



Metropolitan Transit System

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November 9, 2016

Ms. Lara Gates  
City of San Diego  
Planning Department  
1010 Second Avenue, 11th Floor  
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Dear Lara:

**SUBJECT: EL CAJON BOULEVARD CORRIDOR COMPLETE STREETS PROJECT**

Thank you for allowing MTS the opportunity to review the fourteen alternatives presented for the El Cajon Boulevard Complete Streets Project. As every MTS passenger is also a pedestrian at some point during their journey, pedestrian safety is a top priority for MTS and we support the City's initiatives to improve infrastructure for non-vehicular traffic.

The El Cajon Boulevard corridor itself is an important element of the transit network in San Diego, travelling through some of the most transit-dense neighborhoods in the region, providing a link between communities, and bridging connections in Downtown San Diego and Hillcrest on the west and the College Area and San Diego State University on the east. The importance of this corridor was solidified through the very significant \$44 million Mid-City Rapid regional transit investment that improved the quality of transit and reduced transit travel times along El Cajon Boulevard

Overall, MTS is disappointed that none of the fourteen alternatives proposed includes bus-only lanes. The Mid-City Rapid project originally included bus-only lanes along portions of El Cajon Blvd, to achieve true transit priority. These weren't implemented, primarily due to concerns about parking losses and reduced traffic capacity, yet some of the alternatives here propose removing parking and/or reducing roadway capacity.

Twelve alternatives propose largely maintaining the status quo for transit capacity, with buses in four general purpose lanes, subject to the congestion and delays caused by auto traffic. One alternative proposes combining buses in a single lane with much slower moving bicycles. The last alternative sharply reduces capacity while offering no priority for buses. Out of all of the proposed alternatives, regrettably the best possible outcome for transit riders is to maintain the current lane capacity configuration, which will deteriorate service quality over time as general traffic levels increase.



MTS staff reviewed all of the fourteen alternatives to provide the City with specific feedback on each, with consideration of these objectives:

- Improve safety for pedestrians, transit riders, and other users of alternative transportation
- Maintain safe operation of buses and interaction with other roadway users
- Leverage the significant regional transit investment in the corridor by improving the quality of service and reducing transit travel times

Alternatives noted as “acceptable” are determined to be no worse than the current configuration. Other than separate bicycle facilities that will remove conflict between bicycles and traffic (including buses) in some alternative, none appear to measurably improve transit travel times or reliability.

**Alternative 1:** This alternative is acceptable to MTS. It appears to improve pedestrian safety with median refuges and bulb outs, without additionally challenging transit operations. Note that corner bulb outs must either be eliminated on corners with bus stops, or be extended to include the bus stop (“bus bulb”).

**Alternative 2:** MTS would not support angled parking next to the travel lane with high frequency and/or Rapid bus service. Angled parking (versus parallel parking) increases the density of curbside parking, so delays posed by parking vehicles and the potential for auto-bus conflicts make this feature unsuitable for the corridor.

**Alternative 3:** MTS is neutral on this alternative, as it does not appear to significantly impact or improve bus operations.

**Alternative 4:** This alternative does not appear to impact bus operations, but MTS would be concerned about sudden lane changes from the number one lane into the buses’ travel path by through-moving autos avoiding stopped left-turning cars.

**Alternatives 5/5A, 6, 7:** These would likely be MTS’ preferred alternatives out of those presented. The separation of modes provides the additional safety for active transportation users, while keeping bus traffic with other vehicles moving at similar speed. MTS assumes that the cycle track would be routed behind bus stops at the platform areas to avoid bus and bicycle weaving. MTS prefers the 12’ righthand lanes shown in Alternative 6, versus the 11’ lanes in the other alternatives, as 11’ would be considered a bare minimum for safe and efficient bus travel.

**Alternative 8:** MTS notes that this alternative does not provide for separation of bicycle and vehicle traffic in one direction, so there is no improvement in safety for that direction of bicycle traffic. In the other direction, it provides only a standard bike lane, without a buffer and no cycle track.

**Alternative 8A:** This is a modest improvement over Alternative 8 in that it offers bicycles a separate lane from vehicle traffic in both directions. MTS would support this over existing conditions, although inclusion of a buffer separating bicycles from bus and other traffic would be preferable.

**Alternative 8B:** MTS would not support this alternative because it reduces the bus travel lane to 10' which is too narrow. Note that bus bodies are 8.5' wide, with mirrors adding another approximately 10"-12" on each side, making the bus effectively 10.5' wide.

**Alternative 9:** MTS would not support this alternative because it could have a substantial impact on transit travel times, on-time performance, and reliability. It potentially reduces the quality of transit service for thousands of riders per day through the corridor in favor of the preservation of a handful of on-street parking spaces during off-peak times.

**Alternative 10:** MTS would not support this alternative because it does not provide for separation of bicycle and vehicle traffic. This represents only a token improvement in safety for bicycle traffic (by removing general traffic from the right lane), and reduces the quality of transit service for thousands of riders per day through the corridor.

**Alternative 11:** MTS would not support this alternative because: 1) it reduces vehicle capacity by 50% while providing no priority over buses. This is a substantial reduction in performance, and would significantly impact transit travel times, on-time performance, and reliability. It reduces the quality of transit service for thousands of riders per day through the corridor in favor of the preservation of a small number of on-street parking spaces.

Please note the following general MTS comments applicable to all alternatives:

- For any scenario that proposes shifting lanes:
  - This may require some significant modifications to the station and signaling infrastructure built for Mid-City Rapid. This could include station shelters and their foundations, transit signal priority (TSP) receivers on signal heads, and fiber/electrical connections.
  - Moving bus travel lanes closer to the edges of the roadway may create conflicts with vertical obstructions such as overhanging trees and signage. It may also put buses closer to obstacles such as storm drains, gutter pans, and other drainage elements that could damage buses.
- The ADA requires an 8' deep sidewalk at the boarding area of a bus stop. For alternatives with narrower sidewalk options and right-of-way acquisition requirements, the need for additional space to accommodate this should be considered.

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- To expand on the shared bus-bike lanes suggested in Alternative 10, MTS notes that buses and bicycles are substantially different in nearly every way, including weight, size, speed, and operation. Combining them in one lane may be efficient for economizing space, but it creates conflicts that frustrate cyclists and inevitably delay buses.

Buses would only be able to travel as fast as the slowest bicycle occupying the shared lane. Passing by buses is only recommended by buses using the adjacent general purpose lane, already more congested due to the 50% reduction in lane capacity. (Note that the City is also implementing a road diet and traffic calming measures on parallel University Avenue, which may divert even more traffic to El Cajon Boulevard)

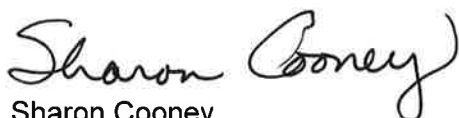
The National Association of City Transportation Officials (NACTO) has issued guidelines for "Shared Bus-Bike Lanes" in its Transit Street Design Guide that do not recommend such lanes on streets operating above 20 miles per hour. It notes that shared bus-bike lanes are not "high-comfort bike facilities" and are also inappropriate for streets with high bus volumes.

It is critical that sufficient road space be allocated for both bicycle and bus infrastructure; MTS cannot recommend mixing bus traffic with bicycles when many other operationally superior alternatives exist.

- MTS' responses to each alternative above are general and do not yet address specific bus stops, intersection treatments, and other facilities. We request that the City continue to engage MTS while narrowing the alternatives, and during the design, engineering, and construction phases of any resulting project.

Thank you again for the opportunity to review and comment on the El Cajon Boulevard Complete Streets Project. Since SANDAG's \$44 million Mid-City Rapid was largely justified by the reduction in transit travel times, MTS believes that subsequent City changes to El Cajon Boulevard that jeopardize the value of this investment could also challenge future regional transit projects. So we look forward to collaborating with the City on the development of an alternative that builds on the progress and success of the Mid-City Rapid.

Sincerely,



Sharon Cooney  
Chief of Staff