



WASHINGTON AREA BICYCLIST ASSOCIATION

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Mr. Stephen Rice
DDOT Project Manager
55 M Street, SE, Suite 400
Washington, DC 20003

Re: Comments on Alabama Avenue SE Corridor Safety Study

Mr. Rice,

On behalf of the Washington Area Bicyclist Association (WABA), and our 2,900 members in the District of Columbia, we write to express our extreme dissatisfaction with the choices that have been made in the final designs of this study. As we discuss in more detail below, the continued prioritization of driver convenience over safety for all users directly contradicts multiple top-level city priorities, including Vision Zero, Complete Streets, sustainability, public health, and transportation equity.

As we stated in our previous comments on this project, Alabama Avenue is a key east-west corridor for Wards 7 and 8. It provides the only direct link from the commercial areas of Congress Heights to the Metro. It is one of the four streets that crosses the major barrier of Suitland Parkway. And, as one of the few continuous streets, it provides a helpful link between many Ward 7 and 8 neighborhoods.

Due to its connectivity, Alabama Ave is integral to the bicycle network. It directly intersects bike lanes on MLK Jr. Ave, Massachusetts Ave, the Pennsylvania Ave sidepath, Fort Dupont Trail, signed bike routes on 4th St, 13th St, Naylor Rd and Bowen Rd, and four Capital Bikeshare stations. In the near future, Alabama Ave could link a planned protected bike lane on Ridge Road, the refurbished Oxon Run Park Trail, and, with a minor spur trail, the Suitland Parkway Trail.

Despite its connectivity, Alabama Ave's road design creates a hostile environment for people walking and makes it unusable for all but the most confident bicyclists. Wide vehicle travel lanes encourage drivers to speed well above the 25 mph limit. On blocks where parking is restricted or not often used, the road becomes two lanes in each direction, which further encourages speeding. People on bikes must either take the right lane, where they contend with aggressive traffic and right turning vehicles, or squeeze between parked cars and a travel lane where they risk colliding with an opening car door. Due to these factors, DDOT's Mobility Analysis shows that the

majority of the corridor is suitable for very few people who bike. Less than 12% of residents would feel comfortable riding on Alabama Ave.¹

DDOT's speed and crash data confirms an alarming pattern of speeding and crash frequency. On some blocks, 85th percentile vehicle speeds reach 42 mph, meaning that 15% of vehicle traffic is traveling faster than 42 mph. As we know from considerable research, 90 percent of pedestrians hit by a car traveling at 40 mph will die, whereas 90 percent of pedestrians hit by a car traveling 20 mph will live. And crashes happen every week: between 2013 and 2015, there were 875 total crashes in the 4.2 mile corridor (8.5 per week). 312 involved injuries (3 per week) and 4 resulted in a fatality. In a similar period, 45 pedestrians and 5 people on bikes were hit by cars. Alabama Ave has an unacceptable speeding problem and it stems from bad road design. As an agency committed to eliminating traffic deaths and serious injuries on DC's roads by 2024, DDOT must make safety the priority on Alabama Ave.

Considering these challenges, we were initially pleased to see that all of the study alternatives included a road diet on Alabama Ave. Removing travel lanes would help reduce speeding, while still accommodating current vehicle volumes. We supported the proposed new crosswalks, new signals, Rapid Rectangular Flashing Beacons and simplified intersections, which would make Alabama Ave safer to travel along and easier to cross for vulnerable road users on foot and bike.

The Final Designs Do Not Reflect a Commitment to Vision Zero

Unfortunately, the final designs for Alabama Avenue fall short of what is needed to keep road users safe on this corridor. The District's Long Range Transportation Plan Move DC calls for continuous protected bike lanes along the four mile stretch of Alabama Avenue in this study. According to census data, approximately 26,000 people living in Wards 7 and 8 would be within a quarter mile of this infrastructure. MoveDC recommends 213 additional miles of bicycle infrastructure, and states that the objective of the ultimate system is "to provide a significant network so that bicycling is not a secondary mode, but a principal and preferred mode for travel." Failing to install continuous protected bike lanes along this corridor would be a shameful missed opportunity.

In the attached supporting documents, we have mapped inactivity and obesity rates over the Alabama Avenue corridor under study, as well as crashes along the corridor. The high rates of inactivity correspond with the lack of safe places on the road. For example, the segment between Suitland Parkway and 25th St SE correspond with the highest obesity and inactivity rates on the corridor, and a high concentration of vehicle, bicycle and pedestrian crashes. This could be mitigated by creating safe spaces for neighbors to choose to bike. Unfortunately, these also correspond with the sections of corridor that are maintaining the status quo for drivers rather than implementing a multi-modal design that would slow vehicle speeds, create dedicated spaces for

¹ District Mobility <https://districtmobility.org/stories/accessibility>

biking, and improve safety for pedestrians. This is emblematic of the approach taken throughout the corridor.

Rather than an approach rooted in a commitment to Vision Zero, which would redesign the stretches of road with the highest crashes and rates of speeding, the design reinforces the status quo to maintain vehicle throughput. This prioritization of driver convenience over safety for all users is deeply flawed and disappointing. We strongly urge DDOT to reconsider all sections of the corridor design that maintain 4 lanes of car lanes without providing safe places for bicycles.

Typical Roadway Sections

In our initial comments on this project, we supported Alternatives 1 and 2, both of which were complete street designs that supported all modes of transportation. Since Alabama Ave is a very long corridor with considerable variation in width and uses, we understood that it was likely that a mix of the proposed alternatives would be used. Recognizing that many neighbors and businesses on Alabama Ave are heavily dependent on driving for transportation and customers, we supported a final corridor design that employed a mix of alternative 1 for areas with lower parking demand and high transit coverage and alternative 2 for areas with higher parking demand. We suggested modifications to both alternatives 1 and 2 to improve safety outcomes for people walking and biking. We did not support Alternative 3, which did not comply with Title III of the Bicycle and Pedestrian Safety Act of 2016 because it was not a complete street.

Cross Section 1:

As proposed, Alternative 1, now roughly “Cross Section 1” in the final design documents, should be effective in reducing speeding and improving safety for road users. Medians physically narrow and separate the roadway, making it harder for drivers to speed and preventing head-on collisions. Medians also create a refuge for pedestrians crossing at unsignalized crosswalks and reduce the exposed crossing distance from 44 feet to 18 feet, which is particularly helpful for older residents and children. The curbside buffered bike lanes also create a designated space for people on bikes.

Unfortunately, as we pointed out already, this alternative does not do all that it can to protect people on bikes because it does not account for likely driver behavior. This design would remove parking from both sides of the road. Yet, the design does not include any deterrent to prevent parking in the bike lanes. Additionally, we are concerned the median may in fact encourage, rather than discourage, speeding because it feels more like a highway and lowers the perceived risk of a head-on collision with another vehicle. Sherman Ave NW was recently upgraded to a two lane road with a median, and vehicle speeds remain high. Instead of creating a design issue that will require significant enforcement to counteract, we urge DDOT to include flex-posts, curbs or other vertical barriers in the buffer area to keep vehicles out of the bike lane and vehicle speeds down.

Cross Section 2:

Alternative 2, now roughly “Cross Section 2” also proposes interventions that would reduce speeding, increase pedestrian safety and add a dedicated space for people on bikes. Removing travel lanes and striping buffered bike lanes will help reduce speeding. Curb extensions on one side of the street will slightly shorten pedestrian crossings distances. And by maintaining parking on one side, this design will have less of an impact on residents who rely on street parking.

Compared to Cross Section 1, however, this design does less to protect people on bikes. In Cross Section 2, bicyclists are separated from moving cars by only a narrow 1 foot painted buffer, which puts bicyclists very close to the travel lane. As with the Cross Section 1 design, we suggest DDOT install vertical separators for the non-parking side of the road to prevent drivers from driving or parking in the bike lanes.

To better separate bicyclists from traffic on the parking side, we again urge DDOT to use a different configuration that accomplishes the same goal of maintaining parking. With a full nine feet devoted to bike lane and buffer on the parking side, there is adequate space to place the bike lane between the curb and parking lane. This could accommodate a 6 foot wide bike lane, 3 foot buffer and full parking lane. Pedestrian refuge islands, similar to those found in New York City, could be added at crosswalks to shorten crossing distances, and floating bus stops could be added to eliminate the bus passenger / bicyclist conflict. Consult the NACTO Urban Street Design Guide for best practices.

Cross Section 3 and 4:

Whereas Cross Sections 1 and 2 apply a complete streets approach to make Alabama Ave accessible and safe for all road users, Cross Sections 3 and 4 do not. Indeed, by introducing additional risks to existing conditions, this design would make conditions dramatically worse for people on bikes. By converting the outside lanes to full time parking and adding curb extensions at intersections, this design concentrates vehicle traffic and bicyclists to a single shared travel lane. Most bicyclists will not be comfortable positioning themselves in front of a line of faster moving traffic, especially on the many hills throughout the Alabama Ave corridor. Instead, the bicyclists who ride on Alabama Ave will likely ride in the narrow space between the travel lane and parked cars, creating a constant risk of right hooks from turning vehicles and of colliding with opening car doors. By not providing a separate space for people on bikes, this design increases crash risks, and increases the likelihood of harassment and driver frustration towards cyclists who bike in the shared lane.

Cross Sections 3 and 4 are Not a Complete Street Design

Title III of the Bicycle and Pedestrian Safety Act of 2016, signed in July 2016, required DDOT to create and implement a Complete Streets Policy “by which streets are designed, operated, and maintained to accommodate safe and convenient access and mobility for all users of the District’s

transportation system, including pedestrians, bicyclists, users of mass transit, motorists, emergency responders, and persons of all ages and abilities.” It requires that DDOT incorporate the complete streets policy into plans, construction, reconstruction and maintenance of all highways unless use of the particular roadway is prohibited by law, costs are excessively disproportionate to the need or probable use, or the safety of vehicle traffic, pedestrians or bicyclists would be put at unacceptable risk.

Cross Sections 3 and 4 do not make the corridor safe and convenient for bicycle use and do not satisfy the Complete Street requirement. This project does not fit the criteria required for an exception to the complete streets policy. Bicycle lanes, even protected lanes, will not substantially increase the costs of the project and will increase bicycle use and safety throughout the corridor. Because Cross Sections 3 and 4 do not satisfy the Complete Street requirements, they must be redesigned before this project moves forward.

Additional Comments

1. Risk to people on bikes is highest at high volume intersections, particularly where the road widens to four lanes. While it may seem expedient to lay down shared lane markings as an accommodation to bicyclists, these treatments make a negligible positive impact on safety and increase the likelihood of harassment and driver frustration towards cyclists. Instead, DDOT should narrow lanes, remove parking, or combine turning and through lanes in order to create a designated space for people on bikes. Even a one block gap in the bicycle network can prevent a facility from achieving its safety purpose. Every multilane intersection is a severe risk for crashes and injury and a deterrent to more people choosing to bike.
2. The Alabama Ave & Suitland Parkway intersection is a busy transition point between a high speed highway and a low-speed street, making it a high risk and stressful area for vulnerable road users. We support the sidewalk expansion, but would like to see a dedicated space for people on bikes as well. This design has not made any steps towards solving these issues since the last round.
3. We support the simplified intersections at Burns St, Stanley St & Bowen Rd and Suitland Rd & 36th St SE.
4. The design for the 25th St intersection does not fix the need for a dedicated space for bicyclists. We urge DDOT to create a design that protects bicyclists through this interaction with protected bike lanes.
5. As mentioned above, speed is a primary factor in crash survival. We urge a 25 mph speed limit (down from 30) east of Massachusetts Ave.

Thank you for the opportunity to comment on this important safety study. For follow-up or questions, please contact me at 202-518-0524 x 212 or advocacy@waba.org.

Tamara Evans

Advocacy Director

