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November 11, 2020

District Department of Transportation
55 M Street, SE, Suite 400
Washington, DC 20003

Attn: Wayne Wilson

Re: ANC 3/4G Comments on the Revised Draft Environmental Assessment for
Rehabilitation of Broad Branch Road, NW

On November 15, 2013, ANC 3/4G submitted comments in reaction to the October 21, 2013 Environmental Assessment (EA) for the rehabilitation of Broad Branch Road, NW.¹ The Commission focused on four key principles: (1) maintaining the essential character of the Road as a largely residential street that respects its proximity to the natural setting in Rock Creek Park; (2) the dire need for structural and safety improvements to the Road; (3) the value of long-run benefits compared with any potential degradation of historical and archeological sites; and (4) the importance of enhanced pedestrian and bicycle uses that will connect our neighborhood with existing trails and bike paths. The Commission has analyzed the October 15, 2020 revised Environmental Assessment² based on those same guiding principles.

¹ Letter from Jim McCarthy, Chair, ANC 3/4G, to District Department of Transportation, November 15, 2013, available at <https://bit.ly/2DlIjpL>.

² "Rehabilitation of Broad Branch Road, NW, Washington, DC, Revised Draft Environmental Assessment, Section 4(f) Evaluation," District Department of Transportation, October 15, 2020, available at <http://broadbranchrdea.com/RevisedEA.html>.

In 2013, after reviewing each of the alternatives, ANC 3/4G urged DDOT to adopt Alternative 4, which includes both a pedestrian sidewalk on the southbound side of the roadway and a four-foot wide bike path on the northbound side. The Commission noted that Broad Branch Road is “currently not at all safe for bicyclists” because “sight lines are too short, and cars trying to pass bikes run a high risk of accident, both for cars and bikes.” Although Alternative 4 is projected to cost somewhat more and take a bit longer to construct, “it is worthwhile to make this addition now.”

We continue to value the multi-modal attributes of Alternative 4. This is the only study option that would give bicyclists safe access to the recreation and commuting bike trails in Rock Creek Park. As noted in the EA Summary, “Alternative 4 would provide a dedicated bike lane and removes the conflict for a safer travel way for both modes.”³ While bicyclists continue to ride on Broad Branch Road, they are taking a significant safety risk. Without a bike path, neither bicyclists nor motorists will be safe.

DDOT is currently considering various options for modifying the reversible lanes on Connecticut Avenue, NW, and some of those options include bike paths. A bike path on Broad Branch Road could be a viable alternative to Connecticut Avenue and would provide the additional benefit of access to Rock Creek Park. At a minimum, DDOT should study whether a Broad Branch Road bike path could affect the need for bike lanes on Connecticut Avenue.

DDOT prefers a modified version of Alternative 3, which includes a pedestrian sidewalk but no bike path. It appears that the primary rationale for DDOT’s optimization of Alternative 3 was to eliminate right-of-way encroachment on any Sovereign Nation’s land. DDOT made “design refinements” to Alternative 3 “following discussions with the US State Department and the decision that no encroachments would be made upon Sovereign Nation properties.”⁴

Given the safety hazards if bicyclists use Broad Branch Road without a bike lane, we request that DDOT consider whether the design for Alternative 4 could be “refined” to address concerns about Sovereign Nations’ lands — as it did for Alternative 3. For instance, DDOT should consider whether a bike lane can be included for the length of Broad Branch Road except for those portions on the southern end where the right-of-way is narrower and there could be significant intrusion on the sovereign lands of Italy and Malaysia. The northern end of Broad Branch Road from 27th Street to Linnean Avenue

³ Draft Environmental Assessment Summary, page S-21.

⁴ Draft Environmental Assessment Summary, page S-29.

has a much wider right-of-way and can certainly accommodate a bike path as well as a sidewalk. DDOT should also work with our Congressional Representative, Eleanor Holmes Norton, to negotiate agreements with the National Park Service and the State Department that could expand the available right-of-way. We urge DDOT not to abandon safe bicyclists' use of Broad Branch Road without studying ways to modify Alternative 4, as it did with Alternative 3.

Except for the encroachment on Sovereign Nations' land, Alternative 3 modified and Alternative 4 are similar.⁵ Alternative 4's estimated construction costs and duration are only slightly greater than Alternative 3 modified. This rehabilitation of Broad Branch Road is unlikely to be repeated for decades, so we will have to live with whatever decisions DDOT makes now. It would be shortsighted, imprudent, and inconsistent with the spirit and stated goals of the "Vision Zero" campaign, to preclude one safe mode of transit — cycling — without thoroughly studying modifications to Alternative 4 that would permit a bike path, at least for the majority of the Road's length.

As in our 2013 comments, we urge DDOT to use the opportunity of the Broad Branch Road rehabilitation to improve or replace sewer and power lines that run under or over the Road, and this would be an opportune time to bury the existing Pepco lines above the Road. We continue to urge DDOT to limit tree removal where feasible and to replace as many trees as possible. As we recommended before, DDOT should use pervious pavements for the pedestrian walkway and the bike path to the greatest extent possible.

Finally, the Environmental Assessment mentions the 2014 stream restoration "daylighting" project on an unnamed tributary of Broad Branch between Linnean Avenue and 27th Street, NW.⁶ A culvert running under Broad Branch Road has been inadequate for the volume of water in that unnamed tributary and has caused repeated flooding. The District Department of Energy and the Environment has long recommended replacement of this culvert, but that project has been stalled. The rehabilitation of Broad Branch Road should include replacement of that culvert if it is not completed sooner.

In summary, ANC 3/4G asks that DDOT make design refinements to Alternative 4 — as it did with Alternative 3 — to determine the feasibility and ultimate inclusion of a bike path along all or most of Broad Branch Road as part of the rehabilitation.

⁵ See Environmental Assessment Summary, Table S-1, pages S-23 and S-24.

⁶ Environmental Assessment Summary, page S-3.

ANC 3/4G approved this letter at its November 9, 2020 meeting by a vote of 4 to 0 (a quorum being 4).

Sincerely,

A handwritten signature in dark ink, appearing to read "Randy Speck", with a stylized flourish at the end.

Randy Speck
Chair, ANC 3/4G

cc: Councilmember Mary Choh
Councilmember Brandon Todd
Monika Nemeth, Chair ANC 3F
Jonathan Bender, Chair ANC 3E
Gail Black, Chair ANC 4A