i want to send to oddo and vacca this week. i sent to you awhile go, but never got your comments which id welcome.
also although i have each one's official city council email address i was wondering if you had their more personal ones.

thx.

Begin forwarded message:

**From:** Norman Steisel  
**Date:** February 14, 2011 9:13:06 PM EST  
**To:** Jim Walden  
**Subject:** Oddo

Thanks.
Dear Councilman Oddo:

I write to congratulate you on your recent suggestion to Deputy Mayor Goldsmith and Commissioner Sadik-Khan that the City’s ambitious program for bike lanes undergo both some level of *citywide* environmental assessment (as your mention of a Generic Environmental Impact Statement suggests) and some *site-specific* review to take into account the effect of bike-lane implementation in specific local situations. The *former* could supply the comprehensive rationality which seems to be missing from the apparently ad hoc individual implementation projects now underway—thus providing both an integrated, *rationally connected network* from what now are *disjointed bike-lane segments* and a systemic framework for evaluating citywide and local social, economic, and environmental costs and benefits. The *latter* could use this framework to consider the potential effects of developing specific segments of the citywide network given specific local conditions.

While, admittedly, the Department of Transportation does give lip service to the New York City Bicycle Master Plan which was first drafted during the Dinkins administration (coincidentally, by my then-assistant Janette Sadik-Khan and myself) and issued, in somewhat elaborated form, by the Giuliani administration in 1997, its current implementation does not reflect the objectives outlined above. In the first place, as I shall show below, the Department’s actual bike lane projects often deviate from the 1997 plan in ways that violate the principles it attempted to frame. In the second place, physical and demographic conditions have so often changed in the interim that plans laid then no longer make sense with relation to specific street segments. (At the recent Council oversight hearing, at least four Councilmembers brought up examples showing how changes since the plan was produced have made other routes superior to those originally envisioned.) And in the third place, the lack of a rational overall implementation sequence—unattached bike lane fragments are apparently dropped down wherever it seems to be easiest to do so, with the result that a flow of riders attracted to a dedicated bike lane is all-too-frequently forced to debouch onto an ordinary street—frequently exacerbates rather than reduces the overall difficulties associated with modifying the city’s complexly interconnected traffic patterns.

These observations, with respect to your suggestion that the City’s program for developing bike lanes be developed in conjunction with an overall citywide plan and reviewed with in relation to local conditions, were forced on our attention by a recent exchange with the Department of Transportation regarding the new “trial” Prospect Park West (PPW) bike lane. Parenthetically, this lane deviates from the 1997 master plan in two game-changing ways: first, the master plan very sensibly puts the lane on the protected parallel greenway *within* Prospect Park, just a couple of hundred feet to the east of where the PPW bike lane was built; secondly, rather than offering the rational pairing of one-way lanes on the parallel PPW and 8th Avenues, which would allow easier connectivity to lane linkages at either end, it increases the risk to
pedestrians (and others) by producing a two-way bike lane on the otherwise-one-way PPW. The group that we founded to advocate that either of these designs be followed rather than the version currently implemented collected ridership data for the lane. At a City Council hearing last month DOT revealed that its counts were nearly twice as high as those we had videotaped. (For instance, on November 9th, our number was 470 while theirs was 863). The explanation we were given was that rather than riding past our camera (stationed between President and Garfield Streets), a large proportion of the northbound riders were instead turning west onto 2nd Street to follow the most-direct route to the Brooklyn Bridge.

A review of the mapping tool provided on the DOT’s Web site (http://ridethecity.com/#) shows that this 2nd Street lane then disappears 5 blocks later, so that this purportedly heavy flow of cyclists has to either blend into a stream of ordinary traffic before it reaches another bike lane, or to turn north again on 5th Avenue, a heavily trafficked, truck-filled commercial street which is only a “shared route” rather than an actual bike lane (see below).

Does the matter of dumping a significant flow of bikes (a flow presumably made greater by the encouragement provided by those bike lane segments that do exist) onto ordinary streets for a few blocks here and there really matter? This same Web link provided by the DOT suggests that it does. The purpose of the Web page is to identify the best routes between specific locations. It offers three types of route choices: “safe route,” “safer route,” or “direct route.” A rider whose route passes 2nd Street (which, according to the DOT, is chosen by a major proportion if not a majority of commuters) is directed to NOT turn onto it, but rather, to continue along the full length of PPW if she wants either a “safe” or a “safer” route. Only if she insists on the most “direct route” is she given the choice of 2nd Street—with the precaution to Please ride with care.

Why would DOT purposely create lanes that both deviate from the template established by the Bicycle Master Plan and from what it recognizes as the most-direct-and-desirable (but less-safe) route for a significant portion of riders? The answer is suggested by a presentation made by DOT representatives to a group of bicycle advocates. On July 29, 2010, the DOT Bicycle Lane Coordinator and one of his Project Managers made a presentation to Transportation Alternatives’ (T.A.) Brooklyn Committee in which they provided updates on all the projects currently planned, underway, or recently completed in Brooklyn. According to the meeting minutes on the T.A. Web site, community (“CB”: community board) opposition to the lanes apparently plays a significant role in DOT’s implementation plans.

...The support of T.A. is crucial to D.O.T. especially with regard to projects that both T.A. and D.O.T. want but which certain community boards oppose. Two Brooklyn projects lined up for this year in particular face CB opposition....
Grand Army Plaza redesign was initially slated to be performed now in conjunction with PPW, but because of all the political hubbub, D.O.T. is holding off until next year. The redesign will greatly improve infrastructure for motorists as well as clearly defining bike lanes and repaving the road...

**Bay Ridge Parkway - in progress, hopefully complete this October**

CB18 is not happy about this, D.O.T. needs assistance and support from T.A. members, especially those living in this area. ...

**Rockaway Parkway - in progress**

Same issues of CB resistance as Bay Ridge Parkway only this bike lane has a buffer....

The DOT staff also implicitly recognized the need to update the 1997 Master Plan, for the reason mentioned above:

**Vanderbilt Street - complete**

Washington Street was the original route set out in the bike master plan, but over time it has become clear that Vanderbilt is used more by cyclists. Because the plan is 13 years old, many things have changed over its course....

Most directly relevant to the present discussion, DOT staff explicitly acknowledged that their game plan involves putting down opening wedges (irrespective of whether the street has undergone significant changes that would affect the desirability of a bike lane, such as a reduction in width) that will allow them to push on farther in the future.

**Fix 5th Ave**

Construction finished from south of 23rd Street to 34th Street 2 weeks ago, D.O.T. wanted to install a bike lane but because 5th Avenue has narrowed, it has to be a shared lane design. The plan for the bike lane stops where it does because that is the boundary of the Community Board, and the next CB has issues with bike lanes. Hopefully, once this lane is installed, used and enjoyed, it will be easier to extend the lane into the next segment of 5th Ave...¹

Reading this, it is impossible for one familiar with New York City history not to be forcibly reminded of Robert Moses, both by the implicit disregard for master planning and by the basic tactic of overcoming opposition by sticking the first shovel into the ground:

---

¹ [http://www.transalt.org/node/4767](http://www.transalt.org/node/4767), last accessed 2-1-11.
“It is easy enough for starry-eyed planners to make pretty pictures...The real job is to find responsible public officials who will do something concrete, if necessary on a small scale”—Robert Moses, letter to the editor, New York Times, 1-2-1943, p. 10.

“One you get that first stake driven, Moses was fond of saying, no one could stop you.”—Robert Caro, The Power Broker, p. 779.

Given all this, it does indeed seem reasonable—as you suggest—to consider how both the citywide program and the local (currently disjointed) implementations conform to the City’s Environmental Quality Review (CEQR) requirements. According to the recently updated version of the City’s CEQR Technical Manual,

Our modes of travel—private car, taxi cab, subway/rail, bus, ferry, bicycle, or by foot—form the basis of New York City’s extensive and interrelated transportation infrastructure and system. A positive effect on one mode of travel may negatively impact another, while a negative effect on travel modes may negatively impact several aspects of the transportation system. The objective of the transportation analyses is to determine whether a proposed project may have a potential significant impact on traffic operations and mobility, public transportation facilities and services, pedestrian elements and flow, safety of all roadway users (pedestrians, bicyclists and vehicles), on- and off-street parking, or goods movement.²

While the implementation of bicycle lanes, whether considered from the local or the (cumulative) citywide perspective, would appear to be an “unlisted” type of agency action (thus requiring at least an Environmental Assessment if not necessarily a full Environmental Impact Statement), both the program as a whole and the local segments would seem to pose the potential for raising potential concerns related to issues such as traffic flow/congestion, mobile-source air emissions, pedestrian safety, accessibility by emergency vehicles, freight delivery, parking access, and aesthetic impacts. And if, on the basis of the requisite Environmental Assessment Statement, it were determined that further analysis were needed, we would anticipate that a major focus of any such analyses would be on alternatives to the proposed actions, as also defined by the CEQR Technical Manual:

SEQRA [State Environmental Quality Review Act] regulations require that “a description and evaluation of the range of reasonable alternatives to the action” be included in an EIS at a level of detail sufficient to permit a comparative assessment of the alternatives discussed. The regulations specify that such alternatives include “the range of reasonable alternatives to the action which are feasible, considering the objectives and capabilities of the project sponsor.” 6 NYCRR 617.9(b)(5)(v). If the environmental analysis and

consideration of alternatives identify a feasible alternative that eliminates or minimizes adverse impacts, the lead agency may consider the alternative as the proposed project. (P. 1-16)

It is precisely this—the consideration of feasible alternatives that would eliminate or minimize adverse impacts—that is most lacking from the present failure to provide coordinated planning for the City’s bike lane program. I too fully support many of the “objectives of the project sponsor.” But I believe that there are indeed feasible alternatives that would produce significantly fewer adverse impacts which have not yet been given a responsibly (if not legally) adequate level of review.

May I therefore make a suggestion that I believe could remedy the problems outlined above? I propose that the City Council enact legislation that would require (a) the development of an updated citywide master plan for bike paths (in the form of a Generic Environmental Impact Statement) prior to the installation of any additional segments; (b) that any new segments installed after the adoption of the citywide plan be made in conformance with the plan (unless, on the basis of a mandatory site-specific Environmental Assessment Statement or Supplemental Environmental Impact Statement pursuant to the master plan a superior alternative is identified); and (c) that already-installed bike lane segments that do not conform to the newly updated bike master plan be removed and replaced with whatever alternatives have been found to be better suited to the citywide program.

While it is beyond my present intent to suggest with any specificity how this citywide planning and implementation process might be conducted—much less the specifics of the citywide framework itself—a few basic expectations about what this process might entail may be in order.

First, as to process: An effective citywide planning process must involve, in addition to NYC DOT, the Community Boards, the Borough Boards (and Borough Presidents), the City Council, and the Department of City Planning and Planning Commission. While this particular CEQR process presumably would not fall under the requirements for ULURP, a ULURP-like process—with the structured involvement of these entities—would be in order. In addition, other governmental agencies (among them, Police, Fire/EMS, Sanitation, Education, Health and Hospitals, Parks, Economic Development, Landmarks, and the Art Commission) should participate. And so should be the obvious public-sector stakeholders (e.g., bike and open-space and environmental advocacy groups, block associations, etc.) as well as entities such as Business Improvement Districts and local Chambers of Commerce that play a significant role in local activity patterns. (While it might be argued that involving this many entities would produce an unwieldy process, these are precisely the “partners” that the DOT claims it currently engages in its bike lane program.)
What form should this extended public and agency involvement take? I recommend that: the entire process be transparent, starting with the outline of overall goals and objectives and specific evaluations of individual neighborhoods with respect to the practicable routing and design alternatives available; that these initial planning templates be presented to each potentially affected Community Board (and relevant governmental agency) near the outset of the process so that local representatives (including Council members and Borough Presidents) have an opportunity to review and comment on the planning principles and objectives and preliminary evaluations and to offer explanations for whatever other alternatives they think it appropriate to suggest; and that all such comments and suggestions be documented, along with the DOT's responses to them, including changes in selected alternatives based on information from sister agencies, elected officials, or the public.

Second, as to content: I anticipate that, as always in transportation planning, the primary issues will be related to the selection of routes that offer rational citywide connectivity. (This is why a bike lane program requires adherence to the principles of master planning—and why the current disjointed, a-segment-here/a-segment-there approach is so inappropriate.) In this respect, the 1997 citywide plan\(^3\) (which, as noted above, has not been closely followed of late) has much useful guidance to offer. Many (but not all) of the suggestions that follow stem from that plan.

1. While it may seem somewhat contradictory, I would argue that the foremost priority for any bike plan—as for any other transportation planning in an urban setting—is the pedestrian. Walkability—a safe and pleasant pedestrian experience for all elements of society, young, old, robust, handicapped, resident, worker, tourist—should be the foremost objective. Since we are all—at some points in time—pedestrians, any form of vehicular movements must be planned to favor walkers.

2. Direct routes between the desired origins and destinations of the greatest number of users are key. Although commuters and recreational users may have somewhat differing origin and destination objectives, their routes (e.g., across bridges, through areas of major density) will often overlap.

3. Both commuters and recreational riders—providing the routes are reasonably direct—are likely to prefer “greenway” paths through parks and along shorefronts, as opposed to sharing ordinary streets, because the separation from ordinary traffic makes them more pleasant and more secure. Another advantage of greenway routing is that parks are a desired destination for recreational riders. The separation from other vehicular traffic that greenways provide also makes them desirable from the perspective of motorists.

4. “Counter-flows”—two-way bike lanes in which one lane runs against the flow of vehicles on a one-way street—are to be avoided (as a risk to pedestrians, among others) except in very special circumstances.

5. Decisions between alternative bike lane routes should also be based on existing traffic conditions on particular roadway segments, taking into account roadway geometry, emergency vehicle access, vehicular volumes, freight-delivery requirements, and residential/land use density, in order to minimize disruptions to existing and projected traffic flows.

6. Decisions between alternative routes should take into account (1) the avoidance, where possible, of specific “sensitive receptors” such as schools, hospitals, old-age facilities; (2) “neighborhood character” (as the recent cultural preferences expressed by the Hasidic population of Williamsburg evidenced); (3) visual impacts on significant aesthetic or historic resources; (4) adverse economic impacts on businesses dependent on vehicular access for goods (or waste) delivery or removal or for customer access.

7. Wherever possible, use existing “segregated spaces” (such as center medians) to achieve the win-win benefits of separating various kinds of traffic flows.

8. Wherever possible, get double win-win benefits by improving two (or more) kinds of traffic flow (e.g., buses and bikes, pedestrians/skaters/bikes) by developing new or improved designated lanes for multiple compatible travel streams.

9. Do not muddle the more-important objectives of rational citywide connectivity by using bike lanes to achieve non-related objectives that could be more directly achieved, with fewer adverse impacts, by other means. “Traffic calming” is a good example of something that should not be a major planning criteria in deciding between alternative bike routes.

If you find any merit in any of these suggestions, please be assured of whatever assistance I can offer to help you accomplish them.

Sincerely,

Norman Steisel