



Department of Public Works  
Infrastructure Services Division

**Jeffrey J. Mantes**  
Commissioner of Public Works

**James P. Purko**  
Director of Operations

**Jeffrey S. Polenske**  
City Engineer

November 2, 2005

To The Public Safety Committee

Subject: Common Council File 050699

Dear Honorable Members:

We are transmitting to you comments presenting our concerns relative to the potential impacts of Common Council File Number 050699. This Resolution would direct the Intergovernmental Relation Division to seek introduction and passage of State legislation to permit parking in certain residential "T" type intersections. In these cases, parking is being sought adjacent to the curb at the top of the "T."

At the present time, stopping, standing and parking in and adjacent to intersections is regulated under several existing State Statutes. "Crosswalks," including both marked and unmarked crosswalks, and "intersections" are defined in Section 340.01(10) and 340.01(25) of Statutes respectively. In summary, intersections are generally defined as the extension of curb lines across an intersecting roadway, while unmarked crosswalks generally consist of the projection of a sidewalk across an intersection. Stopping of any vehicle is prohibited in its entirety within an intersection and on a crosswalk under Section 346.52(1)(a) and 346.52(1)(b). Additionally, parking is prohibited within 15 feet of the near side of a crosswalk under Section 346.53(5) of Statutes. Finally, the City is granted the authority to regulate the stopping, standing or parking of vehicles under Section 349.13 of Statutes, but is barred from allowing parking in areas where stopping, standing or parking is prohibited by Chapter 346.

Similarly, the statutory restrictions noted above are also included in the national Uniform Vehicle Code (UVC), maintained by the National Committee on Uniform Traffic Laws and Ordinances. These regulations are maintained in Chapter 11-1003 of the UVC, with the notable exception of a more restrictive ban of parking closer than 20 feet from a crosswalk specified in the UVC.

We are concerned with the potential impact of this change in restrictions on both vehicular and pedestrian safety. With respect to human factor considerations in traffic safety, the absence of vehicles parked adjacent to a curb is one of the key visual prompts to motorists that they are approaching an intersection, particularly in heavily parked areas. The presence of parked vehicles will eliminate this visual definition of the intersection as they approach, eliminating a key visual prompt for the appropriate response to safely navigate through conflicting pedestrians and vehicular traffic as they approach an intersection.

More importantly, however, is that the presence of parked vehicles within an intersection will obscure the visibility of pedestrians attempting to cross the street as they approach the intersection, as well as affect the ability for pedestrians to observe cross traffic approaching a crosswalk, particularly if large vehicles are parked within the intersection. This could create an effect similar to pedestrians darting into traffic from between parked vehicles. The condition being created could be equated to a mid-block pedestrian crossing absent the visual prompt of a zone clear of parked vehicles. It must be noted that in the case of a mid-block pedestrian crossing, it is the practice of the City to ban parking within 100 feet of the near side of a mid-block crossing to preserve the visibility of pedestrians utilizing the crosswalk.

The presence of parked vehicles within the "T" will have an impact on the ability of school buses, trucks and other heavy vehicles to turn at an intersection based on the turning radius of the individual heavy vehicle. In many cases, this additional room is necessary to safely maneuver through the intersection. The presence of parked vehicles within the "T" can conceivably affect fire vehicle response times due to the size of fire department vehicles.


With respect to implementation of this proposal, current law would still require that no parking be maintained no closer than 15 feet of the near side of the crosswalk within the intersection. This would reduce the area within an intersection where vehicles could park to one or two parking stalls dependent on the width of the right of way and roadway cross section. In the case of a standard 30-foot residential roadway within a 60 foot right of way for example, a maximum of 24 feet, or roughly the equivalent of 1 parking stall, would be available within the intersection. Since the application of this restriction will not be uniform throughout the City, any restriction implemented would require signage for enforceability and to prevent parked vehicles from encroaching into areas, which are to remain clear. Separate signs would be required to define the extent of no parking and no stopping restrictions, which would remain. Since the parking will not be available at every intersection, it can reasonably be expected that drivers will expect

that they will have the ability to park in other "T" intersections although not signed, which may decrease the ability to enforce parking restrictions at other intersections.


Lastly, since the legislation is only intended to allow the parking in "residential districts," care must be given to the definition of a residential area, since many mixed use areas of the City contain significant residential uses, and could conceivably be considered as residential areas. Also, some criteria or guidance should be provided as to where the parking within an intersection would not constitute a hazard.

Based on the above comments, we believe that implementation of the proposed change in State Statutes could create safety problems for both vehicular and pedestrian traffic, would create confusion as to where motorists could park, create operational problems for larger vehicles, be difficult to enforce, and require extensive signing. For these reasons, we recommend that this resolution be placed on file.

Very truly yours,



Jeffrey S. Holenske  
City Engineer



Jeffrey J. Mantes  
Commissioner of Public Works

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