

Attachment 3: NACTO

Ryan Liu

From: Cary Bearn <[REDACTED]>
Sent: Friday, October 4, 2024 12:43
To: Ryan Liu
Subject: Re: NACTO and Daylighting (AB 413)
Attachments: CA Daylighting Bill - NACTO Letter 2023.docx.pdf

CAUTION: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi Ryan,

Great to hear from you!

NACTO supports adopting California AB413 and implementing strategies to improve visibility between pedestrians and drivers by prohibiting parking within approximately 20 feet of a marked or unmarked crosswalk. In support of AB413, NACTO advocated (see attached letter) cities to preserve the authority to use engineering judgment to determine the best local strategy for improving safety. For example, city engineers may determine slightly smaller distances are required at locations with curb extensions or along slow neighborhood streets (e.g., 95th percentile speeds under 25 mph) or that slightly longer distances may be needed to help drivers and pedestrians see each other on streets with parking-protected bike lanes.

I hope this helps - let me know if you need anything else.

Cary

Cary Bearn (she/her)
Senior Program Manager, Biking
National Association of City Transportation Officials
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Attached: NACTO Letter to State Senate



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May 17, 2023

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The Honorable Alex Lee
Assemblymember, District 24
1021 O Street, Room 6330
Sacramento, CA 95814

Dear Assemblymember,

I am writing to express the National Association of City Transportation Officials' support for the safety principles behind daylighting, to express our interest in Assembly Bill 413 (Lee), and to recommend the addition of contextual flexibility to enable smoother implementation of the bill. This bill represents an important opportunity for California, and would be improved by the addition of contextual specificity to best apply the principles of the *Urban Street Design Guide*.

The "Intersections" chapter of the NACTO *Urban Street Design Guide* recommends that designers "Daylight intersections by removing parking within 20–25 feet of the intersection." Other FHWA-recognized guidance such as the NACTO *Urban Bikeway Design Guide* and the FHWA *Separated Bike Lane Planning and Design Guide* cite various lengths for sightlines where a street intersects with a protected bike lane or other separated bikeway. These recommended distances vary from 10-20 feet on the approach of a driveway, alley, or cross-street to a bikeway, to 30 feet for the street that has a parking-protected bikeway on it.

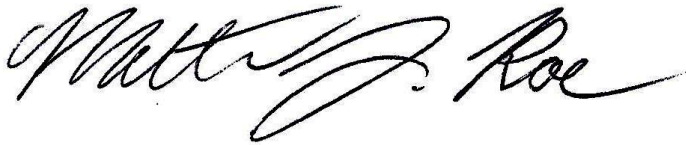
Importantly, the length of daylighting appears in the *Urban Street Design Guide* and the other guides mentioned as a "Recommended" element, rather than a universally standard "Critical" or "Required" feature. (See the "How to Use this Guide"). That important distinction signifies that the clause is intended to promote the practice of daylighting but is *not* intended as a blanket requirement. Especially for topics as contextually specific as daylighting and curbside use, there might be some unintended consequences of directly copying that relatively simple guidance into law. For example, a City may determine that less than 10 feet – or more than 20 feet – is appropriate for a specific intersection given all of the factors discussed above and below. It is also important to note that the 20-25 feet daylighting guidance is part of a section of the *Urban Street Design Guide* that discourages agencies from creating much *longer* highway-like 'clear zones', and instead provides guidance that reducing vehicle speeds is the primary way to increase the rate at which drivers see and yield to people with the right of way.

Both the draft legislation and several existing city daylighting policies, such as those of SFMTA, are therefore aligned with the *Urban Street Design Guide*, even if they are not yet completely aligned with one another.

The bill can support contextual specifics while achieving its goal of allowing cities to design safer intersections. Where there is a curb extension (bulbout) on the approach, there is likely no need to legislate a specific distance of daylighting, since the curb extension is itself a form of daylighting. There is additional nuance at stop-controlled intersections and at uncontrolled (neither signalized nor stop-controlled) crosswalks.

Thank you for considering these clarifications. We would be happy to answer any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew J. Roe". The signature is fluid and cursive, with the first name "Matthew" and last name "Roe" clearly legible.

Matthew J. Roe
Technical Lead, National Association of City Transportation Officials

cc: Members and Consultants, Assembly Transportation Committee
Members and Consultants, Assembly Appropriations Committee