



September 22, 2023

Director Tony Tavares  
California Department of Transportation  
1120 N Street  
Sacramento, CA 95814

Secretary Toks Omishakin  
California State Transportation Agency  
400 Capitol Mall, Suite 2340  
Sacramento, CA 95814

*Submitted via Email*

**Re: DIB-94: Complete Streets Contextual Design Guidance**

Dear Director Tavares and Secretary Omishakin:

We, the undersigned active transportation advocacy organizations and members of Caltrans' California Walk and Bike Technical Advisory Committee, would like to voice our strong support for the proposed Design Information Bulletin 94: Complete Streets Contextual Design Guidance (DIB-94). The standards and guidance provided in this document is exactly the type of progressive leadership we need in California to realize Caltrans' and CalSTA's Complete Streets vision, meet its climate action goals, and create a cleaner, safer, more equitable and connected active transportation system for all users.

However, the decision to categorically exclude interchanges from DIB-94 severely diminishes its value and introduces a major barrier to Caltrans' and CalSTA's goals of reducing greenhouse gas emissions and eliminating traffic deaths. Interchanges are arguably the most dangerous crossings for people on bikes and pedestrians. We strongly urge you to reconsider your decision to exclude interchanges before DIB-94 is approved. Caltrans' DP-37 and the entire effort behind DIB-94 is undermined by the fact that interchanges will continue to be barriers to multi-modal connectivity and their inclusion could allow us to address the severe impacts highways have had on our communities.

Excluding interchanges from DIB-94's improved design standards perpetuates gaps in cities' active transportation networks, gaps that will become even more glaring as "all ages and abilities" networks grow. Interchanges - overpasses and underpasses with ramp connections to the State or National Highway System - are the only means to traverse the highways that cut through many cities in California. Designing these segments with the same guidance and standards as the freeways they cross, which explicitly prohibit bicycle and pedestrian travel, forces the people in our communities walking and riding on local roads to confront dangerous conditions in Caltrans right-of-way.

The barriers created by interchanges frequently lead to inequitable access to resources, services, and job opportunities, with the underserved and marginalized in our communities often facing the greatest impacts. Omission of DIB-94 design guidance at these locations leaves jurisdictions with limited options to address these inequities in their complete street projects. We ask that Caltrans and CalSTA not further isolate and divide marginalized communities across the state.

We are particularly concerned that the decision to exclude interchanges from DIB-94 was made without proper public review and undermines the public process in which the document was developed. The draft version of DIB-94 was shared widely in April 2023 for stakeholder feedback. Not until the August 24th California Walk and Bike Technical Advisory design subcommittee meeting was it revealed that Caltrans staff had decided to exclude interchanges, only weeks before final DIB-94 approval. Prior to that, there was no explicit mention to the public at large that DIB-94 would not be applicable to interchanges. If such an exception had been made clear from the outset, no doubt many public reviewers of the draft DIB-94 would have requested the standards apply to interchanges. There has been no opportunity for feedback on this critical change. The process and outcome has been undermined by this delayed exclusion and spoils the entirety of the agency's effort to publicly review the development of DIB-94.

The current Design Standard Decision Document (DSDD) process to include safety measures for non-motorized users for interchange improvements is not an appropriate avenue to seek transformative complete streets improvements. The DSDD process is cumbersome, and requiring that process in order to include complete street and design elements may set up a legal and

workload barrier for designers to include multimodal elements. This requirement will act as a serious deterrent for cities which are already strapped for resources, many of which haven't been able to apply for funding given the same constraints. The default will mean that complete street considerations will be largely omitted on some of the state's most dangerous roads. We, the undersigned, demand DIB-94 be the universal standard permitting people to walk and ride safely, not the exception.

While we are hopeful about the direction California is moving with its latest Complete Streets Design Guidance, we feel that the agency's efforts would be kneecapped unless applied equitably across all Caltrans rights-of-way including, most critically, interchanges. As drafted, with interchanges excluded, DIB-94 perpetuates our inequitable transportation network where policy decisions maintain an unsustainable status quo: infrastructure which limits mobility options for the majority of California residents and visitors.

We urge you to reconsider your decision to exclude interchanges before approving DIB-94 and request a meeting to discuss our concerns further. Please contact Jared Sanchez, [jared@calbike.org](mailto:jared@calbike.org), to schedule a meeting. Thank you for your attention and consideration on this important issue.

Sincerely,

Jared Sanchez, Policy Director  
CalBike

Warren Wells, Policy & Planning Director  
Marin County Bicycle Coalition

Sandhya Laddha, Policy Director  
Silicon Valley Bicycle Coalition

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**California Walk and Bike Technical Advisory Committee**

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Cc:

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