

Government of the District of Columbia

Department of Transportation



d. Office of the Director

APR 26 2016

Gregory Billing
Executive Director
Washington Area Bicyclist Association
2599 Ontario Road, NW
Washington, DC 20009

Dear Mr. Billing:

Thank you for your letter to the District Department of Transportation (DDOT) regarding the traffic control plan (TCP) and closures during the construction of the Fannie Mae headquarters at 15th and L Streets NW.

DDOT devoted considerable time and expertise to reviewing and modifying the TCP related to this project and its adherence to the Safe Accommodations regulations. The approved TCP for this location reflects the balance called for in the District of Columbia Municipal Regulations (DCMR) Title 24, Section 3315 (Safe Accommodation for Pedestrians and Bicyclists). This balance is achieved by ensuring that access and safety for pedestrians and cyclists is treated equally with access for other transportation modes and prioritized within the consideration of providing a safe and efficient transportation network during construction.

Similar to most construction sites in the District, this site is geographically constrained as it is built to the property line. As a result, there is no space interior to the property on which construction staging or vehicle queueing can occur during excavation. The public space around the site is further constrained by the location of five (5) Pepco transformer vaults along L Street NW. Because these transformers are part of Pepco's service grid for the downtown network, they cannot be taken offline and must remain accessible to Pepco in case of emergency or required maintenance. The location of these transformers effectively eliminates the use of most of the sidewalk area between the property and the roadway for any construction staging or vehicle queuing.

Please allow me to address some of the statements made in your letter. You stated, "*Bicyclists riding in a protected bike lane will be forced to mix suddenly into a dangerous and fast-moving car lane without any safe accommodations. DDOT's granting of the permit violates the Bicycle Safety Amendment Act and DDOT's own regulations implementing the Act.*" The Safe Accommodations regulations are intended to ensure that the highest level of safety is maintained during work zones. The regulations do not provide that separated bicycle lanes will be maintained regardless of the circumstances. In this situation, to do so would be both unsafe and impractical.

In your letter, you assert that *“automobile traffic (on L St) will be largely unaffected”* by taking a travel lane to preserve the protected bike lane during the construction. Regarding the closure of travel lanes, DDOT followed the prioritization levels provided for in the Safe Accommodations regulations by closing a travel lane on L Street, NW, and a dedicated left-turn lane on L Street at 15th Street, NW. Closing an additional east bound travel lane and thereby reducing east bound 15th St from three lanes to one on this block would have unacceptable impacts on the surrounding traffic network as this block handles 15,000 vehicle trips a day. Furthermore, traffic analysis performed during the TCP review process indicated that taking another lane of travel would have resulted in failing levels of service at the intersections of both 16th and L Street and 17th and L Street NW.

Your letter also states that *“DDOT violated the Safe Accommodations Regulations by Failing to Provide Safe Accommodations.”* DDOT met both the spirit and the letter of the Safe Accommodations regulations by providing a method of accommodation that is explicitly delineated in the regulations. Those regulations allow for the inclusion of a shared lane for bicyclists and motorists. That is precisely what was provided at the construction site located at 15th and L Streets NW.

Additionally, your letter recommends that DDOT examine enhancing safety and awareness regarding the merge area for cyclists and motorists on eastbound L Street, NW, near 16th Street. DDOT appreciates this recommendation and will revisit the TCP to see if there is additional signage or other methods that can be deployed to increase safety and awareness.

We sincerely appreciate the Washington Area Bicyclists Association’s continued partnership in identifying solutions to enhance the safety of this and other work sites. As discussed when you met with my staff earlier this month, DDOT’s Public Space Regulations Administration (PSRA) will be in touch to discuss implementation of the Safe Accommodations regulations, traffic control, and work zone design more broadly. We also look forward to continued and increased collaboration between DDOT and WABA on this and other topics.

Thank you, again, for your partnership. For further questions or concerns about this matter, please contact Matthew Marcou, PSRA Associate Director, at 202-359-6497 or Matthew.Marcou@dc.gov.

Sincerely,



Leif A. Dormsjo
Director