

WASHINGTON AREA BICYCLIST ASSOCIATION

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The Position of the Washington Area Bicyclist Association on the Reconstruction of the Rock Creek Trail

The following is the position of the Washington Area Bicyclist Association on the reconstruction of the Rock Creek Trail. The current trail proposal as outlined by the District Department of Transportation barely meets the minimum standards for the construction of shared use paths as established by the American Association of State Highway Transportation Officials (AASHTO). To go below these standards would, in our opinion, result in a facility that will be unable to handle the anticipated usage and would present significant safety hazards for trail users. WABA insists that per AASHTO design recommendations, the future Rock Creek Trail be built to a minimum width of 10 feet wherever possible. To go through an extensive reconstruction process that would close the trail for a long period of time in order to build a facility that would be obsolete and dangerous before it even opened would be a mistake.

As a bit of history, the initial agreement between the city and the National Park Service for the design and reconstruction of the trails in both Rose Park and Rock Creek was signed in April of 2004. After four more years of suffering from a substandard and dangerous facility, we are no closer to breaking ground on the much-needed improvements to the trail. For the last two years, staff from the District Department of Transportation has been in negotiations with Rock Creek Park for the rehabilitation of the Rock Creek Trail. During this time DDOT has made a significant effort to find a balance between the need for a modern trail design that can accommodate the many users of the park, with the need to protect the sensitive environment of Rock Creek Park. The plans that DDOT has arrived at, and which have been presented to and commented upon by Rock Creek Park, achieves that balance.

DDOT's proposed design widens the trail to 10 feet of paved surface where possible with an 8-foot trail where the right of way is constrained. As mentioned previously, it is our opinion that this proposal is the *absolute minimum* design that should be accepted. Guidelines issued by the American Association of State Highway Transportation Officials (AASHTO) on the construction of shared use paths recommend a minimum paved width of 10 feet, combined with two foot soft shoulders on the sides of trail. AASHTO goes on to recommend that an 8 foot trail should only be constructed where bicycle traffic is expected to be low and pedestrian use of the facility will be infrequent. Considering the fact that other trails in the DC area such as the Capital Crescent, Mt Vernon and Washington and Old Dominion are some of the most heavily used trails in the country, each seeing over a million visitors each year, heavy use on a reconstructed Rock Creek Trail is not

an unreasonable assumption. In places of such heavy expected use, AASHTO actually recommends a 12-14 foot wide trail. The current plans are actually below AASHTO recommendations, but are necessary given the unique geography of the Rock Creek valley.

In spite of the efforts of DDOT to find a solution that is acceptable to all parties, the National Park Service has made it clear that they will not entertain the idea of any widening of the trail. According to their own comments on the last DDOT plans, Rock Creek Park is opposed to trail widening because a wider trail "has a cumulative adverse effect on the park because of the increase in impervious surface."

While any trail reconstruction that occurs will undoubtedly have an impact on the environment, WABA believes that that amount of additional impervious surface will be minimal, and the effects of the increase can be offset. DDOT consultants have studied the impact of a wider trail on the amount of impervious surface and have determined that the impact would indeed be negligible. In fact, even under the most aggressive trail widening, the amount of impervious surface in the Rock Creek watershed will increase by only .017%. If this is still a concern, WABA feels that a "no net gain" approach toward impervious surface would be best. For example, there are many underutilized parking lots lining Beach Drive that can be resurfaced with permeable pavers or porous asphalt in order to offset any additional paved surface added to the stream valley through trail widening.

We also believe that an expensive and time consuming Environmental Assessment is not required for the rehabilitation of the existing trail. According to 23 CFR section 771.117, categorical exclusions to the Environmental Assessment process may be granted to projects that "do not induce significant impacts to planned growth or land use for the area; do not require the relocation of significant numbers of people; do not have a significant impact on any natural, cultural, recreational, historic or other resource; do not involve significant air, noise, or water quality impacts; do not have significant impacts on travel patterns; or do not otherwise, either individually or cumulatively, have any significant environmental impacts." Under this section the "construction of bicycle and pedestrian lanes, paths, and facilities" are specifically mentioned as meeting the exemption requirements.

If, in spite of these strong arguments, an EA is still to be performed, WABA demands that the process be truly open and that a full range of options for the trail, including the current DDOT proposal, be included in the list of alternatives that can be examined by the public. This list of alternatives should include options that may be not be currently acceptable to the NPS.

In conclusion, we now have a once-in-a-generation opportunity to rebuild an important non-motorized transportation and recreation facility that will add to the enjoyment of Rock Creek National Park for years to come and we should not waste this opportunity by building a substandard facility. After four years of no progress the time for proposals and counter-proposals is over and we are at the point now where decisions need to be made. DDOT has given their final plans to the NPS, and the NPS has given their final comments back to DDOT. Yet in spite of this, another walk-through of the trail has been scheduled for April 2nd. At WABA, we are concerned that DDOT will further compromise on a design width that already barely meets the minimum requirements of the project. We should not settle for anything less than the best trail possible and that is one that adheres as closely as possible to modern trail design standards.

