



January 15, 2014

921 Pennsylvania Avenue SE
Suite 305
Washington, DC 20003-2141
202-543-3344 (office)
202-543-3507 (fax)
office@anc6b.org

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

Executive Director
Susan Eads Role

VIA E-MAIL: terry.bellamy@dc.gov

OFFICERS

Chair
Brian Flahaven

Vice-Chair
Ivan Frishberg

Secretary
Nichole Opkins

Treasurer
Brian Pate

Parliamentarian
Philip Peisch

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

Dear Director Bellamy:

Advisory Neighborhood Commission 6B (ANC6B) has been fully engaged in the DC Department of Transportation's (DDOT) *Barney Circle & Southeast Boulevard Transportation Planning Study* since its inception.¹ ANC6B Commissioners attended DDOT's second meeting of the study on November 21, 2013; and the Commission has discussed the results of that meeting with the community at three public meetings. Individual Commissioners have had additional conversations with their constituents.

COMMISSIONERS

SMD 1 *David Garrison*
SMD 2 *Ivan Frishberg*
SMD 3 *Philip Peisch*
SMD 4 *Kirsten Oldenburg*
SMD 5 *Brian Pate*
SMD 6 *Nichole Opkins*
SMD 7 *Sara Loveland*
SMD 8 *Chander Jayaraman*
SMD 9 *Brian Flahaven*
SMD 10 *Francis Campbell*

On January 14, 2014, at a properly noticed meeting with a quorum present, the Commission voted 10-0 to send this letter to DDOT outlining our many concerns about the *Barney Circle & Southeast Boulevard Transportation Planning Study* to date and how we think the study ought to proceed.

In summary, the Commission:

- rejects DDOT's proposed 4-lane SE Boulevard with parking lots and no connections to the existing street grid;
- opposes the inclusion of a multi-modal parking facility in any form;
- opposes Barney Circle Option 2 and has concerns about many aspects of Barney Circle Option;
- feels the study suffers from a lack of neighborhood planning and involvement by DDOT with its Anacostia Waterfront Initiative (AWI) partners the DC Office of Planning, the Deputy Mayor for Planning and Economic Development, and the DC Department of the Environment; and
- questions the sufficiency of DDOT's traffic planning scope and assumptions.

These positions are discussed more fully below and lead ANC6B to the following conclusions in keeping with the AWI goal to "redesign highways and freeways to reduce barriers between neighborhoods and waterfront parks."

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

- If a road is to be built to replace the SE/SW Freeway, then the best option may be a two-way street fully connected to the grid, along with a pedestrian and bicycle bridge, that opens up the possibility of using the balance of the land for recreation and economic development; and
- Barney Circle should be designed to accommodate the decision on whether or not there is a direct road connection to 11th Street and what type of road that will be and in ways that directs commuter traffic to appropriate arterials while protecting residential streets from cut-through traffic.

Overview

The Commission seeks two major outcomes from this study. First, the overarching goal should be an enhancement of neighborhoods by improving multi-modal connections between Capitol Hill and the Anacostia River. Second, ANC6B's major transportation goal is to reduce commuter cut through traffic across Capitol Hill while improving regional flows once the 11th Street Bridge project is completed. ANC6B recognizes the complexities of the inter-relationships of altering Barney Circle and adding a boulevard (or not). Opening up Barney Circle to residential streets that currently don't connect will provide residents with improved access. But, it will also alter regional vehicle travel patterns through those neighborhoods and, as such, must be combined with an aggressive traffic calming program. The same principle applies to streets affected by a boulevard.

ANC6B is concerned that these goals will not be met by a study that so far is only focused on traffic. In its November 21st meeting presentation DDOT said that it plans to "carry forward for operational analysis and to develop design options" only one Boulevard option (Scenario 1C). The presentation was silent about whether DDOT plans to "carry forward" both Barney Circle options or only one of them.

According to the Federal Highway Administration (FHWA), the "NEPA process allows transportation officials to make project decisions that balance engineering and transportation needs with social, economic, and natural environmental factors."¹ In this study, DDOT is working toward an Environmental Assessment and, as such, needs to "provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact."²

Whatever is finally decided by this study will involve tradeoffs. There will be choices to make between preserving residential streets vs. designating others for through traffic, for instance. But other tradeoffs, as FHWA suggests, need to balance traffic, environmental consequences, and economic development. DDOT, by carrying forward its analysis on options chosen solely on the basis of traffic data, will be denying the community the opportunity to decide what tradeoffs it is willing to accept. Traffic data ought to be used for making a "first cut" but not the final one.

Where's the Urban Plan?

A fundamental flaw in this study is that it started as a transportation study when it ought to have been initiated with a robust community planning effort of some kind. Perhaps, this was done a decade ago

¹ NEPA and Transportation Decisionmaking: <http://www.environment.fhwa.dot.gov/projdev/pd3tdm.asp>

² <http://www.environment.fhwa.dot.gov/projdev/docuea.asp>

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

under *The Middle Anacostia River Crossings (MAC) Study*. But, times and the area have changed since then. One AWI program goal is to “create great urban boulevards with mixed uses, landscaping, and great civic spaces.” Proposing, as a final choice, a 4-lane boulevard with no grid connections does not meet this goal.

In some other U.S. cities where freeways have been turned into boulevards, the key to success has been the engagement of multiple stakeholders within an urban planning context. ANC6B realizes that situations differ but redesigning Barney Circle and reestablishing a road between a new Barney Circle and 11th Street SE on Capitol Hill could inevitably change immediate and surrounding neighborhoods in both negative and positive ways. While it is DDOT’s role to analyze the need for and build roads for multi-modal traffic, creating a new Barney Circle and a road in this Capitol Hill area requires the active participation from DDOT’s AWI partners: the Office of Planning, Deputy Mayor for Planning and Economic Development (DMPED), and the District Department of the Environment (DDOE). We do not see their planning, economic development, or environmental imprint on the current options. Thus, the Commission directs this letter not just to DDOT but to its AWI partners, as well.

Today’s Urban Context for a Boulevard

While the urban context surrounding Barney Circle is well understood, the same cannot be said about the area where a Boulevard is planned. DDOT’s proposed 4-lane boulevard would traverse a triangle-shaped “neighborhood” bounded by 11th Street, L Street, and the Anacostia River that is essentially a development hodgepodge. It consists of residences along L Street between 13th and 15th Streets SE with no access from the south, the CSX freight rail tracks, two Maritime Plaza office buildings, Boathouse Row (the site of historic boat clubs, a rowing association, and a Corps of Engineers dredging facility), a section of the Anacostia Riverwalk Trail, and 11th Street Bridge approaches and connections. Access to this area is limited and many residents of Capitol Hill know little about it.

Planned or conceptual changes and near term disruptions to this small area include:

- extensions of the CSX Virginia Avenue Tunnel east portal to a point east of 14th Street and of 12th Street SE from M Street north to the boulevard;
- an ongoing DC Water Clean Rivers project;
- a potential mixed-use development at 1333 M Street SE;
- completion of the 11th Street Bridge project (which plans to add a double intersection on 11th Street to enable I-695 Freeway and local traffic to flow to and from a boulevard);
- a recreational Bridge Park connecting Capitol Hill and Anacostia;
- the rumor of a DC Water maintenance yard to be moved from Capitol Riverfront; and
- a proposed boat repair facility.

Just west of the “triangle” area is the mostly undeveloped “Lower 8th” with a few residences and businesses and a sizeable Virginia Avenue Park. And, directly north is Hill East, a largely residential neighborhood through which runs the commercial strip of Pennsylvania Avenue. The portion of Hill East south of Pennsylvania Avenue is affected by increased cut through traffic during commute times that many think is caused by the yet to be completed 11th Street Bridge, other factors, and the year old

Page 4

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

shutdown of the SE/SW Freeway segment between 11th Street and Barney Circle. The rest of Capitol Hill lies north and west of the “triangle.”

Into this changed and changing area, DDOT has offered up a boulevard that was conceptualized almost a decade ago.³ Instead of adhering to an old plan, DDOT and its partners should consider ways to knit this triangle’s north and south portions together despite the rail tracks and how to connect this section of the Anacostia Waterfront to the rest of Capitol Hill.

DDOT’s Proposed Southeast Boulevard

To replace the SE/SW Freeway (the “no build” option), DDOT has settled on one basic design: a 4-lane boulevard with no road connections to the existing street grid, other than at its extreme ends. Thus, the differences between the build concepts shared with the community (options 2, 3A, 3B, and 4) are minor. They are limited to: (1) road alignment (north or south), (2) parking lots (surface or underground), and (3) two versions of a bicycle/pedestrian crossing over the CSX rail tracks.

In the Commission’s view, this proposed 4-lane Boulevard would become a virtual freeway, creating an unsafe place for pedestrians and bicyclists. On the other hand, a signalized local street that connects to all three existing north/south streets (13th, 14th, and 15th Streets SE), rather than just one, spreads any induced traffic among them, provides a safer environment for pedestrians and bicyclists by virtue of its cross streets, and creates an opportunity for Hill East residents to access to their homes from the south is a much better use of this important space.

If the goal of the Anacostia Waterfront Initiative is really "to reduce barriers between neighborhoods and the waterfront parks" and "provide continuous pedestrian and bicycle access along the entire waterfront," than the community needs an option that replaces the Freeway with a new street grid that prioritizes local connections. Fundamentally, a road without connections contributes nothing to the enhancement or creation of a neighborhood.

On a side note, the Commission realizes that DDOT is adhering to the language of NEPA by calling the reestablishment of the SE/SW Freeway between 11th Street and Barney Circle the “No Build” option. But, logically, this formulation makes no sense. We ask that in future discussions and presentations, “No Build” is the label for “no road” and reestablishing the Freeway simply becomes Option 1.

DDOT’s Traffic Data for SE Boulevard Options

DDOT did not present traffic data on November 21st to support its conclusions of two options for Barney Circle and one basic option for the SE Boulevard. ANC6B appreciates that DDOT, as a follow-up to the meeting, provided data that apparently underlie its conclusions as shown in its table “Traffic Analysis Confirms 4 Lanes Necessary for Southeast Boulevard.”

Whether these data support DDOT’s conclusions is not obvious to the Commission. First, the data only include traffic projections (in the year 2040) for a small portion of Hill East between Barney Circle and

³ “In general, the boulevard would be developed as a four-lane, divided minor arterial. Pedestrian and bicycle accessibility would be provided adjacent to the roadway by a shared use trail. Enhanced landscaping would also be applied to medians, buffer zones and all other areas where existing pavement is removed. This would assist in providing a better connection between the neighborhoods and the waterfront by creating a park-like environment, accessible to all modes of travel.” [MAC Study, 2005]

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

the intersection of Pennsylvania/Potomac Avenues and 14th Street SE. We know that current Capitol Hill traffic problems extend at least as far as 11th Street SE and probably beyond in all directions. Second, the data only pertain to the AM rush hour (7:00 AM to 8:00 AM) and, as such, they predict primarily SB and WB traffic through this small portion of Hill East and a road (or not) between Barney Circle and 11th Street SE. Surely, PM rush data should also be considered.⁴

Some specific questions ANC6B has about the data it reviewed include:

1. *What data did DDOT use to develop the two options for Barney Circle? The data DDOT provided us show a rise in K Street WB traffic that seems to imply that the data are based on DDOT's Barney Circle Option 2 that creates a direct connection onto K from the Circle. If so, how would the numbers change throughout if Barney Circle Option 1 is considered instead?*
2. ANC6B supported a DDOT proposal for a redesign of the Pennsylvania and Potomac Avenues SE Intersection Pedestrian Safety Study in its letter of June 15, 2013. *What assumption does this data run make about that intersection in the year 2040?*
3. In viewing the data, it isn't intuitively obvious to us that boulevard connections to 14th Street would especially create NB traffic in the AM rush. *Is there no impact SB?*
4. The relatively heavy use of Potomac Avenue south of Pennsylvania Avenue struck us; especially since all but one option seem to increase this somewhat. This is the cut through route drivers now take to access I Street and then I-695 westbound (at 11th or 3rd Streets). *Are these 600 or so vehicles turning left off of Pennsylvania Avenue or are they continuing from Potomac Avenue north of Pennsylvania Avenue? Or, both perhaps? And, what happens during the PM rush? It is noteworthy that all of the AM options presented in this data set maintain or increase this flow.*
5. For the true no build option (*i.e.*, no reestablishment of the Freeway nor replacement by a boulevard), the 2040 data suggest that about 2,000 vehicles in the AM rush are disbursed somewhere. The combined Freeway and Pennsylvania Avenue AM rush traffic ranges from 3,500 to 4,000 vehicles in 2040 for all other options but Pennsylvania Avenue is projected to carry only 2,275 vehicles should there be no road linking Barney Circle and 11th Street SE. *Where do 2,000 vehicles go?*
6. Finally, does the National Capitol Region Transportation Planning Board Travel Forecasting Model (Version 2.3) take into account transit service and those changes over time or it is auto-centric?

In using these data (or other data), DDOT compared six boulevard options with the No Build (or, Freeway replacement) option using three criteria that measure changes in: (1) neighborhood cut-through traffic, (2) traffic on Pennsylvania Avenue, and (3) regional traffic. DDOT then chose a 4-lane boulevard with no connections for further analysis because it saw "no change" for all three criteria. This is not

⁴ ANC6B is aware that the Navy Yard's hundreds of employees contribute significant commuter traffic to the area. We also understand their work day begins and ends earlier than most. Are the AM and PM hours chosen by DDOT sufficient to capture this traffic in the "rush hour" data?

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

much of a surprise since a 4-lane boulevard with no connections is functionally equivalent to a 4-lane freeway with no connections.

ANC6B considers this analysis to be simplistic at best. First, it should be the magnitude of change that is important, not the change itself. Second, increasing traffic on Pennsylvania should be a positive unless it overwhelms the street's capacity. In making connections with existing streets, it should be expected that traffic may increase but, again, it is the magnitude of cut-through traffic that is important and whether or not that can be mitigated with traffic calming measures.

Why Parking Lots?

As ANC6B said in its letter to DDOT of April 11, 2013, "One of the most surprising and disconcerting elements of the study unveiled at the February 21 meeting was the idea of putting a 'municipal or bus parking facility' underneath a portion of the boulevard." The letter then asked, "What is the purpose and need of such a facility? Why is this area, somewhat isolated from major thoroughfares and retail areas, appropriate for a parking facility of any kind?"

These questions remain unanswered as DDOT, without giving any justification, is now proposing either surface parking lots or a "multi-modal parking facility below the roadway" as a component of a SE Boulevard. Again, no purpose and need have been offered nor have the appropriateness of situating parking lots and/or a facility in this particular area been explained. Who are the potential users of parking lots?

- The Anacostia waterfront in this area, including Boathouse Row, currently has no facilities for casual daytime users other than the Riverwalk Trail. Despite an effort DMPED conducted with multiple stakeholders in 2009 to analyze the development potential of Boathouse Row, the study sits on a shelf and the area has been left un-zoned.
- At the November 21st meeting, we heard vague references to a future streetcar line running along 11th Street and that parking lots and/or a facility on a SE Boulevard could somehow be important for this line. If so, ANC6B needs to know more about the probability of such a streetcar line and what kind of supporting facility it might need. We note that the "DC Transit System Plan, Final Report of April 2010" does not include such a route as part of a future 37-mile streetcar system.
- A multi-modal facility is usually a place where people can transfer among modes (bicycle, car, bus, train, air, etc.) What are the transfers that could occur here? It is not a convenient spot for bus drop-offs and pick-ups, given that the closest Metro station is several blocks north. It might, however, be a convenient spot for the endemic drug market that, unfortunately, has flourished for years in the area.
- The inclusion of parking lots, whether surface or underground, would actually attract more commuter traffic to the neighborhood, in direct conflict with one of the main purposes of the 11th Street Bridge project: to keep traffic on the freeways and off local streets.

Page 7

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

ANC6B understands DC may have a need for daytime and overnight storage of tourist, special events, and commuter buses while they await their return trips out of the city. But, the location of that facility should be the result of citywide analysis of need and identification of viable locations based on objective criteria rather than incidental convenience. Until the Commission has such information and can evaluate the pros and cons of siting it here instead of in some other part of the city, ANC6B is emphatically opposed to a parking facility or the surface lots being considered as a component of a SE Boulevard.

What Else is Possible?

The Commission asks the DC Office of Planning and DMPED to step in to this DDOT study and fully engage in some creative thinking with the community on how to plan appropriate, mixed uses for the land area rather than a virtual freeway. Examples of other approaches are found across the United States. In Milwaukee, a freeway conversion led to the restoration of a traditional street grid and new neighborhoods. In New York City, the demise of the elevated West Side Highway resulted in a park, pedestrian promenade and bicycle path along the Hudson River.⁵

Can You Add a Grid to the Grid and Still have a Road?

Limits of Disturbance maps produced for the CSX VAT DEIS⁶ show a “ghost” Square 1048 situated between 13th and 14th Streets SE and “under” the WB lanes of the SE/SW Freeway. This shows the possibility of adding over 40 townhouse lots, creating housing along the south side of L Street SE. The layout of Square 1048 also includes a classic Capitol Hill alley at the rear of these lots and another row of townhouse lots facing south. And, still, there is room for a 2-lane road connecting Barney Circle and 11th Street SE (the EB lanes SE/SW Freeway). Two green spaces; one between 11th and 13th and another between 14th and Barney Circle could be included. What gets squeezed out in this scenario? Dedicated bicycle lanes, perhaps. And, it is problematic that the lots facing south and fronting on the new road overlook the CSX rail tracks. Could DC develop this new Square as mixed income housing similar to what was accomplished at Ellen Wilson?

If DDOT’s rationale for conducting this NEPA study is to qualify for Federal funds to pay for implementing the final results, the community needs to know what—if any—limitations this funding source places on the study’s outcomes. Any such limitations need to be part of future discussions. Do we tie up DC land with a 4-lane boulevard or do something more productive with it? This may be one of the tradeoffs involved in this study but so far it is not evident.

DDOT’s Proposals for Barney Circle

So far, this letter has focused more on DDOT’s plans for a boulevard than the redesign of Barney Circle. But, as previously mentioned, while these two parts of the study have a complex inter-relationship, each has distinct issues that need serious attention as the study moves forward.

⁵ Norman Metzger, “The Southwest Boulevard: Learning from History.” Available at <http://www.capitalcommunitynews.com/content/southeast-boulevard-learning-history>

⁶ DEIS Appendix: C01 Limits of Disturbance - Alternatives 2 and 3; Sheets 5 and 6. Available at: <http://www.virginiaavenuetunnel.com/project-resources>

Page 8

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard Transportation Planning Study

For Barney Circle, the questions evolve around how many of the radiating streets should have full access to and from the Circle. DDOT has offered two choices to the community: Option 1 and Option 2 but not provided traffic data or projections. Given this limited information, the Commission opposes Option 2 and has concerns about many aspects of Option 1. It may be that an appropriate Barney Circle cannot be designed without first settling on whether or not there will be a direct road connection to and from 11th Street and what type of road that will be.

Under both Barney Circle options, new traffic would clearly use Kentucky Avenue SE, 16th Street SE, and 17th Street SE since both roads currently do not connect directly with a full traffic circle. But in addition to increasing traffic on Kentucky Avenue and 17th Street, Option 2 would also significantly increase traffic on the 1600 block of H Street SE and the 700 block 16th Street SE. At one time, the 1600 block of H Street SE was a two-way street and experienced a significant amount of traffic, speeding, and property damage, so much so that residents successfully encouraged the city to make it a one-way street. Changing this narrow street back to two ways makes little sense as part of this project.

While the 700 block of 16th Street SE would see increased traffic under both options, this small segment would clearly see more of an increase under Option 2 since drivers could view 16th Street and Kentucky Avenue as a cut through alternative to 17th Street to access the new circle. Like the 1600 block of H Street SE, the 700 block of 16th Street SE is a narrow residential street not designed for significant traffic volume.

Option 1 could be improved with the implementation of significant traffic calming measures on the 700 and 800 blocks of Kentucky Avenue SE, the 700 block of 16th Street SE, and the 700 and 800 blocks of 17th Street SE to slow down and discourage cut through traffic. If DDOT proceeds in this direction, efforts should be made to narrow Kentucky Avenue to one lane, one-way northbound north of Freedom Way SE using, for instance, curb extensions and diagonal parking.

Traffic calming on the 700 block of 16th Street SE could include curb extensions and/or other measures. On 17th Street SE, DDOT should extend the traffic calming measures the agency is implementing on 17th Street SE north of Potomac Avenue SE as part of DDOT's separate *17th & 19th Streets Safety Improvement Project*.

This analysis has been about roads for vehicles. We note that, while sidewalks and bicycle lanes have been included throughout, more thought might be given to the different ways in which people and bicyclists will move through and around a new Barney Circle. It may be appropriate, for instance, to build a strong local network of pedestrian sidewalks and "separate bicycle lanes" (or cycle tracks) to handle the current growth of bicycling.

Environmental Consequences and Adherence to DC Sustainability Plan

As we have mentioned several times, DDOT's apparent plan to make its "first cut" options—based solely on traffic data—the agency's final choice is unacceptable to ANC6B. We have already raised the urban planning and economic development void in these choices and are equally concerned that environmental consequences have not yet been factored in.

Page 9

January 15, 2014

ANC6B Letter to Terry Bellamy

RE: Response to the Second Public Meeting of the Barney Circle & Southeast Boulevard
Transportation Planning Study

ANC6B does not claim particular expertise in environmental problems but does know that numbers of vehicles and their speeds contribute to the rate of various emissions. We also know that several factors determine how these emissions would impact residents living at various distances from a new Barney Circle and a boulevard and pedestrians and bicyclists who will use a Boulevard or other roads in the area. Having the information on environmental and other impacts when comparing various Boulevard and Barney Circle options is critical to the community's ability to understand any tradeoffs that might exist.

The *Sustainable DC* goal for 2032 is to be the healthiest, greenest, most livable city in the nation. Building a 4-lane boulevard and ignoring consequences of creating a Barney Circle does not help achieve this goal.

Conclusion

The Commission opposes DDOT's design concepts and options for the *Barney Circle & Southeast Boulevard Transportation Planning Study*. While there may be potential in Barney Circle Option 1, the Commission sees no purpose in DDOT's 4-lane boulevard options. Instead, we ask DDOT and its AWI partners to look at these initiatives in an integrated manner and provide alternatives that support both the AWI goals and those of ANC6B and the community.

The Commission thanks DDOT for the opportunity to comment on the second phase of this important study and asks the agency to seriously consider our concerns. To that end, ANC6B requests a meeting with DDOT officials to discuss them in full.

Sincerely,



Brian Flahaven
Chair

cc: Mayor Vincent C. Gray
Chairman Phil Mendelson, Council of the District of Columbia
Councilmember Mary M. Cheh, Chair, Committee on Transportation and the Environment
Councilmember Tommy Wells
Councilmember Anita Bonds
Councilmember David Catania
Councilmember David Grosso
Councilmember Vincent Orange
Mr. Victor L. Hoskins, Deputy Mayor for Planning and Economic Development
Ms. Harriet Tregoning, Director, Office of Planning
Mr. Keith A. Anderson, Director, District Department of the Environment
Mr. Sanjay Kumar, AWI Program Manager, DDOT
Rear Admiral Markham K. Rich, Commandant, Naval District Washington