

GOVERNMENT OF THE DISTRICT OF COLUMBIA

ADVISORY NEIGHBORHOOD COMMISSION 3A



Comments RE DC Department of Transportation for Performance Oversight Hearing Before the DC Council Committee on Transportation and the Environment Hearing Date February 9, 2024

Advisory Neighborhood Commission 3A (“ANC 3A” or “the Commission”) is pleased to submit testimony for the record of the above Performance Oversight Hearing on the DC Department of Transportation (“DDOT”).

Transportation issues are among the most prevalent and important matters that have come before ANC 3A in the past year—the first year of the Commission’s existence. DDOT has responsibility for many areas related to the daily lives of people who live or work in the ANC area, including repair of streets, alleys, and sidewalks, street resurfacing and restriping, street signs, traffic signals and other traffic control devices, crosswalks, streetlights, street trees, public space permits, establishment of speed limits, location of bus stops, location of on-street parking spaces, the process for obtaining parking permits, a wide range of traffic safety regulations, infrastructure and facilities for bicycles and other micromobility devices, and safety guidelines for rental bicycles and micromobility devices provided by private companies in fleet operations.

ANC 3A has participated in numerous discussions about transportation issues raised by constituents or by Commissioners, and has submitted official comments to DDOT in several key cases affecting the Commission area.

We have been impressed and pleased at DDOT’s efforts to make more information available to ANCs and other stakeholders, such as through the “dashboards” on the DDOT website. The dashboard covering in the District’s network of sidewalks is extremely detailed and informative, with rankings and standards for prioritizing and scheduling construction of new sidewalks. The dashboard for Traffic Safety Inputs also presents quite a bit of information but the linkages are less effective in answering ANC or constituent questions.

The Dashboard for Traffic Safety Input was developed in connection with DDOT’s new TSI 2.0 system adopted in late 2022 for prioritizing DDOT response to 311 requests for Traffic Safety Investigations (the previous meaning of the abbreviation “TSI”). In the previous year, DDOT had encouraged ANCs and residents to submit 311 requests for traffic safety improvements, when the agency was following a “first come first served” system for dealing with requests or TSIs, and dozens of requests had been filed. At the start of 2023, when ANC 3A was first established, as by far the smallest ANC in Ward 3 in both population and square miles, there were about 55 locations marked on the map as subject to TSI requests pending future investigation in our Commission area--the second most of any ANCs in the ward.

Since that time, DDOT has used the new TSI 2.0 system for prioritizing the traffic safety requests submitted via DC 311, based on a series of scoring factors. In ANC 3A area, DDOT has selected a total of 11 TSI requests for inclusion in the quarterly prioritization lists to date. No work at those locations has yet been included on the Dashboard as “Completed,” and the ANC has not seen a report on the results of the investigations DDOT has conducted at those locations.

Advisory Neighborhood Commissioners (January 1, 2023-December 31, 2024) www.anc3a.org

3A01	3A02	3A03	3A04	3A05
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There are currently 53 locations in ANC 3A that are shown on the Dashboard as subject to TSI requests pending future investigation in our ANC area. Several of those locations represent multiple requests covering the same location, which DDOT has “bundled” together, so the total is more than 70 individual TSI requests.

One location at the intersection of Wisconsin Avenue and Fulton Street NW, has been the subject of half a dozen TSI requests that have not yet been addressed. Even though safety concerns at that intersection have been the subject of three separate rounds of comments submitted to DDOT by ANC 3A during 2023, after DDOT developed a plan to install a micromobility corral on the south side of Fulton Street just west of Wisconsin. That is the same segment of the block where residents for almost two years have been urging DDOT to remove 3 to 5 parking spaces on the north side of Fulton Street to reduce the safety hazards posed by the narrowness of the street, especially for westbound vehicles trying to enter Fulton from Wisconsin, often creating back-ups across the crosswalk at Wisconsin, blocking pedestrians and micromobility devices as well as motor vehicles. But because a micromobility corral is not considered a safety improvement, that proposal which we first became aware of in April 2023 did not have to go through the TSI 2.0 process and could be installed with little delay while the TSI request for removal of parking spaces on the north side of Fulton – even with the persistent support of the ANC -- has not been among the TSI requests selected for recognition for the past three quarters.

Unlike the Sidewalk Gap Dashboard, the TSI Dashboard does not indicate the “scores” for any particular service request, or the scores for the TSIs that are selected through the prioritization system. The Commissioners do not know where TSIs in their area may stand on the prioritization list, or if some of the requests in ANC 3A may have been chosen to fill out the guaranteed minimum of 10 cases per quarter in each ward.

From observing the TSI 2.0 system for the past year, the Commissioners have noted that:

- There does not seem to be a plan for DDOT to conduct regular evaluations of the experiences under the TSI 2.0 system, involving data collection and analysis of the results, public comments, and recommendations on ways to improve both the process and the outcomes. The prioritization system was intended to allow DDOT to focus on locations with the highest risk of traffic casualties and achieve a reduction in deaths and injuries, as part of “Vision Zero.” It would be valuable to know how well the system is working, and continue to work toward improving the TSI program.

- ANC's and ANC Commissioners have no role in the DDOT prioritization system. They are not given a list of all the TSI requests in their area (which has to be compiled from searching the dashboard and reviewing the individual locations). They are also not consulted about TSIs they would recommend bundling or TSIs they would recommend prioritizing.

- There is also no system for consulting with ANC's about locations or areas where they would recommend that DDOT focus to address traffic safety problems, other than by having ANC Commissioners file 311 requests. But those requests have no “weight.”

- In the 2019 DDOT Livability Study for Rock Creek Far West, focused on safety improvements, many of the recommendations included a corridor or an area including several blocks that DDOT identified as needing to be studied together, as part of the same system of related streets. The Livability team recognized that the streets, alleys, sidewalks, bike or micromobility facilities in those locations needed to function effectively as a whole, and analysis of the traffic safety improvements on one street in that system had to be planned in conjunction with improvements on the other streets in that system, or the objectives would not be met. In the TSIs selected in ANC 3A to date, that holistic approach does not appear to be taken.

- There is no apparent mechanism for an ANC or others to request that DDOT undertake that kind of systemic look at local traffic safety issues. And yet throughout our area, we are facing exactly that kind of challenge. A small change on one street can cause motorists to shift to connecting or parallel streets or alleys, and result in more traffic on other blocks, more trucks, more vehicles using navigation systems

that direct traffic away from traffic control devices or safety measures, higher speeds, and increased safety hazards for people on all the adjoining blocks.

- There also does not appear to be any coordination between TSIs that DDOT chooses to investigate and other projects the agency is undertaking, for safety or otherwise.

DDOT has indicated that it is evaluating options for improving the TSI selection process. It would be advisable for DDOT to put in place a process for evaluating the results of its TSI 2.0 process, preferably sharing findings with the public to allow the agency and stakeholders to see how well the prioritization process is achieving the goal of greater reductions in traffic injuries and deaths.

It also appears that DDOT not only needs to focus resources on top priority safety improvements but it also could use more resources to address requests for traffic safety investigation, as the number of TSI requests held for potential further investigation continues to grow.

If DDOT would be willing to include input from ANCs into the prioritization process there are several options that could be possible. As examples, DDOT could:

1. Ask all ANCs to identify their top priority TSI request and then select at least one of the top TSIs identified by an ANC in each ward during every quarter.

2. Recommend that each ANC identify its top 5 TSIs from those already in the system (or locations/bundles of TSIs) and ask DDOT to give weight to the ANC priority lists in its selection process quarter by quarter. Maybe these could be considered particularly if DDOT needs to select some locations in order to meet the minimum number of TSI requests it has promised to identify in each ward. Alternatively, potentially some "slots" in the quarterly prioritization list could be set aside for TSI requests identified as priorities by ANCs in the ward.

3. Recommend that each ANC identify from 1 to 10 TSI requests in its area that should be elevated in the prioritization process (maybe at the start of a year, if not every quarter) and have DDOT create a new variable in its algorithm to get a specified weight in the formal prioritization system.

Though DDOT often states that safety is its #1 priority, traffic safety investigation requests submitted by multiple residents and ANCs can take more than a year to address and continue to be delayed even as projects proposed for the same block such as a micromobility corral can be installed with a single request and minimal review in the same segment of the block where multiple residents and the ANC have a) submitted requests for a Traffic Safety Investigation aimed at removing on-street parking spaces and reducing the hazards from pedestrians, bicyclists, and motorists because of the narrowness of the roadway space, and b) are concerned the micromobility corral may detract from safety by creating additional safety hazards for people using multiple modes of transportation in that block, unless the on-street parking spaces are removed. See below for more details.

The NOI process also raises some concerns for ANCs. As a general practice, DDOT does not provide a "docket" of comments received in response to an NOI. There is no indication of how many people commented in support or in opposition, or what they may have recommended as possible adjustments. DDOT also does not always respond to ANC comments to an NOI, articulating with particularity the reasons why the agency does or does not accept the issues and concerns expressed by the ANC—though that is a requirement of the "great weight" provision of the ANC law.

The ANC has had difficulty getting DDOT to give attention to its comments in response to several other Notices of Intent as well. On August 17, 2023, in a month when ANC 3A was not meeting, DDOT issued two NOIs 23-188-TDD and 23-189-TOA related to closing two Metrobus stops on the east side of Wisconsin Avenue and or move a third Metrobus stops from the east side of Wisconsin south of Porter Street next to the Washington Ballet to the north side of Porter Street, in front of a condominium in ANC 3A, launching a 10-day comment period. The ANC Chair contacted DDOT noting that the NOI did not

include the legal and policy provisions governing that particular proposal so DDOT issued a revised and corrected NOI on August 24, 2023, which allowed sufficient time for the ANC to schedule a Special Meeting to hear public comments, deliberate, discuss and vote on a position.

A large number of residents at the condominium at 3601 Wisconsin Avenue NW quickly organized to express their opposition to the proposed relocation of the Metrobus stop north of Porter Street and participated in the ANC 3A Special Meeting, held by Zoom. They noted concerns about traffic safety as well as peace, order, and quiet, as well as trash and other disruption and costs for the condominium residents. They also noted the loss of two-hour parking spaces in front of their building and the loss of all the two-hour parking spaces previously located in front of the condominium, surrounding the single loading/unloading zone and the safety challenges it would create for people leaving the condominium parking lot, as well as for riders who will now have to cross the busy intersection on Porter Street to get to their destination. That includes young dancers going to and from classes at The Washington Ballet as well as workers and others transferring between a northbound bus on the 30-line on Wisconsin to an eastbound bus on the H-2 on Porter Street. The Washington Ballet also opposed the relocation of the bus stop to north of Porter, instead of the long-time location right next to the ballet headquarters building, for the sake of the safety of young ballet students and concerns of parents and teachers.

DDOT did respond to ANC 3A in a letter after the decision was made, asking DDOT to reconsider. The letter repeated that DDOT follows the federal standard for locating bus stops on the “far side” of an intersection, not on the “near side,” and also cited principles that apply to spacing bus stops, though the letter did not indicate how the language applied in the specific case. The letter also did not respond about other options for relocation of the bus stop, farther north on the block with the condominium or farther south on the block with the Washington Ballet.

That experience left residents once again feeling that DDOT was not listening or responding to public comments, including the official position of the ANC, and that DDOT decisionmaking is not sufficiently open or transparent.

EXAMPLES OF CONCERNS WITH DDOT HANDLING OF TSI AND NOI CASES

One DDOT project in ANC 3A was the subject of discussion at four or more public meetings through the past year. In April 2023 at the intersection of Wisconsin Avenue and Fulton Street, DDOT installed a micromobility corral in the roadway space on the south side of Fulton closest to Wisconsin, just east of the parking lane on the south side of the street. That intersection has been the subject of repeated requests for Traffic Safety Investigations in ANC 3A and before that for more than 7 years in ANC 3B, before the boundaries changed. (It is now at the southeasternmost point in ANC 3A, which serves the northwest corner, quadrant while ANC 3B services the southwest corner and ANC 3C serves the east side of Wisconsin.)

Half a dozen TSI requests have been filed for that location over the past year, many of them from residents of ANC 3A, related to concerns about pedestrian safety, overly narrow roadway space on Fulton, and crashes at that location related to vehicles trying to enter westbound Fulton from Wisconsin and finding there was not enough space to pass an eastbound vehicle approaching the intersection. Residents in the adjoining condominium building in ANC 3A filed a request in April 2022 asking DDOT to remove parking spaces on the north side of Fulton to open more space for vehicles to pass, to reduce the safety risks. But DDOT has not done investigations to respond to any of those TSI requests, and the team responsible for the micromobility corral did not appear to consider the outstanding requests for attention to the need for more space at that intersection. Because installing the corral did not involve removing a parking space, DDOT was not required to issue an NOI. And because it was not safety-related request, it did not have to go through the TSI 2.0 prioritization system and could go forward immediately.

DDOT sent a crew out to do the installation, putting up white poles to block the curbside space closest to the intersection. If a resident had not passed at that moment and asked the worker what was happening, most of the people aware of the work would have had no idea why it was being done. No information was provided to the ANC or to nearby residents in advance or at the time of the construction. Previously the curbside space had provided room for an eastbound vehicle on Fulton to pull to the right to allow more space for westbound vehicles, or to prepare to make a right turn, reducing the back-up of vehicles on Fulton Street approaching the intersection. With that space blocked off by flexposts for the micromobility corral, neighbors immediately protested at the ANC 3A meeting that night that the micromobility corral was further narrowing the roadway space and creating even more safety problems at the intersection.

The ANC wrote to DDOT Community Engagement and also to Deputy Director Kershbaum noting the problems with the new micromobility corral and DDOT very quickly looked into it and ordered the corral to be removed, which was a relief for residents and the ANC. During that time, ANC 3A Commissioners had multiple communications with DDOT staff who initially asked whether there were other locations that residents would suggest for the micromobility corral near that intersection. Residents offered several suggestions and also continued to ask DDOT to attend to the request to remove parking spaces to allow vehicles to move more safely in and out of Fulton in that block, as they do a block north on Garfield Street at Wisconsin Avenue where parking is only allowed on the south side. It was only a week or so later that DDOT wrote that it could not consider any of the options, other than the first parking space on the south side of Fulton Street closest to Wisconsin Avenue (directly opposite the parking spaces that residents were asking DDOT to remove) and DDOT would be issuing an NOI by early August to announce that a new micromobility corral would be installed in the new location. DDOT provided several reasons, including that most of the people using rented micromobility devices would live in apartment buildings on the southwest corner of the intersection and they would not be able to use a corral on the southeast corner of Wisconsin and Fulton, and they would not be willing to walk an extra half block to the corner of 38th and Fulton for a corral.

The ANC urged DDOT not to issue an NOI at the beginning of August because ANCs along with many residents take a break in August and would not be available to respond to a request for comments. The NOI 23-231-PSD was released in early October. DDOT did not mention any consideration of or coordination with removal of parking spaces on the north side of Fulton Street, and subsequently sent a message saying they did not recall hearing that was a priority, though ANC 3A's official response to the NOI—supported by residents and also noted in the resolution from ANC 3B--emphasized the importance of removing parking spaces on the north side of that same block in conjunction with adding a micromobility corral on the south side. The flex posts are described as not protruding farther into the street than a typical parked vehicle but as residents noted, they give the impression of an additional obstacle on the south side of the street, and users of micromobility devices often enter or leave the corral from the street, between the flex posts, rather than from the sidewalk, which can create further safety hazards for them and for motorists.

DDOT moved very quickly to indicate before Christmas that it was going to install the micromobility corral as soon as possible. The agency made no mention of the TSI requests to investigate safety improvements needed before that portion of the street would be safe for pedestrians or bicyclists or any other mode of transportation. DDOT's representative said they had thought the ANC was satisfied with the location of the micromobility corral and did not have continuing concerns about it, which was completely counter to the stated position of the ANC in its official comments on the NOI. When the new list of TSIs selected in DDOT's TSI 2.0 prioritization system was announced in early January, once again the Wisconsin Avenue and Fulton Street intersection was left out of the selections for Ward 3, in spite of the 5 or more outstanding TSI requests citing traffic safety issues at that location.

NOTES ON ANC 3A TRAFFIC SAFETY INVESTIGATION REQUESTS IN DDOT SYSTEM

In early 2023, DDOT's map of TSI requests for consideration for future investigation showed approximately 55 TSI requests in the ANC 3A area. ANC 3A is the smallest ANC in Ward 3, but it had the second highest number of TSI requests of all the nearby ANCs.

From January 1, 2023 (Second Quarter FY 2023), through January 1, 2024-March 31, 2024 (Second Quarter FY 2024), DDOT selected 11 TSI requests in ANC 3A to be investigated under the quarterly prioritization system (9 in calendar year 2023, and 2 for January 1-March 31, 2024):

Q2 2023 - 0
 Q3 2023 - 3
 Q4 2023 - 3
 Q1 2024 - 3
 Q2 2024 - 2

One of those locations was on Wisconsin Avenue at Cathedral Avenue, one on Cathedral Avenue at Idaho Avenue, 2 on the 3800 block of Rodman Street, 3 on Van Ness Street near 37th Street, and one at 39th and Fulton Street, at the far southwest corner of the ANC.

No work at those locations has yet been included on the Dashboard as "Completed," and there is no report to date on the results of the investigations

At the present time, there are 53 locations marked on the map as subject to TSI requests pending future investigation in our Commission area. (Several of those locations represent "bundles" of requests, amounting to more than 70 individual TSI requests.)

Five requests are noted at Wisconsin Avenue and Fulton Street.

The dashboard of "Completed" TSI requests includes 8 projects involving requests filed between the beginning of November 2021 and May 2022, with work orders closed from May 2022 through July 2023. Those projects do not appear to have been selected through the TSI 2.0 system, but were likely investigated under the previous "first come first served" system.

This statement was approved by the Advisory Neighborhood Commission 3A by a vote of 4 - 0 at a duly noticed public meeting on February 20, 2024, at which a quorum was present. (Three of the five Commissioners constitutes a quorum.)