



EAST BAY BICYCLE COALITION

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August 22, 2010

Valerie Heusinkveld, Environmental Branch Chief
Caltrans, Office of Environmental Analysis MS 8B
111 Grand Ave
Oakland, CA 94612

attn: Oliver Iberien
submitted via email to: valerie_heusinkveld@dot.ca.gov

Re: Response by East Bay Bicycle Coalition to Niles Canyon Safety Improvement Project, Draft Environmental Impact Report/Environmental Assessment

Dear Ms. Heusinkveld:

East Bay Bicycle Coalition appreciates the opportunity to respond to the Draft EIR for this project, which involves an important bikeway. We have discussed the draft EIR with many of our members who bicycle on Niles Canyon Road and have encouraged our members to contribute to our blog on the project, which many have, some very appreciative of the proposed wider shoulders and some having serious concerns.

Niles Canyon Road is an extremely important bicycle route for the members of the East Bay Bicycle Coalition because it is the only direct bikeway between Fremont and Pleasanton. This route is on the Regional Bicycle Plan, adopted in 2006. For these reasons, our most important concern is the safety of cyclists. While we appreciate the proposed wider shoulders that cyclists can use and how they will add to safety and comfort by providing separation, we are extremely concerned about Caltrans' use of rumble strips and about the increased traffic speeds this project is going to generate. More needs to be done to ensure that the proposed rumble strips do not pose a safety risk to cyclists, and that prevailing speeds are going to be limited by the roadway's new design (rather than just signage), especially at narrow sections of the roadway.

Our ideal project would meet the following functional objectives that:

- Preserves the historic and scenic nature of Niles Canyon.
- Provides wide shoulders for a safe bikeway.
- Eliminates expressway-like features in the roadway design.
- Maintains the rural winding two lane feel of the road.

- Allows cyclists to properly position themselves early, predictably, and safely as they approach intersections, narrow structures, and as needed.
- Does not use rumble strips until they are proven safe for cyclists. Any proposed rumble strips should be designed in a way that they do not present a safety risk to cyclists.
- Provides early and effective communication to motorists that cyclists may be merging into the lane to cross, make left-turns and at narrow sections.
- Includes roadway geometry that eliminates seams in the direction of travel that can result in a cyclist diversion type fall.

Issues and Concerns

Our concerns reflect the needs of our membership based discussions over the past month.

- There is overall concern the project will yield expressway-like changes. With the proposed reconfiguration, speeds will increase to unacceptable levels and pose serious safety risks to cyclists. In addition, traffic may divert to Niles Canyon Road from I-680 with the changes, and create a more unpleasant and more challenging environment for cyclists;
- Rumble strips are a safety risk to cyclists. Rumble strips reduce the surface area that cyclists have to adequately control their bicycle, which increases the risk of fall, loss of control, and collision. Rumble strips also gather debris, which can become a secondary cause a crash. Special consideration should be given to cyclists using the roadway in evening hours, during wet and windy conditions, loaded with camping and commuting gear, with narrow high performance road bike tires, and being physically tired.
- Increase vehicle speeds are a huge concern. Cyclists need to be able to merge onto the road to get to their destination and to navigate intersections, bridges, and underpasses. Existing bridges are of particular concern because they do not have adequate shoulders. Cars need to be slowed down significantly prior to these ‘pinch points’ and ‘merge zones.’
- Niles Canyon (Route 84) is a winding two-lane, undivided, conventional state highway. It is these features that minimize motor traffic and help to direct high speed traffic to highway 680. The proposed straightening, and widening of the roadway jeopardizes its historic and scenic qualities.
- Noise is a concern. The construction of a total of 5.3K feet of upslope wall will reflect traffic noise back to cyclists.
- Traffic and Transportation/Pedestrian and Bicycle Facilities. We expect that cyclists will have the same level of access as motorist during construction.
- Figures 2.8b and beyond , page 2-22 and beyond of simulated images do not illustrate implementation of shoulder rumble strips nor cyclists using the roadway. We request that these images be updated so that the public can review the proposed rumble strip designs.

Recommendation:

1. First and foremost the historic and scenic nature of the Route 84 must be preserved. The conversion of Route 84 into express-like conditions is not desirable and creates unnecessary safety risks due to higher traffic speeds.
2. Eliminate the use of center rumble strip 500 feet prior to locations where lane-sharing and merging will potentially occur. This will accomplish two things: (1) it will narrow the road to match the upcoming narrow structures and it allows motorists to lane-share. It will also position the motorist slightly to the left in preparation to the narrower lanes.
3. Decrease traffic speeds to 25 mph prior to narrow roadway sections. This will allow for cyclists to safely merge with motor vehicles prior to entering the narrow roadway.
4. The roadway surface needs to be of the same material and quality edge to edge. Variances in roadway material will create a line of demarcation that can become a source of cyclist falls. This can occur when one material wears at a different rate, or has different road handling properties.
5. The entire width of the roadway needs to be regularly swept clear of debris, more so at the right side where debris collects. Cyclists generally ride on the right where debris collects. It collects there because cars sweep the roadway and pushed debris outward. What collects is broken glass, sticks, leaves, litter, and car parts that can cause flats, falls, and collisions.
6. Drainage grates need to be perpendicular to the line of travel, as per Caltrans standards, in order to prevent the grates from catching the wheel of a bike.
7. Similar to drainage grates above, seams on the right side of the road and in the direction of travel should be narrow enough as to not become a cause of a diversion type fall.
8. Signage that communicates the roadway narrows and watch for bicyclists be place at least 250' (two hundred fifty feet) in advance. This would include inside curves, outside curves, underpasses, and bridges.

Conclusion

East Bay Bicycle Coalition appreciates the new, wide shoulders on Niles Canyon Road, but has concerns about the speeds of traffic and the decrease in motorists' awareness of cyclists that results from increased speeds and expressway-like conditions. Thank you very much for considering our feedback and we look forward to discussing this project in more detail soon.

About East Bay Bicycle Coalition

East Bay Bicycle Coalition represents cycling members in Alameda and Contra Costa counties who have interest in equal and fair access to the roadway system. We work with agencies to recognize and implement preferred bicycle traffic engineering practices. The result is the bicycling public able and willing to properly ride their bicycle as a vehicle to their destination and to safely return home again.

Sincerely,

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

Dave Campbell
Program Director

cc: Ina Gerhard, ina_gerhard@dot.ca.gov
Website: ebbc.org