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Oregon Transportation Commission members Baney, Lohman, Brown, Simpson and O'Hollaren
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Fern Valley Interchange – NEPA failures

We object to the planned jurisdictional transfer of North Phoenix Road to Jackson County. A portion of North Phoenix Road, the subject of the proposed transfer, has recently been realigned and improved as a part of the Fern Valley Interchange Improvement (STIP – key no. 12723).

Our objection to the transfer stems, in part, from ODOT's failure to complete the project as described within the Environmental Assessment (EA) documents and, more specifically, ODOT District 8 staff's failure to designate bike lanes along North Phoenix Road north of its intersection with Grove Road. ODOT's contractor for the project placed preliminary pavement markings denoting where bike symbols were to be placed but didn't install them or place an eight-inch stripe separating the bike lane from the travel lane (both of which are required to designate bike lanes).

ODOT's Environmental Assessment (EA) for the project explicitly states "the Build Alternative would improve bike and pedestrian facilities throughout the area directly impacted by the project. Bicycles would generally be accommodated by 6-footwide shoulders that would be designated by pavement markings for bike travel, except bike lanes on OR 99, which would be accommodated by 5-foot shoulders." (Fern Valley Interchange EA, Executive Summary, Page ER-6). Bike facilities were not designated on North Phoenix Road north of its intersection with Grove Road. Similarly on a short section of Fern Valley Road east of Grove Road.¹

If ODOT was adhering to Chapter 7 of ODOT's Highway Design Manual (which defines construction standards for rural arterials [Table 7-2] including required shoulder widths relative to projected ADT) the shoulders on N. Phoenix Road would have been eight feet rather than six feet in width (as they are currently constructed). ODOT's construction of an urban cross-section and associated six foot bike lane stems from the fact that the most of N. Phoenix Road, improved as a part of the project, is within the Phoenix urban growth boundary (see - <http://www.phoenixoregon.gov/buildingplanning/page/future-land-use-map-comprehensive-plan-designations>) and planned for "interchange commercial." Home Depot is located within this planning designation.

The Highway Design Manual, Appendix L, establishes standards for bike lane designation. With current volumes on N. Phoenix Road in the 7,500 ADT range, a bike lane, buffered bike lane, or cycle track is warranted according to the Urban/Suburban Recommended Separation Matrix, Page 1-3.

We oppose jurisdictional transfer until the project is completed consistent with the EA.

ODOT's failure to require the contractor to designate bike lanes (consistent with EA documents) stems, we believe, from political pressure by Jackson County Roads Department. This outcome would be consistent with Jackson County's official policy to only designate bike lanes on roadways with sidewalks on both sides of the street. Rather than conforming to Jackson County's policy, ODOT should be encouraging the County to designate bike lanes on N. Phoenix Road between the Fern Valley Interchange project and Medford's bike transportation network (separated by only 1.5 miles).



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The County, in justifying its policy, mistakenly relies upon the statutory definition of “bike lane” instead of the statutory provisions of ORS 814.420 (which explicitly recognizes that walking sometimes occurs in bike lanes). The Roads Department believes that pedestrians could be cited by the Sheriff’s office for walking in a bike lanes (even though the ORS do not identify it as a citable offence nor establish a fine for doing so). This may seem ridiculous, but as a result, the only County roads with bike lanes are largely confined to the White City urban area where sidewalks are present on both sides of the road. In light of the County’s policy, we oppose this and all future jurisdictional transfers to Jackson County where the roadway includes bike lanes unless the “jurisdictional transfer agreement” explicitly requires the County to maintain the roadway consistent with the cross-section/lane configuration at the time of transfer. This is especially important in the case of OR62 once the bypass is completed. The existing OR62 bike lanes serve as a critical connection between the White City industrial area and the commercial and service hub of Medford. The traffic volumes, even after the construction of the bypass could easily exceed 20,000 ADT (roughly half of the current volume).

Without such provisions, a portion of the Commission's investment in creating a multimodal system will be undermined through jurisdictional exchanges between ODOT District 8 and Jackson County Roads Department.

Thank you. On behalf of the Siskiyou Velo,

Gary Shaff,
Siskiyou Velo Education Chair

Cc: [Phillip Ditzler](#) FHWA (by email), [EPA Region 10](#) (by email)

ⁱ It bears noting that ODOT has failed to construct sidewalks in several locations within the project – which is also inconsistent with the approved EA.

There are other instances in District 8 where bike lanes should have been designated but were not.

ODOT, Region 3, District 8 has failed to designate (i.e. stripe) bike lane facilities consistent with FHWA and EPA approved environmental documents (a violation of FHWA policy and the National Environmental Protection Act) on the

- South Medford Interchange

Instead of marking all bike lanes in the project area with an 8 inch wide stripe with bike symbols (see Manual of Uniform Traffic Control Devices, Oregon Supplement, http://www.oregon.gov/ODOT/HWY/TRAFFIC-ROADWAY/docs/pdf/oregon_supplement_mutcd_2009_edition.pdf, page 50), ODOT has, in almost every case, striped bike lanes for approximately 200 feet (often times less) in advance of the upstream approach to the project’s signalized intersections. Everywhere else they are incorrectly marked as shoulders (i.e. with a four inch wide shoulder stripe and no bike symbol).

This same striping method has been used at:

- North Medford Interchange
- OR 238, Phase I.

Traffic volumes and speeds on these facilities exceed the thresholds established in the Commission’s Highway Design Manual, Appendix L, page 1-3, for the installation of bike lanes rather than shoulders. Apparently, ODOT District 8 has been saving paint at the expense of safety.