



MOTHERLODE BICYCLE COALITION

motherlodebike.org

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July 31, 2020

Eric Chin
Senior Transportation Engineer
Office of Project Initiation and Travel Forecasting
Caltrans District 10
1976 E. Dr. Martin Luther King Jr. Blvd.
Stockton, CA 95205

Dear Mr. Chin,

The Motherlode Bicycle Coalition (MLBC) seeks to support Calaveras County, the City of Angels Camp, and the Calaveras Council of Governments in realizing complete streets improvements identified in the San Andreas SR 49 Commercial Gateway and Corridor Study and the Angels Camp Main Street Plan. As you know, two ADA-mandated pedestrian improvement projects have been programmed into the 2020 SHOPP for SR 49 in San Andreas and Angels Camp. The Caltrans Director's Office has identified \$100M funding statewide for additional complete streets improvements for projects programmed in the 2020 SHOPP.

There are detailed complete streets corridor plans developed in partnership with Caltrans in place for SR 49 within the project limits of projects 1018000013 and 1018000277. These communities have documented the need for bike lanes, sidewalk infill and pedestrian paths, bulbouts, crosswalks, and pedestrian refuge islands to expand the use of active transportation on these routes that serve as their Main Streets. We encourage the District to seek to expand the scope of these projects to incorporate as many of these complete streets elements as feasible. We encourage Caltrans management and the CTC to support improving the livability of these rural communities and removing barriers to active transportation by programming additions identified by District 10.

After reviewing the 2020 SHOPP project lists, the MLBC has concerns about two pavement rehabilitation projects that would perpetuate rumble strips on highway segments with little to no shoulders on SR 108 and SR 88. These rumble strips, installed in the last two years, pose a hazard to cyclists by eliminating the option of riding safely to the right of the fog line. The installation of rumble strips that fail to follow "best practices" design standards force cyclists to ride in the travel lane on busy two-lane mountain highways. The installation of rumble strips must only be in locations with sufficient shoulder width and include gaps for cyclists to make predictable movements between the shoulder and travel lane. Substandard and hazardous rumble strips have been created in multiple locations throughout District 10. This practice must stop as it has made parts of the State Highway System essentially inaccessible for many bike travelers. As pavement rehabilitation projects are implemented, MLBC asks that these hazardous rumble strip locations are identified and corrected so they are removed without additional expense to the State.

Project 1012000002 proposes to reinstall edgeline rumble strips on AMA-88 PM R54.7/R60.8. The Project Initiation Report (PIR) states that SR 88 has 4'-8' shoulders on this segment (p. 12). If that were the case, the rumble strips would not be a concern, but the shoulders are actually less than four feet for much of the project alignment, including in areas with a/c dikes and where excess traction sand typically

accumulates on the pavement. We do not object to edgeline rumble strips where there is 4' of maintained and usable paved shoulder to the right of the fog line. Since SR 88 is plowed through the winter, it is available for cross-Sierra travel much earlier in the spring and later in the fall than the other trans-Sierra routes. This makes it an essential route for bike tourists. The Adventure Cycling Association (ACA) has included this segment of SR 88 on their Western Express bike touring route for many years. Much of the project alignment is also proposed for inclusion in US Bike Route 50. The assertion in the PIR that there is minimal use of SR 88 by bicyclists is incorrect. I have attached a March 23, 2017 letter from the ACA in response to project 10-1C430 which demonstrates that the assertion in the PIR that there were no public concerns regarding installing rumble strips on this segment is incorrect.

The PID for project 1013000266 was completed in June 2016, so it doesn't address the more recently installed rumble strips from the end of the Long Barn four-lane segment to just west of Herring Creek Road, and it doesn't have a substantive discussion of complete streets. Excepting wider shoulders at the approaches to intersecting roads and pullouts, this segment has little to no paved shoulder and several areas with excavated rock or guardrail directly adjacent to the edge of pavement. This segment of highway is near Pinecrest Lake and draws many bicyclists among the visitors and locals drawn to recreate in the area. These rumble strips are clearly hazardous to cyclists and should not be perpetuated. Limited complete streets improvements that could be made in association with this project would be to widen shoulders and cut back the rock outcroppings that obscure line of sight on the westbound lane in the vicinity of PM 24.7 east of Little Sweden (photo attached).

The MLBC objects to perpetuating rumble strips that do not allow for bicyclists' safe use of shoulders on State highways where bicycles are permitted. We do appreciate the value of rumble strips for reducing cross center line and run off the road collisions, but we also note that the inability of bicyclists to utilize shoulders adversely affects driver safety as well as that of cyclists. In the two locations noted, we question whether winter season collisions on these highways serving ski resorts are skewing the statistics for these collision types. Rumble strips would be of little use under snow and ice conditions.

The MLBC is willing and committed to working with Caltrans on making the State Highway System in District 10 safer for all modes of travel and more accessible for active transportation. We would appreciate being notified of opportunities to partner with District 10 on implementation of complete streets.

Respectfully,



Jack Becker, Executive Director
Motherlode Bicycle Coalition

Cc: Dave Snyder, Executive Director, California Bicycle Coalition
Ginny Sullivan, Travel Initiatives, Adventure Cycling Association
Melissa Eads, City Administrator, Angels Camp
Joshua Pack, Public Works Director, Calaveras County
Amber Collins, Executive Director, Calaveras County of Governments

Attachments:

Photo of PM 24.7 east of Little Sweden
Adventure Cycling Association letter responding to project 10-1C430

Photo of PM 24.7 east of Little Sweden





Adventure Cycling Association

March 23, 2017

To: Caltrans District 10 & District 6
Attention: Carl Baker, Austin Sos & Tarek A Chowdhury

Re: EA 10 1C430 Rumble Strip Project in Amador and Alpine Counties

I am submitting comments on behalf of Adventure Cycling Association and our 52,000 members in regard to the Caltrans District 10 draft project that will install rumble strips on highways 16, 49, 88 and 104 in Amador and Alpine Counties.

Adventure Cycling inspires and empowers people to travel by bicycle and is the largest cycling membership nonprofit in North America. We run over 100 bicycle tours in the U.S. and Canada and have over 45,000 mapped miles of bicycle routes. We also coordinate the [U.S. Bicycle Route System](#) on behalf of [AASHTO](#).

We appreciate Caltrans' interest in working with the cycling community, and thank you for soliciting our input. Adventure Cycling recognizes rumble strips as a ROR deterrent for motor vehicles; however, they often have a detrimental effect on cyclists' safety, mobility, and comfort. We know that Director Dougherty's focus on providing a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability includes making sure that cyclists are accommodated.

Adventure Cycling's [Western Express](#) bicycle route currently uses SR 88 from Shake Ridge Road (just north of Barton on the vicinity map) all the way to Woodfords where we divert off of SR 88. This is 53.5 miles. Amador County Board of Supervisors is considering designation of U.S. Bicycle Route 50 (USBR 50) using more of SR 88, from the intersection of SR 104/124 (south of lone) to Woodfords. This is 85 miles. Based on the overview map, almost all of SR 88 are proposed to have either edgeline rumble strips or **both** centerline and edgeline rumble strips.

As publishers of the Western Express bicycle route maps and coordinators of the U.S. Bicycle Route System (USBRs), we strongly object to the proposed rumble installation, **specifically to the section which will affect the Western Express and proposed USBR 50**. Installing rumble strips on a narrow highway will require cyclists to share the lane with motor vehicles. This will not accommodate cyclists safely, especially with high speed traffic moving at 65 mph or higher. Therefore, we respectfully urge Caltrans District 10 to **NOT install any rumble strips** on SR 88 from the SR124 intersection (lone) to Woodfords in order to provide a continuous route that

Adventure Cycling Association

A member-supported nonprofit organization, inspiring and empowering people to travel by bicycle.

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connects cyclists from San Francisco to Lake Tahoe and beyond (see more information about USBR 50 below).

In addition, we are particularly concerned about the following aspects of the project and have proposed recommendations for accommodating cyclists on all other affected highways:

- Adventure Cycling strongly opposes the installation of both centerline and edgeline rumble strips as we feel it will have a negative and dangerous impact on cyclists using these highways. Your data shows most ROR crashes are due to speed. Can enforcement be part of the solution?
- As the draft project reports states, many of the highways identified in the project have “substandard shoulder widths” which “may inhibit bicycle use” therefore, our recommendations for District 10 include:
 - 1) Improve highways to consistently provide 5 foot shoulder in order to accommodate cyclists and motorists safely; and if this is not feasible in the near term, then
 - 2) Narrow the travel lane width from 12 to 10 feet on the sections of roadway that are planned for edgeline rumble strips to provide a minimal shoulder for the cyclist to use in case of on-coming traffic.
- Assurance that Caltrans District 10 will observe installation of the rumble strips so the contractor follows the design placement correctly. In our experience, contractors are known to install rumble strips without due diligence or consideration to the planning effort. In particular, Caltrans should observe that the edgeline rumble strip are correctly placed on the fogline and at a depth of no greater than 5/16 inches and that there is a discontinuation of rumbles at intersections and driveways.

Adding the centerline rumble strip can be a disincentive for motorists to cross the centerline to pass a cyclist. A report by Wayne State University, [*Impact of Non-freeway Rumble Strips Phase I*](#), was prepared in 2012 for the Michigan Department of Transportation. This study recommends further study on how centerline rumble strips affect motorists’ behavior while passing cyclists. Very little information on motorist/cyclist behavior is known in terms of centerline rumble strips. Without this research, Caltrans will be placing a vulnerable road user in the path of motorized vehicles, often with short sightlines (curves) and varying terrain (climbs) without understanding the full safety implications.

According to Caltrans Guidance on [*Installing Rumble Strips, Traffic Operations Policy Directive \(11-04\)*](#) under IMPLEMENTATION Section A: Alignment: “Consideration should be given for bicyclists when installing this treatment in narrow shoulder areas or in conjunction with centerline rumble strip treatments. Inclusion of pull out locations, widening of shoulders, installation of signing and other treatments should be considered to accommodate bicycles.”

In addition, [FHWA Technical Advisory 5040.40](#) 6.d states, “When applying shoulder and center line rumble strips in combination, consideration should be given to total pavement width to determine how to best accommodate and serve all road users, particularly in no passing zones where drivers may be reluctant to cross the center line to pass a bicyclist.”

The addition of rumble strips without adequate regard to safely accommodating cyclists also would impact the viability of this route to become part of the U.S. Bicycle Route System. For the past several months, Adventure Cycling members, working as volunteers, have reached out to Caltrans and local jurisdictions to gain support and approval for the many U.S. Bicycle Routes that go through the state. USBR 50 follows the Western Express through California and links cross country through destinations like Reno, Salt Lake City, Kansas City, St. Louis, Indianapolis, Dayton, Pittsburgh, and Washington, D.C. Presently, this route has been designated through four states (DC, MD, OH, IN) and we expect two more states to designate this May (PA, WV). The momentum for this route is strong. Nevada has been working on designation for the past two years. For more information on the USBRS, see our [FAQ for Planners](#).

The development of official and recognized bicycle routes, like USBR 50, brings substantial economic impacts to many states and communities across the country. Bicycle routes that safely accommodate cyclists are particularly instrumental in drawing bicycle travelers. Bicycle tourism brings in over \$377 million to [Montana](#), about \$400 million to [Oregon](#), and \$535 million to [Wisconsin](#) each year. Designation of USBR 50 is a huge opportunity for this rural area of California to develop its bicycle tourism market and experience similar economic benefits.

The draft California bicycle and pedestrian plan, [Toward an Active California](#), employs six strategies: 1) Improve multimodal mobility and accessibility to all; 2) Preserve the multimodal systems; 3) Support a vibrant economy; 4) Improve public safety and security; 5) Foster livable and healthy communities and promote social equity; 6) Practice environmental stewardship. This project will severely inhibit Caltrans ability to meet these tenants, especially preserve the multimodal systems, support a vibrant economy and foster livable and healthy communities. Caltrans District 10 installation of rumble strips will have a long-lasting effect on these important principles. Thank you for your attention and please do not hesitate to contact us with questions.

Sincerely,

A handwritten signature in cursive script that reads "Ginny Sullivan".

Ginny Sullivan

Director of Travel Initiatives

gusullivan@adventurecycling.org

406-532-2769

cc: Amador Board of Supervisors

Dave Snyder, California Bicycle Coalition

Jim Baross, Caltrans Bicycle Advisory Committee

Rob Williams, Motherlode Bicycle Coalition