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January 11, 2017

Maureen Gardiner  
Associate Traffic Engineer  
San Diego Planning Department  
1010 Second Avenue, 11<sup>th</sup> Floor  
San Diego, CA 92101

**RE: Complete Boulevard Study**

Dear Maureen,

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to comment and respond to the final design concepts proposed through the Complete Boulevard Planning Study. We have been pleased to participate in the Study during the last two years, and we appreciate the effort Planning staff has put into the project, especially the numerous design alternatives studied.

The purpose of the Study is to “propose multi-modal mobility infrastructure improvements within the El Cajon Boulevard corridor between Highland Avenue and 50th Street...The mobility infrastructure improvements envisioned for the corridor are intended to help realize the transformative potential of the Rapid Bus service in Mid-City by creating a more walkable, bikeable, and transit-friendly street corridor.”

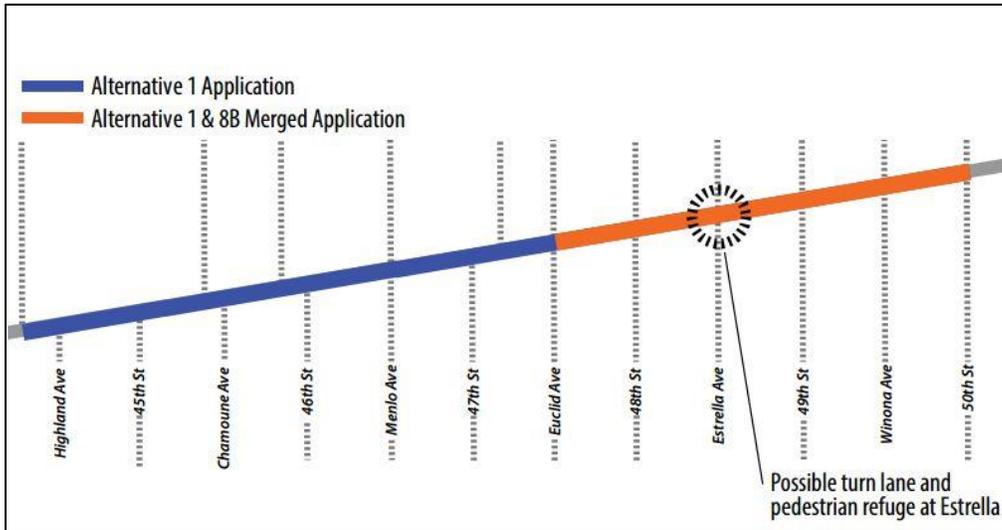
Circulate San Diego supports the improvements proposed in the Study to make walking safer along the corridor. These improvements include numerous curb extensions and new marked crosswalks. We also support the efforts to bring placeamking to the Little Saigon District through new monuments and cultural art. However, the proposed improvements exclude safe, connected bicycling facilities, and as a result will fail to reach the project’s stated goals. Further, the proposed improvements are incompatible with Vision Zero and Climate Action Plan goals adopted by the City of San Diego.

We at Circulate San Diego understand that achieving a balance of transportation modes is challenging, especially in urban built-out areas. The preferred Alternatives 1 Application, and 1 and 8b Merged Application (Preferred Alternative), improve pedestrian safety but put people who ride bicycles at risk for serious injury or death. We cannot support the Study as proposed. We do believe some of the alternatives studied are valid and urge the City to put these options back on the table for consideration.

**1. *The final design concept does not include safe bicycling facilities.***

After two years of planning and analysis of no fewer than 12 [design alternatives](#), the City proposes to move ahead with a hybrid of two previously defined alternatives. Specifically, the Proposed Alternative will provide:

- A new center median/ turn lane
- Improved sidewalks and pedestrian crossings
- Curb extensions at designated intersections
- A combination of sharrows for six blocks, and a Class II bicycle lane on the south side only of El Cajon Boulevard for five blocks



- a. *Shared Lane Markings (Sharrows) are NOT appropriate for a high speed and high volume corridor such as El Cajon Boulevard.*

The National Association of City Transportation Officials (NACTO), of which San Diego is a member agency, discusses sharrows in its design guidelines. *“The shared lane marking is a pavement marking with a variety of uses to support a complete bikeway network; it is not a facility type and should not be considered a substitute for bike lanes, cycle tracks, or other separation treatments where these types of facilities are otherwise warranted or space permits.”* Generally, according to NACTO, shared lane markings are not appropriate on streets that have a speed limit above 35 mph.

Additional research states, “The stress involved in lane sharing is difficult to measure objectively, but is unquestionably one of the main factors that influences bicycle use. If, for the sake of public health, a greener environment, less congested cities, and economy, cities want to make bicycling attractive to the mainstream population, as well as to reduce the incidence of dooring and other crashes involving right side hazards, it would be valuable to have a tool that reduces the stress involved in lane sharing.”<sup>1</sup>

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<sup>1</sup> Furth, Peter G., Daniel M. Dulaski, Dan Bergenthal, and Shannon Brown. *More Than Sharrows: Lane-Within-A-Lane Bicycle Priority Treatments in Three U.S. Cities*, Annual Meeting of the Transportation Research Board (2011), available at

Courts have begun to find cities liable for dangerous street design, when they are put to notice that a stretch of street is particularly dangerous.<sup>2</sup> The City of San Diego is already aware that El Cajon Boulevard is one of its most dangerous corridors.<sup>3</sup> San Diego can avoid future legal liability, and protect lives, by including design features on El Cajon Boulevard that meet established industry standards and provide reasonable efforts to protect bicycle safety.

- b. Where a Class II bike lane is a reasonable bicycling facility, the proposed design is severely limited and offers only a partial connection.

The Class II bike lane is proposed for (a) only five of the 11 study blocks, and (b) only on the south side of the street. The City has numerous policies clearly stating goals to improve bicycling connectivity, mobility, and safety. The offering of partial bicycling facilities does not accomplish these goals. Further, the hybrid approach has been advertised by City staff as a compromise, yet safety is not what should be compromised, especially on a Vision Zero corridor, where a significant number of injuries and deaths have occurred.

## **2. Alternatives 8b and 6 achieve the goals of the Complete Boulevard Study.**

Of the numerous alternative design concepts studied, we believe Alternatives 8b and 6 best achieve the goals of the Complete Boulevard Study for all modes.

- a. Alternative 8b maintains a connected bicycling facility.

Alternative 8b was one of the two preferred alternatives by the community. It improves safety for people walking and also maintains a connected Class II facility on both sides of El Cajon Boulevard. The viability of this alternative was diminished by merging with the Preferred Alternative thereby eliminating a proposed Class II facility on the north side of El Cajon Boulevard, and limiting bicycling facilities to sharrows for five blocks of the nine block study area.

- b. Alternative 6 maintains desired elements for all modes including on street parking, a connected facility for people bicycling, and safer crossings for people walking.

Alternative 6 requires the City to acquire right of way from private businesses and has been referred to as a long term solution only. Yet this alternative maintains parking, includes a connected, bicycling facility, and safer crossings for people walking. This option should be studied as a near term solution.

## **3. A protected bikeway should be considered for southern uphill section of El Cajon Boulevard.**

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<http://nacto.org/wp-content/uploads/2010/08/More-Than-Sharrows-Lane-Within-A-Lane-Bicycle-Priority-Treatments-in-Three-US-Cities.pdf>.

<sup>2</sup> Alissa Walker, Court finds bad street design liable in NYC crash, Curbed, January 6, 2017, available at <http://www.curbed.com/2017/1/6/14194154/nyc-vision-zero-street-design-urban-planning>.

<sup>3</sup> Circulate San Diego, Vision Zero Report (2015), available at <http://www.circulatesd.org/visionzerosd>.

The Preferred Alternative proposes a Class II bicycling facility. This section of the Boulevard is an uphill climb and should the City not consider Alternatives 8b or 6, a protected bikeway should be considered in this section as part of the Preferred Alternative.

Again we appreciate staff's efforts on this Study and we look forward to continued work to make San Diego's streets safe for everyone.

Sincerely,  
Kathleen Ferrier, AICP  
Director of Advocacy

CC: Georgette Gómez, Councilmember, District 9  
Jonathan Herrera, Director of Public Safety and Neighborhood Services, Office of Mayor Kevin Faulconer  
Eric Young, Community Representative, Office of Kevin Faulconer  
Linda Marabian, Deputy Director, Transportation and Stormwater Department