



February 10, 2014

California Traffic Control Devices Committee (CTCDC)
c/o Devinder Singh, Executive Secretary
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VIA E-MAIL

Re: Agenda Item 14-06, February 19, 2014 CTCDC Meeting—Request to Postpone Consideration of Proposed Definition for "When Children Are Present" Sign

Honorable Chair and Committee Members,

We, the undersigned organizations, strongly urge the California Traffic Control Devices Committee (CTCDC) to postpone consideration of Agenda Item 14-06, February 19, 2014 CTCDC meeting--Caltrans District 2's proposal to amend Section 7B.15 of the 2012 California Manual on Uniform Traffic Control Devices (CA-MUTCD) interpretation of "WHEN CHILDREN ARE PRESENT" sign ["Dist 2 proposal" hereafter]--pending further review and study of the proposal's potential child safety impacts.

Motor vehicle crashes remain the leading cause of death among young children, and 19.7% of children aged 15 and younger involved in a fatal traffic crash were pedestrians.¹ Children often lack the cognitive and decision making skills to adequately judge the speed and distance of motor vehicles, with some studies reporting that only 11% of the children looked in any direction before reaching the curb; only 41% of the children stopped at the curb before crossing; and only

¹ National Center for Statistics and Analysis, "Table 3. Motor Vehicle Crash Fatalities and Injuries and Pedestrians Killed or Injured, by Age Group, 2011," *Traffic Safety Facts: Pedestrians, 2011 Data*, National Highway Traffic Safety Administration. DOT-HS-811-625, August 2013. Available at <http://www-nrd.nhtsa.dot.gov/Pubs/811748.pdf>

7% looked in any direction while stopped at the curb.² Given children's unique traffic safety needs, any proposed change or modification to traffic control devices affecting children needs to be fully evaluated for any impact on child safety. Below, we outline some of our concerns with the proposed language, and we look forward to working with the CTCDC to ensure that child safety is not compromised, but strengthened, with any changes or modifications to the CA-MUTCD.

California Vehicle Code Already Defines When Reduced Speed Limits Applicable

The California Vehicle Code already sufficiently defines when school zone speed limits are applicable; to wit, 15 and 25 MPH speed limits in established school zones shall apply "while children are going to or leaving the school either during school hours or during the noon recess period" **AND** "while the grounds are in use by children."³ The Vehicle Code focuses on the commonsense interpretation of "when children are present," which can both be easily understood by the general public and enforced by law enforcement officers. The Dist. 2 proposal unnecessarily adds uncalled-for restrictions on when reduced speed limits are in effect (discussed below) and effectively eliminates the "while grounds are in use by children" statutory provision. This is problematic since there are times that are not school arrival, dismissal, or lunch time where children may be at the school or on the roadway, such as field trips, outdoor recess or special events. We urge the CTCDC to fully implement the protective "while grounds are in use by children" requirement in any interpretation of "When Children Are Present" signage.

Proposal Unduly Grants Motorists' Discretion to Decide When to Adhere to a Reduced Speed Limit

The proposed definition creates an even more difficult standard to enforce--shifting to the motorist, the discretion of when to adhere to a 15/25 MPH school speed limit. The proposed primary trigger relies on whether "**[m]otorists can see children on foot or bicycling within 30 feet of the highway travelled way**" (emphasis added). In effect, this introduces a level of subjectivity that is biased in favor of the motorist and complicates a law enforcement officer's ability to enforce a lower speed limit in the interest of child safety; in other words, law enforcement must be able to objectively determine when a speed limit is enforceable, **not solely the motorist**.

Additionally, if a child is obscured from a motorist's view and the motorist is traveling at a speed greater than 25 MPH, that child would be at a greater risk of injury or death if a collision were to occur, than if the motorist is not exceeding 25 MPH. The faster a vehicle is traveling, the greater the likelihood that both a pedestrian crash will occur and that the resulting injury will be more serious, if not fatal: when struck by a vehicle at 20 MPH, only 5% of pedestrians die, whereas 40% of pedestrians die when struck at 30 MPH, and over 80% die when struck at 40 MPH.⁴

Insufficient Evidence is Provided for the 30' Edge of Travel Way (ETW) Determination

While we agree that a child beyond 30' of the ETW is "less likely to dart out in front of oncoming traffic," the proposal does not provide any evidence to substantiate the claim that a driver would have sufficient time to observe and react to a child approaching the roadway from that distance. A driver's peripheral vision is greatly reduced at higher travel speeds.⁵ Moreover, combined motorist reaction and vehicle braking time consume substantial distance before a vehicle can come to a complete stop. On straight and level surfaces, a vehicle traveling at 25 mph requires approximately a stopping distance of 150 feet due to combined motorist reaction and vehicle braking time; at 30 mph, the distance required increases to 207 feet; and at 40 mph, 341 feet is required.⁶ Accordingly, if a motorist were to travel above a 15/25 MPH

² Zeedyk, M. S., Wallace, L., & Spry, L., "Stop, look, listen, and think? What young children really do when crossing the road," *Accident Analysis and Prevention*, 34:43-50 (2002).

³ California Vehicle Code, Section 22352(b)(2), 'Prima Facie Speed Limits' and Section 22358.4, 'Decrease of Local Limits Near Schools or Senior Centers.'

⁴ W.A. Leaf and D.F. Preusser. "Literature Review on Vehicle Travel Speeds and Pedestrian Injuries Among Selected Racial/Ethnic Groups," National Highway Traffic Safety Administration. DOT HS 809 021, October 1999.

⁵ A. Bartmann, W. Spijkers, and M. Hess. "Street Environment, Driving Speed, and Field of Vision Loss" *Vehicles in Vision III*, 1991

⁶ D. Fambro et al. "Determination of Stopping Sight Distances," National Cooperative Highway Research Program (NCHRP), Report 400. Transportation Research Board, 1997. Available at http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_400.pdf

school zone speed limit, the motorist would likely be unable to react and stop to prevent a collision if a child is obscured from view or if the motorist is driving distracted.

Establishment of a school zone creates reduced speed limits enforceable within 500' of school grounds, and in certain instances, can be extended to 1,000.' These distance buffers recognize that child pedestrian and bicycle safety needs outweigh motorist convenience and speed and attempt to provide the necessary stopping distance to prevent collisions. The 30' ETW trigger, in effect, undercuts and undermines these distance buffers. The proponents have not provided substantial evidence proving that the proposed 30' ETW trigger ensures requisite stopping distance to prevent collisions with children.

While we appreciate the effort to better define the 'When' in the "When Children Are Present" sign, the needs of all road users must be taken into account and addressed under the Caltrans Complete Streets directive,⁷ particularly when dealing with the overriding safety needs of children. We thank you for your time and consideration of our comments. We look forward to working with the CTCDC to ensure that child safety is always preserved in the CA-MUTCD.

Sincerely,

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⁷ Caltrans Deputy Directive DD-64-R1, "Complete Streets-Integrating the Transportation System," October 2008. Available at http://www.dot.ca.gov/hq/tpp/offices/ocp/complete_streets_files/dd_64_r1_signed.pdf

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