



## WASHINGTON AREA BICYCLIST ASSOCIATION

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### **Comments on the Benning Road and Bridge Transportation Improvements Draft Environmental Assessment**

On behalf of the Washington Area Bicyclist Association (WABA) and our 6,500 regional members, thank you for the opportunity to submit comments on the Draft Benning Road and Bridges Transportation Improvements Environmental Assessment. This project offers key opportunities to dramatically improve the Benning Road corridor to move people more efficiently and safely while learning from past planning missteps.

Today, Benning Road from Oklahoma Avenue to East Capitol Street is overwhelmed by infrastructure designed to move automobiles quickly. West of DC-295, 8 traffic lanes speed cars and trucks past River Terrace Park, a new education campus, and the new regional Anacostia Riverwalk Trail. The speed limit is 35 miles per hour -- already too high for a road so close to a neighborhood park -- but every detail on this 90 foot wide divided highway encourages drivers to speed. And they do.

While the corridor caters to drivers, those walking or riding the bus find narrow (3 foot), crumbling sidewalks, 90 foot long crosswalks, and pedestrian beg buttons that prioritize free flow of traffic over pedestrian mobility. The bridge over DC-295, with its lone pedestrian walkway, emphasizes the car-first approach. After the bridge, the Benning Road / Minnesota Avenue intersection is among the top five high crash intersections in the city where 16 pedestrians and 5 bicyclists were hit between January 2012 and August 2015. Pedestrian access and safety are an afterthought in this environment.

Bicyclists traveling in the corridor face similar challenges. Riding in the road here is inconceivable for most, due to the high speeds and proximity to the freeway, yet the narrow sidewalks with frequent driveway entrances are a risky alternative. Bicycle accommodations to, on, and from the bridge over DC-295 are cumbersome to navigate, requiring sharp turns in confined spaces, and are too narrow for two-way passing. Since this bridge is the only freeway crossing within a quarter mile to the north and over a mile to the south, it carries a constant stream of bike and foot traffic.

While Benning Road may move many people by car, the corridor is failing people who walk, bike and ride transit. The streetcar project can and must address these major shortcomings. People must be able to safely walk and bike to the new transit service for it to succeed.

## 1. Track Placement

On the rollout of the H Street line, it became clear that track placement has serious implications for streetcar operations and bicyclist safety. Running streetcars along the right side of the street places tracks exactly where bicyclists most commonly ride. Since bike tires easily slot into and catch on the streetcar tracks when riding parallel to them, crashes occur frequently on H Street. These are preventable with better designs found around the world.

There are many mitigation strategies, but only one fix. Signage and education campaigns can warn bicyclists to be careful while crossing tracks, and parallel bike lanes can provide an alternative bike route. Unfortunately, on H Street, the bike lanes on alternative streets do not serve the whole corridor or deliver a bicyclist directly to her H Street destination. The only truly effective solution is placing the streetcar tracks in the center lane. Including a high quality separated bike facility, such as a protected bike lane or an off-street trail further reduces conflicts.

Build Alternative One would repeat the mistakes of the H Street line, exposing bicyclists to unnecessary crash hazards due to the placement of rails in the rightmost lane. While most bicyclists will choose to ride on the side path where it is available, some will choose to ride in the road, most often in the rightmost lane. Placing streetcar tracks in the center lane minimizes these conflicts and should reduce crashes.

This is not a new suggestion. A 2010 report by Alta Planning + Design entitled *Bicycle Interactions and Streetcar: Lessons Learned and Recommendations* studied Portland's streetcar system and reviewed international best practices for designing streetcars. The conclusion provides the following recommendations: Streetcar tracks and platforms should be center-running or left-running wherever possible.

1. Bicycle facilities should be separated from streetcar tracks as much as possible by:
  - a. Developing a parallel, excellent bicycle facility. (On the same road.)
  - b. Creating high-quality cycle tracks or bicycle lanes adjacent to streetcar tracks.
  - c. Offering 90 degree track crossings whenever possible, by positioning the bike lane or cycle track to cross at 90 degrees; signing and/or marking the best angle for turning
2. Develop a policy framework for future bicycle and streetcar integration, including:
  - a. Developing policies related to bicycle integration in streetcar planning processes.
  - b. Developing innovative design guidelines for integrated streetcar and bicycle facilities.
  - c. Developing performance measures to evaluate safety.
3. Create supporting programs for education and wayfinding.

DDOT's streetcar planning process must learn from past missteps and borrow ideas that work. Build Alternative One would create unnecessary bicycle hazards, increase crash rates, and discourage bicycle use in growing part of the city. We strongly recommend the center lane alignment and urge DDOT to reject Build Alternative One.

## **2. Bicycle access from Minnesota Ave to East Capitol St.**

East of Minnesota Ave, Benning Road narrows to 4 lanes flanked by standard sidewalks. Today, it is a signed bicycle route, and the MoveDC plan recommends upgrading the corridor with a trail extending to East Capitol St as a Tier 1 priority. Though there is limited right of way, neither build alternative would implement a trail, leaving bicyclists in a more hazardous road or on narrow sidewalks. Alternative 1 is unacceptable due to the curb running tracks. Alternative 2 would function as it does today for bicyclists, except where on-street parking would force bicyclists through the narrow gap between streetcar tracks on the left and car doors on the right. Either way, this project will negatively impact the signed bicycle route as proposed. The EA should recognize this significant impact to bicyclist mobility and provide options to mitigate. Since no convenient parallel route exists, the study should seriously examine full time parking restrictions, a road diet with bike lanes, or off-street bicycle accommodations.

## **3. The protected bike lane is a good idea, but needs improvement**

Both build alternatives provide an option for a two way protected bike lane (cycletrack) between Kingman Island and 36th St NE to separate bicyclists from pedestrians traveling between the Anacostia Riverwalk Trail and the DC-295 viaduct. This option would improve the visibility of bicyclists, reduce conflicts with pedestrians and, by removing a traffic lane, would make a slightly shorter pedestrian crossing. However, the proposed lane is too narrow and includes far too little buffer are in the context of this roadway.

The National Association of City Transportation Officials (NACTO) Urban Bikeway Design Guide, which DDOT endorses, calls for 12 feet (8 feet in constrained sections) to accommodate two way bicycle traffic in a cycletrack and a 3 foot buffer between bikes and traffic. Installing a cycletrack with any less than a 3 foot buffer would severely diminish the appeal of biking in the corridor, as few people will tolerate biking next to 35 mph car traffic. Even with the needed speed limit reduction and traffic calming, this cycletrack would need the full 3 foot buffer and a more substantial vertical delineator. At intersections, consider separate signal phases to protect bicyclists from turning vehicles, as well as colored paint and signage.

If the scope of the project does not allow additional right of way for a proper two-way protected bike lane, a westbound traffic lane should be removed as well to accommodate a westbound one-way protected bike lane. A standard one-way protected bike lane can easily fit into the space of a 10 foot traffic lane. Separate east and west bike lanes would reduce intersection turning conflicts, shorten pedestrian crossings, and simplify westbound cyclist movement through the Minnesota Ave intersection onto the bridge side path. One-way lanes do present some design difficulties though. Connecting westbound bicyclists to the Anacostia Riverwalk Trail entrance, which is on the south side of Benning Road, would require changes to the Anacostia Ave intersection to facilitate safe left turns, and connections from the northern bridge side path would need to be redesigned to safely transition bicyclists across the freeway off-ramp. Additionally, bicyclists traveling west would lose the protected lane after Kingman Island with no obvious bicycle connection.

#### **4. Benning Road needs a Road Diet**

Adding a streetcar and new bike facilities to Benning Road will create new transportation options, but without changing the road's car-first design, few residents will consider them. From the beginning, this project has assumed no changes to the number of lanes on Benning Road, yet that is what it needs. Without evidence to the contrary, we see a compelling case for traffic calming and a road diet to reduce Benning Road from 8 lanes to 6. Reducing the lanes from 8 to 6 still accommodates current car volumes and the additional 20 feet can be used for improved pedestrian spaces, protected bike lanes, short trees or stormwater improvements. Every transit rider would benefit from a 20 foot shorter crosswalk and bicyclists would benefit from the increased safety of a proper protected bike lane. A road diet would make Benning Road a better transit street to make the most of the streetcar for a growing resident population.

#### **5. Multi-use trails require careful design**

The proposed multi-use trail will be a major improvement for bicycle access, but careful design is needed to ensure it is safe in this auto-heavy context.

- Visibility at driveway crossings is often poor for vehicles entering and exiting, which creates a crash risk for bicyclists traveling at even a low speed. Pavement marking and signage should alert drivers to trail traffic and designs should seek to maximize sight lines.
- To be a useful and preferable alternative to riding in the street, the shared use path must consider more than ADA requirements. The 10 foot width should be maintained as the AASHTO required minimum 10 feet allows bicyclists and pedestrians to share the trail in both directions and allows faster moving trail users to safely overtake slower trail users. Where the trail must move behind a transit stop, it should be 10 feet at a minimum to allow safe mixing and maneuvering as travelers exit the transit stop.
- Curves in the trail should be designed to accommodate typical bicycle speeds, particularly approaching curb ramps and vehicle entrance ramps. Figure 2-14, for example, suggests a turn radius that is fine for pedestrians, yet too sharp to safely navigate by bicycle, especially larger vehicles like cargo bikes which are becoming increasingly popular.
- The actuated ("beg button") signal crossing at 36th street works against the goal of making the corridor accessible and safe for bicyclists and pedestrians. While a signal provides a safer crossing than an unsignalized crosswalk, there is often a considerable wait between pushing the button and the walk signal appearing, which makes crossing against the light a tempting shortcut for pedestrians and bicyclists.
- If an actuated signal is required, the button placement should be done with bicyclist access in mind. Activating the button should not require a cyclist to dismount or reposition the bicycle.
- Federal Highway Administration's publication *Designing Sidewalks and Trails for Access* provides useful guidance

## 6. Minnesota Ave and Benning Road intersection

The purpose and need chapter includes a lengthy description of vehicle crashes and pedestrian & bike safety concerns at the busy Minnesota Ave and Benning Road intersection stating that “an intersection reconfiguration is required to improve the overall level of service and geometry for pedestrians, bicyclists, buses, and vehicles.” Yet, the four substantial changes to intersection geometry deal with moving a greater volume of cars through the intersection. Certainly, greater order and smoother flow will reduce the last minute driver decisions that cause many crashes. However, not one of the proposed improvements offer a safer pedestrian or bicyclist experience.

Some changes are already planned as part of Phase II of the Minnesota Ave NE Revitalization Project, including a new pedestrian refuge island on the eastern leg of the intersection. And following DDOT’s High Crash Intersection Site Visit 2016 report, some short-term changes were implemented. This project should address the issues identified in that report, especially changing signal order to allow a Leading Pedestrian Interval crossing Benning Road, lessening the crosswalk setback on the west leg, and limiting high speed east to south right turns from the bridge. Additionally, this is a prime opportunity to design a safe bicycle transition from the westbound lane on Benning road to the suggested side path on the south side of the bridge

This intersection is a prime example of poor roadway design that encourages poor decisions and causes unnecessary crashes and preventable injuries. To achieve Vision Zero, we must take advantage of this rare opportunity to create an intersection that protects vulnerable road users. Now is not the time for incremental change.

Thank you for the opportunity to comment,

A handwritten signature in black ink, appearing to read "Greg Billing", enclosed in a dashed rectangular box.

Greg Billing  
Executive Director