



TO: Oregon Transportation Commission  
FROM: Siskiyou Velo (the largest bike club in Southern Oregon w/ over 250 members)  
DATE: February 17, 2016  
RE: Draft Oregon Bicycle and Pedestrian Plan

We had hoped that we could advocate for the approval of the draft Oregon Bicycle and Pedestrian Plan. Regrettably, we have found that it doesn't warrant our support. In fact, the Plan falls so far short of what is needed of a plan extending to 2040 that we oppose its adoption and recommend that the Transportation Commission start anew.

The Plan has numerous flaws:

- 1) It doesn't include an inventory of existing facilities,
- 2) It doesn't identify the facilities or improvements needed to build-out the bicycle and pedestrian system (as defined by regional and local plans),
- 3) It doesn't include a strategy for funding the needed improvements to achieve the required system,
- 4) The draft Plan does not identify nor address widespread violation and ignorance of ORS 811.065, and
- 5) It doesn't identify needed legislative changes to maximize or at least improve the safety of the transportation system for all modes and users.

Rather, the plan is a statement of resignation to the status quo. The bicycle and pedestrian system, to the degree that the Plan includes such a description, will look in the future much like it does today. State highways will be no safer than they are today, highway segments that lack bicycle lanes and sidewalks (in urban and metropolitan areas) will not be improved to add those facilities - unless, of course, motor vehicle travel demand forces their improvement. These are not the outcomes that are needed.

Oregon needs a bicycle and pedestrian plan that will:

- 1) Increase the modal share of bicycle and pedestrian travel,
- 2) Help metropolitan areas reduce per capita vehicle miles of travel,
- 3) Ensure that bicycle and pedestrian facilities are ubiquitous and ensure that people who choose (or are dependent upon) these modes have a safe and convenient system comparable, in extent, to today's motor vehicle system,
- 4) Provide funding to ensure that Oregon's bicycle and pedestrian system will be constructed to serve today's and tomorrow's travel demand, and
- 5) Maximize the potential reduction of carbon emissions from the transportation sector.

These are the imperatives of bicycle and pedestrian planning. The current draft fails in every account.

The attached technical report itemizes the Plan's faults and offers, what we believe, would be the basis for development of a bicycle and pedestrian modal plan worthy of the term.

---- SISKIYOU VELO'S ----

TECHNICAL REPORT

ON THE

DRAFT – OREGON BICYCLE AND PEDESTRIAN PLAN

February 17, 2016



## **Introduction**

This report is organized into five sections reflecting the draft Plan's flaws. These include the following:

1. The draft Plan doesn't include an inventory of existing facilities,
2. The draft Plan doesn't provide or even contemplate the build-out of the bicycle and pedestrian system (as defined by existing regional and local plans),
3. The draft Plan doesn't include a strategy for funding the needed improvements to achieve the required system,
4. The draft Plan does not identify nor address widespread violation and ignorance of ORS 811.065, adopted by the Oregon Legislature in 2007, and
5. The draft Plan doesn't identify needed legislative changes to maximize or at least improve the safety of the transportation system for all modes and users.

## **Section 1 – Inventory Flaw**

The staff and consultants who prepared the draft Plan ignored calls, early in the planning process, to base their efforts on substantive inventories and data. This failure undermines the credibility of the effort and the future value of the result.

Without existing inventories of the ODOT system the “vision” relies upon a blank page rather than an informed basis for decision making. The State Highway Plan serves as a model modal plan with its inventory of and detailed plan for the state highway system. The bicycle and pedestrian plan should have the same details and, as such, include an inventory and plan for bicycle and pedestrian facilities on highways under ODOT's jurisdiction. (Appendix C states “A state pedestrian and bicycle facility inventory was completed in 2012 and it will be updated again in 2015” – why not use it?).

The Plan should focus on which State highways need bicycle and pedestrian improvements; where are the priorities, how much will they cost, and how will they be funded. As it is the draft Plan simply reflects the finding of metropolitan and local plans; that there are too many projects (i.e. travel demand) and too little funding. The updated bicycle and pedestrian plan should do more.

The Oregon Transportation Planning Rule has successfully guided metropolitan and local governments in the development, adoption and update of transportation system plans (including modal elements). The resulting data from this effort is readily available and, while challenging to integrate, should have been one of the first tasks undertaken by ODOT and its consultant staff. Additionally, ODOT has an extensive and detailed Highway Performance Monitoring System (HPMS) which includes details on classification, volume, lane width, and shoulder width. The HPMS data when coupled with ODOT's pavement management inventory provides a robust source of planning information. Finally, ODOT has inventories of bike facilities (and much, much more related data) available at [ftp://ftp.odot.state.or.us/tdb/trandata/GIS\\_data/](ftp://ftp.odot.state.or.us/tdb/trandata/GIS_data/). Why wasn't this data used to identify the existing network and help to identify future needs?



Certainly, more data could be collected now and in the future, but the failure to use the available data in the development of the bicycle and pedestrian plan represents, at best, an unfortunate outcome but, in our opinion, an unacceptable flaw in the bicycle and pedestrian planning process.

By not undertaking an inventory of the existing (and potential) bicycle and pedestrian facilities on ODOT facilities the draft plan paints a rosy picture of the State's progress on creating a multimodal system. The plan includes a statement that "federal and state laws or regulations pertaining to walking and biking are not duplicated in the policies or strategies as they are already in effect." (OBPP, page 32). In absence of an inventory this "fact" is dubious. Our sampling of facilities on ODOT District 8 highways indicates that there are defects in the application of federal and State laws including ODOT's own regulations. (see Appendix A for details)

**Section 2. The draft Plan doesn't provide or even contemplate the build-out of the bicycle and pedestrian system (as defined by existing regional and local plans).**

Oregon cities, counties, and metropolitan areas have, in almost every case, identified through their transportation system plans (TSP) an extensive network of future bicycle and pedestrian facilities. That is the requirement of the Transportation Planning Rule.

Oregon's local and regional TSP's are coordinated, are based upon inventories, and reflect the communities' transportation needs. Local government is doing a great job. It is the State that has failed in its obligation to inventory its own system, define deficiencies, and develop a plan to remedy them (coordinating these actions with local governments).

The purpose of ODOT's State Coordination Rule (OAR 731-15) is to establish the procedures used by the Department of Transportation to implement the provisions of its State Agency Coordination Program which assure that Department land use programs are carried out in compliance with the statewide planning goals and in a manner compatible with acknowledged comprehensive plans, as required by ORS 197.180 and OAR 660, Divisions 30 and 31. Section 731-15-15(12) defines a "Modal Systems Plan" to mean "a plan for a statewide system of one or more transportation modes that includes identification of system needs, classification of facilities, and establishment of policies."

The current draft fails that basic test. It doesn't identify needs nor classify facilities. It only includes policies. Oregon doesn't need more verbiage or plans that simply say the right things but does nothing to advance the needs of the State's citizens. We need a plan that will carry us forward into the coming century.

The draft Plan should include (but doesn't) a listing or map of improvements that would be necessary to complete the bicycle and pedestrian system on the State highway system. This is not a complex task. Metropolitan and local governments have compiled such lists and maps within their transportation system plans; the State's bicycle and pedestrian plan should do no less.



It is critical that such a listing provide for bicycle improvements (i.e. bike lanes, protected bike lanes, or cycle tracks) on all State highways within urban and metropolitan areas. Too often transportation planners use the terms urban (i.e. within urban growth boundaries), and rural to distinguish between those areas where bike lanes are needed and where widened shoulders will suffice. Such simplicity may stem from their understanding of the Portland Metro area which has a single urban growth boundary (UGB) for the entire metropolitan areas and the presumption that other metropolitan areas use the same approach. That is not the case. With the exception of Metro, all the State's other metropolitan areas (i.e. metropolitan planning organizations - MPO) include multiple UGB's, one each for every incorporated city and these are frequently separated from one another by "rural" land.

Stopping and starting bike lanes at the city/county boundary ignores the fundamental basis upon which MPOs were created; MPO's encompass a metropolitan region that has one, interconnected and seamless transportation system. This is clearly the how ODOT, MPO's, and local governments approach the motor vehicle transportation and transit networks. It should be the same for bicycles. A cyclists (and a motorist) should experience a continuity of facility design within the MPO, regardless of jurisdiction. A bike lane on a city street shouldn't arbitrarily end at the city limits line because the road jurisdiction changes to county. Nor should a State highway, in a MPO, change from having a bike lane, to not, every time it leaves or enters a city. It just doesn't make sense.

Unfortunately, existing ODOT policy apparently allows bike lanes to begin and end arbitrarily based upon jurisdiction within MPO's. The final [Rogue Valley Highway Corridor Plan](#) – OR 99 reflects that approach. The OR99 Plan shows future improvements with paved shoulders in rural (i.e. unincorporated areas) and bike lanes within urban areas even though the cities are sometimes separated by as little as 1.5 miles (i.e. a six minute bike ride at 15 MPH).

The language in proposed Goal 2, Accessibility and Connectivity, "Provide a complete bicycling and pedestrian network that reliably and easily connects to destinations and other transportation modes" would not resolve this problem. The OBPP (including Appendix L) should make clear that all roads within MPO's are considered to be urban/suburban for purposes of assessing the appropriateness and design of bicycle facilities (see Appendix L, Chapter 1, page 1-3).

### **Section 3. The draft Plan doesn't include a strategy for funding the needed improvements to the bicycle and pedestrian system.**

The approach described within the OBPP is, in large part, a resignation to the current financing and prioritization of transportation projects in Oregon (and at the Federal level). Continuing the status quo will not ensure completion of the bicycle and pedestrian system network within our children's, children's life times. That outcome should be unthinkable and is totally unacceptable.



If the current financing and priority system had been in place in the early 1900's, we would have today a complete multimodal system. But the country's automobile culture/economy ignored the needs of alternative modes and created a legacy transportation system that is hostile to alternative modes. Bike lanes (or wide shoulders) and sidewalks were rarely constructed up until the passage of the Oregon Bicycle Bill (1971) and even then only as far as the bike funding would stretch. Consequently, the existing transportation system is largely mono-modal: serving only the needs of the automobile.

Completing the bicycle and pedestrian system should be a fundamental goal of the OBPP. That will be the only way the State, as a whole, can ever hope to achieve the potential of these modes. The OBPP should be a tool to change the status quo not sustain it.

The OBPP should not just inventory the existing system but identify the future system and ensure adequate funding to construct it. The listing of potential funding sources (see Appendix C, Table 7) isn't even a good start. The Plan, instead, should include policy that will ensure the Transportation Commission and ODOT pursue funding through the Oregon legislature to get the job done within the Plan's 20 year planning horizon. The OBPP can't be expected to solve bicycle and pedestrian deficiencies on all streets and for all levels of government but it should, at least, deal with the defects on the State highway system. Securing a dedicated funding stream is essential.

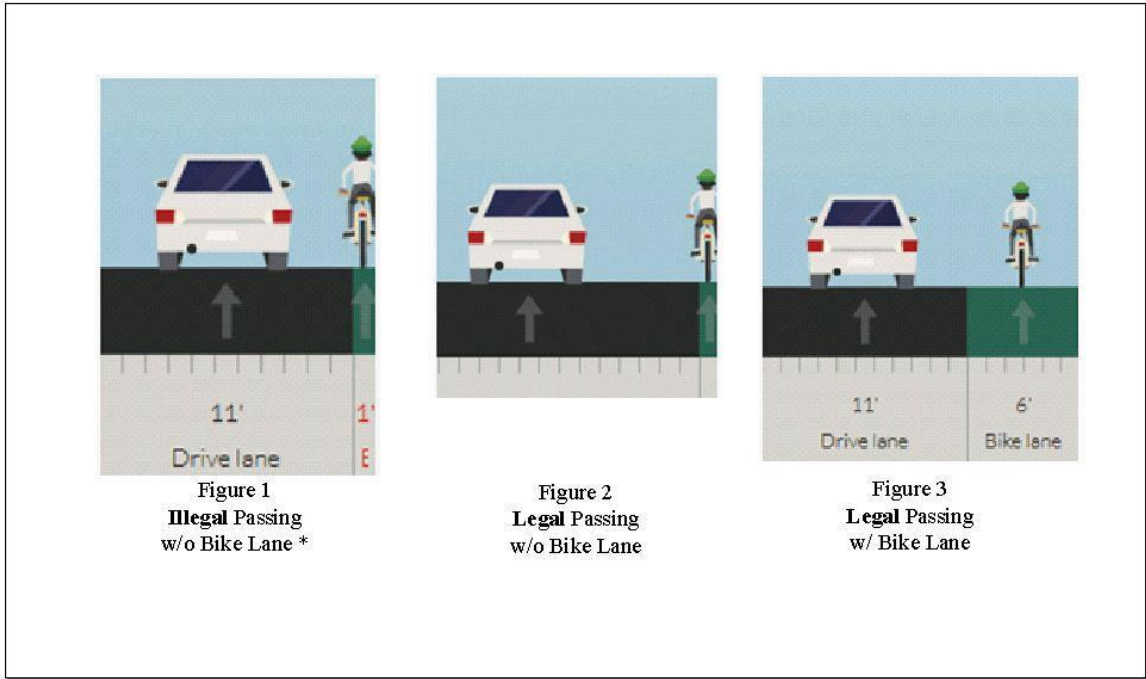
Why isn't there a discussion about a statewide hotel/motel tax dedicated to bicycle and pedestrian improvements (as opposed to simply including it among the list of potential funding sources). The economic, health, and environmental impacts would far exceed that which may arise from hosting the track and field championships in Eugene. Further, the benefits from completing the Statewide bicycle and pedestrian network would be dispersed throughout the State and every resident in the State would directly benefit from the improvements. Additionally, the improvements would continue to generate benefits for 20, 30, maybe even 100 years in the future (and likely have a compounding beneficial effect upon the health of the State's residents, its economy and the environment).

Completing bike and pedestrian improvements on State highways, where they are absent, should be the top priority of the Plan. Instead, the draft seems to characterize the build-out of the bicycle and pedestrian system as an unachievable goal. While we recognize that prioritizing funding for these initiatives will be a challenging task, what better vehicle is there than the OBPP to push for this critical outcome?

**Section 4. The draft Plan does not identify nor address widespread violation and ignorance of ORS 811.065, adopted by the Oregon Legislature in 2007.**

Plan policy 1.2 should be divided into two policies; one focusing on the education of auto drivers and the second on bikes/pedestrians. Ironically, the Plan includes a discussion of level of stress (LTS) while at the same time ignoring the single most effective way of reducing stress: Having auto drivers obey the law.

ORS 811.065 requires safe passing of people riding bicycles but auto drivers typically ignore the law and infringe on the road space occupied by cyclists (see Figure 1). The outcome can partially be attributable to cyclists who do not operate his/her bike as a vehicle by riding on a too narrow road shoulder along a roadway with lanes too narrow to effectively share (lanes less than 14 feet). To legally pass a bicycle under these circumstances a motorist must pass with “sufficient (separation) to prevent contact with the person operating the bicycle if the person were to fall into the driver’s lane of traffic.” A legal passing maneuver is shown in Figure 2 and is striking similar to the separation distances when a bicyclist in a bike lane is passed (see Figure 3).



Despite ORS 811.065 being the law in the State for almost a decade, motorist and cyclists alike are unfamiliar with its requirements. More disturbing is that ODOT has done little or nothing to address widespread ignorance of the law. Figure 1, below, shows how easily the requirements of the law can be graphically illustrated.



Figure 1 - ORS 811.065

The Club has shared this illustration with ODOT officials who rejected the suggestion that it be used as a road side sign (justifying its rejection based upon its exclusion from the Manual of Uniform Traffic Control Devices (MUTCD)).

Regrettably, ODOT officials in rejecting the sign concept, didn't identify an approved sign that would have a similar effect on the public's awareness of the law. The following is an excerpt from the "frequently asked questions" section of the MUTCD.

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1. **Q: The agency I work for has recently enacted a law that requires the motorist to keep a minimum lateral distance of 3 feet from the bicyclist when overtaking the bicyclist. I have seen this sign used elsewhere, but cannot find the sign in the Manual. Where can I find the standard sign for this situation?**

**A:** No standard sign exists. The purpose of highway signing is not to create awareness, which is typically the intent of a sign conveying programmatic rules of the road. Other media—such as radio, television, and newspaper ads; notices on 511 travel information systems; postal mailings; and Web sites—are more appropriate for and conducive to promoting and/or marketing specific programs and new regulations. Special word message signs for the three-foot law should not be installed haphazardly and should be limited to locations where the operation of the two vehicle types is demonstrating a problem or crash history. Thus, installing these signs where say a physically-separated bikeway exists would be counterproductive to achieving the agency's goal. An example of a special word-only message sign for this application could be a four-line black on white regulatory sign with the legend CHANGE :: LANES :: TO PASS :: BICYCLES.

Excerpt from MUTCD, [http://mutcd.fhwa.dot.gov/knowledge/faqs/faq\\_part9.htm](http://mutcd.fhwa.dot.gov/knowledge/faqs/faq_part9.htm)





The MUTCD suggested language would also reflect ORS 811.065 that limits “the passing maneuver to instances where the roadway is unobstructed in an attempt to avoid the situation where drivers are tempted to “squeeze” by bicyclists on a crowded roadway. The law makes clear its intention not to authorize passing when it is otherwise prohibited by law, and states that if the passing maneuver in a no-passing zone causes injury or death to the bicyclist then such an act is “prima facie” evidence of the offense, which means that no further proof is necessary to establish the elements of the violation. However, the new law does not specifically prohibit passing a rider or group of riders in a no passing zone; instead it attempts to hold a driver responsible for an attempt to pass in a no-passing zone which results in an injury accident.” <http://www.stc-law.com/safepassing.html>

ORS 811.420 (Oregon’s general passing law) prohibits “passing” in a no-passing zone except “when an obstruction or condition exists making it necessary to drive to the left of the center of the roadway provided that a driver doing so shall yield the right-of-way to all vehicles traveling in the proper direction upon the unobstructed portion of the roadway within a distance that would constitute an immediate hazard.”

ORS 811.420(3)(b) The “condition” “making it necessary” to “cross the centerline” is the same provision bicyclists have pointed to as legal justification for the maneuver that bicyclists typically encourage motorists to use to get around a slower group of riders. Since bicyclists do not occupy the entire lane, motorists are able to pass bicyclists by waiting until the roadway ahead is unobstructed and then moving only slightly over the center no-passing line in order to give a wide berth and get around the group of riders. Usually this is a much-preferred alternative to the situation where a motorist angrily holds back from going around the riders when the traffic lane is too narrow for both riders and the motorist. It is also far preferable to the situation where the motorist is tempted to squeeze by a group of riders without crossing over the centerline because the motorist is afraid that if they cross the center line, then they are passing in a no-passing zone. If the rider or group of riders is the “condition” “making it necessary to drive to the left of center of the roadway” then so long as the road ahead is unobstructed, many riders believe it is far better to have the motorist pass than to follow behind impatiently, or be tempted to “squeeze through” without crossing the centerline.” (IBID, STC-Law)

The OBPP policies/strategies should explicitly require that “change lanes to pass bicycles” signs be erected on ODOT and local governments roads, streets, and highways where posted speeds are above 35 MPH, bike lanes are not present, the centerline is marked, and travel lanes are less than 14 feet in width. It is critical that signs be placed on urban streets and highways (especially along commuter routes), as well as on rural roads and highway where bicyclist can be expected (such as but not limited to State scenic bikeways, routes leading to Crater Lake National Park, Cascade Lakes Scenic Byway, Coast Highway, US 197, etc).



Additionally ODOT, Department of Motor Vehicles, should include questions related to ORS 811.065 and ORS 811.420 on every driver's test.

With regard to bicyclist education and training, a distinct policy and set of strategies should be developed to address this pressing need. Bicyclists too often disregard traffic control devices and often have little knowledge of the traffic environment in which they operate. Further, the OBPP should include policies and strategies that encourage and provide incentives for local governments to implement bicycle diversion programs. The combination of diversion and bicycle education/training courses provide an excellent approach to ensuring bicycle laws are enforced as well as broadening the population receiving bicycle education/training.

Finally, the pedestrian stings that are carried out by local government and funded (as we understand) through ODOT Traffic Safety Division should be identified as a Plan strategy. The Plan should also call for the similar strategies to enforce the bicycle passing law (especially ORS 811.065 – see above).

**Section 5. The draft Plan doesn't identify needed legislative changes to maximize or at least improve the safety of the transportation system for all modes and users.**

Oregon law provides a very effective and comprehensive set of laws governing all modes of transportation. If enforced, they would ensure the safety and comfort of all road users. We offer here discussion about three laws--ORS 811.420, ORS 814.420 and ORS 366.514.

**ORS 811.420**, as noted above, is Oregon's general passing law and prohibits "passing" in a no-passing zone except "when an obstruction or condition exists making it necessary to drive to the left of the center of the roadway provided that a driver doing so shall yield the right-of-way to all vehicles traveling in the proper direction upon the unobstructed portion of the roadway within a distance that would constitute an immediate hazard."

The statute should be clarified by adding a new section:

3(c) When passing a pedestrian, bicycle, tractor, or other slow moving vehicle, the operator of a vehicle may drive on the left side of the center of a roadway in a no-passing zone when such movement can be made in safety and without interfering with or endangering other traffic on the highway.

**ORS 814.420** requires cyclist to use bike lanes when they are present and free of obstacles. Generally, the statute, as written is fine except for Section 3 which lists circumstances where it is permissible, under law, to "move out of the bicycle lane." In particular subsection 3(e) allows for cyclists to move out of the bike lane when the cyclist is "continuing straight at an intersection where the bicycle lane or path is to the right of a lane from which a motor vehicle must turn right." For starters, lane configurations such as this should be eliminated – they are inconsistent with OBPP, Appendix L, Chapter 6 (except under very rare circumstances).



Now to the point, it is generally agreed that ‘cyclists fare best when they act and are treated as vehicles’ – i.e. vehicular cycling. That is particularly true at intersections where motorists invariably state, following a motor vehicle and cyclists crash, that they didn’t see the cyclists in advance of the collision. With the cyclists on the edge of the roadway, where the bike lane is located, people riding bikes are too often not seen by turning vehicles; either those turning right or left. Changing just one word in ORS 814.420(3)e would make intersections safer for cyclists. The exception to staying in the bike lane should read “continuing straight at an intersection where the bicycle lane or path is to the right of a lane from which a motor vehicle ~~must~~ **may** turn right.” Such language would allow cyclists to merge from the bike lane into the adjacent through lane as they approach an intersection. Cyclists who have taken vehicular cycling courses know that they are much safer by taking the right-most lane serving their destination at an intersection. In this way, they become a part of the traffic flow and not relegated to the outer-regions of the roadway surface. It is safer because the cyclists is integrated into the overall traffic flow and thereby is seen by motorist approaching from behind and those coming from the opposing direction (this is especially important for those motorists making a left turn).

This change is critical to reducing the number of intersection collisions between vehicles and bicycles. “Intersections represent a relatively small portion of a cyclist's travel route.” Nonetheless, “they are where a cyclist is most at risk of getting hit by a car or otherwise involved in a car accident. Only 11% of bicycle accidents involve a collision with a car; but of these, 45% take place in intersections.” <http://www.nolo.com/legal-encyclopedia/bike-accidents-collisions-with-cars-29549.html>

**ORS 366.514** should be amended to provide a bold new strategy for the use of the bike funds. Don Stathos’ bill has not been updated and, as a consequence, does not reflect the change in public policy brought about by the Oregon Highway Plan and the Transportation Planning Rule. When ORS 366.514 was signed by Governor McCall in 1971 bike lanes were uncommon and rarely constructed on State highways or local streets. That is not the case today with both State and local transportation plans requiring bike facilities, in urban areas, on arterials and collector streets.

In keeping with the vision embodied within ORS 366.514, the target of the funds should shift from new construction (where bike and pedestrian facilities are required pursuant to State and local policy) to retrofitting highway and streets to include bike and pedestrian facilities where vehicular capacity upgrades are not warranted. Projects like these are common throughout the State and too little funding makes their construction financially impractical.



## Appendix A

### ODOT, Region 3, District 8 Bicycle Facility Defects - Inventory

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](http://www.oregon.gov/ODOT/HWY/TRAFFIC-ROADWAY/docs/pdf/oregon_supplement_mutcd_2009_edition.pdf), page 50), ODOT has, in almost every case, stripped 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 though they are shoulders (i.e. with a four inch wide shoulder stripe).

This same stripping method has been used at:

- North Medford Interchange
- OR 238, Phase I.

Apparently, ODOT District 8 has been saving paint while jeopardizing the safety of cyclists.

Appendix L, page 1-3, of the Oregon Bicycle and Pedestrian Plan specifies bike lanes rather than shoulders be designated in urban /suburban areas where speeds and traffic volumes are high (like those at these locations).

In the case of the Fern Valley Interchange, the narrow stripping occurs on facilities "opened to traffic in late March" 2015 (now, almost one year ago) "(Grove Rd and N. Phoenix Rd) is temporary paint for the current traffic control stage. The permanent striping will be a thermoplastic material; it will be installed at a later stage in the project when traffic is moving in its final configuration." (4/16/15 email from E. Fenney, ODOT Assistant Project Manager) Bicycle traffic, its control, and provision of legal right-of-way per ORS [811.050](#) is not relevant, per E. Finney, in the "current traffic control stage." It should be noted that crosswalks, and turn and center line markings were installed but bike lanes were designated as shoulders. Bike lanes were explicitly included as a part of the project's environmental documents.

The above, with the exception of the Fern Valley Interchange which was not under construction at the time, were itemized by Gary Shaff - Siskiyou Velo's President to District 8 managers in the summer of 2014 (along with other stripping issues). We had hoped that the errors would be corrected soon thereafter. Tellingly, ODOT has only resolved two of the many that were identified. Those include:



- 1) Correctly marking bike lanes on OR 66 as a part of the S. Ashland Interchange project (Key #16956), and
- 2) Paving the shoulders of OR 66 (MP 1.99 to 4.74). The shoulders should have been repaved when ODOT originally did the overlay/repaving of the travel lanes in 2012 in order to conform to ODOT's internal policy entitled "New Pavement Services Guidance – Pavement Preservation Consideration for Bicycle Travel, CO11-01A, 8/10/2011 – see Appendix A).

Other District 8 actions or inactions that question the legitimacy of the draft Plan's statement are listed below:

Identified as a part of the ODOT/Velo meeting in July 2014:

- 1) Lack of designated bike lanes on OR 99 south of Crowson Road in Ashland.
- 2) Failure to include bike lanes as of part of the improvements at the intersection of OR 238 and West Main (2014) while also failing to include pavement markings (nor signs) acknowledging the Don Stathos Bikepath on OR 238.
- 3) ODOT's failure to stripe OR 62 with bike lanes in Eagle Point (and from Eagle Point to Shady Cove).
- 4) ODOT's delay in extending the bike lane and creating a three lane cross-section on OR 99 from the railroad underpass in Ashland to Valley View Road

Not identified at the July 2014 meeting are the rumble strips (as itemized below) which were added during the fall of 2015

- 1) ODOT rather than designating the bike lanes (as requested in 2014) has recently added centerline and shoulder rumble strips on OR 62 between Eagle Point to Shady Cove (including portions of OR 62 between Linn and Barton Roads within the City of Eagle Point). ODOT had an opportunity to enhance the striping but, instead, cut-in center line and shoulder rumble strips which create hazards for cyclists (particularly the shoulder rumble strips).
- 2) ODOT failed to repave the western shoulder of OR 62 between Shady Cove and the passing lane section north of Little Butte Creek when the highway was repaved.
- 3) ODOT failed to pave the one to two foot wide shoulder between Trail and Casey State Park as a part of its repaving. ODOT has recently added center rumble strips in this area despite this route serving as the primary access for cyclists traveling to and from Crater Lake National Park from the Rogue Valley.
- 4) ODOT's addition of center-line rumble strips on OR 238 (in the vicinity of Hanley Hill) where shoulders are absent or are less than one foot wide. This is a principal cycling route between Central Point and Jacksonville and putting in the rumble strips has made it more dangerous for cyclist.<sup>1</sup>

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<sup>1</sup> It is unfortunate that ODOT did not consult a National Cooperative Highway Research Program report, [NCHRP 339](#), which cautions against installation of centerline rumble strips on routes used by cyclists with inadequate shoulders (try no shoulders).



- 5) ODOT's recent restriping of bike lanes in Ashland on North Main (OR99). Several sections include 6 inch strips and bike lane stencils are missing in numerous locations.
- 6) Absence of bike lane markings on OR 62 between the I5 interchange and Delta Waters Road
- 7) Failure to replace bike lane markings following improvements in the 3000 block of Crater Lake Highway (near Kaleidoscope Pizza) (see bike lane inventory at [ftp://ftp.odot.state.or.us/tdb/trandata/GIS\\_data/](ftp://ftp.odot.state.or.us/tdb/trandata/GIS_data/)).

In conclusion, ODOT's existing policy framework for bicycle and pedestrian infrastructure must be restated as policy in the Bicycle and Pedestrian Plan to ensure that ODOT personnel and the Commission don't ignore or otherwise forget their obligations. This includes policies ensuring:

- ODOT construction projects include bicycle and pedestrian improvements within metropolitan and urban areas, and
- Pavement management practices ensure all vehicles (including bicycles) benefit equally from pavement improvements (explicitly CO11-91A), and
- Pavement markings and signage conform to the relevant standards.