



## Montgomery Bicycle Advocates Montgomery County, Maryland

January 18, 2007

The Montgomery County Council  
100 Maryland Avenue  
Rockville, MD 20850

### **The following is MoBike's written testimony regarding the "road code" legislation (Bill 48-06 and SRA 06-04)**

To the Montgomery County Council,

Our organization is extremely concerned about the proposed "road code" legislation, Bill 48-06 and SRA 06-04. We believe that the legislation, as written, defines standards that are likely to be very detrimental to bicycling in Montgomery County. We appreciate the County Council's sincere desire to calm car traffic and protect pedestrians. But the legislation would achieve only modest gains in pedestrian safety at a very high cost – namely, the viability of cycling as a mode of transportation. We urge you to reject the road code bills or significantly alter them to address cyclists' needs.

#### **Slow Down the Process**

First, we urge the Council to move more slowly on the road code bills. Our organization has barely had time to analyze the legislation since its introduction. Such a wholesale paradigm shift deserves several months of analysis and public discussion. My group needs time to consult with the cycling community as well as experts in bike and pedestrian design practices. We are dismayed that the Council did not adequately consult with key stakeholders such as cyclists before devising new standards. At least let's take the time to let stakeholders respond fully now.

#### **Lane Width is Vital to Cyclists**

Our biggest concern with the legislation is that it frequently calls for lane widths that are hostile to cycling. The proposed lane width standards, 10.5' or 11' on slower roads and 12' on faster roads, are simply too narrow to be considered bike-friendly on arterial or collector streets. Most bikeway design literature, including the county's Countywide Bikeways Functional Master Plan (CBFMP), recommends that shared lanes be 14' wide excluding gutters. 14' allows cars to safely pass cyclists in the same lane, and 15' is necessary on higher speed roads. For multi-lane roads, a typical bike-friendly

configuration is to provide so-called wide outside lanes (right lanes) that are 14' or 15' wide and inside lanes (center and left lanes) that are as narrow as 10'. But 10.5' or 11' outside lanes utterly fail to make a road a "complete street" that safely supports cycling.

Narrow lanes certainly have their uses. Narrowing inside lanes is often an excellent way to create space needed for wider outside lanes, shoulders or bike lanes. A road with a 10' inside lane and 14' outside lane (in each direction) is generally much better for cyclists than a road with two 12' lanes. In fact we recommend that 10', not 10.5', be the minimum lane width, to allow greater widening elsewhere. Randolph Road just east of MD 355 Rockville Pike currently has 10' lanes (including the gutter) and carries considerable truck traffic, yet does not create problems for drivers. A recent literature review by the city of Arlington in 2003 noted that 10' lanes do not measurably increase crash rates. The same review also stated that 15' outside lanes are preferred to allow safe bike use.<sup>1</sup>

The road code legislation stipulates one extra foot of lane width for roads that are actually master-planned as shared roadway bike routes. But that still leaves lanes that are only 11.5' or 12' wide on most roads and 13' wide on faster roads. These widths are still well below the 14' or 15' needed on a legitimate shared roadway. 13' on an arterial is not a compromise – it's an unsafe condition. 13' outside lanes are also effectively a violation of the Countywide Bikeways Functional Master Plan, which calls for shared roadway bike routes to have 14' lanes or the equivalent (e.g. bikeable shoulders).

### **Paved Shoulders are Vital Too**

The road code legislation does not permit shoulders on roads with curbs. Yet shoulders are an easy and common way to accommodate cyclists on many roads, and they serve other useful purposes as well. Even where the legislation calls for shoulders (on certain curb-less roads), it stipulates that they be only 2' wide in most cases. While 2' shoulders might be better for bikes than no space at all, they aren't wide enough to allow a road to be called bikeable.

### **What's Left**

So the legislation effectively leaves only two tools in the bikeway designer's toolkit: bike lanes and the shared use path. The legislation allows for bike lanes on roads where they are master planned, but such roads are not numerous in the plan. The Countywide Bikeways Functional Master Plan allows bike lanes to be substituted for other bikeway types, but substitution may be difficult to bring about in practice (it's hard enough to get bike lanes where they're specifically called for). Also, there are situations where bike lanes aren't the best way to accommodate cyclists – in dense urban environments with frequent turning traffic, next to parallel parking, or on roads where cyclists historically use the main travel lanes (Beach Drive, for example). In these situations, 14' outside lanes are often the best solution.

### **Bike Accommodation Should Be Routine**

A fundamental problem with the legislation is that it's based on the premise that cyclists should only be considered in the design of master-planned bike routes and not other roads. This contradicts the well-established principle that pedestrians and cyclists should

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<sup>1</sup> See [http://www.arlingtonva.us/Departments/CPHD/forums/columbia/pdf/lane\\_width.pdf](http://www.arlingtonva.us/Departments/CPHD/forums/columbia/pdf/lane_width.pdf)

be accommodated as a matter of routine along every street. The AASHTO Guide for the Development of Bicycle Facilities states:

*"All highways, except those where cyclists are legally prohibited, should be designed and constructed under the assumption that they will be used by cyclists. Therefore, bicycles should be considered in all phases of transportation planning, new roadway design, roadway reconstruction, and capacity improvement and transit projects."*

Cyclists must often use roads that aren't master-planned bikeways when traveling from point A to point B. County bikeway plans are intended to serve as a lower limit, not an upper limit, on which roads should be bike-friendly. Unlike highway master plans, the county's bikeway plans represent a prioritization of shared roadway routes, listing the most important routes rather than the only routes. The idea of limiting bikes to master-planned bike routes is tantamount to limiting trucks to master-planned "truck routes" and deciding not to accommodate trucks anywhere else. Or it's comparable to limiting pedestrians to master-planned "pedestrian routes" and deciding not to build sidewalks anywhere else.

There are many roads that carry a certain amount of bike traffic but which are not master-planned as on-road bike routes. Sometimes planners didn't want to go so far as to mandate bike accommodations with the full force of a master plan. Other times it wasn't clear that county could feasibly provide full width lanes. In some cases there may have been simple oversight. On these roads and many others it's important to provide as much space for bikes as possible (which often may be perfectly adequate) regardless of the master plan designation.

The Countywide Bikeways Functional Master Plan emphasizes that,

*"Current State and County policies require that all new roads and highways be designed to accommodate bicycles and that all road improvement projects to incorporate bicycle elements where feasible."*

Our roadway design standards should continue to reflect this. Building narrow, bike-unfriendly streets should be the exception, not the rule.

### **Shared Use Paths**

The road code permits construction of bike paths next to roads where such paths are master-planned, but these roads will still be left without adequate on-road space for bikes unless bike lanes are also planned. Yet bike design literature emphasizes that paths should not be treated as a substitute for on-road accommodations. The AASTHO bike guide states:

*"Shared use paths should not be considered a substitute for street improvements even when the path is located adjacent to the highway, because many bicyclists will find it less convenient to ride on these paths compared with the streets, particularly for utility trips."*

Therefore width for on-road cyclists should be provided as a matter of routine where feasible, even on roads with bike paths. Roadside bike paths serve an important purpose but do not provide the same level of service for cyclists as the roadway itself. The road code bills may ironically force more cyclists off the road and onto sidewalks and sidepaths, creating more conflicts with pedestrians.

### **Don't Undermine Flexibility and Creativity**

We are concerned that the road code legislation stomps on the flexibility needed to create a road network that serves all users and meets community needs. It establishes absolute lane widths rather than minimums and maximums. Such hard standards take away planner discretion, negate public input, suppress creativity and undermine the flexibility needed by planners to account for all the factors involved in a specific project. In some cases 14' wide lanes would have negligible impacts on pedestrian safety or traffic speeds, but hard standards are oblivious to this. The fact that waivers must be approved by the County Council is a strong disincentive against DPWT staff who might otherwise explore novel or creative approaches.

Extensive public input is a key trait of Context Sensitive Solutions. But the public is disenfranchised by overly strict standards. The legislation puts the burden on the public to prove that a particular standard doesn't apply.

As a practical matter, getting adequate on-road bike space next to a shared use path would be vastly easier if county standards called for adequate on-road bike space as a matter of routine rather than only where it is master-planned. Under the new legislation a road would have to be master-planned as a "dual facility" bikeway (on-road space + path), one of the most difficult designations to achieve.

### **A Poor Trade-Off**

We agree that crosswalk length should be a consideration when designing roads, but it is just one pedestrian safety factor among many, whereas roadway width is arguably the *single most important safety factor* for cyclists. Road cyclists are in the road essentially *all the time* and are extremely vulnerable to inadequate width, more than someone crossing the street is affected by a few feet of extra width. We strongly support the use of pedestrian refuge islands to cut crossing distance in half, adjustment of signals to allow more crossing time, installation of countdown signals and use of dedicated pedestrian lights – all of which protect pedestrians without sacrificing bike safety.

This legislation appears to be driven by environmental concerns as well. Eliminating bike space at the margins to protect the environment is a bit like banning mopeds to save fossil fuels. The county has already canceled many good hiker-biker trails due to impervious surface concerns; let's not give up on shared roadways too.

### **Conclusion**

This legislation threatens to dramatically undermine bicycling in Montgomery County, more than a dozen botched road projects could. The legislation would reduce the number of bike-friendly roads to be built and could take away existing routes when they are rebuilt. What's worse, the bills would instill in county officials and engineers a new way of thinking that is much more hostile to cyclists. The standards send the message

that roads don't have to support cycling unless bikes are explicitly sanctioned by a master plan. They imply that 12' or 13' is all the width we need even on planned bike routes. They imply that width for bikes should be lower priority than width for street trees or landscape panels or extra car lanes. They seem based on the premise that there aren't enough cyclists to justify so much pavement left unused so much of the time. But without that extra pavement, the entire mode of cycling would suffer enormously. MoBike members have spent a great deal of effort emphasizing the importance of width and seeking it on project after project: width for wider shared lanes, width for bike lanes, width for extra shoulders, width for safer shared use paths, width for wider sidewalks and median refuges (bike advocates are pedestrian advocates too). But the proposed road code legislation is nothing short of an assault on width, so we must oppose it vigorously.

Sincerely,

A handwritten signature in black ink that reads "Jack S. Cochrane". The signature is written in a cursive, flowing style.

Jack S. Cochrane  
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