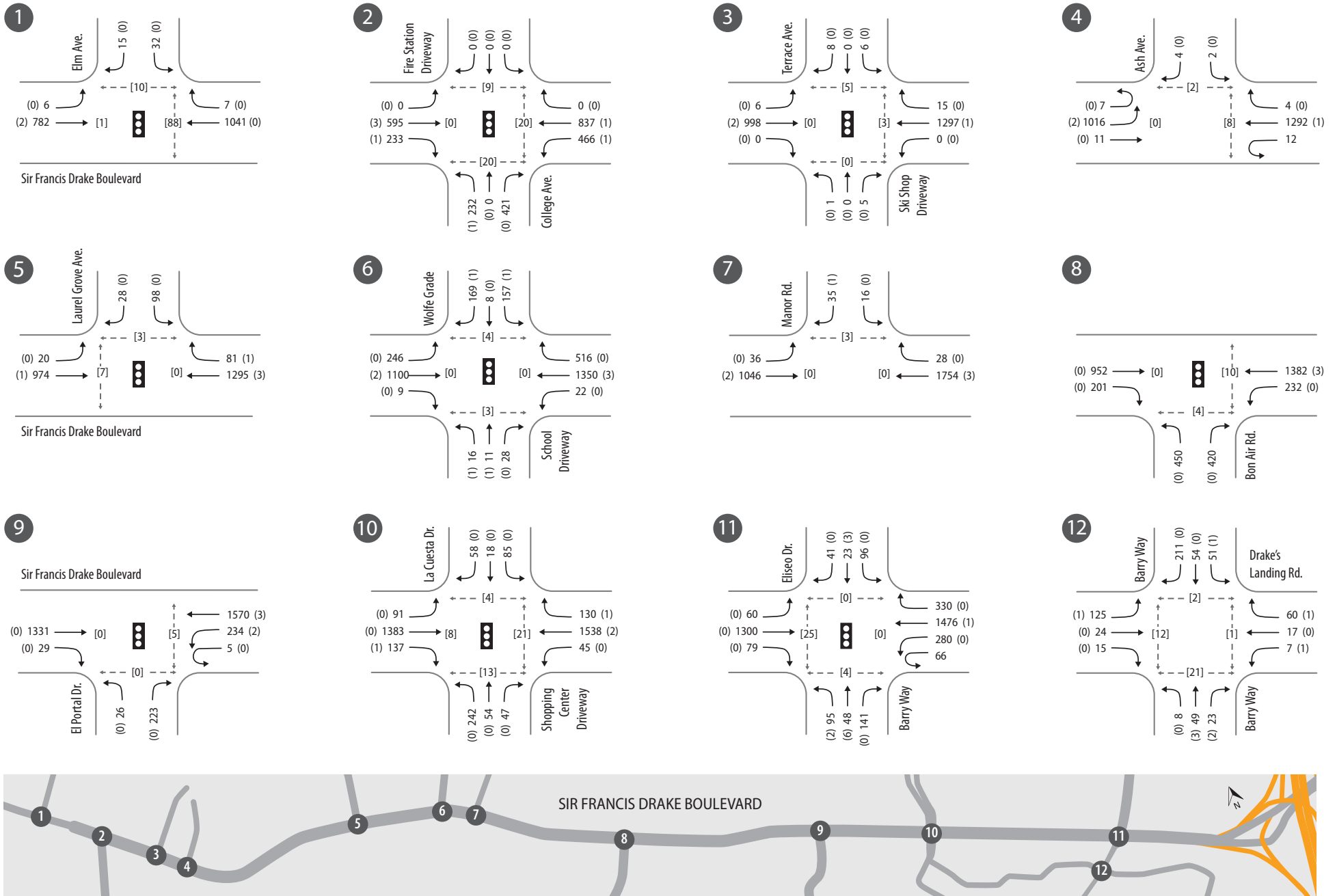


Figure 4
Sir Francis Drake Boulevard
PM Vehicular Peak Hour Volumes

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Page 351 has been revised to include a reference to Table 5.A, which has been added to the Draft EIR to address this comment, as follows:

Following is a discussion of each alternative and an analysis of the anticipated environmental impacts of each alternative. This analysis compares the anticipated impacts of each alternative to the impacts associated with the proposed project; the discussion includes a determination as to whether or not each alternative would reduce, eliminate, or create new significant impacts. Table 5.A provides a summary of the project elements proposed as part of each alternative.

Page 375 has been revised to include those projects at the College of Marin that may be constructed concurrent with the proposed project, as follows:

- Using Measure B funds, the College of Marin proposes to replace the existing maintenance complex, located east of Kent Middle School adjacent to Corte Madera Creek. Construction of this project is anticipated to be completed in 2019.³⁴
- Using Measure B funds, the College of Marin proposes to demolish the maintenance facilities along Kent Avenue. The demolition of these structures is anticipated to be completed by summer 2018.³⁵
- The College of Marin proposes to renovate, demolish or construct new facilities at the Learning Resources Center, located on College Avenue south of SFDB. Proposed improvements are still being designed, with construction anticipated from May 2020 to December 2021.

³⁴ Gilbane, 2017. Roll-Up Schedule as of November 30, 2017. Available online at: <http://measurebcom.org/wp-content/uploads/2017/12/COM-Schedule-11.30.17-Roll-Up.pdf> (Accessed February 19, 2018).

³⁵ Ibid.

Table 5.A: Summary of Alternatives

Components	Alternatives					
	Proposed Project	No Project	General Maintenance	Congestion Relief	Corridor Pedestrian and Bicycle Improvements	No Pipeline
Congestion Relief and Maintenance	<ul style="list-style-type: none"> • Pavement Rehabilitation • Roadway Striping • Accessibility Improvements • Guardrail Replacement • Signal Timing • Future Adaptive Infrastructure Accommodation • Additional Third Lane between El Portal Drive and Highway 101 • Signal Technology Modifications • Eliseo Drive Intersection Improvements • La Cuesta Drive Intersection Improvements • El Portal Drive Intersection Improvements • Bon Air Road Intersection Improvements • College Avenue Intersection Improvements 		<ul style="list-style-type: none"> • Pavement Rehabilitation • Roadway Striping • Accessibility Improvements • Guardrail Replacement • Signal Timing • Future Adaptive Infrastructure Accommodation 	<ul style="list-style-type: none"> • Additional Third Lane between El Portal Drive and Highway 101 • Signal Technology Modifications • Eliseo Drive Intersection Improvements • La Cuesta Drive Intersection Improvements • El Portal Drive Intersection Improvements • Bon Air Road Intersection Improvements • College Avenue Intersection Improvements 	<ul style="list-style-type: none"> • Providing a shared use path along the north side of Sir Francis Drake Boulevard between Eliseo Drive and Bon Air Road • Bacich Elementary School Frontage • Marin Catholic High School Frontage • Manor Road Improvements 	<ul style="list-style-type: none"> • Pavement Rehabilitation • Roadway Striping • Accessibility Improvements • Guardrail Replacement • Signal Timing • Future Adaptive Infrastructure Accommodation • Additional Third Lane between El Portal Drive and Highway 101 • Signal Technology Modifications • Eliseo Drive Intersection Improvements • La Cuesta Drive Intersection Improvements • El Portal Drive Intersection Improvements • Bon Air Road Intersection Improvements • College Avenue Intersection Improvements

Table 5.A: Summary of Alternatives

Components	Alternatives					
	Proposed Project	No Project	General Maintenance	Congestion Relief	Corridor Pedestrian and Bicycle Improvements	No Pipeline
Pedestrian Safety Improvements	<ul style="list-style-type: none"> • Elm Avenue Transit Stop • Ash Avenue Intersection • West McAllister Avenue Intersection • Laurel Grove Avenue Intersection • Bacich Elementary School Frontage • Manor Road Improvements • Marin Catholic High School Frontage 					<ul style="list-style-type: none"> • Elm Avenue Transit Stop • Ash Avenue Intersection • West McAllister Avenue Intersection • Laurel Grove Avenue Intersection • Bacich Elementary School Frontage • Manor Road Improvements • Marin Catholic High School Frontage
Improving Access to Bicyclists and Pedestrians	<ul style="list-style-type: none"> • Providing a shared use path along the north side of Sir Francis Drake Boulevard between Eliseo Drive and Bon Air Road 					<ul style="list-style-type: none"> • Providing a shared use path along the north side of Sir Francis Drake Boulevard between Eliseo Drive and Bon Air Road
MMWD Water Pipeline	<ul style="list-style-type: none"> • Pipeline Replacement 		<ul style="list-style-type: none"> • Pipeline Replacement 			

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APPENDIX A
AIR QUALITY SCREENING OUTPUT

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Roadway Screening Analysis Calculator

County specific tables containing estimates of risk and hazard impacts from roadways in the Bay Area.

INSTRUCTIONS:

Input the site-specific characteristics of your project by using the drop down menu in the "Search Parameter" box. We recommend that this analysis be used for roadways with 10,000 AADT and above.

- County: Select the County where the project is located. The calculator is only applicable for projects within the nine Bay Area counties.
- Roadway Direction: Select the orientation that best matches the roadway. If the roadway orientation is neither clearly north-south nor east-west, use the highest values predicted from either orientation.
- Side of the Roadway: Identify on which side of the roadway the project is located.
- Distance from Roadway: Enter the distance in feet from the nearest edge of the roadway to the project site. The calculator estimates values for distances greater than 10 feet and less than 1000 feet. For distances greater than 1000 feet, the user can choose to extrapolate values using a distribution curve or apply 1000 feet values for greater distances.
- Annual Average Daily Traffic (ADT): Enter the annual average daily traffic on the roadway. These data may be collected from the city or the county (if the area is unincorporated).

When the user has completed the data entries, the screening level PM2.5 annual average concentration and the cancer risk results will appear in the Results Box on the right. Please note that the roadway tool is not applicable for California State Highways and the District refers the user to the Highway Screening Analysis Tool at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>

Notes and References listed below the Search Boxes

Search Parameters	Results
County	Marin County
Roadway Direction	EAST-WEST DIRECTIONAL ROADWAY
Side of the Roadway	PM2.5 annual average
Distance from Roadway	0.101 (µg/m ³)
Annual Average Daily Traffic (ADT)	Cancer Risk
	6.40 (per million)
	Data for Marin County based on meteorological data collected from Mt. Tamalpias in 2005

Notes and References:

1. Emissions were developed using EMFAC2011 for fleet mix in 2014 assuming 10,000 AADT and includes impacts from diesel and gasoline vehicle exhaust, brake and tire wear, and resuspended dust.
2. Roadways were modeled using CALINE4 air dispersion model assuming a source length of one kilometer. Meteorological data used to estimate the screening values are noted at the bottom of the "Results" box.
3. Cancer risks were estimated for 70 year lifetime exposure starting in 2014 that includes sensitivity values for early life exposures and OEHHA toxicity values adopted in 2013.

Roadway Screening Analysis Calculator

County specific tables containing estimates of risk and hazard impacts from roadways in the Bay Area.

INSTRUCTIONS:

Input the site-specific characteristics of your project by using the drop down menu in the "Search Parameter" box. We recommend that this analysis be used for roadways with 10,000 AADT and above.

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- Roadway Direction: Select the orientation that best matches the roadway. If the roadway orientation is neither clearly north-south nor east-west, use the highest values predicted from either orientation.
- Side of the Roadway: Identify on which side of the roadway the project is located.
- Distance from Roadway: Enter the distance in feet from the nearest edge of the roadway to the project site. The calculator estimates values for distances greater than 10 feet and less than 1000 feet. For distances greater than 1000 feet, the user can choose to extrapolate values using a distribution curve or apply 1000 feet values for greater distances.
- Annual Average Daily Traffic (ADT): Enter the annual average daily traffic on the roadway. These data may be collected from the city or the county (if the area is unincorporated).

When the user has completed the data entries, the screening level PM2.5 annual average concentration and the cancer risk results will appear in the Results Box on the right. Please note that the roadway tool is not applicable for California State Highways and the District refers the user to the Highway Screening Analysis Tool at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

Notes and References listed below the Search Boxes

Search Parameters	Results
County	Marin County
Roadway Direction	EAST-WEST DIRECTIONAL ROADWAY
Side of the Roadway	PM2.5 annual average
Distance from Roadway	0.099 ($\mu\text{g}/\text{m}^3$)
Annual Average Daily Traffic (ADT)	Cancer Risk
	6.28 (per million)
	Data for Marin County based on meteorological data collected from Mt. Tamalpias in 2005

Notes and References:

1. Emissions were developed using EMFAC2011 for fleet mix in 2014 assuming 10,000 AADT and includes impacts from diesel and gasoline vehicle exhaust, brake and tire wear, and resuspended dust.
2. Roadways were modeled using CALINE4 air dispersion model assuming a source length of one kilometer. Meteorological data used to estimate the screening values are noted at the bottom of the "Results" box.
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