

October 24, 2023

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

Re: George Washington Memorial Parkway South and Mount Vernon Trail Improvement Plan/Environmental Assessment

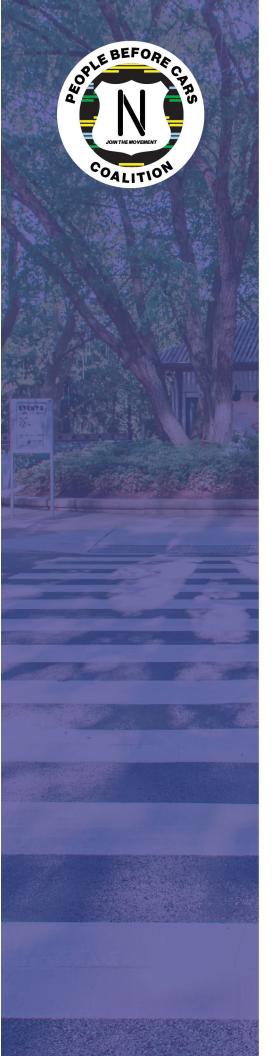
Dear Superintendent Cuvelier,

We are writing on behalf of the People Before Cars Coalition, a consortium of local business, advocacy, and community groups working together to promote safe, sustainable transportation in the National Landing area. In this letter, we offer overall support and several specific recommendations on the National Park Service's draft Environmental Assessment and preferred alternative concept to improve the south section of the George Washington Memorial Parkway and the Mount Vernon Trail.

For over forty years, the Mount Vernon Trail has provided visitors from near and far cherished and unique access to green space, the Potomac River waterfront, and historic sites along its winding 17-mile course. Its popularity and importance as a cultural and transportation resource make the trail's significant, often dangerous deterioration acutely felt. The popularity of the trail combined with its narrow width and poor condition leads to conflicts and crashes. Overall, we enthusiastically support the National Park Service's plans to rebuild and rehabilitate the trail along with implementing numerous safety and visitor comfort improvements so that it can remain an experience accessible to all for generations to come.

It is with these future generations in mind that we offer our single most urgent recommendation: **more trail space is needed.**

We applaud the meaningful improvement on the current 8-10' conditions, however, to meet future visitor needs we are advocating going beyond NPS' proposed trail concept featuring a 12' width between Theodore Roosevelt Island and Alexandria and a 10' width between Jones Point Park south to the Mount Vernon Estate. We strongly recommend that NPS future-proof the design so that visitors a decade from now can enjoy a safe, conflict-free Mount Vernon Trail with plenty of capacity for cyclists and pedestrians, unlike today. The need for more space now and in the future is most acute in the stretch of trail



adjacent to National Landing and the airport, from the 14th Street Bridge to Daingerfield Island. New development in the area and new access points via the Long Bridge and CC2DCA bike/pedestrian spans will likely increase the number of visitors visiting the trail.

A solution we are advocating is a 16' mode-separated/dual-use trail in the Arlington segment of the parkway. The American Association of State Highway and Transportation Officials' (AASHTO) design guidelines recommend a 12-14' width for heavily-trafficked multi-use trails but 16' allows for full separation of visitors on foot and on mobility devices such as bikes, trikes, and scooters.

A wider trail undoubtedly introduces several complications, namely the increased costs associated with stormwater management for the extra pavement and adverse impacts to the environment; however, the long-term benefits outweigh these short-term costs. Modern stormwater management strategies mean a properly designed widened trail can generate significantly less runoff than a narrower legacy trail; more robust stormwater facilities may also be a prudent investment on their own given rising water levels in our fast-changing climate. Additional tree disturbance could be mitigated by more thoughtful, robust, and resiliency-focused replantings, turning temporary loss into an opportunity to strengthen the overall ecosystem.

However, we need not approach trail width as an all-or-nothing situation. Viable alternatives to create more usable space for trail users abound. NPS might consider braided or split trails to avoid legacy trees or other spatial constraints, providing additional capacity via parallel paths. This strategy has already been studied and recommended for Gravelly Point in the Gravelly Point/Roaches Run Environmental Assessment, and we urge that implementation of the bypass trail or a 16' dual-trail hat Gravelly Point be a top priority. The addition of gravel buffers alongside a 10-12' trail – a feature of several trails in Fairfax County – would also effectively widen the usable space without adding impervious surface while also improving drainage, reducing trail edge erosion and plant encroachment, and creating a softer surface for runners.



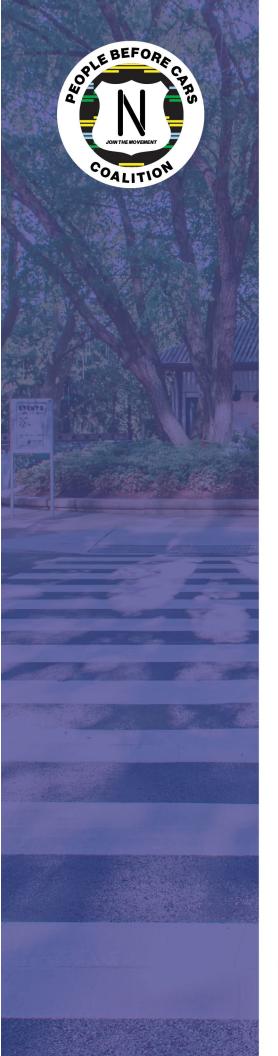
Lastly, NPS could repurpose additional space within the roadway for visitors on foot or bike, similar to its solution to the trail pinch point underneath Memorial Bridge. Creating a parallel (and protected) bike facility in the road could be especially appealing to faster-moving visitors, alleviating trail conflict and congestion, all without the need for the increased disturbance and cost of a wider trail.

In sum, we believe NPS has an obligation and, perhaps more importantly, has options to create more space for trail users and visitors, throughout the corridor and in the northern segment in particular. Given the long-expected lifespan and high costs of this trail rehabilitation project, it is paramount that we get the design right and create a facility we are confident will meet the varied needs of park visitors well into the future. There are so many things to love about the concept including the road diet south of Tulane Drive, the aforementioned alleviation of the pinch point under Memorial Bridge, numerous bike/pedestrian intersection safety improvements, and a host of new trail amenities including signage, water bottle refill stations, and six new Capital Bikeshare stations. But we have to give folks the space they need to experience it all.

Our final recommendation is for NPS to ensure that the proposed trail intersection roundabouts are geometrically suitable for long-wheelbase bikes/bikes with trailers and designed/signed in such a way that encourages compliance around rather than cutting across the intersections. With visitors arriving/departing the northern segment now from Memorial Bridge, the Four Mile Run Trail, and the Crystal City access trail plus the Long Bridge and CC2DCA bike/pedestrian spans in the future, NPS should endeavor to create seamless and conflict-free entry points.

These 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,

Stewart Schwartz Executive Director, Coalition for Smarter Growth

Jay Corbalis Vice President, Public Affairs JBG SMITH

Chris Slatt President, Sustainable Mobility for Arlington County

Gillian Burgess President, Safe Streets Are For Everyone Thank You

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