



October 5, 2015

Mr. Lester J. Friedman, Chair
Mr. Jake Manaster, Vice Chair
Members of the Traffic & Parking Commission
455 North Rexford Dr.
Beverly Hills, CA 90210

Dear Chair Friedman and members of the commission:

Following up on my comments at the open house, I want underscore the importance of including multimodal mitigation measures in planning for Santa Monica Boulevard reconstruction. Construction on this corridor will particularly impact non-motor road users; indeed construction activities present formidable challenges to two-wheeled travelers. To date that has not been acknowledged by the commission, by our consultants or City Council. I hope this commission will include in its guidance to City Council and consultants the appropriate measures as part of the mitigation ‘framework.’

Caltrans is clear about making safety a first priority in temporary traffic control zones (TTCs). And the agency is explicit about the need to safely accommodate *all* road user. As noted in the *Manual of Uniform Traffic Control Devices* (MUTCD):

The needs and control of all road users (motorists, bicyclists, and pedestrians within the highway)...through a TTC zone shall be an essential part of highway construction....The primary function of TTC is to provide for the reasonably safe and effective movement of road users through or around TTC zones while reasonably protecting road users... (section 6A General Principles).

The MUTCD continues:

Road user and worker safety and accessibility in TTC zones should be an integral and high-priority element of every project from planning through design and construction....work should be planned and conducted with the safety and accessibility of all motorists, bicyclists, pedestrians (including those with disabilities), and workers being considered at all times (section 6B Fundamental Principles).

Indeed the MUTCD devotes an entire chapter to TTC policy guidance and device usage and mentions bicyclist safety on no fewer than 37 of them. Three of the MUTCD’s seven TTC ‘fundamental principles’ pertain to cyclists:

- “General plans or guidelines should be developed to provide safety for motorists, bicyclists, pedestrians...” (principle 1)

Better Bike

Mark Elliot, Organizer
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To: Traffic & Parking Commission
Re: SM Blvd construction mitigation

- “Bicyclists and pedestrians, including those with disabilities, should be provided with access and reasonably safe passage...” (principle 2)
- “Motorists, bicyclists, and pedestrians should be guided in a clear and positive manner while approaching and traversing TTC zones...” (principle 3)

To date in the Santa Monica Boulevard mitigation discussion, however, the safety of bicycle riders has taken a backseat to concerns about neighbor convenience.

Mitigation Measures

To underscore the threat that construction zones present specifically to bicycle riders, the MUTCD establishes as ‘standard’ the following direction: “Bicyclists shall not be led into direct conflicts with mainline traffic, work site vehicles, or equipment moving through or around the TTC zone.” And section 6D enumerates ‘considerations’ specific to the needs of bicyclists:

- “A travel route that replicates the most desirable characteristics of a wide paved shoulder or bikeway through or around the TTC zone is desirable for bicyclists.”
- “If the TTC zone interrupts the continuity of an existing bikeway system, signs directing bicyclists through or around the zone and back to the bikeway is desirable.”
- “Unless a separate bike path through or around the TTC zone is provided, adequate roadway lane width to allow bicyclists and motor vehicles to travel side by side through or around the TTC zone is desirable. When the roadway width is inadequate for allowing bicyclists and motor vehicles to travel side by side, warning signs should be used to advise motorists of the presence of bicyclists in the travel way lanes.”

The MUTCD is a design manual, of course, and it recommends specific measures to protect bicyclists:

- ‘Bicycle crossing’ and ‘share the road’ signage when riders must share a lane with vehicular traffic.
- ‘Uneven lanes’ signage where a difference in elevation exists in order to “warn bicyclists or other road users of the uneven pavement condition...” (There is also a lower tolerance for the difference in surface elevation if bicyclist will be present.); and,
- Temporary traffic barriers when needed “to separate workers, bicyclists, and pedestrians from motor vehicle traffic.”

Now I’m no traffic engineer, but some combination of these measures should be deployed during the construction phase of the project. Even better would be the designation of an alternate route to entirely separate motor from non-motor traffic *off the corridor*. That’s what I would recommend to the commission.

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A Designated Alternate Route Is the Best Mitigation Measure

The commission should recommend to City Council and our consultants that bicyclists be separated entirely from the project area by providing a safe, signed alternate route. Indeed in the MUTCD there exists support for an alternate route designation in a TTC zone. Section 6F.84 recommends detours for road users “including bicyclists and pedestrians” when appropriate; section 6G.11 suggests shared-use paths and signed alternate routes may be advisable too for work “within the traveled way of an urban street.”

In fact, a designated alternate route concept already came up in this commission’s discussions. In meeting #1, a commissioner mentioned the option of routing westbound bicyclists along Carmelita. Indeed should westbound *vehicular* access be restricted – which was another commissioner recommendation - then riders would find a relatively less congested path from east to west.

(While I don’t support Carmelita as a permanent bicycle route because it is difficult to access for eastbound travelers, I believe that an eastbound route, striped and signed, would allow riders to safely avoid the bulk of phase I construction work.)

In the eastbound direction, the commission-recommended option C (removal of parking from South Santa Monica Boulevard) would allow for a complimentary striped and signed alternate route that too would put riders beyond much (if not all) construction activity on the corridor.

Today the curbside parking presents a clear hazard for bicyclists, as has been acknowledged in City Council discussions. Removing south-side curbside parking would allow for travel lanes and turn pockets as well as a (temporary) eastbound striped bicycle lane.

The key to safe travel for cyclists, whether on or off this corridor, is a separate dedicated lane marked for bicyclist-only use. The alternative – tacitly requiring riders to slug it out under suboptimal and unsafe conditions – amounts to negligence. Any route during construction, whether on the corridor or off-corridor as an alternate, should be designated by signage and marked with a (temporary) class II bicycle lane.

Closing Note

My concern about negligence is well-founded: I have urged our transportation division to deploy basic construction impact mitigations on Santa Monica Boulevard west of the Wilshire intersection. That could be as simple as hanging a few share-the-road signs. But that’s proven to be quite a challenge over the past nine months. Adding probable injury to the insult, an adjacent (Gateway) parcel was permitted for construction staging this spring. Again, without so much as a thought about what it means for bicycle riders to share the #2 lane with construction vehicles.

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Likewise, we all should want to avoid is a situation where bicyclists are afforded no measure to mitigate the negative impacts of North Santa Monica project construction. And here the MUTCD offers guidance. So why not embrace it?

Our city's planning policies explicitly suggest we ride a bicycle more often in order to reduce congestion and emissions. Why set up two-wheeled travelers for a greater likelihood of injury?

Sincerely,

A handwritten signature in black ink that reads "Mark Elliot". The signature is written in a cursive, slightly slanted style.

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