

**Comments on LADOT Report**  
**IMPLEMENTATION OF SCHOOL SAFETY ZONE SPEED LIMITS**  
**(COUNCIL FILE NO. 14-0348-S1)**

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At the Transportation Committee meeting on February 10, 2016, LADOT will present their report **IMPLEMENTATION OF SCHOOL SAFETY ZONE SPEED LIMITS** (COUNCIL FILE NO. 14-0348-S1) dated February 4, 2016, seeking authority to implement 15 mph "School Safety Zone" speed limits at twenty-three (23) street segments adjacent to eleven (11) Safe Routes to School (SRTS) prioritized school sites in accordance with California Assembly Bill 321, which allows for speed limits ranging from 15 - 25 miles per hour (MPH) at eligible residential streets adjacent to schools.

The following comments are in response to this LADOT request. Our goal in providing these comments is to provide a broader context for the discussion of improving the safety of children traveling to and from school. Policies adopted by elected officials can only be successful when they target the correct problems using proper countermeasures. In general, our review of collision data indicates that focusing primarily on speed reduction as a means of protecting pedestrians from harm is unlikely to yield the safety improvements we all wish to see. However, there are numerous policies which can be employed to achieve this goal and which can produce very tangible results. Some suggestions are included within these comments.

In general, Safer Streets L.A. questions the need for the recommended 15 mph speed limit reductions and their potential to achieve the stated goals of improving the safety of children traveling to and from school. We believe alternative countermeasures are available that would generate greater compliance from motorists and improve safety to a greater extent. Concentrating on the wrong countermeasures are counterproductive and wastes resources. Further, a reduced speed limit of 15 mph is unlikely to be complied with by the majority of drivers and may give school aged pedestrians a false sense of security, thereby reducing safety rather than enhancing it.

### **I. Lack of Support for the Need to Further Reduce School Zone Speed Limits**

We believe DOT has made the classic mistake of recommending a traffic safety countermeasure, in this case a reduction in the school zone speed limit, without fully evaluating the need for that countermeasure or considering other potential countermeasures that may provide greater benefit.

1. The documents and reports submitted by DOT in support of their recommendation lack any specific evaluation of collision history on the roadways recommended for school speed zone reductions, especially with regard to collisions involving children traveling to and from school. Instead, DOT provides a one paragraph summary of a traffic survey conducted at the school sites which is repeated verbatim for every location that was evaluated.

***“Due to the number of pedestrians, bicyclists and vehicles at the school during the drop off and pick up and the residential density, it has been determined that 15 MPH When Children Are Present signs should be posted on [street names inserted].”***

This does not provide sufficient information upon which to evaluate the need for a speed limit reduction. It does not show that any safety problem exists with regard to the speed of vehicles at these locations, that there have been any collisions involving children traveling to or from school while the

current reduced school zones speeds are in effect, or that children experience difficulty traveling to or from school within the current reduced speed school zones.

While it is possible that the traffic surveys conducted do contain this evidence, no mention of these factors is noted in the summaries and the surveys themselves have not been included within the report or attached to the Council File. One would imagine that if the surveys found these safety problems to exist, they would have been highlighted and included within the report.

2. Instead, DOT provides general statistics about a High Injury Network, references to the finding that traffic collisions are the leading cause of death for those between 2 and 14 years old (national figures), and that 56% of all fatal and severe injury collisions occur within 1/4 mile of a school. However, none of these statistics tells us anything about the safety of children *traveling to or from school upon the roadway segments recommended for a reduced school speed limit*, nor do they tell us whether the speed of vehicles upon these roadway segments during the times when the current reduced school speed limits are in effect are problematic in any way. The assumption is simply made that school speed limits need to be reduced and that greater safety will result. No evidence of this has been provided.

3. Safer Streets L.A. reviewed the collision data for the City of Los Angeles using the California Highway Patrol's Statewide Integrated Traffic Records System (SWITRS) database. The SWITRS database serves as a means to collect and process data gathered from collision scenes by multiple police agencies throughout the state. Unsafe speed (not necessarily exceeding the speed limit) is the most cited cause of traffic collisions in California. Speeding in a school zone is citable under CVC 22352 or CVC 22358.4. We searched the database for the period 2000 – 2014 (years for which data was available) for collisions where the primary or contributory collision factor was a violation of either of these sections of the vehicle code. We could find no collisions attributable to this violation for any of the years studied. It is therefore reasonable to believe that since we could find no collisions due to speeding in a school zone for a fifteen year period, that excessive speed in school zones is not a factor with regard to the safety of children traveling to and from school and further reducing the speed limit would have no effect on increasing their safety.

## **II. Motorists are Often Not Given Proper Warning of When Reduced School Zoning is Operational**

In order to gain compliance from motorists with regard to speeds within school zones, motorists must be fully informed as to when the reduction in speeds is required. The California Vehicle Code states that reduced speeds in school zones are applicable when the roadway is:

*...posted with a standard "SCHOOL" warning sign, while children are going to or leaving the school either during school hours or during the noon recess period. The prima facie limit shall also apply when approaching or passing any school grounds which are not separated from the highway by a fence, gate, or other physical barrier while the grounds are in use by children and the highway is posted with a standard "SCHOOL" warning sign.*

Motorists are often unaware of the specific hours of the day or days of the year when the above conditions exist. Furthermore, the vehicle code does not require the signage giving notice of the school zone to list these times. Therefore, motorists approaching a school zone are often left wondering whether the school zoning is operational.

If the goal is to increase compliance with traffic laws in a school zone, a more effective method would

be to provide specific signage indicating the exact times and days when the school zoning is operational. Alternatively, changeable message signs which inform the motoring public that school zoning is operational or a “School Speed Limit XX When Flashing” sign could be used. Without this proper notice, reduced speed school zones with additional enforcement to gain compliance would likely be ineffective and grossly unfair to the motoring public.

It should be noted that the California Traffic Control Devices Committee (CTCDC) is currently studying the issue of school zones and whether changes to the vehicle code or required signage is necessary. An interim report is expected on March 3<sup>rd</sup> and a full report with final recommendations is expected in June. The recommendations of the CTCDC should be considered prior to reducing school speed limits, as the changes recommended by the CTCDC may produce an added level of safety for children traveling to and from school without the need to further reduce the speed limit.

### III. Alternative Methods for Improving Safety of Children Traveling to and From School

Numerous engineering countermeasures exist to improve the safety of children traveling to and from school. Unfortunately, many, including apparently LADOT, mistakenly believe that reducing school speed limits is an effective means of achieving this goal. Data from numerous studies show conclusively that simply changing the number on the speed limit sign, even when coupled with massive enforcement efforts, fails to change the speed of vehicles on the roadway over the long term.

One of the most effective methods of changing speeds is to alter the nature of the roadway (change the built environment) to encourage a natural reduction in speeds. This may be an effective strategy for some of the locations recommended in the report for reduced speed limits provided there is a proven safety problem for school children due to excessive speeds within the current school safety zone. However, this may not be practical in all locations and other methods may need to be employed during the times children are traveling to and from school.

As referenced above, changeable message signs which inform the motoring public that school zoning is operational or a “School Speed Limit XX When Flashing” sign are effective in providing notice to motorists that a reduced school speed limit is in effect. Additionally, these signs can be coupled with a radar speed feedback sign to gain even greater compliance.

Figure 1: Flashing Beacon



Figure 2: Flashing Beacon with Radar Speed Feedback Sign



A comprehensive report on school zones by the Texas Transportation Institute (TTI) noted:

*Studies have indicated that using flashing beacons with the school speed limit assembly provides greater speed reductions than using the WHEN CHILDREN ARE PRESENT or specific time plaques. There is strong evidence that using a speed monitoring display also produces notable speed reductions.*

It is recommended that rather than simply reduce speed limits to 15 mph, which is unlikely to be complied with and may give pedestrians a false sense of security, the above types of installations should be employed in the locations where DOT has noted a safety need.

Many other types of countermeasures can be used as well. A comprehensive list is beyond the scope of these comments but we are happy to provide them upon request.

#### **IV. Conclusions**

1. The DOT Report lacks support for the need to further reduce school zone speed limits to 15 mph. No collision history data or specific references to safety problems at the locations where the reduced speed limits are being requested has been provided.
2. Collision history for a fifteen year period shows that excessive speed in school zones is not a factor with regard to the safety of children traveling to and from school in Los Angeles and further reducing the speed limit would therefore have no effect on increasing their safety.
3. Motorists are often not given proper warning of when reduced school zoning is operational. The standard “When Children are Present” sign does not provide sufficient information to motorists that reduced school zone speed restrictions are in effect. A changeable message sign which informs the motoring public that reduced speed school zoning is operational or a “School Speed Limit XX When Flashing” sign should be used where compliance with the school speed zone is not sufficient.
4. The above signage coupled with a radar speed feedback sign should be used to gain even greater compliance where necessary.

We thank you for your time in reviewing our comments and look forward to working with all parties to bring about safer streets in Los Angeles.

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