

# WASHINGTON AREA BICYCLIST ASSOCIATION

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June 4, 2008

Mary Bradford  
Director of Parks  
Maryland National Capital Park and Planning Commission  
9500 Brunett Avenue  
Silver Spring, MD 20901

Dear Ms. Bradford:

On behalf of the Washington Area Bicyclist Association and the undersigned organizations, I am writing today to urge the Maryland-National Capital Park and Planning Commission (MNCPPC) to provide a period for public comment on the speed limits and other safety improvements that have recently been recommended for the Capital Crescent Trail. While we all share your concerns about safety along the trail, and many of us work actively on promoting responsible trail use, we are very dismayed that proposed changes were made without public input. By opening up a dialog with all trail user groups, including runners, roller bladers, walkers, and cyclists we strongly feel we can arrive at a solution to managing the heavily used trail that better balances the responsibility for trail safety among all who use the facility without unduly impacting the many cyclists who use the trail for commuting purposes in off peak hours.

The Capital Crescent Trail is one of the jewels of the Washington region. Every year, this trail sees over a million visitors making it one of the most heavily used trails in the country. When it was initially designed, it may have been adequate for the number of runners, walkers and cyclists that came to the trail, but as the popularity of trail increased dramatically, the challenge of managing trail safety has also increased. To maximize public safety while keeping the Capital Crescent Trail a valuable resource for all users, it is important to adopt safety measures that are tailored for a mixed-use trail environment. Simply importing rules designed for automobiles onto a mixed-use trail fails to recognize the many differences between a public road like Rockville Pike and a hiker-biker path like the Capital Crescent Trail. The shared nature of a mixed-use trail requires greater consideration to the needs and safety of all users. Our concerns, in addition to the lack of public involvement, are that a proper analysis of crash data for the trails which would help determine the nature of the problem was not conducted, nor was any thought given to the possibility of widening the trail to help segregate users.

We are concerned that MNCPPC's plans may actually have the unwanted effect of decreasing overall public safety. For instance, cycling at 15 mph on the Capital Crescent Trail sometimes is too fast, such as when riding through especially heavy trail congestion or when passing large groups of young children.

Speed is not, in and of itself, a safety problem. Trail safety is dependent on educating all trail users on their responsibilities and how to properly act within the environment that is presented to them. By creating the appearance that it is always permissible to travel at 15 mph, M-NCPCC could, in fact, be creating the very problem they are hoping to address. The rule also does not take into account the fact that many cyclists do not use speedometers and would therefore not know their true speed, nor does it address safety concerns at at-grade crossings where encroaching construction and vegetation reduce sight distances for both trail users and motorists.

While the trail is certainly heavily used, there are peak times for the trail, as well as peak locations where trail traffic is usually heavy, such as just south of Bethesda, where a speed of 15 mph would be unsafe.

However, during commuting hours or when no other users are present, the speed limit serves no purpose and will not impact trail safety. The speed limits being imposed do not reflect the nature of the trail, nor does it address the diversity of users. In MNCPPC's press release on the improvement no mention was made of what efforts will be made to educate walkers, runners, or those with dogs on leashes. While we stand ready to assist MNCPPC with efforts to educate trail users on their responsibilities, no mention was made about what education efforts the county will undertake.

Many cyclists who use the Capital Crescent Trail see it as a safe and environmentally friendly way to commute between Bethesda and the District of Columbia or Northern Virginia. Especially in this time of rising gas prices, unhealthy air quality, and rising rates of obesity the County should be encouraging rather than discouraging alternative forms of transportation. While we all wish that the roads of the DC region were safe for all types of cyclists, the simple fact remains that most roads were designed with only motor vehicles in mind. As progress toward the implementation of the Montgomery County Functional Bikeways Master Plan remains stalled, and key new multiuse trails which would take pressure off the Capital Crescent Trail fall victim to budget realities, the Capital Crescent will continue to see a rise in the number of users. We hope that MNCPPC, through their involvement in the revisions to the County's Road Code, will be strong voice for better on road facilities for cyclists and continue to push new trail development which together will help take pressure off the Capital Crescent.

There is still time to find a solution that will be acceptable to all trail users and we stand ready to provide any knowledge and assistance you may need. M-NCPPC should respond to the controversy that has erupted over its new rules by opening a period of notice and comment on how to make the Capital Crescent Trail safer and more enjoyable for all. We are confident that by working together, a solution can be found that all types of trail users will be able to support.

Respectfully,



Eric Gilliland  
Director  
Washington Area Bicyclist Association

/s/

Andy Clark  
Director  
League of American Bicyclists

/s/

Jack Cochrane  
Chair  
Montgomery Bicycle Advocates