

Incomplete Streets

Aligning Practice with Promise in
Caltrans Projects



CALBIKE
CALIFORNIA BICYCLE COALITION

INCOMPLETE STREETS: Aligning Practice with Promise in Caltrans Projects

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Acknowledgments

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This report would not be possible without the hard work of everyday people fighting for safer streets. We follow the leadership of our local partners working on-the-ground with their public agencies who have accomplished hard-fought successes.

We extend gratitude to the hundreds of survey respondents who shared their lived experiences on state roadways.

Executive Summary

IN CALIFORNIA, STATE ROUTES OFTEN SERVE AS LOCAL STREETS as they pass through towns and cities. These roads provide access to schools, hospitals, senior centers, shops, and homes. They are often the most direct route across a neighborhood or a region. People walk, bike, and take public transit to destinations on these corridors owned by the California Department of Transportation (Caltrans), yet most of these streets operate as mini freeways, designed to move cars and trucks fast with little regard for the safety of vulnerable road users.

In 2023, the California Bicycle Coalition (CalBike) surveyed our members about their experiences on Caltrans-controlled local streets. The response was almost unanimous: people want to walk and bike on these streets, but they don't feel safe doing so. We then spent much of 2024 reviewing Caltrans State Highway Operation and Protection Program (SHOPP) project documents obtained through Public Records Act requests. We narrowed our focus to 200 projects on roadways used by people biking and walking funded by the 2024 SHOPP cycle, out of a total of over 600 projects in the 2024 SHOPP.

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Findings

Caltrans' project records, which are not available to the public, show the agency has made progress but still has a long way to go to make sure California's main streets are safe for all users. The total cost of Complete Streets facilities needs identified¹ in the 200 projects was \$1 billion out of total project costs of \$6.1 billion, or 17.13% of the total cost.

But **Caltrans only ended up including, or "programming," less than a quarter of the bicycle and pedestrian facilities identified by its own staff**, ultimately promising to spend less than \$240 million on Complete Streets. Therefore, less than 4% of total spending on the 200 projects where Caltrans considered active transportation elements (which was already a subset of the 600 total SHOPP projects) went to bicycle or pedestrian safety.

¹Caltrans identifies pedestrian and bicycle infrastructure needs in District Active Transportation Plans for each of the 12 Caltrans districts based on consultation with local cities and the public. If any needs correlate with a SHOPP project location, they must be reflected in a Complete Streets Decision Document (CSDD) for each project. The CSDD must also describe which elements the district ultimately decides to include in the final version of the project that is "programmed" for SHOPP funding.

Slightly more than half the projects (52%) included all the Complete Streets elements identified by Caltrans. Of the rest, 6% didn't include any of the needed active transportation improvements, and 39% included at least some of the recommended elements. The remaining 3% (six projects) did not recommend any active transportation improvements.

While 61% of identified needs for bikeways were programmed, **many of the implemented bikeways were downgraded from the physically protected facilities recommended in the planning document** to unprotected paint on the road. Recommendations for Class II or III bikeways, which require only paint and are generally inexpensive, were most likely to be implemented. A recommendation for a Class I multi-use path was the least likely type of bike facility to be included in the final project, with only 22% of those facilities programmed. Class IV bikeways, which include a physical barrier between bike riders and car traffic and are the gold standard for on-street bikeways, were programmed only 60% of the time they were identified as the appropriate bike facility on a project.

Only 215 miles of bikeways and 30 miles of sidewalk were included in all projects approved in the 2024 SHOPP.

Only 215 miles of bikeways and 30 miles of sidewalk were included in all projects approved in the 2024 SHOPP. That will result in building **less than 8% of Caltrans' 10-year bikeway target from the State Highway System Management Plan,² and 2% of its sidewalk target** in the next four years.

Strengthening the Mandate

Caltrans has adopted very strong Complete Streets policies at headquarters, but the project-level discretion to make decisions in each district about what Complete Streets facilities to include is big enough, literally, to drive a truck through. Caltrans' 12 districts across the state implement Complete Streets policies unevenly, resulting in exclusionary streets that don't serve all users. District project managers cite a variety of excuses not to spend time, money, and energy building infrastructure that would save the lives of vulnerable road users. It is time for the project-level processes to align with the state-level promise of roadways that serve all.

Thanks to CalBike and our partners, Caltrans now has a stronger mandate to implement Complete Streets in the SHOPP. Governor Gavin Newsom signed the

²The State Highway System Management Plan is a key document where Caltrans establishes goals for maintaining all "assets" like pavement and bridges on the highway system.

2024 Complete Streets Bill, SB 960, on September 27, a huge milestone after seven years of advocacy by CalBike and our partners to negotiate an agreement with the administration and the legislature.

The Complete Streets Bill requires Caltrans to create and make meaningful progress toward “goals and objectives for complete streets assets that reflect the existence and conditions of bicycle, pedestrian, and transit priority facilities on the state highway system.” It further requires public transit improvement goals, transparent reporting, and expedited approvals allowing local governments to implement active transportation improvements that impact state-controlled roadways or interchanges.

As we celebrate SB 960 becoming law, the hard work to implement the needed changes is just beginning. Stronger implementation of Complete Streets on Caltrans projects as prescribed by SB 960 will require advocacy and oversight by CalBike and our partners for many years to come.

Implementation

CalBike proposes seven measures to improve Complete Streets implementation at Caltrans, detailed at the end of this report.

- 1. Set stronger SHOPP targets** for implementation of Complete Streets.
- 2. Publicly identify targets and progress toward them** throughout project development.
- 3. Create full project transparency** and publish project documents (PIDs) online.
- 4. Engage local stakeholders in project development** where Complete Streets needs are identified, especially in equity-priority communities.
- 5. Formalize and limit exemptions** to Complete Streets directives.
- 6. Create annual progress reports** that detail progress towards Complete Streets performance targets based on project implementation.
- 7. Create project development accountability tools** to easily track project-specific Complete Streets facilities implementation.

Foreword

By Jeanie Ward-Waller
Director of Transportation Advocacy, Fearless Advocacy

IN 2015, WHEN I WAS CALBIKE'S POLICY DIRECTOR, I completed the first comprehensive Complete Streets review of Caltrans' SHOPP projects. I waded through a lengthy PDF containing brief descriptions of over 300 pavement, bridge, and other highway maintenance projects. By looking on Google Maps at the location and current roadway conditions, understanding the nature of each project, and seeing nearby destinations like schools, I identified 50 projects that were missing opportunities to add sidewalks and bike lanes and make crossings safer. I shared my analysis with Caltrans, and to the agency's credit, its leadership team met with me and agreed that more could be done.

Walk and bike advocates in California have played a critical role in pushing Caltrans to do better, and, as this report demonstrates, their work continues to be essential.

But it's been more than 15 years since Caltrans adopted its first Complete Streets policy in 2008 and began a very slow process to implement walk and bike facilities on the State Highway System, and almost 10 years since I, as an outside advocate, showed the agency how it could identify projects that should include improvements for people biking and walking. While big bureaucracies can take time to change, this should be more than enough time to embrace travel modes that are well-aligned with current state goals and policies. However, as this report will describe in detail, Caltrans still has a very long way to go.

CalBike has led this tireless work alongside other partners since my review in 2015, and Caltrans has made big strides in strengthening its original Complete Streets policy and developing plans in each district that identify the need for walk and bike facilities across the entire State Highway System. Caltrans leadership even hired me in 2017 to join the Caltrans Sustainability Program and help lead Complete Streets work across the department, ultimately promoting me to an executive role in recognition of the value of that work.

Caltrans developed and iterated on design standards for Complete Streets that are now nation-leading among state departments of transportation and established

systemic safety programs for pedestrians and bicyclists with the aim of proactively identifying unsafe conditions and addressing them systemwide. Yet, despite all the great progress in policy, planning, guidance, and good intentions from headquarters, project implementation of Complete Streets in Caltrans districts still lags.

CalBike continues to be relentlessly proactive in its advocacy, requesting project documents through Public Records Act requests and following up on those requests for months to get access to what should be accessible public documents. These documents are hundreds of pages long for each project and require significant work to wade through to find the relevant information. As you'll learn in these pages, CalBike's work to investigate hundreds of projects and understand exactly where progress is still needed is critical to advocate for a stronger mandate for implementation and hold Caltrans to account.

There are many good people at Caltrans who are slowly shifting the agency's direction and culture, but different results on the ground won't happen fast enough without significant outside pressure. I am thrilled that after nearly a decade of advocacy, CalBike and our allies won passage of SB 960, Senator Scott Wiener's Complete Streets Bill, to mandate that project-level change. We must continue to advocate for implementation of the new law to ensure Caltrans serves the transportation and safety needs of all Californians.



Introduction

STATE ROADWAYS THAT RUN THROUGH LOCAL POPULATION CENTERS are some of the deadliest streets for pedestrians and bicyclists. When CalBike set out to review data about State Highway Operation and Protection Program (SHOPP)³ projects on state-controlled roadways, we evaluated project documents, crash data, and user surveys. What we found were missed opportunities, inattention to the safety and comfort of people walking, biking, and taking transit, exclusionary thoroughfares that people who aren't driving cars avoid because of safety concerns, and disproportionate fatality and injury rates for vulnerable road users on state routes. It is clear that the mismatch between directives and project practice has resulted in a lack of adequate progress to serve active transportation needs and protect people walking, biking, and taking transit.

In the best cases, Caltrans has used state and federal funding and agency resources to design and build Complete Streets projects on state routes. But those projects are the exceptions. More commonly, the agency has failed to use the funding in its control to benefit active transportation and instead required local agencies to fund and maintain pedestrian and bicycle facilities on state corridors that serve as local streets. In the majority of instances, our examination of project records showed that Caltrans deprioritizes people who walk or ride bikes on its projects, often citing limited state funding — even though Complete Streets infrastructure usually amounts to a fraction of the project costs for repairs or upgrades to roadways benefitting people in motor vehicles.

The vision of zero road fatalities is a fantasy until we make safety for all the central design concept on our state roads. It's time for Caltrans and California to do better.

Caltrans has good [policies](#), [planning](#), and [guidance](#) in place for Complete Streets, but policies are ineffective if project managers ignore them more than they follow them, all too often reverting to a focus on moving vehicle traffic quickly. As our survey showed, many people avoid biking or walking on these streets altogether, foreclosing a shared public amenity to anyone not encased in steel.

Every time Caltrans engineers design a project where people bike and walk, they have a choice to seriously consider those needs and allocate funding, generally a small fraction of the project budget, to Complete Streets infrastructure. Instead, they often do the minimum or nothing at all.

³SHOPP represents the bulk of repair and maintenance work done by Caltrans on the State Highway System, with an annual budget of over \$5 billion. The majority of those projects are pavement and bridge rehabilitation, which is the least expensive and best opportunity to make roads safer and more functional for all users.

The vision of zero road fatalities is a fantasy until we make safety for all the central design concept on our state roads. It's time for Caltrans and California to do better.

In this report, we break down the percentage of funding Caltrans puts toward infrastructure to make our streets safer for people biking, walking, and taking transit. We show that Caltrans' claims of spending nearly \$1 billion on Complete Streets in its 2024 SHOPP allocation is likely a gross overestimation and includes elements that are either required by the Americans with Disabilities Act (ADA) — and so would need to be included even without the agency's Complete Streets policies — or token improvements such as sharrows or painted bike lanes where protected or separated lanes are recommended.

District project managers used varied reasoning to avoid including Complete Streets needs identified by Caltrans planning staff, including overestimating costs, pushing bicycle and pedestrian safety to unplanned future projects, citing a lack of funding (often in projects with budgets of tens of millions of dollars), pushing the responsibility for funding and building active transportation infrastructure onto local jurisdictions, or refusing to proceed without “study.”

Every piece of infrastructure Caltrans builds today will be with us for years or decades, for better or worse. We can't let outmoded and disproven engineering practices and theories from the past drive our future.

As this report shows, Caltrans can and must do better. We include seven recommendations to help move this process forward, including setting stronger targets for Complete Streets on state routes, limiting exemptions to Caltrans policies, bringing advocates and other stakeholders into the project development process, and providing public reporting on progress.

Background

Before California built a system of separated highways, state routes were local roads that ran through cities and towns and served as major crosstown thoroughfares as well as connections across regions. Caltrans still manages many of these streets, which often serve as a roadblock when local communities want to redesign their infrastructure to reduce vehicle speeds and increase safety.

A number of factors affect the way California manages our state routes, most critically funding, governing laws and legislation, and policy directives.

Funding

California spends approximately \$30 billion on transportation annually from state and federal funding. Caltrans' largest pot of funding for the State Highway System (SHS), including for repairing bicyclist- and pedestrian-accessible "main streets," is found in the SHOPP. The SHOPP is a four-year program of projects that collectively improve the condition, operation, safety, and sustainability of the SHS, allocating approximately \$5.3 billion annually. The SHOPP was augmented starting in 2021 with additional formula federal funds from the Bipartisan Infrastructure Law, also known as the Infrastructure Investment and Jobs Act, which increased funding for highway performance improvement and bridge repair to the tune of almost \$1 billion per year.

The SHOPP is the best opportunity to build Complete Streets facilities on Caltrans corridors because the most economical time to create Complete Streets is during maintenance projects. This "dig once" approach is a cost-effective best practice for building out a more complete and connected system that supports mobility for people of all ages and abilities using all transportation modes.

With the influx of new funding and strong mandates to address safety, equity, and climate at both the state and federal levels, this is an opportune moment to implement facilities that make our SHS safer, greener, and more accessible for all users.

According to the U.S. Federal Highway Administration combining a pedestrian safety project with a resurfacing project can reduce costs by more than 50% compared to stand-alone projects. This means that roadway repaving and rehabilitation projects funded by the SHOPP present the best opportunity to cost-effectively build sidewalks, bikeways, and crosswalks rather than having to come back and build those facilities separately.

Legislation

In 2017, Senator Scott Wiener authored his first Complete Streets Bill, SB 760, which died early in the legislative session during a year that the Legislature was focused on passing an increase to the state gas tax. In 2019, Senator Wiener authored a second bill, SB 127, which this time made it through the legislature and garnered significant support, demonstrating the growing demand for walkable, bikeable streets in California communities. Governor Gavin Newsom vetoed the 2019 bill, stating that he wanted to give new Caltrans leadership the opportunity to implement its policies for making state-controlled streets safer for people biking and walking.

⁴ See FHWA's "Good Practices: Incorporating Safety into Resurfacing and Restoration Projects" at https://safety.fhwa.dot.gov/roadway_dept/strat_approach/fhwasa07001/fhwasa07001.pdf

In 2024, Senator Wiener again authored a Complete Streets Bill, SB 960, with CalBike once again sponsoring as it had for the two prior versions, adding transit priority treatments to the list of Complete Streets elements Caltrans should consider. This time, the measure passed the legislature and Governor Newsom signed it into law.

Policy Implementation

Our examination of Caltrans records, collision data, and user surveys finds that implementation of Caltrans Complete Streets policies is uneven. Too often the elements that would benefit people who aren't in cars are downgraded or eliminated with little justification. Still, the agency that controls the largest portion of the state's transportation budget has made progress toward embracing Complete Streets at a policy level, including:

- In 2021, Caltrans adopted Director's Policy 37 to provide stronger direction and better integrate Complete Streets into transportation systems.
- In 2022, Caltrans adopted district active transportation plans for all 12 districts and created the Complete Streets Decision Document (CSDD) to lift up the needs of people biking and walking during project planning and implementation.
- Caltrans adopted Design Information Bulletins [89](#) and [94](#) to provide a more comprehensive set of design standards for bicycle and pedestrian facilities.
- Caltrans has taken input from California's Walk Bike Technical Advisory Committee (TAC) and Active Transportation Program TAC on their policies; CalBike is active on both TACs.

CalBike has worked to make Caltrans corridors safer for more than a decade, including by co-sponsoring each version of Senator Wiener's Complete Streets bills. As California's statewide bicycle advocacy organization, we will continue to work with Caltrans to ensure that it better serves the needs of vulnerable road users and to hold it accountable not just for setting strong policies but also for implementing projects to serve the safety of all Californians.

What is a Complete Street?

A Complete Street is a community thoroughfare that is safe and comfortable for people of all ages and all transportation modes: bicycling, walking, using a mobility device, taking transit, and driving. Complete Streets are context-sensitive, and have all the features needed for someone using active transportation to get where they need to go safely. This can include protected bikeways, bulb-outs at intersections to reduce

crossing times, speed humps and other measures to reduce vehicle speeds, bus-only lanes, road diets, and more.

Limited-access highways are not and never will be Complete Streets. They are designed for fast-moving motor vehicle traffic and must be managed accordingly by Caltrans. However, roughly two-thirds of the state highway system, or 10,000 miles, are bicycle-accessible and nearly that amount is accessible to pedestrians as well. Caltrans also has responsibility for these accessible state routes that serve as urban and rural main streets and critical local travel corridors.

Caltrans policy⁵ states that state routes that double as local streets should be rehabbed into Complete Streets that serve the needs of all users when it repairs or repaves them. Since 2019, the agency has even undertaken a few projects solely aimed at making biking and walking safer. However, it has consistently failed to take advantage of economies of scale by incorporating Complete Streets into repair projects.

A note about Caltrans' use of the term "Complete Streets"

Caltrans has adopted the term "Complete Streets" as a catchall to refer to any single project element that benefits (or in some cases merely doesn't harm) people biking or walking. In the agency's usage, the Complete Streets portion of a project could be a crosswalk, bicycle route signage, or sharrows on a busy street. In the past, the agency has included elements like a drainage grate that doesn't grab a bike tire in its accounting of Complete Streets. That is a misuse of the term.

A Complete Street is the total of all the elements needed to create a corridor where all road users, including those biking or walking, can safely and comfortably travel. A truly Complete Street requires a comprehensive assessment of the context, prioritizing the needs of active and public transportation users, and reconfiguring the street to provide safe passages for all users. Although we disagree with Caltrans' use of the term to apply to individual elements of active transportation infrastructure, we sometimes use it in this report to match the terminology in Caltrans' documents.

⁵ See Caltrans Directors Policy 37 (DP-37) at <https://dot.ca.gov/-/media/dot-media/programs/esta/documents/complete-streets/dp-37-complete-streets-a11y.pdf>



Three Crises That Intersect on California's Roadways

Mobility Injustice

FOR DECADES, MAJORITY BLACK, INDIGENOUS, AND PEOPLE OF COLOR (BIPOC) communities in California have been disproportionately impacted by transportation's harms. BIPOC communities continue to lack safe and accessible mobility options and often suffer from neglect, disrepair, and overpolicing.

Although this report does not focus explicitly on the needs of BIPOC Californians, dangerous state routes often bisect and divide communities of color, and BIPOC residents are disproportionately impacted by the dangerous conditions Caltrans creates for people who rely on walking, transit, or biking. Caltrans recently adopted its first [transportation equity index](#) to identify priority communities based on burden and need, which should be used in future SHOPP cycles to prioritize outreach and improvements like complete streets.

Climate Change

The transportation sector accounts for [50% of California's greenhouse gas emissions](#). It is imperative to transform our transportation network so that Californians have choices beyond personal automobiles. We can't ask people to make this change in

a meaningful way until our transportation network safely supports all travel modes. California's transportation leadership needs to shift the primary goal of traffic engineers from moving cars and trucks as quickly and efficiently as possible to making low- and no-carbon transportation options safe and convenient.

Governor Newsom's Administration has made efforts to reduce driving through Executive Order N-19-19 and the Climate Action Plan for Transportation Infrastructure (CAPTI). However, these policies do not go far enough to create safe and convenient alternatives to driving in all communities across the state.

Traffic Violence

Caltrans has a long way to go before its investment is balanced in terms of prioritizing the safety and movement of the most vulnerable road users — people walking and bicycling — as much as it prioritizes the movement of cars on the SHS. We can see this imbalance most clearly in the alarming rise in pedestrian and bicycle fatalities on our roadways, which have increased more than 50% since 2013 and risen at a much faster rate than fatalities of people in cars. In 2021, 26% of all victims of traffic fatalities in California were pedestrians, despite walking trips representing only 12% of all trips and a tiny fraction of miles traveled in California. People with low incomes, people of color, children, and seniors are overrepresented in traffic fatalities and serious injuries.

According to the latest Smart Growth America [Dangerous by Design](#) report, a third of the deadly collisions with pedestrians occurred on state-owned roads. California is ranked the 8th most deadly state for people walking per capita, and the violence continues to grow.

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Corridors that facilitate high-speed car and truck travel and not much else are demonstrably dangerous, particularly to people who aren't inside cars, often concentrated in our most marginalized BIPOC communities.

In this report, we use injury and fatality statistics as a proxy for traffic violence, but they don't represent the full picture. Traffic violence includes exclusion: when people walking and biking are forced to avoid a state-controlled route because it isn't safe. And we don't have data on minor collisions, which are often not reported to police, or near misses, which add to the stress of biking and walking and may discourage people from choosing these modes.



Methodology

THIS REPORT EXAMINES CALTRANS' performance on projects on state-controlled, local-serving roadways in the 2024 SHOPP. Under the California Public Records Act, CalBike received the agency's Complete Streets Decision Documents (CSDD) and project documentation⁶ for 567 SHOPP projects since 2019. **We examined 200 projects on streets used by people biking and walking included in the 2024 SHOPP.** We excluded projects Caltrans determined didn't affect roadways used by people biking or walking, such as limited-access highways.

We used automated data scraping, and then scoured each document manually to extract the information we used to determine trends. Because some of the forms were incomplete and because Caltrans doesn't use consistent units of measurement across districts, we have used cost as a proxy for the amount of infrastructure at times.

We closely examined CSDDs, a form Caltrans added to require district staff to consider the needs of people biking and walking when developing projects. CSDDs document active transportation infrastructure needs in the project area, if any, and the elements required to meet those needs. This form also states which elements were programmed into the final project and the estimated cost for both the identified needs and those included in the final project.

When we reference "recommended" infrastructure in this report, that refers to active transportation safety needs identified by Caltrans staff in the CSDD. "Included" or "programmed" elements are the active transportation facilities that Caltrans staff ultimately decided to implement in the project.

⁶ Caltrans provided Project Initiation Documents (PIDs) and Project Initiation Reports (PIRs) in response to CalBike's document request. These are lengthy documents with many attachments, detailing the budget and elements of a project.

We use dollar amounts as a proxy for Caltrans prioritization of bike and pedestrian infrastructure. It is not a perfect measure, but, given the inconsistency of units of measurement in Caltrans records across and within districts, it is the one metric that can reliably be compared. And, given that Caltrans often cited budget constraints when refusing to build infrastructure for active transportation, we feel the agency's budget allocations are an accurate representation of its priorities.⁷

Our analysis further draws on survey data of user experiences and data on fatalities and injuries retrieved through the Statewide Integrated Traffic Records System (SWITRS) database. We also did a deeper dive on nine state highways that act as community main streets with recent, current, or proposed projects. These examples can be found in Appendix 2.



⁷ Please note that we do not assume the active transportation improvements listed as needed by Caltrans staff represent the best options for truly Complete Streets on Caltrans corridors. We use these numbers for the sake of comparison. When we looked at the Transportation Planning Scoping Information Sheet (TPSIS) included with the project documents, we found additional active transportation needs not included in the CSDDs. In fact, more than 60% of the projects CalBike reviewed did not actually program all the documented needs for people to safely walk and bike.

2024 SHOPP Projects: Missed Opportunities, Missing Connections

CALTRANS HAS CLAIMED THAT IT WILL SPEND [\\$930 MILLION](#) ON COMPLETE STREETS IMPROVEMENTS IN THE 2024 SHOPP. Through our records requests, we reviewed project documents for 200 projects that were not exempt from Complete Streets consideration⁸ (state highways that people can walk and bike on). These projects included a total of \$239,767,257 in expenditures to benefit people biking, walking, or taking transit, including \$17 million in required ADA improvements. We estimate that 59 projects are missing from this analysis of the 2024 SHOPP. Unless those projects allocate \$690 million to active transportation (and average of \$12 million per project), the amount dedicated to Complete Streets in the 2024 SHOPP is far less than the \$930 million that Caltrans claimed.

Caltrans puts its money where its priorities are

Caltrans project documents tell a story of missed opportunities to meet the needs of active transportation users. The total cost of Complete Streets elements cited as needed by district staff in the 200 projects would have represented \$1 billion out of total project costs of \$6.1 billion, or 17.13%. But Caltrans programmed less than a quarter of the bicycle and pedestrian facilities identified as necessary by its own staff, spending less than \$240 million on Complete Streets, under 4% of its total project expenditures.

In addition:

- **Overall, Caltrans only implemented 23% of the infrastructure for people biking and walking identified in its CSDDs.**
- Where CSDDs reported funding constraints, less than 6% of the elements identified as needed were implemented.
- Funding was cited as a reason not to include some or all Complete Streets elements in 23% of projects.
- Caltrans Districts 3 (Sacramento region) and 4 (Bay Area) were most likely to report funding as an issue, each citing it around 35% of the time.

⁸ CalBike initially requested Project Initiation Documents dated 2019 through 2023, in August of 2023. The responsive documents — 567 PIDs — included 250 projects eligible for Complete Streets treatments, 200 of which were programmed into the 2024 SHOPP. In early 2024, we requested all the documents from the 2024 SHOPP, and, after months of negotiations and delays, Caltrans provided documentation for projects eligible for Complete Streets treatments shortly before we were set to publish this report. We will review those documents at a future time and provide an update. However, we don't anticipate significantly different results once those projects are added.

- Slightly more than half the projects (52%) included all the identified Complete Streets needs. Of the rest, 6% didn't include any of the needed active transportation improvements, and 39% included some of the elements staff identified as required for Complete Streets. Staff identified no needed infrastructure for people biking or walking on 3% of the projects. While this doesn't approach the need for Complete Streets on Caltrans corridors, it is a step in the right direction.

Downgrading Infrastructure

Caltrans projects that did include bicycle and pedestrian infrastructure still often fell far short of the agency's Complete Streets mandate. For example, if a Class IV physically separated bikeway was recommended, with a budget in the millions, Caltrans might include a Class II painted bike lane instead, with a price tag in the thousands. In project-level decisions on individual SHOPP projects, biking, walking, and transit infrastructure need identified by Caltrans planners were consistently downgraded, pushing the responsibility and costs onto local agencies with much smaller budgets and providing vulnerable road users with inexpensive and insufficient upgrades.

Imagine our state highway agency taking a “cheaper is better” approach to roadways used by cars and trucks.

One illustration of the way Caltrans downgrades lanes is a District 3 project in Nevada County. The Complete Streets portion of the project looks good on paper: it includes twice the linear feet of bikeways identified as needed by active transportation staff. However, a closer look reveals that the preferred treatment was a Class I multi-use path ([pp.270-272](#)), while the infrastructure Caltrans chose to build was Class II lanes: striped paint on

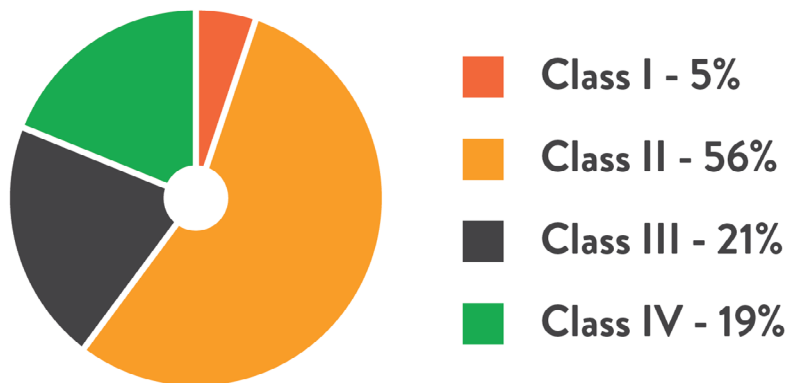
both sides of a high-speed and high-traffic volume road, covering the same distance . Instead of spending \$15 million in a project with a \$68.2 million budget to provide a safe, all-ages, separated bike facility, Caltrans allocated \$120,000 for paint to provide an unprotected place for people who get around by bike.

Imagine our state highway agency taking a “cheaper is better” approach to roadways used by cars and trucks. The outcry would be loud and the repercussions of resulting crashes fast and fierce. We believe Caltrans should face the same consequences for building substandard bikeways that offer no protection from fast moving traffic.

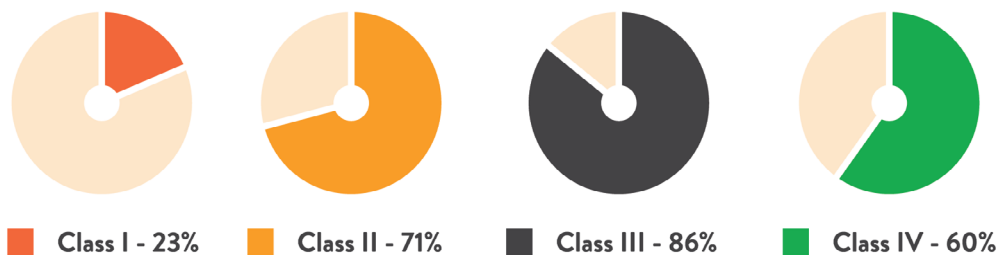
Here are some of the ways Caltrans downgrades safety improvements for people who walk and bike:

- Just **61% of recommended bikeway linear feet were built**, and many of the bikeways included in projects were downgraded from physically protected facilities to paint on the road.
- Recommendations for Class II or III bikeways, treatments requiring only paint, were most likely to be followed.
- **More than three quarters of the bikeway linear feet added in Caltrans projects are Class II (striped bike lanes) or Class III (sharrows/shared traffic lanes with cars)**, neither of which is physically separated or protected from vehicular traffic. In many cases, these facilities are incompatible with the high speeds and/or volumes on these roadways.⁹
- An identified need for a Class I multi-use path was least likely to be included in the final project, with only 22% of those bikeways programmed.

Percentage of Bikeway Built by Class



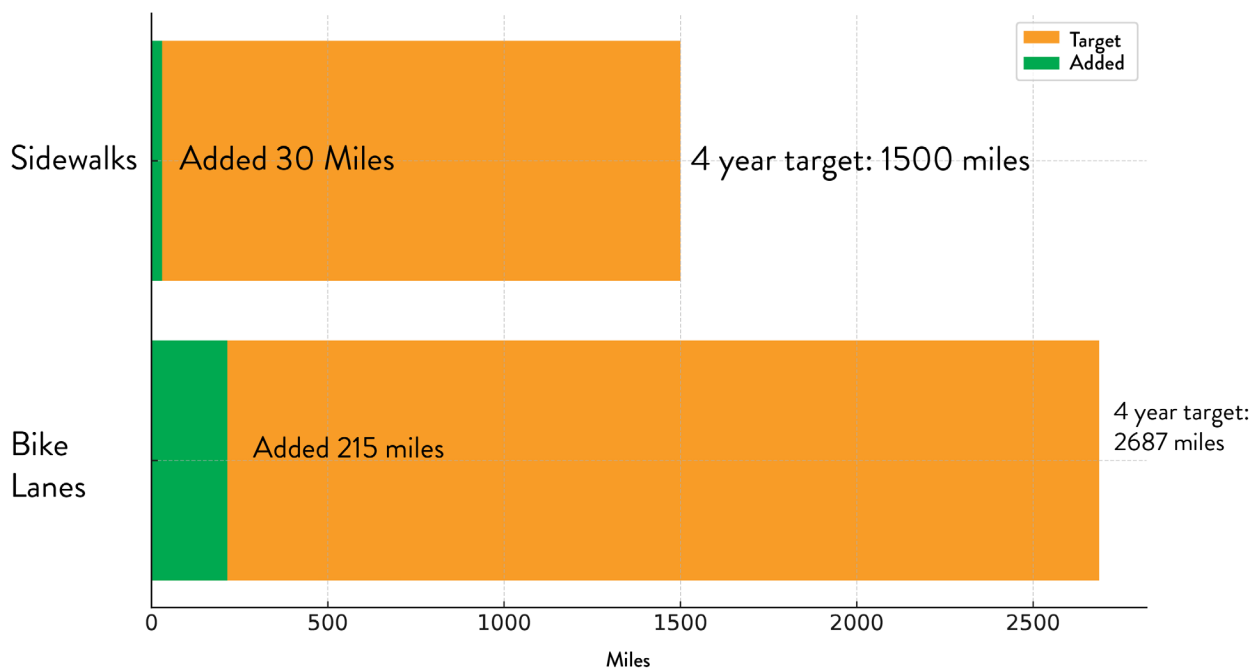
Percentage of Bikeway Recommendations Programmed by Class



⁹ Caltrans DIB-94 states that Class III bikeways are inappropriate for state roadways and shouldn't be included in projects or counted toward Complete Streets improvements. The projects reviewed for this report were developed before that update.

- Of the other linear feet we measured, which include restriping or resurfacing existing bikeways, adding or restriping crosswalks, sidewalk repairs, adding or repairing sidewalks, and shoulder widening, less than 36% of the identified needs were included.
- Only 215 miles of bike lanes and 30 miles of sidewalk were added in projects approved in the 2024 SHOPP.¹⁰ **Compared to Caltrans’ ten-year targets, that’s less than 8% of the bike lane target and 2% of the sidewalk target that will get built in the next four years.**
- Only three Caltrans districts — 4 (Bay Area), 7 (Los Angeles and Ventura Counties), and 11 (San Diego and Imperial Counties) — recommended including Class IV bikeways on any projects. Class IV, which includes a physical barrier between bike riders and car traffic, is the gold standard for on-street bikeways. Caltrans programmed 60% of needed Class IV bikeways.

2024 SHOPP Miles of Bike Lanes and Sidewalks Added v. 4 Year Targets



¹⁰ This data point was extrapolated from analysis of the [SHOPP dashboard](#).

Caltrans Districts Chart Divergent Courses

The performance of different Caltrans districts is hard to parse, but a few stand out for consistently overlooking the needs of vulnerable road users.¹¹



- **District 5, including Monterey, Santa Barbara, and San Luis Obispo Counties,** implemented only 6% of Complete Streets improvements their own staff said were needed, failing to spend \$110 million that should have gone to vulnerable road user safety.
- **District 9, covering Mono and Inyo Counties,** had only a few projects on roads used by people biking and walking but failed on even this small number of projects. It completed only 6% of needed safety upgrades identified in the CSDDs and spent just \$1.8 million out of a recommended \$26 million.
- **District 6, in Kern and Fresno Counties,** joins District 9 in identifying zero opportunities for new bikeways in their 2024 SHOPP projects.

Some districts did better:

- **District 2, in Shasta, Trinity, Siskiyou, and Modoc Counties,** spent the highest percentage on biking and walking infrastructure, allocating almost 10% of its total SHOPP budget of \$367.7 million without using ADA improvements to boost the total. Sadly, this still fell far short of the need, representing less than 15% of Complete Streets needs outlined by district staff.
- **District 7, in Los Angeles and Ventura Counties,** allocated the next highest share of its budget to active transportation infrastructure: 9.2%. And it budgeted \$51.4 million for Complete Streets, second only to District 4 in Complete Streets spending.

¹¹ See Appendix 3 for a chart of performance by district.



Excuses, Excuses

Our review of the data and documents uncovered common threads in the reasons given for excluding or downgrading infrastructure. These excuses were used across Caltrans districts and on projects in rural and urban settings.

Here are some trends we found in the data:

- **Using budget constraints as an excuse to eliminate biking and walking infrastructure.** In projects that cited funding constraints as a reason not to include all Complete Streets needs identified in the CSDDs, only 6% of the needed safety improvements were included.
- **Including unsubstantiated and inflated cost estimates.** On some CSDDs, district staff inserted round numbers for bike or pedestrian facilities or the costs varied widely between what appeared to be similar facilities in similar locations, indicating they may have not truly costed out that element and perhaps never seriously considered including it in the project. Often, these numbers seemed inflated, providing further rationale for not building those elements.
- **Using time constraints as an excuse to eliminate biking and walking infrastructure.** Some CSDDs cited the extra time needed to design, permit, and build infrastructure to accommodate biking and walking as a reason to downgrade or eliminate these elements.
- **Refusing to use SHOPP funds and requiring a local funding contribution to pay for biking and walking infrastructure.** Caltrans often eliminated Complete Streets elements citing a lack of local funding contribution and



Users Speak: Traffic Violence on Caltrans Routes Blocks Desired Paths

In 2023, CalBike conducted a survey of user experience on Caltrans-controlled highways that serve as surface streets in local neighborhoods around the state. The results confirmed that Californians are desperate for solutions: a majority of respondents felt uncomfortable walking or bicycling on these Caltrans-controlled streets, and they were nearly unanimous that the roadways are hazardous for children, even with adult supervision.

The survey provided an opportunity for respondents to share feedback concerning all pertinent routes in California. In total, 2,348 people filled out the survey, providing 4,918 route evaluations collected over a 32-day period. After removing duplicates and erroneous or irrelevant submissions, we evaluated and scored the remaining 2,179 responses.

Traffic violence kills more than 4,000 Californians every year, and a quarter of those deaths are pedestrians. Yet, fatalities and injuries don't tell the whole story. **Caltrans-controlled streets are often the quickest and most direct routes through a community, yet people biking and walking avoid them because of the threat of traffic violence.** CalBike's survey asked respondents to rate their perception of safety on the state highways that are part of the fabric of their neighborhoods, as well as their wish to travel those corridors using active transportation if it were safe.

In Their Own Words

Respondents to CalBike's 2023 survey were asked if they had any other feedback on the state routes that bisect their communities. Here are some of their comments.

"These highways are generally scary to bike on and crossing them on foot often feels dangerous. As a result, they segment neighborhoods and make it harder to get places on bike, foot, or transit."

- Ian, San Francisco County

"If Caltrans is unable to modify existing highways, they could work with, and fund, local municipalities to provide alternative complete streets standards on adjacent roadways."

- Anonymous, Mono County

"I typically cross San Pablo at Virginia by bike, often with my child. Despite multiple casualties at the intersection, it's still quite dangerous to cross. The crossing lights are great to have, but are only triggered with a pedestrian-oriented button. Even with no pedestrians on the sidewalk, it's difficult to access via bike."

- Ian, Alameda County

"Biking with my 3-year-old child on any of these routes is a joke."

- Kayla, Los Angeles County

"State and local governments must plan for the future- not the present or past. Climate change will only get worse if governments fail to make the right transportation decisions today that take cars off the road. Please give people safe alternatives to driving and it will happen."

- Anonymous, Los Angeles County

"If Sacramento and Caltrans aren't able or willing to aggressively improve their infrastructure around safety and comfort, I'm going to vote with my feet and move somewhere that gives me the freedom to not have to drive."

- Anonymous, Sacramento County

"Make it safe and I will ride."

- Mark, Riverside County

"As long as the mentality is to focus on cars instead of bicycles nothing will change"

- Anonymous, Ventura County

Completing our Streets

CalBike's research on Caltrans projects shows a department that has promising policy directives coming from the top that haven't yet been fully integrated into project-level decision-making. The result is missed opportunities on projects that could make a significant impact. Caltrans must take responsibility for improving the safety of vulnerable road users, for its role in adding to hardships in BIPOC and environmentally burdened communities, and for the impact of our car-centric transportation system on the deepening climate crisis.

Caltrans has made some positive changes since Governor Newsom vetoed the Complete Streets Bill in 2019, but it is not enough. His signature on SB 960 provides a stronger mandate to implement Complete Streets in its projects.

Implementation of SB 960

The work needed to ensure that Caltrans serves all Californians, especially vulnerable road users, doesn't end with the passage of the Complete Streets Bill — in fact, it's just beginning. Stronger implementation of Complete Streets on Caltrans projects as prescribed by SB 960 will require powerful advocacy and oversight by CalBike and our partners for many years to come.

Our research in creating this report has pointed us towards strategies and processes that will help Caltrans advance equity, safety and accessibility for all users on California's multimodal streets. Below, we offer seven broad recommendations—several of which are now required by SB 960 and will need strong oversight—for stakeholders creating and implementing our state's investments, to ensure our state highways are complete corridors for all users.

- 1. Set stronger SHOPP targets for implementation of Complete Streets.**
Provide specific fund allocations for Complete Streets elements in each district and track these investments to ensure it is used to include biking, walking, and transit elements on projects that serve these uses.
- 2. Publicly identify targets and progress toward them** throughout project development and post regular updates online. Confer with the California Walk and Bike Technical Advisory Committee, update the State Highway Safety Management Plan, involve the California Transportation Commission, and make targets for improving biking, walking, and transit integral to subsequent SHOPP development and adoption.

- 3. Create full project transparency** and publish project documents (PIDs) online. Make CSDD information accessible and searchable. Refine the CSDD so responses are uniform within and across districts, allowing Caltrans and the public to meaningfully review progress on Complete Streets implementation.
- 4. Engage local stakeholders in project development** where Complete Streets needs are identified, especially in equity priority communities. Additional staffing to specifically engage with the public during all phases of a project may be necessary. Focus community engagement resources on projects with bicycle and pedestrian needs that align with the assets that count toward targets in the State Highway System Management Plan (e.g. bikeways in classes I, II, and IV; sidewalks; and crosswalks).
- 5. Formalize and limit exemptions** to Complete Streets directives. Set clear standards and limitations for exemptions from Complete Streets implementation so they can only be applied in appropriate cases. Don't allow budgetary or time limitations to be used as blanket exemptions. If budgetary limitations apply, the additional funding needed should be logged and should inform future district SHOPP allocations. Guidance should be developed for the delegation of exemption approval to district executives in consultation with advocates and other stakeholders.
- 6. Create annual progress reports** that detail progress towards Complete Streets performance targets based on project implementation. Caltrans headquarters should move beyond the Complete Streets Action Plan and develop specific implementation plans at the district level, aligned with SHOPP project development. Caltrans should track and report on Complete Street facilities constructed through the SHOPP program, similar to the analysis in this report. Reporting should include a quantification of active transportation needs identified on projects compared to facilities built, expenditures recommended versus those programmed, and percentages of SHOPP funds spent on Complete Streets as a proportion of the total SHOPP for the year. Improvement of the CSDD form would allow a much simpler means to track and report this information.
- 7. Create project development accountability tools** to easily track project-specific Complete Streets facilities implementation. Include all programmed SHOPP projects from the 10-year dashboard and beyond in this tracking system.

Appendices

Appendix 1: Definition of Terms

STATE HIGHWAY OPERATION AND PROTECTION PROGRAM (SHOPP): Every other year, California programs four years of roadway projects in the State Highway Operation and Protection Program, commonly referred to as the SHOPP. SHOPP is for maintenance, rehabilitation, safety, and operation of the state highway system, and may not be used to add new traffic lanes. According to a Caltrans directive, SHOPP projects should cover facilities for people biking and walking on roadways with pedestrian and bicycle access and infrastructure needs.

COMPLETE STREETS DECISION DOCUMENT (CSDD): This is a form Caltrans attaches to SHOPP project initiation documents at the early project concept development phase to identify and scope the active transportation needs on the project, if any, and explain if not all recommended elements are included.

STATE ROUTE (SR): State routes are intrastate roads managed by Caltrans. These routes range from two-lane main streets to rural roads to multi-lane, limited access freeways. Many state routes change in form and size multiple times along their length.

PROJECT INITIATION DOCUMENT (PID) OR PROJECT INITIATION REPORT (PIR): A PID or PIR is a report that describes the need for a project, outlines the project alternatives, if any, estimates costs, identifies environmental impacts, and usually includes multiple Caltrans forms plus scoping documents from contractors. These documents are generally 100 to 300 pages for each project. The CSDD is attached to a PID or PIR.

TRANSPORTATION PLANNING SCOPING INFORMATION SHEET (TPSIS): This Caltrans form, included with the PID or PIR, gathers conceptual “scoping” information on stakeholders and different aspects of the project, including active transportation. It documents road use by people biking, walking, or taking transit, identified needs, stakeholders to be consulted, and active transportation planning documents reviewed.

VULNERABLE ROAD USERS: People outside cars — bike riders, pedestrians, people using mobility devices, people taking transit, etc.

ACTIVE TRANSPORTATION: Bicycling, walking, and using mobility devices. We include access to public transit in our definition.

BIKEWAY CLASSIFICATIONS: California recognizes four classes of bikeways.

- **CLASS I:** A completely separated path for use by people biking and walking. Also called “multi-use path” or “shared use path.”
- **CLASS II:** Lanes on a roadway delineated with paint only. Can include painted buffers.
- **CLASS III:** A lane shared by bike riders and car drivers, sometimes marked with sharrows and signage.
- **CLASS IV:** An on-road bikeway with a physical barrier such as a raised concrete curb, planters, or plastic delineator posts between bike riders and vehicle traffic.



Appendix 2: Case Studies - How Caltrans Shortchanges Walking and Biking

WE TOOK A CLOSER LOOK at a few specific examples to better understand the trends outlined in this report. Here are nine projects where Caltrans downgraded biking or walking infrastructure while still claiming that the projects contain “Complete Streets elements.” The first two examples epitomize the way Caltrans shortchanges vulnerable road users by failing to remedy high-injury corridors when the opportunity is presented and help shine light on the assumptions that “no one bikes here” or “no one walks here,” when the reason no one bikes or walks is because the roadway is filled with life-or-death hazards for people biking, walking, and taking transit.

Each example links to the original document provided to CalBike by Caltrans.

CASE STUDY #1

State Route 39: Beach Boulevard projects don’t meet bike, pedestrian, and transit needs in District 12

Caltrans’ Complete Streets policy, [DP-37](#), states in bold type: **“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.”**

The question is, what constitutes an exception? The answer appears to be: almost anything.

On some of the projects reviewed by the CalBike team, the reasons for not including desirable active transportation infrastructure appear logical. For example, extending the shoulders on a rural route to accommodate people biking and walking might be infeasible in a mountainous area where extensive engineering is required to widen the route. However, more often, the reasons given for excluding Complete Streets elements seem to boil down to some version of “we don’t want to.”

A 2024 SHOPP project on [8.5 miles of Beach Boulevard](#) in Orange County uses an all-too-common rationale for ignoring the directive in DP-37 to make state routes comfortable and convenient for people biking, walking, or taking transit: The purpose of the project is travel lane rehab, so the \$5 million in bike and pedestrian improvements excluded from the \$46 million repaving project “can be explored or incorporated on future projects on SR 39” ([see p. 154](#)). That is, **perhaps some mythical future engineers will view their jobs as serving all Californians, unlike today’s road builders.**

Ocean Access — If You Have a Car

Beach Boulevard (State Route 39, or SR 39) is the longest continuous north-south arterial in Orange County. The corridor extends through nine cities (Huntington Beach, Westminster, Garden Grove, Stanton, Anaheim, Buena Park, Fullerton, La Mirada, and La Habra) as well as through unincorporated Orange County and is primarily under the jurisdiction of Caltrans.

Beach Boulevard is a fully developed corridor that is heavily used not just by people in cars.

Like many of Caltrans' "main street" highways that also serve as local-serving surface streets for those cities, Beach Boulevard is a fully developed residential and commercial corridor that is heavily used not just by people in cars, but also by many people walking, biking, and using transit to access destinations along its length. Beach Boulevard does not prohibit access to people outside cars, but it dedicates the vast majority of its available space to the six to eight travel lanes for cars, and narrow or no infrastructure for people walking other than incomplete sidewalks and widely

spaced crosswalks. There are no marked bike lanes along the entire length of Beach Boulevard/SR-39, though people ride bikes there.

The share of transit trips on Beach Boulevard is significantly higher — almost double — that of the Orange County norm; for work trips only, transit on Beach Boulevard serves 2.5 times as many people as the county average. Yet, despite two major bus lines on the corridor itself and interconnections with 25 bus routes, there is no transit-priority infrastructure that would speed up buses so they aren't waiting in traffic, and the 2024 SHOPP project we reviewed didn't identify any needed infrastructure improvements to support transit riders.

Dangerous by Design

Beach Boulevard is one of the deadliest Caltrans "main streets" for people walking and biking. Over the last decade, there have been 78 vulnerable road users killed on the street, and pedestrians and people biking account for nearly 70% of all road user deaths on SR 39. This is a significantly disproportionate share, since most people traveling on Beach Boulevard are in cars. It's also much higher than the 27% statewide share of all traffic fatalities that are pedestrians and bicyclists. The six- to eight-lane street has speed limits of 40 to 50 miles per hour and is particularly dangerous for people outside of cars due to these high speeds and the lack of protective infrastructure.

In addition to fatalities, more than 700 people walking or biking have been seriously injured in the last 10 years on Beach Boulevard, and that counts only official police reports. Many collisions go unreported, so that number is undoubtedly higher.

The Beach Boulevard project documents we reviewed included detailed injury and fatality statistics broken down by small segments but not by travel mode ([pp. 1-4](#)). The project documents don't indicate that without Complete Streets infrastructure improvements, Beach Boulevard will continue to have these high death and injury rates among bike riders, walkers, and transit riders.

Ignoring Documented Needs for Active Transportation Infrastructure

In the past six years, Caltrans District 12, the Orange County Transportation Authority (OCTA), and several private transportation planning/engineering firms in their employ have documented the high need for safe street infrastructure on Beach Boulevard, saying that it should be a priority for road repair projects.

A [study to improve Beach Boulevard](#) was conducted and published in April 2020, and a [Caltrans Active Transportation \(CAT\) Plan](#) for all of District 12 was finalized two years later. Many active transportation needs were identified in the planning phases by Caltrans and OCTA, including transit signal priority treatments, pedestrian scrambles, and protected bikeways.

The Beach Boulevard Corridor Study and District 12 CAT Plan assessed existing conditions, forecast projections of future growth, and proposed solutions ranging from enhanced pedestrian, bicycle, and transit facilities to improved signal synchronization. These plans also prioritized the need for Complete Streets facilities to implement the multimodal transportation vision and stem the rising number of vulnerable road user fatalities.

In the very first block of Beach Boulevard, where it starts at the Pacific Coast Highway adjacent to beach and trail access, pedestrian needs are glaringly apparent. The distance from the first marked pedestrian crossing, at the PCH intersection, to the next, at the intersection of Pacific View Avenue, is 755 feet. The [NACTO Urban Design Guide](#) recommends 120 feet to 200 feet between crosswalks. Since there is no cross street in the first 755 feet of Beach Boulevard, Caltrans would have had to create midblock crossings to achieve this outcome.

If a transit rider needed to get to the bus stop across the street, they might have to walk as far as six football fields.

However, the distance to the next marked crosswalk, at Atlanta Drive, is 2,419 feet — nearly half a mile — despite multiple cross streets. Two bus boarding islands are located in the middle of the block, more than 1,000 feet from the nearest crosswalk, or about the length of three football fields. If a transit rider needed to get to the bus stop across the street, they might have to walk as far as six football fields. This is a time-consuming trek that may be impossible for older adults, people with disabilities, or most travelers on the increasingly frequent days of extreme heat.

This block is not an anomaly. As Beach Boulevard traverses urban neighborhoods of homes and businesses, most of the signalized intersections are around half a mile apart, with few or no pedestrian crossings in between. The shortest distance

between crosswalks we found was 500 feet, more than twice NACTO's recommended maximum.

The corridor goes under two freeway overpasses, crossing on and off ramps, sometimes with poorly marked or unmarked crosswalks. While the SHOPP project does include 98,150 square feet of crosswalks, it is not clear from available documentation whether those are new crosswalks, or locations where Caltrans will simply restripe existing pedestrian crossings without adding new ones. And the SHOPP project fails to include a modest \$1.5 million needed to build new sidewalks that would close gaps along the dangerous, high-speed corridor.

Implementation (or Lack Thereof)

Over the past several SHOPP cycles, there have been four Caltrans projects programmed on Beach Boulevard. The largest pavement rehabilitation project is the [8.5-mile multi-asset management project](#) from Huntington Beach to Westminster in the 2024 SHOPP. The project boundaries are identified as including the highest-collision areas along the entirety of Beach Boulevard for people walking and biking, yet Caltrans project staff chose to implement only required ADA improvements. They declined to close sidewalk gaps or add bikeways, even though those improvements were identified as needed for vulnerable road user safety and would have added barely more than 10% to the project cost.

The casual dismissal of well-documented bicyclist and pedestrian needs in the CSDD for this project emphasizes the Caltrans district's inattentiveness to the lives and safety of people biking and walking, and to the agency's own policies. This consistent

lack of attention to vulnerable road users is hidden under complex and lengthy technical documents viewed mostly by agency staffers, and not made public unless a formal request is filed. CalBike requested and made these documents — which belong to the citizens of California — available to the public so our elected leaders can understand the urgent need for better oversight of Caltrans.

CASE STUDY #2

State Route 49: People Bike and Walk Outside City Centers in District 3

Although not as heavily used as their urban counterparts, sections of SR 49 and other rural highways in Nevada County serve local community residents who do not own cars. Many rural highways are designated bike routes, and people still walk on them in some places because there are few, if any, alternate routes to reach needed destinations. And even though the bike and pedestrian traffic is relatively light on rural highways compared to urban areas, people still get hit by cars, often in the most dangerous of circumstances given the complete lack of safe active transportation infrastructure (no shoulders or sidewalks) and very high-speed traffic.

A project in the 2024 SHOPP on [SR 49](#) in Nevada County, near the foothills of the Tahoe National Forest approximately 50 miles outside of Sacramento, spans 8 miles within unincorporated Nevada County between the cities of Auburn and Grass Valley. SR 49 here is a mostly rural two-lane highway with truck climbing lanes. The adjacent land uses are primarily rural residential and agricultural parcels with paved shoulder widths varying from 2 to 8 feet.

The primary purpose of the project is to develop a safer evacuation route for local residents to flee increasingly frequent wildfires caused by climate instability. It was deemed a climate resiliency project to adapt the existing infrastructure to address impacts of climate change, but as with all SHOPP projects, the bottom-line goal is to rehabilitate the highway to improve mobility, safety, and equity for all road users.

Caltrans has identified this stretch of SR 49 as a mix of rural, urban, and main street. **The route bisects several small, underserved, unincorporated communities, and it acts as the transportation backbone of the area.** Within the project boundaries, many people use the route to walk and bike.

Nine people in the last decade have been hit by cars, resulting in two pedestrian deaths, making this stretch of SR 49 in Nevada County the most dangerous for people walking and biking on the entirety of the highway. Caltrans' planning division deemed

it a “medium opportunity area” for people walking and biking, and a “medium tier 2 priority area,” indicating that it’s an area that currently has a moderate amount of people biking and walking to meet their daily needs but also that it has the potential to be adapted to facilitate more non-car trips. At both ends of the project, the highway has been identified as a high-need and priority area, making this a crucial connection to the more populous cities of Auburn, Grass Valley, and Nevada City.

In developing the SHOPP project plan, Caltrans identified many Complete Streets opportunities, aligning with general planning documents and the active transportation needs identified by the local transportation agencies. Proposals included constructing physically separated facilities for people walking and riding bicycles in the form of a Class I multi-use path; constructing raised crosswalks and sidewalks at regular intervals adjacent to improved bus stop safety treatments; installing pedestrian hybrid beacon (also known as High intensity Activated crossWalk or HAWK) signals and dark skies-compliant lighting to improve visibility; and upgrading more than 20 non-ADA compliant curb ramps ([pp.270-272](#)).

In the end, citing lack of funding, Caltrans only included two ADA curb ramps and downgraded the Class I path to a severely limited Class III bike route with “sharrow” markings. Ultimately, Caltrans only spent \$170,000 on Complete Street facilities out of \$17 million in identified needs, which leaves the highway just as dangerous for people biking and walking after spending almost \$70 million on rehabilitation for people driving.

This specific SHOPP project received federal funding through the Infrastructure Investment and Jobs Act (IIJA) Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) Program. Caltrans referenced funding constraints within this specific program as a reason to not provide safety for all users. However, it’s unclear why Caltrans did not use additional funds within the larger SHOPP funding pot, the State Highway Account, for these additional costs where state and federal funds flow through together and are often paired with project implementation funds.

CASE STUDY #3

Vulnerable Road User Safety Outside the Scope in District 1

A [pavement rehabilitation project](#) in the 2024 SHOPP along 43.5 lane miles of the US 101 expressway between Cummings and Leggett in Mendocino County identified a need for 3 miles of shoulder widening at a cost of \$10-\$15 million, the creation of bus stops and park-and-ride lots with a price tag of \$5-\$10 million, and Pacific Coast Bike Route wayfinding signage for \$5,000.

This language shows the attitude that “the program” is maintaining roadways for motor vehicles, and any other transportation considerations are dropped if they aren’t convenient.

The only active transportation element included in the \$33.5 million project was \$5,000 for wayfinding signage. The CSDD stated that road widening would trigger an analysis that was outside the scope of the project and the bus stops would delay the schedule and might cause a “change in program.” This language shows the attitude that “the program” is maintaining roadways for motor vehicles, and

any other transportation considerations are dropped if they aren’t convenient. See [pp. 148-149](#) for project staff justification for not including active transportation recommendations.

CASE STUDY #4

Beyond the Need and Purpose in District 2

A [pavement rehabilitation project in the 2022 SHOPP](#)¹² on SR 299, a two-lane road near Burnt Ranch in Trinity County, noted that bike riders are forced to share the roadway with cars where there is no paved shoulder and pedestrians, including schoolchildren, walk on the paved and unpaved shoulder. Identified needs included 70,000 linear feet of 8-foot shoulders with an estimated price tag of \$80 million, a pedestrian crossing for \$100,000, and 10 bike-friendly drainage grates for a total cost of \$20,000.

Caltrans opted to install the drainage grates but didn’t include the elements that would most benefit people biking and walking in the area, citing SHOPP funding constraints. The justification stated that “shoulder widening goes beyond the need and purpose of the project” and included a complaint about the difficulty of adding shoulders because of steep terrain. The narrative also stated that Caltrans couldn’t study the need for a pedestrian crossing because students were not attending school in person during the pandemic. Total cost for the project is \$9.6 million. The Trinity County Active Transportation Plan envisions a Class III bike route on paved shoulders in this section, but it won’t get it from this Caltrans project. Note the wildly high and vague estimate of \$80 million for shoulder widening, indicating engineers put little or no effort into determining the actual cost for that element of the project. Note also that Caltrans refused to install a pedestrian crossing in the active transportation plan

¹² While we only considered projects included in the 2024 SHOPP in our data analysis, we analyze three projects from the 2022 SHOPP in this section because we believe they provide useful examples of the overarching issues with Complete Streets implementation. These projects were finalized after Caltrans’ DP-37, and the 2022 SHOPP was the first instance to implement its updated Complete Streets policy.

without pedestrian counts. Instead, when students return to school, they will have to cross with no marked crossing because vulnerable road users are “beyond the need and purpose of the project.” See [pp. 69-71](#) for more information.

CASE STUDY #5

Counting ADA Implementation as Complete Streets in District 3

Caltrans consistently counts federally required ADA facilities as a Complete Street facility to meet its performance targets. However, implementation of ADA improvements is not optional because federal regulations require ADA upgrades during repaving projects.¹³

When implementing ADA requirements, Caltrans consistently misses the opportunity to make wholesale safety improvements when rehabilitating the entirety of the right-of-way. Caltrans will often shortchange pedestrians while keeping drivers safe and giving them full accessibility.

One such example (among dozens) is a [21.5-mile repaving project in the 2022 SHOPP on SR 32, a two-lane arterial in Glenn County](#) between Interstate 5 and the Sacramento Bridge. This route was identified as having significant pedestrian needs. The elements Caltrans proposed included constructing new sidewalks to close gaps, converting non-compliant driveways, relocating non-compliant pedestrian walk buttons, adding ADA curb cuts, and making other ADA-required upgrades. It estimated a cost of \$893,500 to build all necessary active transportation infrastructure in a \$20.7 million project, including \$286,500 for 149 ADA curb ramps.

The final project included only 104 ADA ramps at a cost of \$188,000. **The remaining curb ramps and the rest of the pedestrian improvements were pushed to an unplanned Phase 2 of the project.**

A view of this stretch of state roadway on Google Street View shows a main route through the city of Orland, with speed limits of 30 mph in town and as high as 55 mph where it enters a more rural section of the county. There are no bicycle facilities, except a short segment of Class II (painted) bike lane between a through lane and a right turn pocket onto Papst Avenue. The sidewalk and driveway quality varies, with many missing curb cuts, areas of crumbling pavement, and segments where the sidewalk disappears altogether. In addition, the street has numerous uncontrolled intersections and missing or substandard crosswalks.

¹³ In addition, a 2006 class action lawsuit against Caltrans requires it to add ADA curb ramps on all pavement projects where accessibility is needed. [Californians for Disability Rights vs. California Department of Transportation, Case No. C-06-5125](#)

This is, in short, a segment of roadway that would benefit greatly from a thorough Complete Streets treatment. Instead, Caltrans will build fresh, smooth pavement for the vehicular portion of the street while leaving many of the areas used by pedestrians to crumble.

Caltrans cited SHOPP funding limitations and suggested the City of Orland apply for ATP funding to complete the needed pedestrian improvements. See [pp. 202-206](#) of the PID for details. The 2022 SHOPP had a budget of \$17.9 billion. The chronically oversubscribed Active Transportation Program was able to give \$1.6 billion in grants in Cycle 6 in 2023 because of a one-time general fund contribution of \$1 billion, which the governor tried to claw back in the succeeding two budget years.

The ATP normally gives about \$500 million in grants every two years. Because of budget cuts, Cycle 7 in 2025 will have just \$200 million. Yet Caltrans refused to spend a fraction of the money it allocates to paving vehicle lanes on improvements for people walking and biking, pushing projects to the ATP, which is consistently able to fund only a small portion of eligible projects.¹⁴

CASE STUDY #6

No Budget for Bike Safety in District 5

A [2024 SHOPP paving project on 7 miles of Highway 1](#) in Santa Barbara County, described as a four-lane conventional highway, found a need for bike lanes, crosswalks, and ADA ramps. It didn't cost out crosswalks or ADA ramps, and those are not included in the project. The CSDD estimates the costs for 3,060 linear feet of Class II bikeway at \$2,655,230. The identified Complete Streets needs included four segments, but one section of 1,450 linear feet would cost \$2,510,158 because it would need a retaining wall added, not just paint on the street. Caltrans included 1,610 linear feet of paint-only bike lanes at a cost of \$145,072 in the \$23.4 million project.

Caltrans project budgets are large, but, when it comes to biking and walking infrastructure, they are pinching pennies.

The reason for not completing the section of bike lane that required a retaining wall was that it was too expensive, even though it was a fraction of the total project cost. Caltrans project budgets are large, but, when it comes to biking and walking infrastructure, they are pinching pennies. See [pp. 151-152](#) for more information.

¹⁴ In addition, Orland would have little chance of winning funding through the competitive grant process because it lacks crash history due to low local traffic volumes and a small population. The only realistic way for small cities like Orland to get active transportation infrastructure on the state routes that bisect them is during roadway repair on SHOPP projects.

CASE STUDY #7

A Tale of Two Projects in District 8

On two-lane [SR 62, a repaving project](#) on 30 lane miles east of Twentynine Palms in San Bernardino County and [another project](#) on 24 lane miles farther east were both in the 2024 SHOPP. They needed the same Complete Streets improvements: standard paved shoulders, rumble strips, and flying wedges.

In the end, **neither included any elements protecting people biking and walking**, but the ways each got there show the inconsistency of Caltrans treatment of active transportation needs. The first project justified this by saying the area is rural and there isn't enough bicycle or pedestrian traffic to call for widening the shoulders. The second cited the high cost of shoulder widening.

Viewed on Google Maps' aerial view, the terrain for both segments of roadway looks very similar: rural high desert with minor elevation change. Yet, the project east of Twentynine Palms estimated the cost of adding shoulders at \$9,102,730, plus detailed estimates for the rumble strips and flying wedges. The project farther east estimated shoulder widening at "48 millions" and didn't include any cost estimates for the other elements.

Engineers estimated that shoulders would cost almost five times as much on the project to the east, on a stretch of road 3 miles shorter than the western project, in similar terrain. While it appears that the team preparing the first CSDD at least bothered to develop realistic cost estimates, the second team threw down a highly inflated round number and used that as justification not to include bicycle infrastructure the district clearly never intended to build.

CASE STUDY #8

Caltrans Speaks for the Trees in District 11

A [repaving project](#) on 66.7 lane miles of two-lane SR 79 near Julian in San Diego County in the 2022 SHOPP identified five improvements needed for people to bike and walk safely. Three were relatively inexpensive, ranging in price from \$128 to \$60,200 for pavement markings, share the road signs, and rumble strips. However, creating 10 lane miles of Class II bikeways by widening shoulders would have cost \$3.9 million and was excluded from the \$26.5 million project. See more details on [pp.107-109](#).

In the end, only about \$100,000 out of \$4 million in identified active transportation infrastructure needs was included in the project. The pattern of

choosing the cheapest recommended elements so Caltrans can say it did something for people who bike and walk, while excluding costlier elements that might provide real safety, was common among many of the project documents we reviewed.

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The justification for not creating safer bikeways states, in part: “The areas that would benefit from shoulder widening to accommodate bicyclists have many issues that will increase the project costs, exceeding the projects’ allowable funding. The issues include the environmental cost of having to disturb possible sensitive vegetation such as trees and plants.” So we must ask: when has Caltrans ever nixed a highway widening project because it might disturb “sensitive vegetation such as trees and plants”? It is ironic that staff balk at 5 or 6 feet of shoulder widening to give bike riders safe passage because of unverified environmental concerns. This is further evidence that the current project processes allow an individual to provide unsupported excuses to forgo bicycling and walking infrastructure, with little accountability to

department-wide directives to the contrary.

CASE STUDY #9

What’s Left Out in a Completely Complete Streets Project in District 1

A 2024 SHOPP project on [Highway 101 in Humboldt County](#) is, in many ways, an example of Caltrans getting it right. Much of what’s right in this project has to do with advocacy from the [Coalition for Responsible Transportation Priorities](#) (CRTP), which led a strong local push for safer streets.

Within the project area, Highway 101 becomes Broadway, a main thoroughfare through Eureka and part of the Pacific Coast Bike Route. Broadway is traveled by people using all transportation modes, but traffic speeds are high and there are no marked bikeways. The project creates a Class I shared bike/pedestrian path separated from traffic, which extends the active transportation network on the edge of town and connects bike riders to other bike routes.

Caltrans considered local and district active transportation plans and centered the needs of vulnerable road users in this project by creating the Class I path. In fact, the path was originally part of a much bigger Complete Streets project from the 2020 SHOPP, which adds Class IV separated bikeways, protected intersections, bus stop improvements, and traffic calming to a 2-mile stretch of Broadway.

The Class I path was carved off and delayed four years to lower the cost of the bigger 2020 SHOPP project. The Transportation Planning Scoping Information Sheet (TPSIS) for the 2024 project notes: "Careful coordination needs to be had with EA 01-0K940K South Broadway Complete Streets. This project currently proposes an interim solution of Class IV bikeways in this section, but the Class I shared use path proposed here is the long term solution." In other words, bicyclists will have to make do with a few pieces of plastic separating them from highway-speed traffic until the Class I path is built. Caltrans should be commended for developing significant Complete Streets projects on a dangerous state highway like Broadway. But the Class I path is one of approximately five 2024 SHOPP projects entirely focused on the needs of people biking and walking. In contrast, 425 projects in the 2024 SHOPP are exclusively for the benefit of people using motor vehicles, and 175 projects are primarily for drivers but have some Complete Streets elements.

Appendix 3: Caltrans Performance by District

Note: Data from the 200 Caltrans projects with Complete Streets eligibility, programmed into the 2024 SHOPP

Caltrans district	Total cost of identified active transportation needs	Total cost of programmed active transportation elements	Difference between identified needs and programmed bike/ped elements	Total project budget
1	\$49,096,164	\$18,184,164	\$30,912,000	\$292,544,000
2	\$244,146,640	\$36,290,066	\$207,856,574	\$367,799,000
3	\$85,687,150	\$10,924,650	\$74,762,500	\$619,615,000
4	\$223,119,562	\$51,612,209	\$171,507,353	\$1,437,545,000
5	\$117,883,963	\$7,642,467	\$110,241,496	\$327,746,000
6	\$7,825,178	\$1,023,178	\$6,802,000	\$369,693,000
7	\$60,360,592	\$51,436,707	\$8,923,885	\$559,167,000
8	\$76,738,813	\$14,644,793	\$62,094,020	\$944,907,000
9	\$26,548,420	\$1,817,420	\$24,731,000	\$65,138,000
10	\$12,834,771	\$12,032,771	\$802,000	\$257,230,000
11	\$95,869,582	\$27,604,712	\$68,264,870	\$450,834,658
12	\$45,166,950	\$6,751,120	\$38,415,830	\$410,066,000
Grand Total	\$1,045,277,785	\$239,964,257	\$805,313,528	\$6,102,284,658

Caltrans district	Cost of ADA elements included	ADA as a % of active transportation investments	% of identified bike/ped needs included	Identified bike/ped needs as a % of total project cost	Programmed active transportation infrastructure as a % of total project cost
1	\$160,800	0.88%	37.04%	16.78%	6.22%
2	\$0	0.00%	14.86%	66.38%	9.87%
3	\$238,000	2.18%	12.75%	13.83%	1.76%
4	\$5,224,324	10.12%	23.13%	15.52%	3.59%
5	\$245,000	3.21%	6.48%	35.97%	2.33%
6	\$0	0.00%	13.08%	2.12%	0.28%
7	\$9,464,813	18.40%	85.22%	10.79%	9.20%
8	\$2,276,821	15.55%	19.08%	8.12%	1.55%
9	\$0	0.00%	6.85%	40.76%	2.79%
10	\$767,500	6.38%	93.75%	4.99%	4.68%
11	\$3,172,356	11.49%	28.79%	21.26%	6.12%
12	\$1,590,000	23.55%	14.95%	11.01%	1.65%
Grand Total	\$23,139,614	9.64%	22.96%	17.13%	3.93%

Bikeway Linear Feet

Caltrans district	Bikeway LF identified needs	Bikeway LF programmed	% of bikeway LF needs included in projects
1	38,622	38,235	99.00%
2	214,365	56,862	26.53%
3	64,865	83,337	128.48%
4	1,058,429	573,931	54.22%
5	18,920	27,716	146.49%
6	66,358	35,818	53.98%
7	12,666	12,645	99.83%
8	122,194	121,444	99.39%
9	0	0	0
10	87,276	84,636	96.98%
11	53,830	19,870	36.91%
12	15,900	3,700	23.27%
Grand Total	1,753,425	1,062,678	60.61%

Class I Linear Feet

Caltrans district	LF of Class I identified needs	LF of Class I programmed
1	10,060	9,985
2	87,090	23,773
3	52,800	0
4	35,962	3,500
5	3,100	3,100
6	0	0
7	2,746	2,746
8	0	0
9	0	0
10	0	0
11	1,600	400
12	0	0
Grand Total	193,358.00	43,504.00

Class II Linear Feet

Caltrans district	LF of Class II identified needs	LF of Class II programmed
1	14,480	14,480
2	40,815	7,930
3	2,025	83,337
4	409,523	191,179
5	15,720	25,147
6	49,358	34,758
7	8,520	8,090
8	25,045	25,819
9	0	0
10	87,276	80,940
11	41,670	15,270
12	15,900	15,900
Grand Total	710,332.08	502,850.48

Class III Linear Feet

Caltrans district	LF of Class III identified needs	LF of Class III programmed
1	13,760	13,760
2	85,800	0
3	0	0
4	4,488	73,128
5	0	0
6	17,000	0
7	0	0
8	97,149	95,625
9	0	0
10	0	3,696
11	0	2,500
12	0	0
Grand Total	218,197.00	188,709.00

Class IV Linear Feet

Caltrans district	LF of Class IV identified needs	LF of Class IV programmed
1	0	0
2	0	0
3	0	0
4	270,916	167,026
5	0	0
6	0	0
7	1,400	1,400
8	0	0
9	0	0
10	0	0
11	10,540	1,700
12	0	0
Grand Total	282,856.00	170,126.40



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