



August 31, 2023

Superintendent Charles Cuvelier
700 George Washington Memorial Parkway
McLean, VA 22101

Re: George Washington Memorial Parkway South and Mount Vernon Trail Improvement Assessment of Effect

Dear Superintendent Cuvelier,

I am writing on behalf of the Washington Area Bicyclist Association (WABA) and its more than 6,000 members across the Washington metropolitan area to provide written comments on the National Park Service's draft Environmental Assessment and preferred alternative to improve the south section of the George Washington Memorial Parkway and the Mount Vernon Trail.

For fifty years, WABA has worked to transform the capital region by improving the conditions for people who bike. Our work to advocate for dedicated bike infrastructure, pass laws that promote safe roadway behavior, and provide education programming for all road-users has resulted in a drastically different cultural and political approach to biking for transportation. Biking can and should be an equitable, safe, low-cost, time-saving, and sustainable way to navigate our communities and parks for all visitors and users.

We are overall supportive of the National Park Service's goals around safety for all users and are highly encouraged by many of the design changes in the preferred alternative plan. These elements largely align with suggestions we encouraged at the start of the study and design process, with one major exception. **We remain adamant that a 10-12' trail width is insufficient given the existing and projected future volume of visitors and therefore strongly urge NPS to widen the southern section to at least 12' and the northern section to 14' wherever feasible and practicable.**

While 12' or 14' is still insufficient for true modal separation (which would require 16'), the extra width will still provide for a meaningfully safer and more comfortable experience especially for groups and families traveling together and those on larger mobility devices such as cargo bikes. We acknowledge and accept that historic and environmental sensitivities may require a narrower trail in some locations; we deeply appreciate NPS' context-sensitive approach

that seeks to minimize impacts to legacy trees and environmentally-sensitive areas. But those constrained locations should not preclude a wider footprint elsewhere.

The trail's many bridges and boardwalks already feature or will feature a wider 14' cross-section, and many nearby and intersecting trails also feature cross-sections wider than 12' or will be widened in the near future. Tellingly, updated AASHTO guidelines are expected to establish 14' as the minimum width for multi-use trails this year. Alternatively, NPS might consider retaining the 10 and 12' trail widths with the addition of a 2' gravel buffer on each side as Fairfax County has successfully done on the Mount Vernon Memorial Highway Trail and elsewhere. This would reduce environmental impacts while still providing trail users with more space to navigate, pass, and pull off.

The Mount Vernon Trail is a truly special place and NPS should take care to ensure it can be safely and comfortably enjoyed now and for years to come. The trail may not have been a part of the original vision for the parkway but it has nonetheless become the quintessential way that millions of people experience our region and its unique natural beauty. Widening it is how we can be sure that experience remains accessible and comfortable for all visitors.

Notwithstanding the above concern, listed below are other elements of the preferred alternative plan that we would like to specifically call out and strongly support, along with suggestions on how those elements might be made even better, strengthened and/or improved:

Good → Rerouting the trail at Gravelly Point and creating a new separate sidewalk.

Gravelly Point is one of the most congested trail sections in the entire capital region. The initial design for this area readily acknowledges this reality and we commend NPS for thinking seriously about how all the various visitors and users can continue to coexist in this unique space.

Better → Continue the new sidewalk deeper into the park and clearly indicate mode separation. We continue to believe that the high volume visitors on bike and on foot warrant full modal separation through the entirety of Gravelly Point and would welcome a more extensive sidewalk/walking path network. With the addition of the sidewalk, NPS should also make clear through signage and trail markings which facilities are for which use to reduce conflicts between visitors on wheels and those on foot.

Good → Restoration work to medians and curbs that shrinks the overall roadway footprint. Returning to the historical footprint is notable and will significantly improve safety along this corridor while simultaneously reducing impervious surfaces and associated stormwater

effects. A narrower roadway with fewer lanes is easier to cross on foot or by bike and helps encourage slower driving speeds.

Better → Using some of the newly-freed roadway/shoulder space for a bike lane and allowing cyclists on the parkway again. Creating an on-road alternative bicycle route would relieve some of the congestion on the parallel Mount Vernon Trail and be especially appealing for recreational riders who wish to experience the parkway at higher speeds than the scenic trail allows. The presence of a bicycle facility alongside the travel lane would also serve as a deterrent to excessive speeding. Many sections feature a 20' roadway with only a 12' travel lane, leaving an ample 8' for a buffered bike lane.

Good → Road diet for the George Washington Parkway South Section from the Mount Vernon Estate to Tulane Drive. This is a monumental step in returning the parkway to its original purpose as a scenic byway rather than a high-speed commuter route with significant safety benefits for all users.

Better → Extend the road diet north to the Beltway and limit dedicated turn lanes. We would push back on the findings of excessive delays north of Belle Haven Road, particularly in light of anticipated modal shifts resulting from an improved Mount Vernon Trail and improvements along the nearby Route 1 corridor including the addition of bus rapid transit. Throughput cannot be the primary measure of success for a scenic byway such as the GW Parkway. Additionally, we encourage NPS to consider eliminating dedicated turn lanes where traffic analyses predict low volume of use. While convenient for drivers, turn lanes increase the distance visitors on foot or bike have to cross and increase the exposure visitors have to vehicular traffic unencumbered by traffic signals.

Good → Intersection improvements (especially crosswalks with median refuges) and better sidewalk connections to neighborhoods, bus stops, and trails. We strongly commend NPS for its focus on meaningfully improving safety conditions for people walking and biking along this corridor. We also celebrate the accessibility improvements to ensure trail and transit users have better access to the amenities and neighborhoods along the parkway.

Better → Ensure sufficient lighting, tighten turn radii, and harden turning islands. We encourage NPS to build on its solid initial intersection designs and implement all manner of best-practices such as those listed in this heading. Tightening turn radii and hardening turning islands will encourage slower speed turning motions; these infrastructure improvements, along with proper lighting, will help better protect vulnerable road users.

Even better → Consider roundabouts. Replacing the current unsignalized intersections with roundabouts would be an ideal way to maintain vehicular traffic flows and facilitate turning motions without excessive turn lanes while simultaneously discouraging high speeds and simplifying pedestrian crossings. We think roundabouts, while perhaps a radical-seeming approach, would be beneficial and align with NPS’ objective to “not include the use of traffic signals, which were considered intrusive and not in keeping with the Parkway’s historic character and original design.”

Good → Interest in automatic traffic enforcement (ATE). This would be a huge – and enthusiastically welcomed – change to the GW Parkway. We look forward to advocating for an expansion of NPS’ traffic enforcement mandate in Virginia and elsewhere.

Better → Consider roundabouts (again)! Given the long legislative path to bringing ATE to the GW Parkway or any NPS unit, an alternative would be self-enforcing roadway facilities – facilities whose geometry makes excessive speeding difficult. Roundabouts – which require slowing but not stopping – are one way NPS could meaningfully reduce dangerous speeds on its roads within its existing enforcement mandate.

Our ambitious suggestions befit a most ambitious vision for the trail and its future. We are encouraged and emboldened by this once-in-a-generation opportunity to not just repave the trail and parkway as is but to boldly rebuild them for the enjoyment and benefit of visitors and users for decades to come; one of the region’s and nation’s most iconic, popular, and successful public spaces deserves nothing less.

We appreciate this opportunity to submit comments and thank you for your careful consideration. We look forward to the next steps in the environmental assessment, planning, and design process.

Respectfully,

Kevin O’Brien
Virginia Organizer | Washington Area Bicyclist Association