



**California Association of Bicycling Organizations**  
**Headquarters: PO Box 2684 • Dublin, CA 94568**

**CABO Comments on Irvine’s Bicycle Friendly Community Application**  
**April 13, 2009**

CABO was asked to comment on the City of Irvine’s application to obtain Bicycle Friendly Community (BFC) status by the League of American Bicyclists (LAB). While Irvine has taken advantage of starting with a “clean slate” to build a network of on-street bike lanes and off-street bike paths, this alone does not make a community friendly to cyclists, and as described below more work needs to be done before Irvine should be given a BFC award.

The LAB recently adopted a Cyclists’ Equity Statement, available here:

[http://www.bikeleague.org/images/equity\\_statement\\_1-05-09.pdf](http://www.bikeleague.org/images/equity_statement_1-05-09.pdf)

Our comments mirror the structure of the Cyclists’ Equity Statement (portions of the LAB statement have been quoted in italics):

1. ***Equality*** – *The equal legal status and equal treatment of cyclists in traffic law. All US states must adopt fair, equitable and uniform traffic laws, that are “vehicle-neutral” to the greatest extent possible. Cyclists’ ability to access to all destinations must be protected. State and local laws that discriminate against cyclists, or restrict their right to travel, or reduce their relative safety, must be repealed.*
  - 1.1. **Local Ordinances**: Although the state preempts local regulation of traffic per California Vehicle Code (CVC) 21, Irvine has a set of local ordinances regulating how cyclists must ride on the roadway. While many of these ordinances mirror state law, a provision limiting cyclists to two abreast exists, which is unenforceable as it is inconsistent with state law. These illegal local ordinances need to be repealed.
  - 1.2. **Lack of Access to All Destinations**: While for the most part cyclists have access to all destinations in Irvine, there are two locations where motorists have direct access via a controlled access toll road, while cyclists have long alternate routes. (In California, cyclists are generally allowed to use freeway shoulders when there is no alternate route, a nearby local example being I-5 through Camp Pendleton.)
    - State Route 241: Direct access between the Portola Springs community in Irvine and the Foothill Ranch area of the City of Lake Forest is only available via SR 241, which is prohibited to cyclists. Irvine should work with Caltrans to open the road shoulders to cyclists until Portola Parkway is completed. (A short video that makes the case for access is available here:  
<http://www.youtube.com/watch?v=-bDvmtzNDfA>.)

- State Route 73: Direct access between Newport Coast Drive in Irvine and SR 133 near Laguna Beach is only available via SR 73, which is prohibited to cyclists. Irvine should work with Caltrans to open the road shoulders to cyclists.

1.3. Severing of Access During Construction Projects: Irvine has not done a good job of protecting cyclist access during construction projects. A couple of examples are as follows:

- Laguna Canyon Road: Irvine closed a one mile portion of Laguna Canyon Road to all traffic between Alton Parkway and State Route 133 during the construction of the Quail Hill community. Since that portion of Laguna Canyon Road is the only non-freeway access to State Route 133, the closure in effect severed cyclist access to a five mile section that is the only direct route to the City of Laguna Beach. .
- Culver Drive: Rather than accounting for bicycle traffic during construction and/or informing motorists that they need to share the road with bicyclists, Irvine posted signs prohibiting bicycling along this stretch of roadway during construction. Selectively closing a (non-freeway) road only to cyclists while leaving it open for motorists is illegal under state law and must not be repeated in the future.

2. ***Engineering – Roadways and separate facilities must conform to state and national standards and allow for safe, legal and efficient traffic movements. Construction and maintenance of roads must equitably serve all users. Separate facilities must be maintained at a level not less than that applied to the public roadway. Trip-endpoint and waypoint facilities such as parking must serve bicyclists.***

2.1. Adherence to Design Standards: In general, Irvine has done a good job of meeting or exceeding the minimum design standards – typical on-street bike lane width is 8 feet instead of minimum requirement of 5 feet, and off-street paths are typically designed with grade separation from roadway traffic. However, there are some cases – for example, a portion of the bike lane on Jamboree Road south of Barranca Pkwy is only about 2 feet wide. Irvine should do an audit of existing facilities for compliance and identify corrective measures.

2.2. Cyclist Accommodation During Construction Projects: Where cyclist access has not been severed, Irvine in general has done a good job of posting “share the road” or other signage to remind motorists of the presence of cyclists, but there are occasions where this is not the case. One project on Irvine Blvd had signage directing cyclists to use the sidewalk, which invites harassment of cyclists legally using the roadway. Furthermore, this project had used portable fences to separate the sidewalk from the roadway. These fences had blown over onto the sidewalk during the strong winter Santa Ana winds.

2.3. Bicycle Unfriendly Freeway Interchanges: Freeway interchanges with arterial roadways in Irvine often have features such as dual on/off ramps or other features that are optimized for high speed motor vehicle traffic. While these interchanges can be safely negotiated by experienced cyclists, they are intimidating to many cyclists

and therefore form barriers that discourage travel by bicycle. Furthermore, many of these interchanges have design features, such as bike lanes to the right of right turn only lanes, that are not compliant with engineering design standards. In some cases there are alternate routes, but these often involve significant out of direction travel. Irvine should work with Caltrans to ensure that design of freeway interchanges complies with appropriate design standards and accommodates the needs of bicyclists as well as motor vehicle traffic.

- 2.4. Bicycle Detection at Traffic Signals: Detection of bicycle traffic at intersections, particularly in left turn pockets, is a major problem in Irvine as bicyclists often have to wait for a motorist to arrive before receiving a green traffic signal. The current practice of push button actuation at the side of the road is not acceptable, as it is often incompatible with cyclist lane position (such as when a cyclist is in the left turn pocket, or in the through lane to avoid a right turn only lane). New pavement loops should be of a quadrapole or other type that is optimal for detecting bicyclists. Existing loops should have the sensitivity increased for better bicycle detection, with the “sweet spot” clearly identified using the Caltrans bicycle detector symbol.
- 2.5. Planning/design which ignores the needs of the entire cycling community: In a couple of cases, provision of a bike path (or the promise to provide one at a future date) was used as justification to ignore the needs of roadway cyclists. This is unacceptable. A couple of examples are as follows:
  - Jamboree Road: Cyclist access to northbound Jamboree under I-5 was severed after completion of the Jamboree/SR 261 interchange. (There were also other opportunities to better accommodate cyclists, one example being better frontage road design.) Access was later restored by relocating a “no bikes” sign, but the situation is still less than optimal as cyclists must travel a short distance down the northbound SR 261 onramp and then merge two lanes to the left to a connecting ramp to Jamboree. The reasoning given to cyclists for the loss of access was that the extension of the Peters Canyon Trail would provide access. Completion of the Peters Canyon Trail under I-5 was finally completed about a few years ago, about ten years after the interchange was completed.
  - Culver Drive: Culver between Campus and Bonita Canyon was originally a two-lane road with shoulders. The Irvine bicycle master plan indicated striped bike lanes would be provided when the road was widened to four lanes. During the planning for the widening project, residents adjacent to the right-of-way on the east raised concerns about increased traffic noise. As a result, the city changed the plans, eliminating the bike lanes and sidewalks to move the road alignment as far west as possible in right-of-way to keep the traffic noise as far away from the residents as possible. A shared bicycle/pedestrian sidepath was provided in the eastern portion of the right-of-way, which is on a downhill where cyclists can easily attain 30 mph without pedaling. To add insult to injury, a city staffer asked at least one of the local bicycling clubs for a letter of support for funding for the bike path – at a time when road construction was nearly complete and cyclists were (unsuccessfully) trying to work with the city to try to get a narrower inside lane striped to make room for a wider outside lane for side by side car/bike sharing.

3. **Enforcement** – *Cyclists must be given equal treatment by police and the courts in the enforcement of traffic laws and in the investigation of crashes that involve bicyclists which reach the threshold for the state or jurisdiction in question. Cyclists must be viewed as fully equal to other parties in the determination of culpability in crashes, the economic value of injuries or death, and non-economic losses that are commonly awarded to crash victims.*

**Education** – *Cycling training should be based on the principle that “cyclists fare best when they act and are treated as drivers of vehicles.” This type of cycling is based on the same sound, proven traffic principles governing all drivers, and is the safest, most efficient way for all cyclists to operate, by making them highly visible and their actions predictable to other road users.*

Our comments on Enforcement and Education are combined as follows:

- 3.1. Cycling clubs and informal cycling groups have reported a recent increase in enforcement activities directed at group rides. While we have no objection to enforcement of right-of-way violations such as failing to stop for stop signs, the recent wave of enforcement seems to be focused on using a narrow interpretation of the cyclist “far to the right” laws and the illegal “two abreast” law to address motorist complaints about groups of cyclists using the roadway - rather than educating motorists that cyclists have a legal right to the road. On multilaned roads on early weekend mornings with low traffic, we believe that a limitation on two abreast unnecessarily delays faster traffic, as it stretches out the group of cyclists and requires long waits for turning motorists. It is our opinion that a group using the whole outside lane at such a time of day enhances traffic flow and does not negatively impact motorist or cyclist safety. This is consistent with the vehicle code, as sections 21202 (on roads without bike lanes) and 21208 (on roads with bike lanes) only apply when "operating a bicycle upon the roadway at a speed less than the normal speed of traffic moving in the same direction at that time", and on early weekend mornings the group of cyclists is the "normal speed of traffic ... at the time" and is not subject to the provisions of 21202 and 21208.

4. **Encouragement** – *Promotion of cycling as a healthy and environmentally sound method of transport and recreation. Encouragement is done via promotional campaigns, incentives for those choosing bicycling rather than another form of transport and promotion of cycling as a healthy activity. The encouragement of bicycling should be inclusive of all types of cyclists.*

No comments.

5. **Evaluation** – *Evaluation of the other five Es (Equality, Engineering, Enforcement, Education and Encouragement). Evaluation must involve measurement, analysis and research using rigorous, statistically sound methodologies.*

No comments.