October 14, 2016

Anna Chamberlin  
Manager, Project Review  
District Department of Transportation  
55 M Street SE, Suite 400  
Washington DC 20003-3515

Re: Comments on Public Scoping for the Long Bridge Study Phase II

Ms Chamberlin,

I am pleased to submit comments on behalf of the Washington Area Bicyclist Association and our 6,500 regional members. The Long Bridge Study presents an unparalleled opportunity to expand non-motorized access across the Potomac River, close gaps in the regional trail network, and move our region towards more sustainable transportation modes. We are grateful for the opportunity to comment.

The Long Bridge is one of only eight bridges that span the Potomac River into downtown DC. It is the only bridge that carries intercity freight and passenger rail, and it is the oldest by far. Though there are extensive rehabilitation efforts in progress or under consideration for many of the other bridges (Key, Roosevelt, Arlington, and 14th St.), the Long Bridge is the only facility where complete replacement and dramatic changes to the physical configuration of the crossing are under consideration. The Long Bridge may be the only blank canvas for a Potomac crossing that the region considers for the next fifty years in this location.

With the scale of the opportunity in mind, we believe that the draft Purpose and Need for the Long Bridge Study is too narrowly focussed on the needs of freight and passenger rail. Indeed, expanding rail capacity, reliability and redundancy are essential to meet the growing demands of a 22nd century rail system. Yet, the regional trail network faces similar challenges to realize long term connectivity plans. Alongside rail improvements, expanding the capacity, redundancy, and regional connectivity of the trail network should be a core element of the study’s purpose and need statement and selection criteria. A Long Bridge replacement without a high-quality trail is a wasted, once-in-a-century, opportunity.

Current non-motorized Potomac crossings are inadequate

Of the eight Potomac River bridges that connect Virginia into downtown DC, four include a sidepath to allow walking and biking. Each of these is a crucial link in the regional network, yet not one fully satisfies today’s trail standards for width, sight distances or protection from traffic. The Key Bridge, for example, was built with 10 foot-wide sidepaths that carry up to 4,000 daily bicycle and pedestrian trips between Rosslyn and Georgetown in good weather. Though a delightful ride, the Key Bridge paths are four feet narrower than modern trail standards suggest to safely accommodate this volume. Similarly, the 14th St. Bridge, which links the Mount Vernon Trail to the Jefferson Memorial, mixes more than 2,700 bicyclists and 500 pedestrians per day
on a single 10 foot path with a long section of poor sight lines. Minor details of these bridges can be improved to reduce friction between trail users, but trail widths and capacities are fixed. For more capacity, a new, wider, trail crossing will soon be necessary to keep up.

Meanwhile, across the region, and on both sides of the Potomac River, residents are leaving their cars at home and choosing the bicycle for transportation to and from work, for errands, and recreation. Between 2008 and 2015, the share of residents who bike to work rose from 2.3% to 4.1% in the District, 1.1% to 1.9% in Arlington and 0.8% to 1.2% in Alexandria according to the American Community Survey. Each year, Capital Bikeshare sets new records for peak ridership as it expands stations and in popularity around the region. From 2011 to 2015, yearly bikeshare trips increased by over 400% in Arlington alone. Thanks in part to planned investments in safe bike infrastructure in the District, Arlington, and Alexandria, this growth will continue. Soon, these poor bridge crossings will inhibit access and deter residents from making sustainable transportation choices.

The Long Bridge study should be consistent with all Federal, Regional, and Local plans

This study should not just aim to be consistent with long term rail plans, but consider transportation, sustainability and master plans as well. By the time a preferred alternative is selected, significant public funds will be invested for planning and construction from federal, regional and local sources. The jurisdictions that contribute funds deserve a final result that benefits their constituents and their goals within the study area. Therefore, this study’s selection criteria must weigh consistency with regional plans, as detailed below, and give appropriate justification if the study selects an alternative that is inconsistent with them.

- MoveDC Plan (2014)
  - A multi-use trail alongside the Long Bridge connecting to Maine Ave is listed as a Tier 1 priority. A further trail connection along Maryland Ave SW to 9th St. SW is listed as a Tier 3 priority. Both segments fall within the scope of the study area.

- Arlington Long Bridge Park Esplanade expansion
  - In its 2017-2026 Capital Improvements Plan Arlington County has committed to an extensive expansion of park amenities at Long Bridge Park. This plan includes an extension of the esplanade trail towards the eastern boundary of the park. Though currently not funded, the county intends to begin study of a connection across the George Washington Parkway to the Mount Vernon Trail in partnership with the National Park Service.

- NPS Paved Trail Plan (2016)
  - Capital Project Recommendation N2.1 proposes a CSX bridge connector to link Long Bridge Park, the Mount Vernon Trail, Ohio Drive, and the Rock Creek Park Trail on the east side of the Potomac River.
  - The Paved Trail Plan includes dozens of recommendations for capital trail projects to fill gaps and improve access to trails on each side of the Potomac River. With expanded access, these trails will see increased use and require high capacity river crossings.

- DDOT Anacostia Waterfront Initiative & Anacostia River Trail
  - DC’s Anacostia Riverwalk Trail, once a bold vision, is now a reality, stretching for more than 15 miles on the banks of the Anacostia River in DC. Though the majority of the planned trail mileage has been completed on the east and west riverbanks, new segments will open alongside the Wharf, the DC United Stadium, and the
Douglas Bridge to make direct connections from Ohio Drive and destinations along the Anacostia. A link from this trail to Virginia via the Long Bridge would increase the utility of the Riverwalk Trail, create a new commuter route from Virginia to employment centers in SW and SE DC, and coax drivers off of the congested I-395 and I-695 highways.

- Sustainable DC Plan (2013)
  - This plan sets as a target that by 2032, 25% of all commuter trips in the District will be made by biking and walking. To accomplish this, it sets a goal of nearly doubling the mileage of trails, bike lanes, and safe places to bike. Quality connections into DC via bridge are a crucial part of realizing this vision.

**Trail and Rail can coexist on the same bridge**

Throughout this study process, we have heard objections that it is not possible to accommodate both heavy freight rail and a multi-use trail on the same bridge. We understand the need to separate rail traffic from trail users to prevent intentional and accidental access to tracks. We understand that there may be additional design concerns to limit risks to trail users from train derailments and other common rail incidents. However, with more than 600 miles\(^1\) of freight and passenger rail service operating alongside trails (rail with trail) across the country, there is a strong case that it can be done well. Below are a few examples of new and retrofitted bridges that accommodate both rail operations and trails.

- Tilikum Crossing in Portland, OR
  - Completed in 2015, this bridge accommodates light rail, streetcar, buses and a wide multi-use trail.

- Steel Bridge in Portland, OR
  - Now over a century old, this bridge carries freight trains, Amtrak, MAX light rail, buses, highway traffic and thousands of daily bicyclists via a cantilevered multi-use trail on the lower deck.

- Delaware and Lehigh Bridge in Jim Thorpe, PA
  - Renovated in 2009, this bridge carries freight trains for the Reading and Northern Railroad and a multi-use trail over the Lehigh River into Jim Thorpe. Before the bridge, the trail parallels this rail line for almost seven miles.

- Harpers Ferry Railroad Bridge in Harpers Ferry, WV
  - This freight rail bridge also features a cantilevered trail to extend the C&O towpath into Harpers Ferry.

- Harahan Bridge in Memphis, TN
  - This bridge over the Mississippi river, currently undergoing significant rehabilitation, will carry freight rail trains and a cantilevered multi-use trail almost a mile between Memphis and West Memphis.

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\(^1\) Rail with Trail List as of June 2014 from Rails to Trails Conservancy
http://www.railstotrails.org/resourcehandler.ashx?id=3507
The Long Bridge study is a tremendous opportunity for realising so many of the region’s mobility, sustainability, and access goals, but without expanding the scope from its current rail focus, it will leave them unmet. We look forward to continued participation in this study process. For questions and follow-up please contact Garrett Hennigan at garrett.hennigan@waba.org or 202-518-0524 x210.

Thank you for considering our comments,

[Signature]

Gregory Billing
Executive Director