



San Diego County Bicycle Coalition
300 15th St
San Diego, CA 92101

January 18, 2023

Gustavo Dallarda
Caltrans District 11 Headquarters
4050 Taylor St. San Diego, CA 92110

Subject: Caltrans Class IV Bikeway Approval Process

Dear Director Dallarda

We're writing on behalf of Circulate San Diego and the San Diego County Bicycle Coalition to comment on Caltrans District 11's current policy towards implementing Class IV separated bikeways.

Since 1987, the San Diego County Bicycle Coalition has acted as the voice for everyone who rides bikes throughout the San Diego Region. We advocate for safer bike lanes and paths, host world-class cycling events like Bike the Bay, and provide safe cycling classes to hundreds of San Diegans every year.

Circulate San Diego is an active partner of the San Diego County Bicycle Coalition, and works throughout the San Diego region to promote great mobility choices, more walkable and bikeable neighborhoods, and land uses that promote sustainable growth.

We have also discussed this issue in depth with the office of San Diego City Councilmember Steven Whitburn, who represents the neighborhoods surrounding Balboa Park, and have his support for the actions proposed in this letter.

While we are tremendously supportive of the policies that Caltrans has adopted to support the creation of safe and complete streets, we have become aware of several instances in which Caltrans is planning not to provide adequate active transportation facilities as parts of current projects.

Specifically, due to Caltrans standard lane width requirements and the policy of requiring Design Standard Decision Documents whenever these lane widths are narrowed, Caltrans staff have



informed us that they cannot accommodate Class IV bikeways on Park Boulevard at the interchange with Interstate 5.

San Diego is currently planning the construction of Class IV bikeways through the full length of the Park Boulevard corridor, and **failing to build Class IV bikeways through Caltrans Right of Way would compromise the safety and useability of the entire corridor for people riding bikes.** Additionally, we have become aware of several instances in which Caltrans staff have rejected bike infrastructure improvements to I-5 interchanges proposed by the City of Carlsbad due to minimum lane width requirements.

Based on these problems, we request two courses of action from the Caltrans District 11 office.

1. Pass a District 11 level policy that waives the requirement to process a Design Standard Decision Documents when lanes must be narrowed to less than twelve feet in order to accommodate bicycle facilities. The National Association of City Transportation Officials [recommends 10 feet as the standard lane width](#) in constrained urban environments, with up to one 11 foot lane per direction to accommodate truck and bus traffic. We recommend that Caltrans District 11 pass a policy to allow this configuration whenever necessary in order to accommodate the bicycle facilities recommended by Caltrans' own [Contextual Guidance for Bike Facilities](#).
2. If passing such a policy is not possible in the short term, **we strongly recommend that Caltrans District 11 process a Design Standard Decision Document as soon as possible to permit Class IV bikeways through the interchange of Park Boulevard and Interstate 5.**

Park Boulevard Context:

Park Boulevard is one of the most important active transportation corridors in the San Diego Region. It provides a direct connection between two of San Diego's densest, most walkable job and population centers: Downtown San Diego, and the Hillcrest/University Heights/North Park area. It also runs through the center of Balboa Park, the jewel of the San Diego park system and an international tourist attraction. All of the areas through which Park Boulevard runs have significant bicycle and pedestrian traffic.

For the last year, we have worked with the City of San Diego to develop a plan for implementing Class IV separated bikeways and dedicated bus lanes on Park Boulevard through Balboa Park, between the intersection with Upas Street and the Intersection with Caltrans Right-of-Way at Interstate 5. Now approved for construction to begin in early 2023, this project would connect the Class IV bikeways currently in existence on Park Boulevard both North and South of Balboa Park. Once this project has been completed, **the section of Park Boulevard in Caltrans ROW**



at the I-5 interchange would be the only section of the entire five mile corridor without a Class IV bikeway.

At the November 8th, 2022 meeting of the Caltrans District 11 Bicycle and Pedestrian Advisory Committee, Caltrans staff reported that Caltrans was planning on installing Class II bike lanes on the section of Park Boulevard in Caltrans ROW as part of an upcoming minor B project. Further discussion with Caltrans staff revealed that Caltrans is unable to install Class IV bikeways because of guidance in the [California Highway Design Manual Chapter 300](#) that requires outside lanes on multilane roads through interchanges to be at least 12 feet in width. Staff informed us that narrowing traffic lanes to install Class IV bikeways would require securing an exemption to this lane width requirement through the filing of a Design Standard Decision Document, which would increase the costs associated with the project.

While the rest of Park Boulevard will be an inviting and safe corridor for cyclists once the City of San Diego's project is completed, the section without Class IV bikeways will remain dangerous and uncomfortable for cyclists, with a 40 mph speed limit and over 5,000 average daily trips. Completing Class IV bikeways on this section of Park Boulevard must be a priority for Caltrans District 11.

Relevant Caltrans Policies:

We have been particularly frustrated by Caltrans' difficulty in building Class IV bikeways on Park Boulevard because Caltrans has recently committed itself to a series of policies that clearly require it to build Class IV bikeways on roadways with characteristics similar to Park Boulevard.

On December 7th, 2021, Caltrans Director Toks Omishakin signed [Director's Policy 37](#), which states that "all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. When decisions are made not to include complete streets elements in capital and maintenance projects, the justification will be documented with final approval by the responsible District Director."

Moreover, while Caltrans has proposed Class II bike lanes for its section of Park Boulevard, Caltrans' own [Contextual Guidance for Bike Facilities](#) clearly identifies Class IV bikeways as the "comfortable, convenient, and connected" facility for this context. Caltrans' own bikeway selection matrix is pictured below.



Caltrans Contextual Guidance for Preferred Bicycle Facilities**					
Place Type and Surrounding Land-Use 1		Posted Speed			
		15-20	25-30	35-45	> 45
Urban Areas & Suburban Main Streets	<2,500	Standard Shoulder or Shared Lane	Standard Shoulder or Shared Lane	Class II or Class IV	Class IV
	2,500-5,000				
	5,000-10,000	Class II or Class IV	Class II or Class IV	Class IV	
	>10,000	Class IV	Class IV		
Rural Areas (Developing Corridors)	<2,500	15-20	25-30	35-45	> 45
	2,500-5,000	Standard Shoulder (may be designated as a Class III facility)2			
	5,000-10,000				
	>10,000				
	Rural Main Streets	<2,500	15-20	25-30	35-45
2,500-5,000		Standard Shoulder or Shared Lane	Class II	Class II	Class I or IV
5,000-10,000		Class II			
>10,000			Class II	Class I, II, or IV	

1 Highway Design Manual (HDM) Index 81.3

2 HDM, Tables 302.1 and 307.2

** Chart is not a replacement for engineering judgement. Intended for planning purposes, to identify minimum preferred bikeway facility under different place type, volume and speed conditions.

With a 40 mph speed limit and [traffic counts ranging between 5909 and 9620 per day](#) on Park Boulevard surrounding Caltrans ROW, this section of Park Boulevard **clearly requires Class IV bikeways according to Caltrans’ own design guidance.**

Even more recently, [Caltrans DIB 89-02](#), the agency’s guidelines on designing Class IV bikeways, stated that a “separated bikeway should always be considered for multilane roadways, which are desired to be part of the bikeway network, where vehicle speeds are greater than 30 mph, next to parking lanes, or where vehicles volumes are greater than 6,000 ADT.” Once again, these criteria clearly apply to Park Boulevard.

Caltrans has been very clear, both internally and externally, about its commitment to building complete streets, and more specifically, its commitment to building Class IV bikeways on roads like Park Blvd.

Conclusion:

We appreciate that Caltrans has made active transportation a greater focus of its work, and we’re encouraged by the excellent bikeway plans that the agency is designing in many locations throughout District 11. However, with [bicycle and pedestrian deaths reaching a ten-year high in San Diego County in 2021](#), it is essential that Caltrans translates its forward-thinking policies around complete streets into hard infrastructure as soon as possible.

In particular, the Park Boulevard redesign is one of the most important active transportation projects that the City of San Diego has ever attempted, and it is essential



that Caltrans work with the city to provide fully connected and protected bicycle facilities through this corridor.

Thank you for considering our recommendations. The San Diego County Bicycle Coalition and Circulate San Diego are excited to continue partnering with Caltrans District 11 as it seeks to make its streets safer for everyone.

Sincerely,

Will Rhatigan
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San Diego County Bicycle Coalition

Jacob Mandel
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