

November 3, 2023, via email to the following address: SR131CapMProject@dot.ca.gov

Caltrans District 4 - Office of Environmental Analysis
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Bcc: Town of Tiburon Town Council
Mayor of Belvedere
Greg Chanis, Tiburon Town Manager
Robert Zadik, Belvedere City Manager
Office of Supervisor Stephanie Moulton-Peters

Dear Maxwell Lammert, Acting Office Chief

I have been a resident of Tiburon for 6+ years and live at the eastern end of CA131 (aka Tiburon Boulevard). I have a child in high school who rode his bike or took the school bus to school either at Bel Aire Elementary off Blackfield and Karen (western section of CA131) and Del Mar Middle School (middle section of CA131). His high school is in San Rafael, and we now end up driving the full length of CA131 for a host of reasons 2 or 3 times a day. When commuting to San Francisco we prefer to take the Golden Gate Transit ferry and it is one of the reasons we chose our house at the eastern end of CA131.

I have lived in the Bay Area for over 25 years and I started riding the [Paradise Loop](#) (the popular bicycle route that uses CA131, Paradise Drive, roads in Belvedere, a section of the Class I trail in Tiburon and other roads) in 2001 as a mid 30 year-old cyclist and triathlete. I am now 56, I am the Vice-Chair of the Tiburon Parks Open Space and Trails Commission, I was the Reed Union School District (RUSD) PTA volunteer on the Transportation Authority of Marin's Safe Routes to School (SR2S) for three years and I am on the Golden Gate Ferry Passenger Advisory Committee. I am a bicyclist, an environmentalist, I am a driver, I am a parent, I am an advocate for mass transit, and I am engaged in the community.

I have spent several hours reviewing the Caltrans "State Route 131 Capital Preventive Maintenance Project Draft Initial Study", I attended the community call on October 26, and I have attended every SR2S call for the last 3 years.

Summary

Caltrans mission is to *"Provide a safe and reliable transportation network that serves all people and respects the environment."* I believe the CA131 Capital Preventive Maintenance Project (CAPM) highlights in limited fashion, needs on CA131 for some maintenance, but for 220 days of construction and a price of over \$22 million it **1) does not address the community's transportation network priorities nor 2) were elements in the plan effectively communicated with the community or documented properly.** In addition, **3) the plan specifically has a negative material impact on several CEQA environmental factors** including but not limited to:

- 3.3.1 Aesthetics
- 3.3.6 Energy
- 3.3.8 Greenhouse Gas Emissions
- 3.3.14 Population and Housing
- 3.3.15 Public Services
- 3.3.17 Transportation

Based on this, Caltrans should provide a MITIGATED NEGATIVE DECLARATION or an ENVIRONMENTAL IMPACT REPORT AND return to the community in a public forum to guarantee that the CAPM is a project that the community can support. Below are the specific items that support this conclusion.

Priorities Missing

The residents of Tiburon and Belvedere have communicated to elected officials and Caltrans when they decided to show up a number of priorities either through public meetings or in the Transit Authority of Marin Safe Routes to School meetings. However, some items are missing either because they were miscommunicated or there were meetings held and the community was not invited (See communication sections). Priorities that are missing going west to east:

1. **Western Section - Flooding of Greenwood Cove Drive** (PM 0.88) due to wall being installed between there to Cecilia Way (PM 1.00) Figure 2-1, Map 9. The UNINTENDED consequence of the wall to avoid flooding CA131 but impact other communities was NOT addressed. This is not necessarily a Caltrans action item, but this fix will negatively impact the primary way CHILDREN will be getting to schools on their bikes.
2. **Western Section - Cecilia Way and CA131**: Turning left from Cecilia Way south bound to east bound CA131 there is no safety area, similar to Reed Ranch Road making a similar turn even though the population density may be higher. I have seen multiple auto accidents more than once at this intersection, yet there are no updates or mention or making it like Reed Ranch Road.
3. **Central Section Gilmartin and CA131**. There is a Class I path (Tiburon Old Rail Train) across the two lanes of CA 131 at this intersection but no physical safety islands, no cross walk, no safe way to walk to San Rafael Avenue to the east (sidewalk), and similar to Cecilia Way, no auto safety area when making a left from Gilmartin to east bound CA131. This specific priority was raised several times in SR2S calls.
4. **The entire section – traffic volume and traffic management**. In the CAPM sources are cited from a traffic study in 2016, 7 years ago and takes into consideration no post pandemic changes in behavior. For a \$22M price tag I think better data on traffic would be warranted. For those who use CA131 there are very adverse traffic conditions generally two periods of time during the school year, 7:30 – 8:45 and 2:30 – 4:45 in the afternoon. During these peak periods a drive over the length of CA131 can take 40 min, or an average of 7 miles per hour. Yes, the time is faster once you hit the 4-lane section, meaning the time on the 2 lane section (the central and eastern sections) the average speed is less than 7 miles per hour. From an impact perspective that there will be 220 days of construction with no direct traffic time improves explicitly spelled out in the Caltrans document misses the priorities of the community and leads to adverse conditions on energy, GHG emissions and transportation. From an efficient use of resources, this project seems to be missing the point.
5. **Eastern Section - Improvement or negative impact on bus stops at San Rafael Ave and CA131**. The CAPM makes no mention of the improvement of this bus stop that is tucked at the intersection with no bus lane waiting area. Without needed improvements, pedestrian safety and traffic will be negatively impacted.

Planned activities and unintended consequences.

The CAPM put forwarded does not fully explain how and where several of the planned additions will be implemented. Specifically, I identified the following, and I am sure there are more:

1. **Central Section, Class IV Bike Lane**, west bound starting at Trestle Glen past Jefferson to Reed Ranch Road. This section of the road is very busy and narrow with drainage, a sidewalk, electrical and gas lines, and a major crossing for kids for school. There is no room for a class IV bike lane here without significantly encroaching the pedestrian right of way. I cannot image that Caltrans would be advocating for bike lanes (where there really is not a need) at the expense of pedestrian safety, not to mention expense! See Figure 2.1 maps 14 and 15.
2. **Central and Western Section, Class IV Bike Lane west bound**, from Reed Ranch Road end of project. With the potential addition of the westbound Class IV turning from CA131 to Reed Ranch Road, Cecilia Way and Blackfield and from those streets to west or east bound CA131 will become more difficult. Safe Routes to School community members did not request any bike lanes on CA131 EXCEPT from Blackfield to E Strawberry (Western Section). No parent would let their kids on CA131 between Blackfield to Trestle Glen where the speed limit is mostly 45 MPH. The Class I bike lane proposed on the eastbound side of CA 131 from Blackfield to E Strawberry addresses these issues.
3. **Central and Western Section, Class IV bike lane east and west bound from Blackfield to Trestle Glen**, according to the plan will eliminate the breakdown/safety lanes on CA131. Where are disabled cars supposed to go?
4. **Western Section, E Strawberry and CA 131**. Traffic impact from the elimination of free right hand turn from north bound E Strawberry drive to east bound CA 131. This intersection is already a safety mess. The elimination of the free right-hand turn may impact safety and increase traffic congestion during school days. With the addition of the Class I lane, without proper planning and coordination with the county, pedestrian and bike traffic onto E Strawberry will become a hazard for all.
5. **Central Section Westbound CA131 to north-east Avenida Miraflores**. Traffic impact from the elimination of free right hand turn from westbound CA131 to north bound Avenida Miraflores. If this addition includes the elimination of the right hand turn lane, this will create additional back ups and traffic slowing during the AM and PM school times. The CAPM is NOT clear on this.

Communication, Documentation and Schedule

The CAPM Communication plan is misleading, misses a significant number of stakeholders and the maps used are out of date based on the current conditions. The schedule is long and there is only a brief window of time that Caltrans can do the work and not be influenced by environmental exogenous factors and the school year. These are the following I identified, but there may be more.

1. Caltrans did not go through the list of Safe Route to School (SR2S) priorities with **COMMUNITY members**. SR2S had our standing meeting on January 26 and uninformed Caltrans employees were on the call. Later on January 26th there was a call with Tiburon town staff, SR2S staff, the MCBC, a representative of our supervisor and Caltrans but NO members of the community directly or members of the Reed Union School District.

2. There was NO direct outreach to the Reed Union School District (RUSD). RUSD is the town of Tiburon's largest employer and a primary reason for the massive use of transportation infrastructure on and near CA131 every weekday. A representative from RUSD is critical. One of the pieces necessary on the CAPM is timing. The intersection of CA131 and Avenida Miraflores and planned safety improvements will be valuable. If these changes take months and are during the school year, there will need to be a lot of communication and planning. Over 100 kids use this intersection every day on foot and bike and the rest of campus predominately uses this for the buses and auto drop offs. Additionally, use of the north gravel lot on the eastern section for staging by Lyford and the REED ELEMENTARY SCHOOL may have some risks with it. This school is a Pre-K to 2nd. Effective communication and planning are paramount for safety.
3. There was no outreach to the St Hilary School. Likely the town's second largest employer, coordination with them and their campus at Rock Hill Road (central section) is necessary.
4. There has been no communication or review with the City of Belvedere. CA131 is how all their community members get to their homes. How can a project of this size move forward without any communication with a significant stakeholder?
5. Many of the exhibits use older map images than those publicly available. Specifically, I am referencing the maps in Figure 2-1 maps 1-3, 8, 17-18 and 32. Updated images represent the "as built environment" are publicly available, it would appear that the time spent, and thoroughness is suspect. What else is missing from the CAPM?
6. On the schedule, according to the plan, ground-disturbing activities would be restricted to the dry season (between April 15 and October 31); however, proposed ground-disturbing activities within jurisdictional waters would be further restricted to between June 15 and October 31. Additionally, the school year runs from approximately the last week of August to the first week of June. Nothing in the CAPM seems to be concerned with this limited open window.

CEQA Impacts

I disagree with Mr. Lammert's conclusion that the CAPM proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION be prepared. Caltrans should provide a MITIGATED NEGATIVE DECLARATION or an ENVIRONMENTAL IMPACT REPORT. Below are the specific items that I believe support this.

CEQA Item	Issues
3.3.1 Aesthetics	The addition of Class IV and Class I bike lane will eliminate some median vegetation that the CAPM identifies as being maintained by the town of Tiburon at the town of Tiburon's expense. This is important and not effectively communicating this is a Significant Impact .
3.3.6 Energy	Caltrans and a number of government agencies do not review or identify the life cycle (LCA) energy impacts of these projects. The energy wasted by redoing concrete, redoing paving, and other work is massive. Specifically, many of the curb ramps were just redone, now Caltrans is going to do them again? The traffic lights at Blackfield and CA131 were just replaced 2 years ago, we are now going to replace them again. It takes energy to maker and replace already functioning devices. The CAPM does not address this and it is a significant impact .

CEQA Item	Issues
3.3.8 Greenhouse Gas Emissions	CA131 as mentioned earlier has a terrible traffic problem. The traffic impacts of the CAPM will have a significant impact on GHG emissions and the lack of any other measures addressing the current conditions will have a continued negative significant impact on GHG emissions for the foreseeable future. This is a material omission that Caltrans must address.
3.3.14 Population and Housing	Tiburon and Belvedere are mandated by the State to develop plans for additional housing. However, the CAPM makes no allowance for potential increases in population and uses traffic data from 2017. This is a significant impact for the two jurisdictions and this project and lack of scope has a significant impact on this measure.
3.3.15 Public Services	As mentioned above, the construction works has the potential to impact two of the three schools directly with construction. This is a significant impact and there is nothing in the CAPM identifying how to mitigate this. Secondly CA131 is the only direct route out from the major population areas for Tiburon and Belvedere. There is nothing in the plan directly mitigating this risk and this is a Significant Impact .
3.3.17 Transportation	The CAPM will have a significant impact on the use of mass transit on CA131 and impacts on the use of ferry service at the eastern end of CA131. With the reduction of Marin Transit bus stops and no updates/plans for addressing traffic on CA131 during construction or afterwards, transportation will be impacted. With no plans or mitigation to assist emergency traffic during construction or improving traffic after the CAPM emergency traffic will have significant negative impact .

I look forward to hearing from Caltrans in future public forums addressing all of these concerns and concerns raised by other community members.

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