

July 25, 2014



John Rodriguez, Interim Director
Stuart Mori, Associate Transportation Planner
Gary Arnold, Transportation Corridor Planning Manager
Caltrans District 3
703 B Street
Marysville, CA 95901

RE: Comments on Caltrans Complete Streets Implementation Plan (CSIP)

Mr. Rodriguez, Mr. Mori, and Mr. Arnold:

The Lake Tahoe Sustainability Collaborative (LTSC) Community Mobility (CM) Workgroup appreciates this opportunity to submit comments to Caltrans on the Complete Streets Implementation Plan. LTSC includes over 120 volunteers living, working, and recreating in the Lake Tahoe-Truckee region. Our mission is to sustain a citizen-based effort to accelerate a shift toward a healthier Tahoe-Truckee community, environment, and economy. The Community Mobility Workgroup is comprised of over 25 residents and representatives of organizations, jurisdictions, and agencies working together to improve bicycle and pedestrian safety, accessibility, and mobility.

We support Caltrans efforts to undertake a complete streets visioning plan. It very much complements Tahoe's current approach and we welcome the opportunity to talk more and share ideas. We do have some concerns and questions about the proposed plan, as outlined in our comments below. Overall, we do not believe that Caltrans is following through on the principles, concepts, and intent contained in the CSIP. Just adding Class II bike lanes to a highway is not a complete street; and the segments included in CSIP are not inclusive or connected. There are a number of local plans for complete streets, and aspects of complete streets, which Caltrans did not review or include in the CSIP. We do not feel that there was extensive public outreach conducted while developing the CSIP. As a result, there are a number Caltrans projects underway which not only preclude aspects of complete streets, but in some cases Caltrans is actively and consciously opposing requests for complete streets and aspects of them. Prime examples of this are the Camp Richardson area (SR-89), Meyers to the Y (US-50/SR-89), and Trout Creek to the Y (US-50). Our comments below are more specific.

South Lake Tahoe offers a perfect example of how complete streets concepts can meet multiple transportation goals, but current projects miss the opportunity to make improvements that complement local actions. We believe it is possible to integrate quite a few of the complete streets concepts outlined in the Caltrans plan into some of Tahoe's current projects in an easy, cost effective manner.

Framing Comments

1. On page 9, in the Introduction under "Purpose and Need," the Plan states that the CSIP "identifies a **vision** and framework for complete streets improvements on the State Highway System (SHS) that facilitates livable communities."
 - a. **We read this to mean that even if a project cannot be implemented in the next 5-10 years, the CSIP is intended to create the vision for the future. Thus, the Plan should be ambitious and inclusive.**

2. On page 10, in the Introduction under “Background,” the Plan states “Complete Street concepts apply to all roadways in all contexts, including rural, suburban, and urban areas.” Further, the background states that “Complete Streets benefit communities of all sizes, especially in small towns in rural areas. Rural towns have more automobile traffic collisions, while urban areas have more pedestrian and bicyclist traffic collisions. Small towns in rural areas have more seniors and low income populations that are less likely to have a car or drive.”
 - a. **South Lake Tahoe and Kings Beach are rural, disadvantaged communities (based on Median Household Income) and should be given priority for complete streets planning and implementation. Further, we are a rural MPO so do not have access to the ATP funds set aside for MPOs with populations over 200,000, even though we have that many visitors straining our existing infrastructure and demanding bicycle and pedestrian access.**

3. On page 12 under “Stakeholder Participation,” the Plan claims that “Caltrans coordinated with various stakeholders throughout the development of the D3-CSIP. “
 - a. We did not hear of this plan until it was released, and then only through our local MPO. **Can you please explain how you reached out to stakeholders in the Lake Tahoe region, which stakeholders you reached out to and when? In particular, how did you reach out to local jurisdictions and agencies, community groups, and disadvantaged communities? We would be happy to collaborate more with you in the future. The CM workgroup has broad representation from numerous bike and transportation agencies and NGO’s in the Basin.**

4. On page 6 under “Recommended Complete Streets” and on page 22 under “Recommended Complete Streets List and Methodology” the Plan states that “Priority is given to ensuring consistency with city or county general plans, complete street plans, bicycle plans, pedestrian plans, active transportation plans, and safe routes to school plans, unless the local proposal is inconsistent with the allowable use of the SHS, because of safety considerations, environmental conditions, ROW limitations, financial conditions, maintenance considerations, or other factors.”
 - a. On Table ES1: Recommended Complete Streets Facilities, there is no mention of:
 - i. The “Caltrans District 3 State Highway Bicycle Facility Plan”¹ from June 2013, which includes Class II’s (50/89 by airport, Trout Creek to the Y, and Camp Richardson to Visitor Center Blvd).
 - ii. The existing TRPA/TMPO “Lake Tahoe Bicycle and Pedestrian Plan”² which includes many existing and proposed bicycle and pedestrian facilities which are integral aspects of complete streets.
 - iii. The existing “Tourist Core Area Plan,”³ which includes many existing and proposed bicycle and pedestrian facilities, which are integral aspects of complete streets.
 - iv. Existing USDA Forest Service “Camp Richardson Resort Campground and Vehicle Circulation BMP Retrofit,”⁴ which includes relocated parking, realigned bicycle and pedestrian routes and facilities, and other projects and plans, which would facilitate complete streets.
 - v. *The released draft “Tahoe Valley Area Plan,”⁵ which includes many existing and proposed bicycle and pedestrian facilities, which are integral aspects of complete streets.*

¹ http://www.dot.ca.gov/dist3/departments/planning/bike/D3SHBFP_June2013.pdf

² http://www.tahoemp.org/bike_plan.aspx

³ <http://www.cityofslt.us/index.aspx?nid=720>

⁴ http://www.fs.usda.gov/detail/lbmu/landmanagement/?cid=fsm9_046806

⁵ <http://www.cityofslt.us/index.aspx?NID=734>

- vi. *The under-development Safe Routes to School plan and On Our Way funded engineering and design for the South Tahoe Middle School, which borders US Highway 50.*⁶
 - vii. *The City of South Lake plans for complete streets on Sierra Boulevard, which intersects US Highway 50.*
- b. Because the CSIP is in draft form, there is still time to incorporate the latter three plans and the complete streets aspects of these plans, including the proposed sidewalks and bicycle routes.**
5. On page 21 under “Complete Intersections,” the Plan states “It is important that motorists, pedestrians, and bicyclists be able to see one another approaching, and to not have their sight distance blocked by parked vehicles, trees, and transit vehicles at intersections. The following guiding principles summarize common considerations.
- a. **Can you please explain how Caltrans used the principles listed in the Plan to evaluate key intersections around Lake Tahoe? In particular the principle of “Slow it Down” as it relates to the Y (US-50/SR-89), Pioneer Trail and US Highway 50, the intersections and egresses throughout the Camp Richardson area, and key signalized intersections with US Highway 50 such as Keys Blvd, Sierra Blvd (City of South Lake Tahoe is planning on making Sierra Blvd a complete street), Al Tahoe Blvd. (target of Safe Routes to School Planning), and Ski Run Blvd.**
 - b. **Traffic calming is a key aspect of complete streets. Can you please explain how you evaluated and considered “slowing it down” and “improving visibility” – particularly at intersections and egresses -- throughout South Lake vicinity, using techniques such as narrower lanes, crosswalks, raised crosswalks, pedestrian and bicycle activated signals, etc.? Bishop, Bridgeport, and Lee Vining are examples of successful traffic calming in similar situations, as is “the Grid” in Kings Beach, North Lake Tahoe, Caltrans District 3.**

Specific Comments

6. We appreciate Caltrans’ recommendation on page 23 to conduct “69 SHS complete street segments to be included in future fiscally constrained planning documents, such as TCRs, CSMPs, and corridor studies. This list is intended for future prioritization and inclusion in fiscally constrained planning documents. Caltrans will use these documents to form the basis for capital improvements.”

Unfortunately, the segments included in the Plan are incomplete, unconnected, and not inclusive as follows:

7. Pg. 53: Tahoe Basin, TAH (ED) 50, 70.021/71.47, TCR 17: US-50 from Town Center Area, which includes Meyers Community Center District and portions of Upper Truckee Residential/Tourism District, Meyers.
- a. The Class I route is inaccessible seasonally due to snow, impacting local businesses and residents. **Can Caltrans make an effort to not pile snow on the Class I when conducting snow removal?**
 - b. **We have heard that Caltrans is installing/stripping Class II facilities through Meyers this summer, which should be included in this Plan.**
8. Pg. 54: Tahoe Basin, TAH (ED) 50, 75.446/78.887, TCR 18: US-50 from Emerald Bay Road (SR-89) to Fairway Drive, South Lake Tahoe.

⁶ <http://sustainabilitycollaborative.org/how-we-work/community-mobility-cm/>

- a. **The shoulder lane (fog lines) is not sufficiently striped as Class II and the shoulders are in disrepair to the point of creating very unsafe conditions for bicyclists between the “Y” and Trout Creek. The Trout Creek to Fairway section of this corridor has bike lane and sidewalk improvements. Sidewalks are nonexistent, inconsistent, and unconnected. Complete streets should not be narrow bike lanes on a wide, busy, fast highway; there must also be sidewalks, Highway crossings, traffic calming, and visibility improvements. Further, we have heard that Caltrans is backing away from its plans to install sidewalks and Class II lanes as part of permitted water quality improvements in this area. This is a very high priority for us as the current conditions are unsafe – especially at nighttime. Will Caltrans be implementing aspects of its complete streets plans and vision throughout this area and what is the current timeline for these improvements?**
9. Pg. 54: Tahoe Basin, TAH (ED) 89, 8.57/11.772, TCR 2-3: US-50/SR-89 to Visitor Center Blvd, South Lake Tahoe.
- a. This area is included in the maps and tables in the Plan, and Class II bike lanes are recommended. Class II bike lanes would be extremely helpful here, as the existing Class I next to the road is overcrowded and dangerous. As such, many bikers chose to ride on the road. Unfortunately, Caltrans staff told us that they do not plan on installing Class II lanes this year and next -- when permitted work is already being implemented. Instead Caltrans will simply stripe the shoulders, which will be wide enough for bike lanes, but will not designate them as such. Furthermore, the current plan is to widen the road to continue to allow shoulder parking —despite the fact that the Forest Service has plans for off street parking lots that would eliminate the need for on street parking. The USFS plans for off street parking areas should be referenced and incorporated in the CSIP and Caltrans should consider not installing the on-street/shoulder parking, because **with just a 4’ shoulder and roadside parking allowed there will always be parked cars on the shoulder pushing cyclists and pedestrians into the roadway. This is a dangerous situation with the amount of use the road receives. Can you please explain why the Class II lanes are not being installed and why the CSIP does not consider Forest Service plan and actions?**

Omissions and disconnects:

10. There are many businesses, residents, recreation, lodging, and services south of the Y (US-50/SR-89), yet the conceptual complete street segments in and around South Lake Tahoe do not include this area. The neighbors on either side of US-50 here south of the Y are very low income. Some households do not have cars and many can be seen walking or biking home from the grocery stores with heavy bags – darting across US-50. Additionally, there are several people with motorized wheelchairs that are often seen along the sidewalk. Caltrans has installed some nice sidewalks, which has helped, however there needs to be a safer way to cross at B or D street before there is a serious accident. In addition:
- a. **Our understanding was that there were to be Class II lanes between the Y and E Street.** It appears that construction is complete, the shoulders are wide enough and yet they have not been marked yet as bike lanes. This is a stretch of highway notorious for speeding and anything to alert drivers to bikes here would be very useful.
 - b. **Please add a conceptual complete street segment from the Y south to E Street and include plans for addressing the principles listed in the “Complete Intersections” section and elsewhere in the CSIP, especially slowing traffic and improving visibility.**
 - i. **Options to consider include, especially approaching and at D Street: raised crosswalks (proven to not impact snow removal), brightly colored paint to make**

**crosswalks more visible (allowed by the state manual, Lahontan, and TRPA),
rumble strips, green painted bike lanes and bike boxes, etc.**

11. Effective and true complete streets cannot stand alone, without connection to other complete streets or bicycle and pedestrian facilities.
 - a. Between the conceptual complete streets segments in Meyers and the Y, Caltrans is currently redoing the road and widening it but not installing/striping Class II bicycle lanes along US-50 – making it very difficult for bicyclists to get from Meyers to the Y safely. The shoulders become narrow, unmarked, and unsafe in sections, particularly near the airport. This is yet again another opportunity to easily support the complete streets approach with the least cost and interference. **Can you please explain why bicycle lanes were not completed throughout this section and when they will be added? Not only is this section is a very serious safety concern, but it greatly diminishes the effectiveness and the intent of complete streets.**

Comments on “Summary of Actions,” pg. 75:
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Planning Actions

12. Caltrans and local agencies will maintain proactive communication and collaborative complete street planning.
 - a. **We are not aware of Caltrans efforts to reach out to community groups or relevant agencies regarding plans to not complete Class II lanes and sidewalks from Trout Creek to the Y.**
 - b. **In order to facilitate a collaborative relationship, we encourage Caltrans to work with the Forest Service on the Camp Richardson area.**
13. Caltrans will consult local planning documents when updating this plan to coordinate complete street improvements.
 - a. **We recommend that Caltrans consider inclusion of the plans listed on page 2 of these comments. Because the CSIP is in draft form, complete streets aspects of these plans (even the latter three under development), should be included.**

Programming Actions

14. Caltrans will work with local agencies in developing regional transportation plans and on projects on the SHS.
 - a. **We greatly support this programming action, however would like to see more evidence of Caltrans’ efforts to implement this intention. We encourage Caltrans to support and work with TRPA/TMPO to incorporate aspects of the Lake Tahoe Bicycle and Pedestrian Plan into the CSIP.**

Project Development Actions

15. Caltrans will maintain the complete street scope through the environmental, project delivery, and construction phases.
 - a. **Caltrans did not consider complete streets options in its environmental review (EIR/EIS) for the Camp Richardson area and is now using the EIR/EIS as a reason to not implement Class**

II bike lanes there (even though the shoulder will be wide enough) and to not work with the Forest Service to eliminate shoulder parking (even though USFS has plans to create several new parking lots in the area – in order to eliminate the shoulder parking). A Negative Declaration or simple Mitigated Neg. Dec. to allow for marked bike lanes would be a simple fix. While Caltrans staff has told us they can revisit those decisions in a year or so after the project is complete, in the interest of saving time and money, we encourage Caltrans to consider marking these Class II bike lanes now.

16. Caltrans will give high priority to overlaying the entire traveled way and paved shoulders, where feasible, when implementing new highway construction and major maintenance projects at locations on the SHS where this plan recommends complete street improvements, and Caltrans roadway rehabilitation projects will be scoped to take into consideration recommended complete street improvements in this plan.
 - a. **We strongly recommend that Caltrans maintain their intention to install sidewalks and Class II lanes between Trout Creek and the Y, consider bike lanes and eliminating shoulder parking throughout the Camp Richardson area, and fully connect Meyers and the Y with Class II lanes.**

Other Comments and requests from the South Lake Tahoe community:

17. Bicycle and pedestrian improvements *are* water quality improvements because they reduce the number of cars on the road and reduce runoff. Co-benefits include noise reduction and air quality improvements.
18. For South Lake Tahoe, expand the area of proposed corridors slated to receive complete streets improvements, including the section of 89 south from the Y until at least the intersection of F Street.
19. For all Tahoe areas proposed to receive complete streets improvements, where Class II bike lanes are recommended in the Draft Plan, consider building on-street protected bike lanes, with a physical barrier (curb, planters, etc.) to separate cyclists from motorists.
20. For all Tahoe areas within the commercial/residential areas, add or improve sidewalks to provide safety for pedestrians from automobile traffic and cyclists.
21. For high-traffic intersections, consider additional protection of cyclists and pedestrians by including the use of [protected intersections](#).
22. Currently, there is a safety issue where cyclists in South Lake Tahoe frequently ride in the shoulder bike lane in the direction against traffic – often because they cannot safely cross US-50. Better education could help reduce this behavior, but better design would do even more: make crossing 50 and 89 easier for cyclists to reduce the perceived need for some cyclists to save time by riding against traffic; painted markings and installed signage could warn beginner cyclists about the risk of wrong-way riding and direct them to the opposite side of the roadway; etc.

In Summary, we encourage Caltrans to review the intent and principles of complete streets and highlight the importance of complete streets to rural, disadvantaged communities such as Lake Tahoe. We want to emphasize that installing Class II lanes is important, but does not constitute “complete streets.” We hope Caltrans will recognize in the CSIP that sidewalks, traffic calming, and increasing visibility are key aspects of complete streets. Many of these aspects are included in existing and emerging plans for the Tahoe region.

Specifically, we ask Caltrans to include the plans listed above and incorporate complete streets aspects into the CSIP. We strongly encourage Caltrans to work with the Tahoe Regional Planning Agency/Tahoe MPO and the USDA Forest service to complementary implement the CSIP, Regional Plan and Area Plans, and Camp Richardson. Between the Y and Camp Richardson, the southernmost section is a 4-lane highway, which we would like to see prioritized for Class II lanes.

We would also like to emphasize the importance of connectivity and completeness. Complete streets segments should be connected, at least with Class II bicycle routes. In particular, we ask that Caltrans install/tripe Class II lanes *continuously* between Meyers and the Y and between the Y and Trout Creek. We also very strongly encourage Caltrans to include US Highway 50 south to E Street as a complete streets segment. Narrowing the vehicle lanes to accommodate bicycle lanes could also result in reducing speeds along these road segments, which, as you have may have heard when the legal speed limits were increased in Meyers and South Lake Tahoe, is a major concern of local residents.

Thank you for your consideration of our comments on the Caltrans Complete Streets Implementation Plan. We look forward to working collaboratively to improve the safety and mobility for cyclists and pedestrians in and around Lake Tahoe. Please contact us if you have any questions or response to our comments.

Sincerely,

Community Mobility Workgroup of the Lake Tahoe Sustainability Collaborative
Gavin Feiger, Co-Chair | gavin@sierranevadaalliance.org | 530-542-4546 x702
Rebecca Bryson, Co-Chair | rebeccabryson27@yahoo.com | 510-469-4320

CC: Brian Judge, Tahoe Regional Planning Agency
Karen Fink, Tahoe Regional Planning Agency
Jim Marino, City of South Lake Tahoe
Ray Jarvis, City of South Lake Tahoe
Nancy Kerry, City of South Lake Tahoe
John Hitchcock, City of South Lake Tahoe
Brendan Ferry, El Dorado County
Garrett Villanueva, USDA Forest Service
Steve Teshara, SCA, TTD, SSTMA