11 Jan 2012

From: Edward Hasbrouck <edward@hasbrouck.org>
To: cityhall@ci.brisbane.ca.us
Subject: (Fwd) RE: Bayshore Blvd. bike lanes
Date sent: Wed, 11 Jan 2012 12:53:18 -0800

Dear City Council members:

Below and attached please find written comments and a request for calendaring on the agenda for your next meeting, and action by the City Council, to overturn the decision of the City Engineer (as below) and direct the appropriate City agencies to remove the "rumble strips" recently installed on Bayshore Blvd. (in violation of the applicable Federal Highway Administration standards and the recommendations of leading bicycle transportation engineering groups, as attached).

The installation and maintenance of these continuous unbroken rumble strips separating the general traffic lanes from what was formerly a pedestrian shoulder, now relabeled as a bike lane, has created an imminent ongoing safety hazard to bicyclists, pedestrians, and motorists which it is your duty to remedy and for which the City is liable.

If you do not direct that the rumble strips be removed entirely, I request that you direct that they be replaced with intermittent rumble strips conforming to the applicable FHWA standards. Such action would mitigate, but not eliminate, the hazard you have created, and the City's liability.

I plan to attend the next City Council meeting, which I have been told is scheduled for January 17th. I would be happy to discuss these comments with you and/or to arrange to join you in a visit to inspect the site and explain the hazards the City has created and is maintaining.

Rumble strips are, in general, inappropriate and disfavored in locations, such as these, where bicyclists routinely need to cross back and forth across them (something that is not the case on, e.g., Interstate highway shoulders that are open to bicycle traffic). Uninterrupted rumble strips are never recommended to separate bike lanes from other traffic. Wherever rumble strips are used for such a purpose, regular gaps should be provided to permit safe movement of bicycles across the rumble strips. The space between the rumble strips and the edge of the pavement on Bayshore Boulevard is, in some places, too narrow for safe passage of bicycles, especially loaded touring bicycles with wide panniers, and too narrow for any bicyclist to safely pass a pedestrian within the bike lane. At the narrowest place in the bike lane, just south of Guadelupe Canyon Pkwy., bicyclists are trapped between the unbroken rumble strips and a vertical concrete "crash barrier" with a flange that projects several inches further at just the wrong height to snag a right-hand bicycle pedal or the widest part of a right-hand pannier, throwing the bicyclist.
I presume that the installation of the rumble strips was part of a well-meaning attempt to improve conditions for bicyclists, for which I thank you. However, I urge you to place this on your agenda and act promptly to eliminate (or failing that, to mitigate) the safety hazard that has been created and is being maintained by the City.

Please enter these comments in the record of your next meeting, to supplement the oral summary I will present in person.

Sincerely,

Edward Hasbrouck

-------- Forwarded message follows ---------
From: "Kinser, Karen" <kkinser@ci.brisbane.ca.us>
To: 'Edward Hasbrouck' <edward@hasbrouck.org>
Copies to: Ruth Radetsky <Ruth@Radetsky.org>
Date sent: Mon, 19 Dec 2011 14:46:08 -0800
Subject: RE: Bayshore Blvd. bike lanes

Edward,

The City has received your email correspondence of 12/16/11.

As noted therein, the "best practices" for the design and installation of bikeways continues to evolve, with the oldest provided reference being a 2001 technical advisory (TA), and the newest being a May 2011 TA. We disagree with your conclusion that the city's installation of rumble strips on Bayshore Boulevard creates a hazardous condition; we believe that the new condition is a vast improvement over the previous Class I Bikeway on this 45 MPH arterial road. This project, which was initiated in 2004, has been reviewed by all appropriate regulatory authorities, designed by a licensed civil engineer, and approved by the City Council.

We will maintain the information you provided, and when the roadway is re-paved, we may incorporate those features which are deemed necessary by a civil engineer, and which are then current practice.

Thank you for sharing your concerns. Best wishes for a happy holiday season.

Karen Kinser
Senior Civil Engineer
City of Brisbane

--------Original Message--------
From: Edward Hasbrouck [mailto:edward@hasbrouck.org]
Sent: Friday, December 16, 2011 1:27 PM
To: Kinser, Karen
Cc: Ruth Radetsky
Subject: Bayshore Blvd. bike lanes

Ruth Radetsky forwarded your response to her complaint about the hazardous conditions created by the new bike lanes on Bayshore Blvd., which response seemed to indicate that you don't plan to do anything about the problems.

I, too, ride that stretch of road regularly, and have been doing so for many years. For several years -- long before the bike lanes were put in -- I worked at VWR Scientific on Bayshore at the south end of Brisbane, and commuted by bike daily from San Francisco along Bayshore.

I'm not opposed to all rumble strips, but I can say that as a lifelong bicyclist who has never owned a motor vehicle, what has been done on Bayshore Blvd. is the single most inappropriate and worst-implemented installation of rumble strips I have encountered in 40 years of riding.

According to your message to Ms. Radetsky:

> The incorporation of the traffic control device known as a "shoulder rumble strip" into bike lane design and in general as a tool to provide audible and physical (shaking) feedback to keep motorists in their lanes and off of shoulders, medians and the like is widespread, and is considered a nationally accepted engineering practice.

This is not correct. The use of rumble strips to separate bike lanes from same-direction all-vehicles traffic lanes, as a general practice, is contrary to Federal Highway Administration (FHWA) standards.

(In addition, a bike lane is not a "shoulder" but part of a roadway. And vehicles don't routinely need to cross a median the way bicycles, as discussed below, routinely need to cross in and out of bike lanes.

Rumble strips can create seriously hazardous conditions for bicyclists and pedestrians, and their indiscriminate use, without adequate consideration for their potentially hazardous consequences and the need to mitigate them, have been the subject of vigorous, longstanding nationwide objections from bicyclists.

In response to the legitimate concerns raised by bicyclists, the applicable FHWA standards were recently revised to make even more clear that rumble strips should not be used indiscriminately and should *never* be continuous the way they are on Bayshore Blvd., and that attention must be paid to the need to limit their use and mitigate their hazards.

In relation to what has been done wrong on Bayshore Blvd., and the hazardous conditions that have been created there, the most significant part of the FHWA guidelines, as most recently revised, is as follows:

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http://safety.fhwa.dot.gov/roadway_dept/pavement/rumble_strips/t504039/

"recurring short gaps should be designed in the continuous rumble strip pattern to allow for ease of movement of bicyclists from one side of the rumble to the other. A typical pattern is gaps of 10 to 12 feet between groups of the milled-in elements at 40 to 60 feet."

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There's a good discussion of the problems that can be caused for bicyclists and pedestrians by rumble strips, and discussion of these and other relevant standards and recommendations, here:

http://www.bikeleague.org/resources/reports/pdfs/rumble_strips.pdf

and some background on the latest revision of the standards here:


In your message to Ms. Radetsky, you say that, "the southern portion of this project (Valley Drive to the southern city limit) has been in place for several years without a single complaint similar to your concern."

Had I known where to complain, I would certainly have done so sooner. I was appalled by what had been done to the southern portion of Bayshore Blvd., but it appeared as a fait accompli. Even then, nobody ever asked those who use the road what we thought, or told us how to give feedback, before proceeding to repeat the same mistakes (and more) to the north.

Unlike in San Francisco where I live, where notices of proposals such as for revised traffic patterns or bike lanes are required to be posted on-site *before* plans are finalized, and road users and others who might be impacted (perhaps in ways that planners hadn't anticipated) have a chance to review plans and have input before they are implemented, I never saw any notices along Bayshore Blvd. before the construction started.

Even the best planners can't always anticipate how others may be impacted, and may not realize who uses a particular road, or how. That's why public posting of notice of proposed changes, and public opportunity for input, are considered essential as a *standard* part of the planning process. It should go without saying that Bayshore Blvd. is by far the most significant road in the city of Brisbane, and that no road project anywhere in the city would be likely to affect more people, in more different ways, than a major revision of traffic patterns on Bayshore. If there is anything your department could have done that would have cried out for solicitation of public comment, such as by notices on lamp and signal poles at intersections along the affected road, this was it.
While I presume that the changes were well-intended, they make bicycling or walking on Bayshore Blvd. far more dangerous than it was before.

The most serious hazards on Bayshore Blvd. relate to the difficulty of crossing the rumble strips where that is necessary to avoid obstructions, ranging from blackberry brambles in summer to windfalls of eucalyptus branches in winter, and debris and pedestrians year-round. (Bayshore Blvd. is a popular jogging route. Since there is no sidewalk, the conversion of the former shoulder into a "bike lane" has left runners and walkers nowhere to be except in the bike lane.)

*Continuous* rumble strips are clearly contrary to the AHW standards, and create a clear and imminent hazard. Bicyclists must, typically several times in this stretch of Bayshore Blvd., cross them and merge into the general traffic lane to avoid something in the bike lane. That's possible, but requires considerable bike handling skill, and requires bicyclists to slow (for safety crossing the rumble strips) just when safety in merging would normally dictate that they accelerate to match as closely as possible the speed of the motor vehicles with which they must merge.

A bicyclist must simultaneously or in very rapid sequence, in what may be a very limited distance after debris comes into sight, signal their intent to slow to following bicyclists (who may not yet be able to see the debris or obstruction ahead through the leading bike, and won't have any other warning that the bike ahead is about to brake), signal their intent to merge left to vehicles in the general traffic lane, check for overtaking vehicles in the lane into which they need to merge, brake to a sufficiently slow speed to cross the rumble strips safely, turn across the rumble strips and then back into line, and maintain control of their bike while crossing the rumble strips. Then they have to repeat the process to merge back into the bike lane after passing the obstruction.

With the former configuration of the road, motorists seeing a bicycle at the right edge of the traffic lane ahead could tell that they would need to move left to pass safely, and had plenty of space to do so. Now, the burden falls on bicyclists to merge into the general traffic lane, an action that motor vehicles don't expect and can't anticipate the way they can anticipate the need to pass a bike ahead in a normal lane. (Motorists typically perceive the rumble strips as being the edge of the "roadway", and pay less attention to a bicycle ahead that is "off the road" than to one that is obviously in, albeit at the edge of, the same lane with them. To most motorists, a bicyclist merging across the rumble strips in front of them is coming "out of nowhere" in a completely unexpected manner.)

Bayshore Blvd. is a major, perhaps *the* major, through north-south route between SF and the peninsula used by long-distance touring cyclists, many of whom have wide panniers and other gear. As noted in the LAB comments I linked to above, these are among the bicyclists for whom narrowing of the space between rumble strips and the roadside is most critical and dangerous. The *worst* case is the one you have created just south of
Guadelupe Canyon, where the narrowest point -- the projecting rail along the side barrier -- is at pannier height, where a loaded bike is widest.

Please log this message as a formal complaint of hazardous road conditions, and as a request for corrective safety action. Please reply to confirm that you have done so. I want to be sure that, if nothing is done and someone is injured or killed, they will be readily able to discover that the dangerous conditions are known to the city of Brisbane, that you have received complaints and requests for action, and that any failure to act is not the consequence of ignorance or mistake but is a knowing and deliberate choice for which the city is responsible.

Please provide me with formal notice of your decision on this request for action, and of any available mechanisms for administrative appeal of any adverse decision or failure to act on this request.

Sincerely,

Edward Hasbrouck

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Edward Hasbrouck
<edward@hasbrouck.org>
<http://hasbrouck.org>
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+1-415-824-0214


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Attachments:
   H:\Documents\bike\rumble_strips.pdf