

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

**Subject:** Are Millbrae red light cam Encr. Permits justified by collision history?  
**Date:** Mon, 31 Oct 2016 01:25:37 -0700  
**From:** Jim  
**Reply-To:** jim  
**To:** amjad.naseer@dot.ca.gov

10-30-16

To: Mr. Amjad Naseer, Caltrans Encroachment Permits, Oakland

Subject: Are Millbrae's red light camera Encroachment Permits justified by the collision history?

Dear Mr. Naseer:

In June of 2015 I wrote to you (copy below) questioning whether Millbrae's red light camera encroachment permits, and the resulting very heavy ticketing, are justified by the collision history.

I have just reviewed the traffic study the City submitted to you earlier this month as part of their application to renew those encroachment permits, and for the following reasons continue to believe that the permits are not justified and should not be renewed.

1. Figs. 2 and 3 (page 5 and 6) in the DKS study memorandum dated Sept. 30 (the Study) show us that total crashes in the Study area already were low for 2+ years before the Sept. 2006 activation of the first cameras, those sited at the Rollins Road / Millbrae Avenue intersection.
2. Figs. 2 and 3 also show us that after the Nov. 2009 activation of the cameras at the El Camino Real / Millbrae Avenue and 101 offramp / Millbrae Avenue intersections (the Caltrans intersections), total crashes did not decline, but actually rose, slightly.
3. Tables 3 and 4 (page 8) in the Study show us that the number of the most dangerous crashes (broadside and head on) in the five years after the activation of the cameras at the Caltrans intersections is about the same as it was before the activation of the cameras.
4. It would have been useful if the Study had looked at the primary collision factor (PCF) of the accidents, to see which, if any, were attributed to red light running - like I did in my June 2015 email to you.
5. In the first paragraph of page 2 of the Study, it is claimed, "Repeat violations are rare which indicates success in changing driver behavior." That claim - changing driver behavior - is inconsistent with the recent large increases in the number of tickets issued. Table 5 on page 10 of the Study shows us that ticketing at the 101 offramp more than doubled between 2012 and 2015, and I estimate (based upon the official ticketing reports, attached) that in 2016 ticketing will be about 79% higher than it was in 2015 - an extra 3490 tickets just from that one camera. I also estimate that in 2016, violation events will be 152% higher than in 2015.
6. The Study concedes (page 1, bottom), that "collision statistics are low," and that they already were low, before the cameras came along.

There was no justification for the cameras at the time they were installed, and there is none now. Please do not renew the permits.

Sincerely,

Jim

Attached below: My email of June 2015

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

**Subject:**Are Millbrae red light cam Encr. Permits justified by collision history?

**Date:**Fri, 12 Jun 2015 10:42:57 -0700

**From:**Jim

**Reply-To:**jim

**To:**[amjad.naseer@dot.ca.gov](mailto:amjad.naseer@dot.ca.gov)

6-12-15

To: Mr. Amjad Naseer, Caltrans Encroachment Permits, Oakland

Subject: Are Millbrae red light camera Encroachment Permits justified by the collision history?

Dear Mr. Naseer:

The City of Millbrae operates red light cameras at three intersections, two of which are on or adjacent to State highways and are operated under Caltrans Encroachment Permits issued in September 2009.

On September 5, 2014 I asked CalTrans for copies of “all current issued encroachment permits for red light cameras in Millbrae” and for “the justification the City provided.” On October 2, 2014, CalTrans mailed responsive documents to me. PDFs of all those documents are attached to this email (excluding copies of the large format construction plans).

As justification for the Permit to install the red light camera monitoring the two southbound El Camino Real (RT 82) to eastbound Millbrae Avenue left turn lanes, the City created and submitted to Caltrans a one-page document entitled Collision Diagram 2005-2009, which showed nine collisions in five years. One of those nine collisions (date 9-4-2005) involved a “Sig/Signs” violation by a left-turning motorist; all the other collisions depicted on the Diagram involved other movements or violations other than CVC 21453. At a very busy intersection is one collision in five years sufficient to justify the installation of a red light camera which to cover its rent during a five year period must generate at least 3000\* tickets bearing \$1,500,000 in fines and which during just the last calendar year (2014) generated 1744 tickets bearing \$872,000 in fines?

As justification for the Permit to install the red light camera monitoring turns from the southbound RT 101 offramp

at Millbrae Avenue, the City created and submitted to Caltrans a one-page document entitled Collision Diagram 2004-2008, which showed 17 collisions in five years. Caltrans also sent me a copy of that same Diagram bearing hand-annotations by an unknown person. The City submitted Traffic Collision Reports for 12 of the 17 collisions plus two more Reports for collisions whose dates were not shown on the City's Diagram.\*\* Copies of the Diagrams and the Reports are attached.

Of the 14 collisions, one (date 1-13-04) involved a CVC 21453 (red light) violation by a motorist using the southbound offramp. That motorist struck a bicyclist, with no injury.

Another of the 14 (date 11-5-08) was listed on the City's Collision Diagram 2004-2008 as "sig/signs" but SWITRS shows the Primary Collision Factor as "ALC/DRG." SWITRS shows two injuries with Extent: "comp pn."

The remaining 12 collisions involved other locations or violations other than "sig/signs" and CVC 21453. Is two collisions (with two minor injuries) in five years at a very busy intersection sufficient to justify the installation of a red light camera which to cover its rent during a five year period must generate at least 3000\* tickets bearing \$1,500,000 in fines and which during just the last calendar year generated 3891 tickets - mostly for right turns - bearing \$1,946,500 in fines?

Please consider the revocation of both permits.

Sincerely,

Jim

\*Millbrae pays rent of \$5395 per camera per month and receives approximately \$100 of revenue for each ticket issued.

\*\*Per Mr. Lim's 8-20-09 email to Caltrans, three of the 17 collisions shown on the US101/Millbrae collision diagram involved only property damage, so no collision reports were written.

#### Details of My US101/Millbrae Avenue Collision Analysis

Number in ( ) refers to sequence in attached PDF of Millbrae/101 Traffic Collision Reports.

1-2-04: Date is shown on City's Collision Diagram 2004-2008 but no Traffic Collision Report was received by me. SWITRS does not show a collision on Millbrae Avenue or RT 101 near Millbrae Avenue on that date.

1-3-04: Date is not shown on City's Collision Diagram 2004-2008 but I received a Traffic Collision Report. Both vehicles were proceeding straight westbound. PCF was unsafe speed. CVC 14603 was noted as at fault driver was age 16. No injuries. (12)

1-13-04: Date is not shown on City's Collision Diagram 2004-2008 but I received a Traffic Collision Report. Driver at fault entered intersection from middle lane of southbound offramp, hit bicycle. PCF: CVC 21453 and CVC 21201 (no bike headlight?). No injuries. (13)

6-22-05: Location was at offramp from northbound RT 101. (14)

11-16-05: Location was 321 feet east of offramp from southbound RT 101. (4)

12-9-05: On City's Collision Diagram 2004-2008 date is shown in error as 12-19-05 . Driver at fault was westbound on Millbrae Avenue and ran signal controlling entry to intersection of Millbrae Avenue and the southbound offramp. (3)

8-31-06: Driver at fault entered intersection from southbound offramp at excessive speed, rolled. PCF: CVC 22350. (5)

1-6-07: On southbound offramp, rearend, DUI and speed. PCF: CVC 23152(a). (6)

8-23-07: Location was at offramp from northbound RT 101. (7)

10-12-07: On southbound offramp, rearend, speed, wet road. PCF: CVC 22350. (8)

11-28-07: Location was at offramp from northbound RT 101. (9)

1-17-08: Location was at RT 101 overpass. (10)

2-20-08: No Collision Coding page received by me. City's Collision Diagram 2004-2008 shows a left turn from ramp and "improper turn" while hand-annotated copy of same Diagram indicates a left turn from ramp and "wet speeding hit curb." SWITRS (copy attached) shows PCF as "unsafe speed," no injuries. (11)

8-9-08: No Collision Coding page received by me. City's Collision Diagram 2004-2008 shows a right turn from ramp and "unsafe lane change" while hand-annotated copy of same Diagram says "fail to yield." SWITRS (copy attached) shows both vehicles westbound prior to the crash, the PCF as "ROW Auto," the Collision Type as "sideswipe," and one injury with Extent "comp pn." Without a Collision Coding page I cannot tell if the at fault driver, or the other driver, or both drivers, approached from the southbound offramp. (1)

11-5-08: No Collision Coding sheet received by me. City's Collision Diagram 2004-2008 shows a straight ahead movement from ramp and "sigs/signs." SWITRS (copy attached) shows the at fault vehicle was southbound, the PCF as "Alc/Drug," the Collision Type as "broadside," and two injuries with Extent "comp pn." (2)

\*\*\*\*\*