



**Government of the District of Columbia  
ADVISORY NEIGHBORHOOD COMMISSION 3/4G**

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**Connecticut Avenue Reversible Lane Study  
Comments on DDOT's Proposed Alternatives  
Commissioner Randy Speck  
April 28, 2021**

**Introduction and Background**

On April 26, 2021, ANC 3/4G adopted a resolution supporting installation of protected bike lanes on Connecticut Avenue from Calvert Street NW to Legation Street, NW. These comments supplement that resolution and are my views as an individual commissioner, not of the Commission as a whole.

The Commission adopted a resolution in October 2018, encouraging DDOT to conduct a study of traffic on Connecticut Avenue, but advised DDOT to include particularly “the impact that any changes may have on traffic patterns on streets other than Connecticut Avenue, including but not limited to Nebraska Avenue, Military Road, Reno Road, Nevada Avenue, and Chevy Chase Parkway.” The Commission further advised DDOT to “evaluate the impact of any changes on businesses and parking in the portion of Connecticut Avenue north of Military Road, including the possible backup of

traffic to and through Chevy Chase Circle and the impacts of the resulting congestion on the Chevy Chase business district.”<sup>1</sup>

In January 2020, Commissioners Fromboluti and Speck met with DDOT to discuss the scope of the study and community outreach. We were asked to be on DDOT’s Community Advisory Committee (CAC) beginning with an initial meeting on April 30, 2020, and subsequent meetings on June 11, 2020, and October 20, 2020.<sup>2</sup> After those meetings, we offered comments to DDOT and asked questions about its analyzes and proposed alternatives.

DDOT defined three primary project goals: (1) reduce vehicle crashes during peak periods; (2) improve safety/access for bicycles and pedestrians; and (3) assess the feasibility of removing the reversible lane operation.<sup>3</sup> The “guiding principles” were further expanded during the study to include:

- Quality of Life (accommodating the needs of people who live, work, and recreate within the Connecticut Avenue corridor, prioritizing the needs of corridor residents and businesses, and providing sustainable, resilient, and equitable transportation options for all modes);
- Safety and Vision Zero (alternatives should reduce the number of crashes and fatalities as compared to current conditions and should reduce vehicle speeds along the corridor);
- Traffic Operations (mitigate significant traffic impacts, to the extent feasible, when considering alternative concepts and understand diversions impacts within the corridor and mitigate, where possible);

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<sup>1</sup> ANC 3/4G Resolution Requesting that DDOT Conduct a Comprehensive Study of Current Connecticut Avenue Traffic Patterns and Potential Changes, October 18, 2021, available at <https://bit.ly/3dgZquI>.

<sup>2</sup> Some of the documents related to CAC meetings on are the study project’s website, <https://ddot.dc.gov/page/connecticut-avenue-nw-reversible-lane-safety-and-operations-study>.

<sup>3</sup> CAC Meeting #1 Presentation, April 30, 2021, Slide 23, available at <https://bit.ly/3dhnEF2>.

- Parking and Loading (retain some level of parking and/or loading within commercial areas in the corridor);
- Pedestrians (integrate pedestrian improvements into each alternative concept);
- Bicycles (incorporate concepts that include a protected bicycle lane (PBL));
- Transit (include bus transit operational improvements as part of design concepts); and
- Right-of-way/Construction (any alternative must be constructed within the 60-foot curb-to-curb cross-section).<sup>4</sup>

I support the overall goals of the study, but the study results and the data presented do not always support its conclusions. Despite repeated, specific requests for data, some key information still is not available. As a result, the ramifications of DDOT’s preferred alternatives are not well understood or documented, and the real impact of the proposed changes is unknown at this stage. The issues that the Commission flagged in 2018 — the impact of changes on traffic on other streets and parking — have not been adequately addressed.

DDOT may have reached the right conclusions about which alternatives should be preferred, but it is not possible to make a fully informed decision based on the information DDOT has provided. There are strong advocates for adoption of Concept C with protected bike lanes in both directions, but DDOT needs to provide better analyses before it begins a final design and implementation and may need to begin with tentative steps that can be modified if they prove to be untenable in the real world. (DDOT’s reduction in the number of lanes on Military Road in 2005, only to restore them later when mammoth backups occurred, should be a cautionary tale.<sup>5</sup>)

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<sup>4</sup> CAC Meeting #3 Presentation, October 1, 2020, Slide 12, available at <https://bit.ly/3sl6evF>.

<sup>5</sup> In December 2005, DDOT re-striped Military Road to reduce the number of traffic lanes in an effort to reduce speeding. ANC 3/4G Minutes, December 12, 2005, available at <https://bit.ly/3dj9jYD>, page 110. After a six-month trial period, DDOT found that traffic backed up from 27th Street, NW as far as 16th Street, NW, and there was “substantial opposition” to the changes, so DDOT reversed the changes and restored the prior configuration. ANC 3/4G Minutes, October 23, 2006, available at <https://bit.ly/3toyIpo>, page 36.

These comments will focus on four primary concerns: (1) inadequate data to support DDOT's conclusions; (2) the diversion of traffic under the proposed alternatives to other streets; (3) the impact from the elimination of parking and loading zones; and (4) inadequate consideration of the no-build management alternative.

### **Data that Does Not Support DDOT's Conclusions**

**Crash Data** — After the June 11, 2020 CAC meeting, I advised DDOT that its data did not support the conclusion that reversible lanes contribute to crashes. DDOT compared the percent of crashes during reversible lane operations — 44% — with the percent of time when the lanes were reversible — 15%.<sup>6</sup> This is not a useful comparison since much more traffic is concentrated during the time periods of the reversible lane operations. For instance, if 44% of the traffic occurs during reversible lane operations, it should be expected that crashes may be related to higher traffic volume, not reversible lanes.

I asked DDOT in June 2020, and again in October 2020, for data on the total average daily traffic volume during reversible lane operations and the total average daily traffic volume during non-reversible lane operations.<sup>7</sup> DDOT never provided that data. Instead, DDOT has continued to cite the misleading comparison of crashes and hours of reversible lane operation.<sup>8</sup> When compared with other corridors without reversible lanes, the crash frequency on Connecticut Avenue falls between some that are lower and some that are higher,<sup>9</sup> suggesting that other factors — e.g., traffic volume — may be more responsible for crashes than reversible lanes. DDOT should fully understand the nature of the safety problem before it finalizes solutions.

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<sup>6</sup> Existing Conditions Report, June 2020, Figure 35, page 54, available at <https://bit.ly/3dwi3aI>. “A smaller portion of pedestrian (32%) and bicycle (20%) crashes occurred during reversible lane operations.” Existing Conditions Report, Table 21, page 53.

<sup>7</sup> It would be useful to have these numbers both pre-pandemic and during the pandemic.

<sup>8</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 35, available at <https://bit.ly/3g6ebT0>. In this public presentation, DDOT reported that 46% of crashes occurred during reversible lane operations, but the actual figures from the five-year study period (2015-2019) shows 401 total crashes resulting in injury, 177 (44%) of which occurred during reversible lane operations.

<sup>9</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 35, available at <https://bit.ly/3g6ebT0>.

**Bike Usage** — DDOT’s projections of bicycle ridership are also unreliable because they are based on dubious assumptions and not on hard data. DDOT’s consultant, VHB Metro DC, attempted to project the increase in bicyclists’ use of Connecticut Avenue if DDOT installs protected bike lanes.<sup>10</sup> The study projects that protected bike lanes would create a more than ten-fold increase in bicycle traffic, but that estimate depends on at least four questionable postulates: (1) that total bike usage would be 20 times that number of Capital Bikeshare trips based on a limited city-wide sample from 2016-2017; (2) that bicyclist from as far as four miles away would reroute their trips to a Connecticut Avenue protected bike lane; (3) that widely varying increases in bike volumes at only two locations could be averaged to project how many new bicyclists would be induced to use the Connecticut Avenue protected bike lanes; and (4) that the number of pre-pandemic bicycle commuters can predict the number of bicycle commuters after the pandemic who — like other commuters — may work from home in the future. Variations in any of these assumptions could dramatically impact DDOT’s expectations about how many bicyclists will use new Connecticut Avenue protected bike lanes.

DDOT has also not analyzed the impact of terminating the protected bike lanes at Calvert Street, the southern end of the study area. DDOT has provided no plans for how bicyclists will get from there to downtown, including over Rock Creek on the narrow Taft Bridge or through Dupont Circle. If the number of bicyclists increases ten-fold, as DDOT predicts, they will have to find some way to navigate the remainder of their trip, but DDOT has not suggested how that would happen. One criticism of the District’s past creation of bike lanes has been that they are not connected with each other. Connecticut Avenue bike lanes could have that same problem unless DDOT develops a plan for linking bike routes to Connecticut Avenue and for the continuation of bicycle trips beyond Calvert Street.

**Future Vehicle Volumes** — DDOT faces a formidable challenge to project traffic volumes through 2045 when it is impossible to predict how commuter patterns may change permanently as a result of the COVID-19 pandemic. As DDOT acknowledges, its analysis of future traffic patterns “does not consider potential mode shifts that may occur in the study area such as additional transit or Metro ridership” and “does not consider potential changes such as more people working from home as a direct result of dynamics

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<sup>10</sup> CAC Meeting #3 Presentation, October 1, 2020, Slide 17, available at <https://bit.ly/3sl6evF>. The more complete VHB study was provided to the CAC but is not on DDOT’s website.

created by pandemic conditions.”<sup>11</sup> DDOT simply assumes that pre-pandemic traffic conditions will return, and traffic volumes will be driven primarily by regional demographics. While that is one potential scenario, it is not the only — or perhaps even the most plausible — scenario. It might be more prudent to acknowledge a range of future traffic possibilities.

### **Impact of Traffic Diversion**

Either of DDOT’s preferred alternatives — Concepts B and C — would significantly reduce the number of lanes available for vehicles during rush hours using reversible lanes.<sup>12</sup> Thus, if traffic volumes traveling to the the central city remain the same or increase, as DDOT assumes, congestion is likely to be substantial during rush hours with significant backups at intersections and vehicle diversion to alternative routes that were not designed for that level of commuter traffic and that frequently do not have the same safety measures as traffic corridors.

While DDOT attempted to predict how traffic would be diverted from Connecticut Avenue to other streets, it did not examine how increased congestion would affect the L1 and L2 bus routes on Connecticut Avenue, with 4300 daily boardings pre-pandemic.<sup>13</sup> In addition, the M4 bus — a major mode of transportation for students at Deal Middle School and Wilson High School — crosses Connecticut at Nebraska Avenue, an intersection that is projected to have even longer wait times with the proposed changes. Hopefully, transit will be an ever growing means of commuting downtown or to other destinations, but if the bus routes are clogged by backed up traffic, they will not attract riders, and those who have less mobility and cannot bike or walk will have no alternative but to drive. DDOT identified as a “guiding principle” “bus transit operational

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<sup>11</sup> Learning Room: Traffic Analysis & Parking, Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, slide 37, available at <https://bit.ly/3v2wrRs>.

<sup>12</sup> Concept B would have three lanes in both directions during rush hours and two lanes in both directions in off-peak hours, with a parking lane on each side. Concept C would have two lanes in both directions at all times with left-turn pockets and a protected bike lane on either side. With reversible lanes, there are four lanes for inbound or outbound traffic during rush hours, with off-peak the same as Concept B. Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, pages 42, 44, and 46, available at <https://bit.ly/3g6ebT0>.

<sup>13</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 30, available at <https://bit.ly/3g6ebT0>.

improvements as part of design concepts,” but it has not provided any analysis of how its alternatives will impact bus travel times. Before making a substantial change, as proposed, DDOT needs to understand the impact on all modes of transportation, particularly the Connecticut Avenue buses.

I also remain concerned about the impact of proposed Connecticut Avenue changes on surrounding streets in our ANC, including Chevy Chase Parkway, Nevada Avenue, Utah Avenue, 41st Street/Reno Road, Broad Branch Road, and Linnean Avenue. DDOT conducted a traffic analysis of some expected impacts from the elimination of rush-hour traffic lanes on Connecticut Avenue.<sup>14</sup> It predicts that under Concept B, 1920 vehicles will be diverted to secondary streets and under Concept C, 3890 vehicles will find their way through the surrounding neighborhoods. It is not possible to accurately predict where those vehicles will go because mapping apps (e.g. Waze) will send drivers on whatever route will reduce travel time, including neighborhood streets that DDOT has not even attempted to anticipate.

Some of DDOT’s modeling results are puzzling. For instance, it predicts a decrease in peak-hour traffic volume on Nevada Avenue but an increase in volume on Broad Branch Road,<sup>15</sup> even though Nevada feeds into Broad Branch Road when it crosses Nebraska Avenue. More logically, vehicles using Broad Branch Road will access it using Nevada Avenue, thus avoiding the predicted congestion on Connecticut Avenue. Similarly, it seems unlikely that rush-hour traffic volumes on Nebraska Avenue and Utah Avenue will decrease since they are reasonable alternative routes for commuters seeking to avoid congestion on Connecticut Avenue.

Any traffic volume increases on streets like Chevy Chase Parkway and 41st Street/Reno Road — which DDOT predicts — will be problematic.<sup>16</sup> These streets are residential (except for Murch Elementary School in the 4800 block of Reno Road), were never designed for heavier volumes, and already have some dangerous intersections that

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<sup>14</sup> DDOT did not analyze some possible alternate routes, e.g., Linnean Avenue. DDOT said that they did not consider those routes significant.

<sup>15</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 71, available at <https://bit.ly/3g6ebT0>.

<sup>16</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 71, available at <https://bit.ly/3g6ebT0>. DDOT’s estimates for diversions to these streets appear to be low considering their close proximity to Connecticut Avenue.

will get worse with more traffic (e.g., Chevy Chase Parkway and Military Road,<sup>17</sup> Reno Road and Harrison Street, Reno Road and Military Road). DDOT has not proposed any measures to mitigate the increased volumes on these streets, and there may be no steps that would make them safe with the projected additional traffic.

### **Impact on Parking**

Concept C would eliminate a substantial number of existing parking and loading spaces on Connecticut Avenue — 321 fewer parking spaces and six fewer loading spaces, including 40 to 50 fewer spaces in our ANC between Livingston Street and Nebraska Avenue.<sup>18</sup> DDOT has also suggested that it might extend the protected bike lanes further north of Legation Street as far as Northampton Street or Chevy Chase Circle, which could eliminate 48 additional metered spaces serving our retail businesses.<sup>19</sup>

Parking to serve our business corridor is already scarce, and adoption of Concept C would further exacerbate that problem. While DDOT has made some efforts to get feedback on this aspect of its proposal from businesses south of Livingston Street, it has not made a similar effort with the businesses north of Livingston Street in our commercial district. At a minimum, DDOT must work with Chevy Chase businesses to address their concerns about parking and delivery. For instance, as part of this project and to alleviate some concerns, DDOT could work with the community to open the currently restricted surface parking lots — e.g., at PNC Bank, behind the building with Blue 44 and the Fishery Seafood Market, at Safeway, behind the CVS, behind Magruder's, and at Wells Fargo Bank — more broadly to all patrons of neighborhood businesses.

Moreover, this area — as well as the entire study area — is designated as a Future Planning Analysis Area on the Generalize Policy Map in the Comprehensive Plan, and

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<sup>17</sup> This intersection has been the subject of repeated Commission requests for safety improvements to prevent accidents. Despite some steps, the intersection is still not safe. More traffic diverted to Chevy Chase Parkway will exacerbate this unsafe condition. DDOT needs to have a plan to prevent serious accidents and injury.

<sup>18</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 64, available at <https://bit.ly/3g6ebT0>. DDOT's analysis does not separately identify the eliminated parking spaces between Jennifer Street and Nebraska Avenue, the southern border of the ANC, so the number of eliminated spaces is estimated.

<sup>19</sup> Chevy Chase Neighborhood Parking Task Force Report, Fall 2018, page 8, available at <https://bit.ly/2QOaHtt>.



the Chevy Chase section of Connecticut Avenue is the subject of an ongoing Small Area Plan effort. DDOT should not proceed with any plans to extend the protected bike lane without close coordination with the community-led Chevy Chase Small Area Plan.

### **Inadequate Support for Eliminating the No-Build Management Alternative**

DDOT eliminated all possible alternatives from further consideration except Concepts B and C. In general, there were good reasons for eliminating Concepts A and D.<sup>20</sup> The no-build management option was eliminated based on DDOT’s representation that it “would require [Manual on Uniform Traffic Control Devices]-compliant overhead signage and signals; not supported by [the Commission on Fine Arts] and [State Historic Preservation Office].”<sup>21</sup> DDOT did not provide any documentation on the control devices that would be necessary for the reversible lanes — which have apparently never been in place for the reversible lanes and, thus, have presumably been out of compliance with the Manual — or any formal expressions of non-support from the Commission on Fine Arts or the District’s Historic Preservation Office. As a basis for eliminating the no-build management alternative, DDOT should provide documentation for the MUTCD requirements and of its discussions with the Commission on Fine Arts and the Historic Preservation Office and their formal conclusions that overhead signage and signals are unacceptable.

### **Conclusions and Recommendations**

Based on my review of the DDOT study, I have reached these conclusions and recommendations:

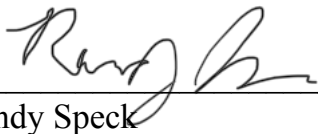
1. The study goals and guiding principles are widely shared and supported;
2. The reported study data does not adequately support DDOT’s conclusions, and further data collection/disclosure and analysis is necessary;

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<sup>20</sup> Concept A would retain reversible lanes, add protected bike lanes on both sides, and remove all parking; Concept D would retain reversible lanes, add a two-way protected bike lane on one side, and eliminate all parking. Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, pages 43 and 49, available at <https://bit.ly/3g6ebT0>

<sup>21</sup> Connecticut Avenue NW Reversible Lane Operations and Safety Study Public Meeting No. 1, April 1, 2021, page 39, available at <https://bit.ly/3g6ebT0>

3. More emphasis needs to be placed on identifying and mitigating unintended and never fully predictable adverse consequences;
4. DDOT should be prepared to modify the future design of Connecticut Avenue once it has a better understanding of the likely impacts, including particularly the long-term effects of the changes caused by the COVID-19 pandemic;
5. Concept C has an advantage over Concept B by providing protective bike lanes, which are a desirable long-range addition to support safety and multimodal transportation, but that change comes with a number of potential drawbacks, e.g, greater congestion on alternative routes and elimination of parking and loading spaces; and
6. As DDOT proceeds with its proposed alternative, it should do so cautiously, recognizing that there could be significant unexpected adverse consequences, and it should be prepared to identify and make rapid modifications to correct problems as they appear.



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Randy Speck  
Commissioner, ANC 3/4G03