



The Alabama Bicycle Coalition | P.O. Box 18984, Huntsville, AL 35804 | [www.alabike.org](http://www.alabike.org)

March 23, 2010

Dear Mrs. Crenshaw,

We hope your meetings with citizens across the State were both productive and enjoyable. The AlaBike Board has reviewed the Draft Alabama Statewide Bicycle and Pedestrian Plan, and is herewith submitting our comments and recommendations. They have been discussed and have the consensus of our Board members, located in Huntsville, Birmingham and Auburn.. We hope that they will be of benefit.

Thank you for your help in advancing the interests of cyclists. We look forward to working with you and ALDOT in the future.

Sincerely,

Marjorie Holderer  
President, Alabama Bicycle Coalition  
[Mjholderer@knology.net](mailto:Mjholderer@knology.net)

### **AlaBike Analysis and Comments**

The following comments are a combined statement of the AlaBike Board regarding the ALDOT Bicycle and Pedestrian Plan.

#### **Financing:**

The Plan spends much space discussing various “enhancement” programs for funding of bicycle facilities. Granted, there is a table listing funding programs and the type of facilities that qualify. But Federal guidance states: “Bicycle and pedestrian accommodations may also be constructed as incidental features of highway construction projects. These incidental features may be financed with the same type of Federal-aid funds, and at the same Federal share payable as a basic highway project.” Given the Plan’s emphasis of facilities that are incidental, it is important to stress the eligibility of such facilities as part of funding for routine construction.

Related to this is a statement on Page 2 which quotes Title 23: *No bicycle project may be carried out under this section unless the Secretary has determined that such bicycle project will be principally for transportation rather than recreation purposes.* This statement has been interpreted by FHWA with a very narrow definition of “recreation”, such as a loop road in a park. All other facilities are assumed to be for transportation.

**Policy:**

The Plan is a significant step forward in that it acknowledges the existence of bicycles as vehicular traffic in the State. To help guide decision-makers, the Plan should state the League of American Bicyclists' axiom: "Cyclists fare best when they act and are treated as drivers of vehicles."

The Plan's statement in the last paragraph under Planning Process begins with "There are opportunities to improve processes and practices to minimize barriers for local and regional bicycle and pedestrian planning..." This needs to be followed by some examples of opportunities that ALDOT is willing to support.

The Plan specifies that facilities will be added only in accordance with otherwise planned improvements. A Policy Statement is needed for routine accommodation on roads not designated as routes in this Plan. For any Federally aided project, the consideration of cycling travelers is a requirement. The Plan does not adequately indicate how this requirement will be met. It is unclear how the recently strengthened FHWA policy in this regard will be manifested in their approval process.

The Plan also gives no evidence of the need for education, encouragement, enforcement and evaluation. It is geared only toward engineering factors. While ALDOT may not see these other aspects as part of its mission, we do think they should be included as important aspects in the Plan's Purpose statement.

**Public Involvement:**

On Page 72, under the heading "Where To Include Bicycle Facilities," we applaud the statement, "All roadways on which bicycles are permitted are considered bicycle facilities to some degree." A statement requesting public involvement **by cyclists** should be added to the first paragraph to help "determine the potential for bicycle use..."

We note that none of the routes' Key Planning Partners include a cyclist group. The current AASHTO Guide directly states: *Bicyclists in the community have the best knowledge of current conditions as well as specific opinions on areas where new facilities are needed or where existing facilities need improvement.* Cyclists are the intended users, and ALDOT can easily contact interested cycling groups in different locations across the State. Contact AlaBike for names, phone numbers and e-mails so these connections can be made.

### **Comprehensive and Continuing**

As for other modes, transportation planning must be comprehensive and continuing. Fulfillment of the “continuing” requirement means the Plan should indicate the need to plan for the short and long range needs of the cycling system, emphasizing the iterative character of the progression from systems planning to project planning, programming, operations and implementation. If that’s not achievable, the Plan should indicate how it is to be updated.

### **Routes:**

Most importantly, the Plan lacks routes connecting the Birmingham metropolitan area with other cities.

We recommend using a numbering scheme like the well-known US Interstate highway numbering scheme; low numbers on the west and south, odd numbers for north/south and even for east/west. Incrementing by ten allows for future routes in between.

US Highway 11 from near Birmingham leading to Chattanooga is a good bicycle route since I-59 carries a majority of high-speed traffic.

EW1 should continue from Scottsboro east across the Tennessee River, up Sand Mountain using highway 40 to Mentone.

Add Highway 14 from Auburn to Prattville.

Add all of highway 431.

Add highway 59 from I-65 to the beach in Baldwin County.

CC:

Mary Lou Crenshaw

Cecil Colson

Don Vaughn

Joe McInnes

Kerri Yap