



June 8, 2017

Dear Mayor Bowser and Director Dormsjo,

I write on behalf of the members of the Brookland Neighborhood Civic Association (BNCA) to convey our deep dissatisfaction with the May 5, 2017 response Director Dormsjo provided Councilmember McDuffie regarding excessive truck traffic, speeding, noise, and other traffic issues currently afflicting Brookland and surrounding neighborhoods in Northeast. While the Director's letter was directed to several specific concerns regarding Franklin Street and 13th Street, these problems are emblematic of traffic issues throughout Brookland. The Director's letter, unfortunately, reflects both a lack of understanding and a seeming disregard of the urgent need for improvements in traffic safety and quality of life for the residents of Brookland. Indeed, not once in the letter did the Director recognize that the concerns raised by the Councilmember and these residents are precisely the concerns the community has been raising for years, and which are well documented in DDOT's own August 2015 Brookland-Edgewood Livability Study.¹

We would like to invite you both, along with any staff, to attend our June 20, 2017 BNCA general meeting to discuss these issues and DDOT's position in greater detail. We need to understand why DDOT now believes, in spite of the Livability Study, that the traffic issues in Brookland do not warrant serious attention and urgent action. We would like to hear from you and your staff regarding the following topics:

- What has DDOT done since August 2015 to control truck traffic and implement traffic calming measures in the Brookland Community?
- What is DDOT's plan to manage and ameliorate the ongoing influx of truck traffic due to major, ongoing construction projects in and around Brookland?
- What is the status of each of the recommendations in the Brookland-Edgewood Livability Study? For actions that have not yet been implemented, why not?
- What steps has the City taken to implement the current Comprehensive Plan elements related to excessive truck traffic, particularly as identified for the Upper Northeast, Transportation, and Implementation Elements? What changes to the Comprehensive Plan would in your view contribute to a solution to these problems?
- Why, despite the flexibility provided by the federal highway guidelines, does DDOT continue to refuse to look at re-classifying certain streets in Brookland to more accurately reflect their local, residential character?

¹ <https://ddot.dc.gov/page/brookland-edgewood-livability-study>.

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Deficiencies in DDOT's May 5 Letter

Director Dormsjo's May 5 letter purported to address residents' concerns regarding traffic safety issues on certain streets in Brookland. I would like to highlight several flaws in this letter's reasoning and conclusions.

- **Comparison of streets:** DDOT asserts that the truck traffic on Franklin does not exceed the amount on Rhode Island Avenue. This is a meaningless comparison. The question is whether the truck traffic on Franklin is excessive compared to streets of similar size and character. DDOT's investigation revealed that 40-45 heavy trucks *per hour* use Franklin, which is a narrow, two-lane, residential street. That is almost one per minute. If DDOT does not understand why that amount of truck traffic is unacceptable on Brookland's residential streets, then new leadership direction at that organization is clearly needed.
- **Street Classifications:** DDOT continues to refuse to consider reclassifying certain streets in Brookland to more appropriately reflect their character and proper use. In doing so, DDOT has made legalistic arguments that such classifications are required by the Federal Highway Administration guidelines. Although no citation to those requirements has been provided, we assume DDOT is referring to the FHA's "Highway Functional Classification Concepts, Criteria, and Procedures."² However, this is a flexible guidance that recognizes street classifications are based on many factors and considerations and are within the discretion of the local transportation agency to determine. In addition, streets are to be reclassified periodically based on new information and considerations. DDOT's rigid adherence to unspecified federal requirements appears to be a bureaucratic dodge to avoid providing a more thorough justification for its choices in Brookland. In particular, we note that each of the roadways classified as "minor arterial" in Brookland (including 12th, 13th, Franklin, and Monroe) are more appropriately considered "local" or at most "minor collector" roads under the federal guidance.³ DDOT's improper classification puts these streets on par with Michigan Avenue, which is also classified as minor arterial and is a 4-lane connecting route across the City. 12th, 13th, Franklin, and Monroe Streets NE, by contrast, are all two-lane roads that are primarily residential, have low speed limits, and do not provide cross-city access. They should be reclassified to local, or at most, minor collector. Under those new

² https://www.fhwa.dot.gov/planning/processes/statewide/related/highway_functional_classifications/section00.cfm.

³ Compare *id.* § 3.1.4 with *id.* §§ 3.1.5 & 3.1.6.



classifications, each of these streets could then be considered for restrictions on heavy trucks.⁴

- **Identifying areas of concern:** DDOT’s letter asserted that an assessment was conducted over the course of just two days in September 2016. DDOT has not made the results of that assessment available to the public, so it is impossible to evaluate DDOT’s assertions in the letter that the speeding and safety issues at certain analyzed locations are insignificant. But DDOT’s conclusory assertions in this regard are belied both by the lived experiences of our residents, as well as DDOT’s own more thorough investigation presented in the 2015 Brookland-Edgewood Livability Study. Among other things, the Livability Study found:
 - A primary quality of life concern for the community is cut-through traffic, speeding, and non-compliance (particularly along 12th, 13th, Franklin, and Michigan Avenue). See 3-8 – 3-9.
 - These streets have the highest number of collisions between vehicles and bikes and pedestrians in the study area. See 4-4.
 - The current configuration of truck routes in the study area “contributes to a great deal of heavy vehicle through-traffic and noise along routes that also have residential uses.” 4-12.
 - Roadway safety data corroborate an extremely high number of crashes along Franklin Avenue, 12th St., Monroe, and Michigan Ave., the same routes used by high volumes of cut-through traffic. See 4-13. Out of about 243 crashes from 2012-2014:
 - Franklin St alone had 65 crashes, or about a quarter of the total incidents in the area.
 - 12th St had about 63 crashes for about a quarter of the total.
 - Michigan had 81 crashes for a third of the total.
 - Monroe St had 50 crashes for about a fifth of the total.
 - Only about 7 crashes occurred in the study area off of the above streets.⁵

⁴ We note that given its local, residential and small boutique commercial character, 12th Street’s designation as a *preferred* truck route is completely inappropriate and needs to be rescinded. At a minimum, DDOT must cease *encouraging* trucks to use 12th Street NE as an acceptable cut-through.

⁵ Traffic safety conditions in Northeast Washington are clearly deteriorating rapidly, according to DDOT’s statistics for 2013-2015. Among the data: The crash-rate ranking for 12th/Buchanan NE went from 906 *to* 47 from 2013 to 2015 and 12th/Allison’s went from 872 *to* 62 in the same period. Table 7.8. Michigan/Franklin NE went from 336 *to* 64 in the crash composite index ranking in the same period. Table 7.17. Rhode Island/North Capitol went from the 28th *to* the 15th *worst intersection in the whole City* from 2013 to 2015. Table 5.1. These statistics are completely consistent with residents’ observations of a collapse in traffic safety in the Brookland area over that period. See <https://ddot.dc.gov/sites/default/files/dc/sites/ddot/publication/attachments/2013-2015%20Annual%20DC%20Crash%20Analysis%20Report.pdf>.



- The Study identified intersections at 12th/Franklin, 13th/Franklin, and Rhode Island/12th as among the very worst in the area for traffic safety. 4-14.⁶
 - Although both Franklin and Monroe Streets are “restricted truck routes” they had heavy truck usage in the study period. 4-15.
 - The Study recommended a number of minimum safety improvements, the status of which is unknown to the community. See 5-5.
 - The Franklin Street Corridor was singled out for special attention due to the significant traffic, truck, and safety issues associated with that street. See 5-6 and 5-18 (identifying multiple improvements needed at virtually every intersection along Franklin Avenue).
 - Most of the implementation actions identified in Chapter 6 of the Study have never been implemented.
- **Measuring vibration from trucks:** The letter claims that DDOT conducted an analysis of vibrations on Franklin Street using a seismograph machine. DDOT apparently took measurements at the roadside and sidewalk areas near potholes and concluded that the levels of vibration would not cause structural damage to homes. However, the methodology DDOT used is highly suspect. According to a report by the National Research Council of Canada, due to the physical mechanics of vibration, roadway vibrations intensify within structures compared to the level felt on the ground near the roadway.⁷ For instance, at 25 km/h, the vibration level of a truck measured on the ground in front of a house may measure at 19.9 mm/sec² while on a second-story floor inside the house, it measures at 37.3 mm/sec²—nearly double the level of vibration!⁸ The report recommends: “Measurements should be made at locations where the vibration levels reflect the purpose of the evaluation. To evaluate the effect of vibrations with respect to human annoyance, measurements should be taken at locations where the vibration level is greatest, *normally at the midpoints of floors*” (emphasis added).⁹ Traffic vibrations also tend to be worst in areas underlain by soft clay, which is the soil type common to Brookland. DDOT’s dismissive conclusions regarding roadway vibrations in the historic buildings in Brookland are clearly flawed and need to be reconsidered.

⁶ Residents have begun collecting videographic evidence of violations in a public Dropbox:

<https://www.dropbox.com/sh/1yvg2iku54ki3vt/AAALbVGmQg5dR8xSMnlas7Zca?dl=0>.

⁷ I can personally attest that I have experienced this precise phenomenon at my house on 12th St. NE, which noticeably vibrates when trucks pass, though ground vibration cannot be felt on the sidewalk outside.

⁸ CNRC, Osama Hunaidi, “Traffic Vibrations in Buildings” (2002), at 2, table 1, *available at* https://www.nrc-cnrc.gc.ca/ctu-sc/files/doc/ctu-sc/ctu-n39_eng.pdf.

⁹ *Id.* at 3.



Again, we extend an urgent invitation to you both to attend our June 20 BNCA meeting to explain DDOT's thinking and plans to improve traffic safety in the Brookland area. Please let me know at your earliest convenience whether you can attend the June meeting. I would also be happy to sit down with your staff for a smaller meeting prior to a BNCA meeting, if you believe that would be a constructive way to proceed. The status quo is not acceptable.

Sincerely,

A handwritten signature in black ink, appearing to read "David Hamm".

President, BNCA

CC:

Hon. Del. Eleanor Holmes Norton
Councilmember Kenyon McDuffie
Councilmember Mary Cheh
MPD Commander William Fitzgerald
ANC 5B Chairwoman Ursula Higgins

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