

March 11, 2019

Mr. Jeff Marootian  
Director  
District of Columbia Department of Transportation  
55 M Street SE, 7th Floor  
Washington, DC 20003

**Request for Comments Concerning DDOT Notice of Proposed Rulemaking — Proper Behavior in Bike Lanes (Notice ID N0078762)**

Dear Director Marootian,

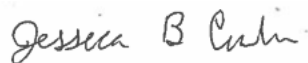
The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the District of Columbia Department of Transportation's (DDOT) proposed rulemaking prohibiting vehicles from entering and obstructing bicycle lanes under most circumstances.

If enforced, the rulemaking proposed by DDOT has the potential to lessen a common hazard that cyclists encounter. IIHS recently completed a study examining environmental factors related to injury risk in the District, New York City, and Portland, Oregon (Cicchino et al., in preparation). Our study recruited patients treated in emergency departments for injuries sustained while cycling and was not limited to cyclists injured by in-transit motor vehicles. We found that the presence of temporary obstructions blocking a cyclist's path, such as parked cars or construction, doubled a cyclist's injury risk. In our study, 22% of DC cyclists who were injured in bicycle lanes reported that temporary obstructions were blocking their paths at the time of their injuries.

The IIHS study also found that nearly a quarter of cyclists injured in street-level cycle tracks collided with or fell to avoid pedestrians, and the majority of these incidents occurred midblock. Only 2% of cyclists injured in other locations were injured while interacting with pedestrians. DDOT should consider how pedestrians can be deterred from entering cycle tracks in addition to enacting rulemaking to prohibit vehicles from obstructing bicycle lanes.

In sum, IIHS supports DDOT's efforts to reduce collisions between cyclists and motor vehicles in the District. We also hope that DDOT will implement countermeasures aimed at reducing the frequency of other kinds of hazards that cyclists encounter in bicycle facilities, such as pedestrians in cycle tracks.

Sincerely,



Jessica B. Cicchino, Ph.D.  
Vice President, Research

**References**

Cicchino, J.B., McCarthy, M.L., Newgard, C.D., Wall, S.P., DiMaggio, C.J., Arnold, B.N., & Zuby, D.Z. (in preparation). *Not all cycle tracks are the same: infrastructure and bicyclist injury risk in three U.S. cities*. Arlington, VA: Insurance Institute for Highway Safety.