



## Bicycle Coalition of New Mexico

A 501(c)(3) organization

[www.bikenm.org](http://www.bikenm.org)

PO Box 23961, Santa Fe, NM 87502-3961

Charter Members: **BikeABQ**, **Silver Spokes Bicycling Club** (Silver City), **Mesilla Valley Bicycle Coalition** (Las Cruces), **Los Alamos County Cyclists Coalition**, **Corrales Cycling Club**, **New Mexico Alternative Transit** (statewide alternative transit)

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6 June 2006

John McElroy  
District 5 Engineer  
PO Box 4127  
Santa Fe, NM 87502

Steve Reed  
Environmental Section, NM DOT  
PO Box 1149  
Santa Fe, NM 87504

Re: US 84/285 (St. Francis Drive) Improvement Project, NH-084-6(82)164 [CN3884]

Dear Mr. McElroy and Mr. Reed,

I have reviewed the file regarding the Categorical Exclusion that was granted for the addition of travel lanes on St. Francis Drive (US 84/285) in Fall 2005.

I am writing on behalf of the Bicycle Coalition of New Mexico to protest the failure to accommodate bicycle traffic in this project, and to state for the record that I believe the changes have increased the danger to bicyclists travelling along and across this facility. I routinely ride my bicycle from my home on Zia Rd along St. Francis to Siringo Rd and back, riding along the right shoulder until I merge left to use the left turn lanes onto Siringo or onto Zia. Given the traffic patterns in this area, with platoons of traffic separated by large gaps (of about 90 seconds), such cycling is very safe. I know other cyclists who also use this corridor.

Aside from my personal experience on this facility, my comments primarily address what I believe to be violations of the intent and letter of laws and policies regarding the planning process for our transportation systems. There are multiple planning documents referenced below which should have been followed in implementing this project.

I wish to raise the following concerns and ask that they be included in the record regarding this project:

1. With regard to state statute, Section 67-3-62 NMSA 1978 states that, "No expenditure or contract for the expenditure of state public funds for purposes of constructing highways along new alignments or for purposes of substantially widening highways along the existing alignments shall be made or entered into by the state highway department unless the design and construction of such highways makes provision for pedestrian, bicycle and equestrian traffic along and across such highway, except when the state highway department, after notice and a public hearing, determines, pursuant to its published regulations as provided in [Section 67-3-63](#) NMSA 1978, that:
  - (1) such provisions for pedestrian, bicycle and equestrian traffic would be contrary to the public safety; or
  - (2) the cost of such provision would be disproportionate to the need or probable usage."Pursuant to this statutory requirement, no notice was provided, nor was a public hearing held.
2. DOT Secretary Rhonda Faught has written, "We are committed to the principle of a multimodal transportation system. We are committed to developing accessible, connected and sustainable multimodal opportunities for all citizens, which allow travel choices making the most efficient use of the State's transportation infrastructure. The Department will combine multimodal infrastructure development with current infrastructure preservation in a manner that best serves the mobility of residents, guests and commerce."
3. The Santa Fe Metropolitan Transportation Plan 2005-2030 has as its subtitle "Providing Interconnected Options for More Travel Choices," while this project does nothing for interconnections or travel choices.
4. The Feb 15, 2005 review by the RPA in a public meeting was for a resurfacing and maintenance project, without re-striping, and no subsequent public meeting was held after additional thru lanes were proposed.
5. Although a maintenance project, as originally developed, is not required to appear in the TIP planning process, a project that adds capacity should be reviewed in the context of the regional transportation

- plans and the TIP process. To convert a project from maintenance to capacity addition should not be allowed without public review in the TIP amendment process.
6. The FHWA has a prescriptive list of items eligible for a categorical exclusion, and adding thru lanes is not one of those items. (see FHWA FAPG 23 CFR 771 Sec. 771.117 Categorical exclusions)
  7. Since 1991, ISTEA and subsequent transportation funding legislation has required the routine accommodation of bicycling and walking, and FHWA guidance has specified that bicycle facilities should not be downgraded.
  8. The Aug 23 letter from Steve Harris to Eric Worrell says, "the speed limit will be reduced to 45 and 35 mph throughout this section [from I-25 to W. San Mateo]." At the time of this writing, the speed is 45 mph from I-25 until it becomes 35 mph just south of Alta Vista, northbound. Thus, there is no posted speed of 35 mph in this section. It is my recollection that the speed was not originally higher than 45 mph, so it appears no speed reduction has been made in spite of the fact that lanes were narrowed from 12' to 11'.
  9. The Oct 27, 2005 letter from Steve Reed to FHWA's Eric Worrell says "NM DOT has also determined that the 6-lane re-striping does not cause additional adverse impacts to the human or natural environment." As both a cyclist and a motorist, I disagree with this statement, and I believe that the corridor is more dangerous, which I consider an adverse impact on the human environment. The shoulder has been reduced significantly, the travel lanes have been narrowed with no reduction in speed, and the merge lanes have been collapsed into thru lanes in several locations.
  10. A test period of thru lanes was performed in September, 2005, before formal permission to re-stripe was requested and approved, making it a *de facto* change.
  11. No study of alternatives was made, and no scientific, data-based analysis was provided regarding level-of-service prior to the change, nor subsequent to the change. It appears to be a judgement call. Since congestion in this corridor is primarily at rush hour, and primarily near the I-25 interchange, as recognized in the documentation, transit may well have provided a better solution, especially given that commuter buses currently operating in this corridor are full, and given that this path represents the direct route from State Government offices to I-25 and points south, which is an optimal situation for transit solutions.
  12. In the Feb 2006 response from John McElroy to me, Mr. McElroy notes, "The City of Santa Fe has plans for extensive bicycle and pedestrian facilities within this section of St. Francis Drive...". On February 14, 2006, Mr. Robert Romero, Santa Fe's Public Works Director, responded to my follow-up inquiry about such "extensive bicycle and pedestrian facilities" with the following statement, "... Knowing that the NMDOT will be doing a study of St. Francis drive which when improved to an urban section will likely accommodate bicycle facilities, I assume that he is referring to the Study they are working on of which we will be involved." These statements indicate that neither the State nor the City has made any plans for bicycle or pedestrian facilities in this corridor, and they appear to be an attempt by the District 5 engineer to place responsibility for bicycle facilities on the City, and to simultaneously exempt the NM DOT from such responsibility.
  13. The pedestrian improvements were also incomplete. In particular, at the northwest corner of St. Francis and Zia, the right-turn only lane from southbound St. Francis onto westbound Zia strands pedestrians on the small island in the middle of traffic. No crosswalk was painted from the island to the side of the roadway, nor was provision made to stop right-turning traffic for the accommodation of pedestrians. It would seem this would also be a violation of ADA requirements to allow safe crossing by disabled persons.

I also request that these comments be made part of the record for the upcoming St. Francis Corridor Study.

Sincerely,

Gail N. Ryba  
Board President

Cc:  
Tim Rogers, NM DOT BPE Coordinator  
Robert Siquieros, MPO Officer, Santa Fe MPO  
Eric Worrell, FHWA  
Robert Romero, City of Santa Fe Public Works  
Karen Heldmeyer, District 2 City Councilor  
Rebecca Wurzbarger, District 2 City Councilor