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Comments of the Washington, DC Chapter of the Sierra Club on the
11th Street Bridges Draft Environmental Impact Statement
August 28th, 2006

The Sierra Club is the nation's oldest and largest grassroots environmental organization with more than 750,000 members nationwide, including more than 3,200 in Washington, D.C. The Washington, D.C. Chapter of the Sierra Club has a long history of advocating for a balanced transportation system that minimizes the impacts of transportation on the environment and neighborhoods, respects pedestrians and bicycle users and maximizes investment in transit.

The Draft Environmental Impact Statement (DEIS) for the 11th Street Bridges disappoints us on many levels, from its use of deceptive language to mask highway capacity increases and park impacts to its failure to present any real alternatives to reshape our city and reconnect its neighborhoods to the Anacostia River and its riverfront parks. Instead, it uses the outdated thinking of a previous generation on transportation and urban design that inflicted so much damage on our nation's urban areas.

The 11th Street Bridges DEIS is all the more disappointing because in the past decade, DDOT has evolved into one of the nation's most progressive transportation agencies. The DEIS goes against much of this new thinking, we hope that it does not signal a paradigm shift at DDOT. Other cities such as San Francisco, Portland, New York and Milwaukee have already removed freeways to much celebrated results, replacing them with light rail lines, bicycle paths and waterfront parks and promenades which have created major development opportunities that have bolstered their tax bases. Based on the DEIS, we fear that the District risks being left behind as other cities advance and reclaim themselves from the automobile and the mistakes of the postwar years.

We urge the District Department of Transportation (DDOT) to reject the DEIS and start afresh to produce a document that uses straightforward language and offers real alternatives. In the following, we ask several questions whose answers might seem obvious in the paradigm of postwar freeway building. But the District of Columbia has repeatedly and justifiably rejected this paradigm, and in our urban context, many of the assumptions of this paradigm need examining and many questions need answers.

General Comments

1. The DEIS consistently stresses that the freeway capacity (or number of lanes) will remain

the same and that local lanes will be “provided” rather than “added.” As we explain below, this language is misleading and should be revised.

2. The DEIS fails to place the 11th Street Bridges into the context of citywide transportation decisions. Given its projected cost of \$500 million, which is certain to grow, the project should make clear that, when combined with the cost of the South Capitol Street Bridge, there will likely be little funding for other transportation investment, particularly in the planned streetcar system that is crucial to improving mobility for District residents and reducing traffic and air pollution. District Residents will pay for these bridges; what they do not realize is that they may be doing so at the expense of future transit improvements.
 3. The DEIS dismisses the reality that the project as presented will create an Interstate shortcut through the District that will draw thousands of cars and truck through the District. There is no discussion the effect of cars using the new connections as a means to get from Baltimore to Richmond. Currently the mainstream way is 95 (eastern Beltway), the secondary way is a diversion via DC295/I295, and the tertiary way is 495 (western Beltway).
- Q. 3-1: What is the anticipated interstate status of each section of the project?
4. DDOT repeatedly mentions that the Middle Anacostia Crossings (MAC) study recommended addition of the new freeway connection as a justification for the additional capacity.
- Q. 4-1: Did the MAC study have an Environmental Impact Statement or a similar study of consequences?
- Q. 4-2: Does DDOT regard the MAC study as policy?
5. The project treats 23 USC Section 138 (popularly known as section 4(f)) as a recommendation rather than the law of the land. Given the major impact that this project will have on Anacostia Park, Virginia Avenue Park, and the Anacostia Community Boathouse, the DEIS should include a much more serious Section 4(f) analysis and alternatives that seek to satisfy 4(f) requirements.
 6. Entirely absent from the DEIS is any acknowledgement of the conscious and deliberate rejection of freeways and freeway planning that the citizens of the District of Columbia undertook in what was one of the first and most significant manifestations of home rule. Likewise, the widely acknowledged destructive and divisive effects of the freeways that were built is given no mention. Several important recent studies, including the South Capitol Street Gateway and Improvement Study, and the National Capital Planning Commission’s “Comprehensive Plan for the National Capital” call for removal of freeways, in particular the Southeast/Southwest Freeway, and the DEIS does not mention these reports either.
 7. Given that 43% of households in the study area do not have access to a vehicle, the DEIS should be more focused than it is on pedestrians, bicyclists and transit users. Although better connected and wider bicycle and pedestrian space on the bridges themselves is welcome, the DEIS gives no mention of mitigation of the impact the additional traffic created by the bridge will have on bicyclists and pedestrians on neighborhood streets adjacent to the bridge. As for transit users, the DEIS only looks at construction impacts on a few bus routes and does not include any discussion of ongoing planning for new transit services such as streetcars.
 8. One of the stated goals of the project is to reduce traffic congestion on local streets, however traffic, and therefore congestion, is projected to increase on: Pennsylvania Ave on both sides

of the river, the Southeast/Southwest freeway, on M St, on 11th St, on DC-295, on 25th St, on Martin Luther King. Jr Ave at U Street, and on Minnesota Avenue at Pennsylvania Avenue.

9. Build Alternative II involves a traffic circle on the west side of the river. Throughout the DEIS, however, there is no attempt to explain what benefit a traffic circle might bring. Because this option would take a large fraction of Virginia Avenue Park, it can not be said to improve aesthetics. We feel that the inclusion of the traffic circle alternative represents a “straw man” alternative, certain to be shown to be inferior on further study, and included only in an attempt to increase the alternative count.
10. The Anacostia Community Boathouse is a tremendously valuable asset to the city. Through its facilities and programs, it connects Washingtonians from all walks of life to the River. The benefits it provides outweigh any potential benefit from expanded bridge capacity. The alternatives to be considered should have been constrained to maintain this structure.
11. At several points, the DEIS states that traffic signage in the study area is confusing and incomplete. We do not dispute this, but we do hope that signage can be improved without a \$500 million+ expenditure.

Biased language

12. The DEIS employs language that, although standard in transportation engineering, is inherently biased towards road construction. Words in transportation planning are biased when their general usage implies a good (or bad) thing, and the actual thing they are describing is only good (or bad) for motorists and perhaps bad (or good) for pedestrians, bicyclists, transit users, the environment, or urban design. The DEIS should seek to use neutral language instead. Words that are biased:

improvement when roadway widening is meant

upgrade/downgrade when altering roadways to increase or decrease speeds is meant

abandoned when a choice not to do something was made deliberately and for good reasons

incomplete when the choice not to build something was made deliberately and for good reasons

missing suggests that something, even when not in place for good reasons, ought to be in place

accident suggests that most car crashes involve no fault on the driver’s part

failure when too many cars are present

forced when talking about routes motorists can and cannot take, because driving is a choice and privilege to begin with

13. The language policy adopted by the city of West Palm Beach, FL, in 1996, is a good model for avoiding biased language. A memorandum explaining this policy, available from www.lgc.org is a good guide to implementation of neutral language.

Capacity should decrease

14. The phenomenon of induced traffic is by now well documented. Essentially, roads generate traffic: when new capacity is provided, it fills up within a few years. This is a specific instance of a phenomenon that economists refer to as Jevons Paradox, in which an increase in the efficiency of the consumption of some resource actually leads to a greater rate of resource consumption. MWCOG has looked at induced traffic, specifically in light of the failure of the expansion of I-270 in Maryland in the late 1980s to produce any long-term reduction in traffic congestion. This is summarized in MWCOG Publication #21653, "Induced Travel: Definition, Forecasting Process, and a Case Study in the Metropolitan Washington Region."
15. Induced traffic has also been documented in traffic engineering literature in papers such as Mark Hansen and Yuanling Huang, "Road Supply and Traffic in California Urban Areas," *Transpn. Res.-A*, v. 31, p. 205 (1997) and Lewis M. Fulton, et al., "A Statistical Analysis of Induced Travel Effects in the U.S. Mid-Atlantic Region," *J. Transp. Stat.*, vol. 3, no. 1, p. 1 (April 2000). These and other results show that a substantial amount of new traffic on expanded roadways is the result of expanded capacity alone.
16. The reverse phenomenon has recently been demonstrated as well: when roadway capacity is reduced, traffic is not simply shifted to alternate paths, but much traffic actually vanishes. As we mention above, successful freeway removal in San Francisco, New York, Portland, and Milwaukee demonstrate that capacity reduction does not lead to traffic chaos. This has been fully documented by looking at approximately 100 cases of capacity reduction in the report "Traffic Impact of Highway Capacity Reductions" by Sally Cairns, Carmen Hass-Klau, and Phil Goodwin, Landor Publishing, 1998, ISBN 1899650113.
17. Together, both the induced traffic of increased capacity and the reduced traffic of capacity reduction suggest that traffic modeling could be made much simpler than it is: roads in DC will be full at rush hour. This should open the door to traffic planning based around desired traffic volumes instead of an attempt to out-build future traffic projections.

Options that should be considered

18. Alternatives that keep or reduce the existing bridge footprint, but which seek to solve structural redundancy and lane configuration problems, should be studied.
19. Alternatives that keep the same number of lanes, four in each direction, should be studied, both with and without segregation of local and freeway traffic.
20. An alternative with a local bridge only, together with expanded transit services, should be studied.
21. To avoid taking parkland, alternatives that make a connection to northbound DC-295 without ramps using a signalized intersection should be studied.
22. Options which facilitate the removal of the Southeast/Southwest freeway, as is called for in several planning documents, should be considered.
23. Options which facilitate the conversion of Kenilworth Avenue and DC-295 into a grand urban boulevard, with signalized at-grade intersections that facilitate access to Anacostia Park from nearby communities, should be considered.

24. An option should be considered that includes the construction of grade separated streetcar tracks on the bridge, as was proposed by DDOT in 2002.

Comments on Chapter 4

25. Chapter 4 acknowledges that plans to extend the Southeast/Southwest Freeway across the river “were abandoned.”

Q. 25-1: Why were they abandoned and what has changed that warrants reversing that policy?

Comments on Chapter 5

26. The alternatives shown in this chapter are not real alternatives. A careful examination of the “wish-list” of bridge features on p. 5-18 will reveal that many of these items are mutually incompatible and the claims that the Alternatives satisfy several goals simultaneously are only made by incomplete analysis.

27. Section 5.1, p. 5-2 describes the general capacity of the proposed bridges and states that these “improvements” “would not increase through-put or capacity of the existing system.” However, the traffic modeling in Chapter 8, in Exhibits 8-1 and 8-2, shows an increase in total 11th st bridge traffic of between 47300 and 50000 cars per day, as compared to the no-build scenario.

Q. 27-1: How can the claim that throughput would not be increased be reconciled with the traffic modeling which shows an increase in throughput?

28. The current bridge functions as both a local and a freeway bridge. Some of the current bridge capacity is being used for local traffic, and this capacity should be subtracted from the total bridge capacity to calculate the existing freeway capacity. Therefore existing freeway capacity is less than four full lanes in each direction, and the proposal to build four freeway lanes in each direction is, in fact, increasing freeway capacity. Thus the claims in Section 5.1 that “the capacity of the freeway system serving this area of Washington, DC and the neighborhoods east of the river would not change” is misleading at best.

Q. 28-1: What fraction of existing bridge capacity is used by local traffic? Is this considered a significant amount of traffic?

Q. 28-2: If local traffic is not a significant amount of traffic, why is it necessary to build an additional four-lane local bridge to accommodate it?

Q. 28-3: If local traffic is a significant amount of traffic, why was it not subtracted from the total bridge capacity to determine the existing freeway capacity?

29. Alternatives II, III, and IV all include an interchange between the Anacostia freeway and the local bridge. All Alternatives also include on and off ramps to local streets west of the river. Each of these build alternatives gives northbound and southbound traffic on the Anacostia freeway an opportunity to enter the local bridge directly from the freeway off-ramp without using local streets, cross the local bridge, and re-enter the freeway after a block or two.

Therefore none of Alternatives II, III, or IV can be truly said to separate local and freeway traffic, because freeway traffic can use either bridge. This is tacitly acknowledged on page 5-19, in which the interchange “provides for redundant movements across the river on both the local and freeway spans.”

- Q. 29-1: How is the acknowledgement of “redundancy” and the ability of freeway traffic to use either bridge consistent with the goal and statement that the Alternatives separate local and freeway traffic?
- Q. 29-2: Were participants in outreach events and meetings informed of the fundamental incompatibility between the ideas of “separating freeway and local traffic” and providing access to freeways from local streets?
- 30.** The fact that Alternatives II, II, and IV permit the possibility of freeway use of the local bridge means that some of the capacity of the local bridge must be considered to be freeway capacity, thus the freeway capacity of these Alternatives must be larger than four lanes in each direction, and therefore the statement that these alternatives do not increase freeway capacity is misleading at best.
- 31.** No mention is made of specific improvements to the bicycle access of the local bridge from-neighborhood streets east of the river in the study area. This is insufficient in light of a review of the MAC study text regarding current conditions: “Bicycle facilities and amenities within the Middle Anacostia River region are generally not widespread. Specifically, the amount of bicycle trails and walkways connecting neighborhoods to neighborhoods as well to the Park and Anacostia River are sparse in relation to the size of the study area.” A mitigation strategy should be added to ensure improved bicycle and pedestrian access from surrounding neighborhoods on both sides of the river.
- 32.** In Alternative IV, where an at-grade local access road from Historic Anacostia links to the new proposed bridge, no mention is made of how bicycle and pedestrian facilities would be incorporated for access to Anacostia Park for bicyclists and pedestrians on the upstream bridge. In fact, bicycle and pedestrian facilities are indicated which would connect the Capitol Hill area to Anacostia Park without crossing lanes of auto traffic, but no such amenities appear to be provided to link Anacostia Park with the Historic Anacostia neighborhood directly.
- 33.** While each of the build alternatives allows for a pedestrian tunnel under (or bridge over) the Anacostia Freeway, each option would also allow for “Local access to Anacostia Park via the revised access to the local river crossing roads rather than the current access at Good Hope Road. Ties to three local streets—Martin Luther King, Jr. Avenue, Good Hope Road, and 13th Street—would be reconfigured, depending upon the build alternative selected.” The current underpass alignment provides greater ease of access to Anacostia Park from Historic Anacostia than the proposed overpass alignments appear to offer. Based on the maps, and given the paucity of details regarding the alignment of bicycle and pedestrian pathways, the proposed overpass alignments appear to be substantially more “obstructive alternatives” than the existing underpass near Historic Anacostia. These overpasses will increase travel distance required to reach the park when traveling over the proposed overpass access point as opposed to the current underpass alignment from Anacostia.
- 34.** The bicycle/pedestrian paths indicated on the study maps do not show any access to Anacostia Park from the upstream-side path.

- 35.** The bicycle and pedestrian access to the bridge for Alternatives II, III, and IV is nearly as bad as the current situation. The one-paragraph discussion on page 5-21 cites Exhibit 5-7 as evidence for better bicycle and pedestrian facilities. However, Exhibit 5-7 only shows the bicycle/pedestrian facilities in the middle of the bridge and no detail is given for the connections of these facilities to the rest of the street and sidewalk network. Inspection of Exhibits 5-5 and 5-4 show that the bicycle/pedestrian paths that are interrupted several times by freeway onramps. This will create a dangerous situation.
- Q. 35-1: For each alternative, are bicyclists and pedestrians expected to access the bridge only from Anacostia Park and the ramp that leads to Anacostia Drive?
- Q. 35-2: Will the bicycle and pedestrian paths be continuous from the bridge to streets in Anacostia neighborhood, in particular Martin Luther King Jr. Ave?
- Q. 35-3: Will right-turning motorists using the ramps to connect between the Anacostia freeway and the bridge be given the right-of-way, or will they be made to stop and yield to bicyclists and pedestrians when crossing the bicycle path?
- Q. 35-4: Are traffic signals planned or other traffic calming measures planned at the intersection of the ramps and bicycle/pedestrian paths? Are these accounted for in the construction estimates given in Exhibit 5-11?
- Q. 35-5: What would be the Bicycle Level of Service (BLOS) for the bicycle paths between Martin Luther King Jr. Ave and the local bridges for each of the alternatives?
- 36.** Exhibit 5-7 shows a streetcar in the local lanes of the bridges. Indeed, the District of Columbia Transit Improvements Alternatives Analysis Final Report of October 2005, and all streetcar planning that preceded it, calls for streetcar crossings of the 11th Street bridges linking a line using the CSX tracks east of the river with a line using M Street SE. However, it is not clear that this eventual use is being accommodated in the present project as there is no evidence that sufficient space will be available for the tracks to make connections from the bridge to the streets.
- Q. 36-1: Would this streetcar share this lane with motor vehicle traffic or would it be exclusive right-of-way?
- Q. 36-2: Would crossing gates be installed at the Anacostia Freeway ramps in Alternatives II, III, and IV to protect the streetcar?
- Q. 36-3: Would streetcar tracks be installed at the time of bridge construction, in the same manner that DDOT will be installing streetcar tracks on H Street NE in anticipation of near future use?
- Q. 36-4: Do the budget estimates in Exhibit 5-11 include any streetcar facility costs?
- Q. 36-5: Can overhead catenary or trolley wire necessary to power streetcars of the type shown in Exhibit 5-7 be installed continuously across the bridge?
- Q. 36-6: Does each of the alternatives permit the linkage of the cross-bridge streetcar tracks to a future streetcar line on M Street SE, a line that has been present on all proposed streetcar maps?
- Q. 36-7: Does each of the alternatives permit the linkage of the cross-bridge streetcar tracks to a streetcar line using or parallel to the CSX tracks east of the river, as the Anacostia starter line is planned to do?

Q. 36-8: The concept drawing on page 23 of DDOT's September 18th, 2002 presentation to the DC City Council on the "City Council Hearing on the District of Columbia Transit Development Study" shows a streetcar on the 11th Street bridge on exclusive right-of-way that is completely separated and fenced off from both pedestrian/bicycle lanes and the roadway. Why was this streetcar configuration not studied as an alternative?

Comments on Chapter 6

37. This chapter consolidates information from several sources and other reports to give a comprehensive description of the environment, history, demographics, and infrastructure of the study area. Unfortunately, through selective use of sources and by employing biased language, it gives an incomplete and misleading account of the study area.

38. As stated above, there is no mention of the South Capitol Street study nor the NCPC plans, both of which recommend removal of the Southeast freeway. Other omissions indicate an incomplete analysis of existing traffic conditions. There is good reason to suspect that the truck-car mixture will be significantly altered with the connection of DC-295 to the 11th Street bridges and therefore it should be studied thoroughly in the DEIS.

Q. 38-1: Why is there no mention or study of truck traffic, or of the relative mixture of trucks and cars on DC-295 and the 11th Street bridges compared with other freeways in the area?

39. The DEIS makes frequent reference to "longer distance regional travelers" without defining this term or making any attempt to quantify their use of roadways. If these travelers are sufficiently regional and their trips sufficiently long, existing freeway-only routes using I-295 or I-495 currently exist.

Q. 39-1: What trip origins and destinations, and what trip lengths, qualify as "longer-distance regional travelers"?

Q. 39-2: What is the license plate (DC/MD/VA/other) distribution of these travelers?

Q. 39-3: How many such travelers are there, and what fraction of current traffic on the 11th street bridges do they represent?

40. Re: 6.2.7, Exhibit 6-16. As this exhibit notes, 43% of study area households do not have access to a car. We feel that transportation planning and spending in DC should give first priority to this group, as they are more reliant on public transit and on walking and bicycling. Public transit, cycling, and walking have traditionally not received as much emphasis as private motor vehicles, and improvements to these modes benefit all.

Q. 40-1: What effort was made to ensure that the car-less households in the study area received proportional representation in public input on this study and the studies that fed into this study?

41. Re: 6.4.4, p. 6-51, and Exhibit 6.36, p. 6-53. The region's air quality is measured by the Air Quality Index, which is computed by first converting the concentration of each potential pollutant into an AQI score, with different conversion factors for each pollutant, and then taking the maximum of these scores, which then defines the Air Quality Index. So long as

there is at least one pollutant that is causing poor air quality, the fact that other potential pollutants are improving or are at good levels is not relevant. A linear least-squares fit to the yearly ozone data in Exhibit 6.36 has a slightly positive slope, approximately +0.3 ppb/year. This means that ozone pollution is likely rising and certainly not falling.

- Q. 41-1: In light of non-decreasing ozone pollution, how can the statement in section 6.4.4 that “air quality is improving” be justified?
- Q. 41-2: Re: 6.4.4, p. 6-55. Does the statement “for ozone precursors, the trend shows emissions leveling off through 2030” indicate that current non-conforming ozone pollution levels will continue at the present level through 2030?

The goal should be to decrease those levels.

- 42.** Re: 6.14.4, p. 6-137. Assessing the visual impact of the Southeast freeway and the 11th Street bridges, the DEIS highlights a 34-year old award given to the elevated Southeast Freeway from the American Institute of Steel Construction, an industry trade association with a vested interest in the construction of structures, such as the Southeast Freeway, that make extensive use of steel. This award is not the only relevant commentary on the aesthetics of the freeway. Indeed, many people would consider the freeway a form of urban blight.
- Q. 42-1: Why does the DEIS fail to acknowledge or mention the conclusion of another AWI transportation study, the South Capitol Street Gateway and Corridor Improvement Study, that “South Capitol Street will not be an urban gateway worthy of the nation’s capital without removing the Southeast Freeway”?
- Q. 42-2: Likewise, why does the DEIS fail to acknowledge or mention the National Capital Planning Commission’s recommendation, in its “Comprehensive Plan for the National Capital” and in other documents, that the “Southeast/Southwest freeway interrupts the urban fabric of the District of Columbia” and should be removed?
- 43.** Re: 6.16.1, p. 6-141:
- Q. 43-1: Which “prior studies” were the ones that “determined that the most important and cost-effective improvements... would be to provide the missing connections”? Most important for what purposes? Cost-effective in terms of what benefit per dollar spent?
- Q. 43-2: Why is there no discussion of the reasons why the “regional plans” of the mid-1960s were rejected by the District of Columbia?
- Q. 43-3: Why does this section mention regional traffic that uses neighborhood streets but not mention regional traffic that is choosing an alternate route altogether, such as the Beltway?
- Q. 43-4: Why is there no mention in this section of the large and deleterious volumes of traffic that the Barney Circle Freeway studies showed would have been added to local streets?
- Q. 43-5: Is the definition of “regional transportation network” referred to here restricted to roadways? What would be considered a “complete” “regional transportation network”?
- Q. 43-6: Whose access, and to what, is “limited” by the “spillover traffic”?
- 44.** Re: 6.16.2 compared to 6.17: We object to the relative lack of detail and weight given to cyclists and pedestrians compared to that for motorists. We feel that this is antithetical to DDOT’s commitment to considering transportation the business of moving “people” and not

simply “cars.” Section 6.16.2 has a street-by-street analysis of conditions for motorists, and casts a pejorative light on “traffic signals” and “pedestrian [activity]” which in several cases are said to contribute to “congested traffic conditions.”

Q. 44-1: Why is there no comparable street-by-street analysis of conditions for bicycles and, separately, for pedestrians?

Q. 44-2: Why is there no mention of locations where the lack of “traffic signals” is contributing to a hostile environment for pedestrians?

45. Re: 6.16.3, p. 6-145: The DEIS states that “nonstandard” “features” “appear to affect... capacity adversely.”

Q. 45-1: Is increasing freeway capacity a goal of this project?

In Chapter 5, it is claimed that the build alternatives will not increase freeway capacity.

Q. 45-2: How are “potential modifications” that would fix “nonstandard features” that “adversely” affect “capacity” consistent with the claim that freeway capacity will not be increased?

The DEIS states that “lack of connections from the neighborhoods to the freeways” is a “nonstandard feature” to which “modifications” “should be considered.”

Q. 45-3: How is this consistent with the stated goal of separating “regional” and “local” traffic?

The DEIS states that “longer-distance regional travelers” must use either Howard Road or local streets to access the bridges.

Q. 45-4: Why is there no mention of the fact that, if these travelers are sufficiently regional, or their distances sufficiently long, that routes using I-295 or I-495 are also available?

46. Re: p. 6-148: The DEIS states that “rehabilitation” would not address “non-redundant features” of the bridge.

Q. 46-1: Is this use of the word “rehabilitation” the same as defined on page 6-147?

Q. 46-2: Is it possible to fix the non-redundancies in the existing bridges through some type of work that would presumably be more extensive than rehabilitation as defined on p. 6-147?

At the July 26th, 2006 public hearing, DDOT officials stated that the bridges could be rehabilitated at a cost of about \$40 million, and further, that these structures could be improved to incorporate redundant engineering features for about \$80 million. DDOT should study the opportunity cost of spending the difference between this amount and the build Alternatives on transit expansion.

47. Re: 6.17: Bicycles are vehicles and pedestrians are not vehicles. Bicycles are subject to traffic law and are supposed to be operated on streets; in the downtown core (which is not within the study area) bicycles are prohibited from using the sidewalk. Pedestrians are supposed to use sidewalks and crosswalks. These differences warrant separate sections and separate discussions. The discussion of bicycling conditions—on Anacostia Drive, for example—implies that sharing of the road between bicycles and cars is negative. DDOT’s current bicycle map rates Anacostia Drive, in its present state, as a “good” road for bicyclists.

48. Re: 6.17: As earlier sections lament “missing connections” and “abandoned plans” for motor vehicle traffic, the section on bicycle conditions should also note that the DC bicycle plan of 1976 was also abandoned and nearly completely un-implemented.
49. Re: 6.19.3, p. 6-155. The discussion of LOS should mention that traditional LOS takes no account of the conditions a street presents for bicyclists, pedestrians, or transit users. Comparable discussion of an equivalent “level of service” for pedestrians, bicyclists, and transit users should be included.
50. The transportation section of the current draft of the revised DC Comprehensive Plan, being prepared by the DC Department of Planning with input from DDOT, notes that “traditional LOS measures are not appropriate in a built out city” and that in DC, “level of service measures must integrate vehicular, bicycle, pedestrian, and transit travel.” Proposed policy T-1.1.2 and proposed Action T-1.1-A spell this out. We take these statements to be indicative of current transportation thinking at DDOT. The DEIS should reflect the position that traditional LOS is not appropriate for urban environments.
51. In Section 6.18, p. 6-152, the DEIS states: “As volumes [“along the 11th Street bridges corridor”] continue to increase, lack of capacity will increase the number of traffic accidents along the corridor.”

Q. 51-1: How is this implicit recommendation to increase capacity consistent with the statement that this project will not increase freeway capacity?

To enhance safety, the focus should be on reducing traffic volumes.

52. In Section 6.19.1 the DEIS states “Existing traffic access in the study area can best be described as indirect and circuitous.”

Q. 52-1: Access to what and by whom?

On each side of the river, within the study area, a grid of streets creates several direct routes between most origins and destinations, except when obstructed by barriers such as the Southeast/Southwest Freeway.

Q. 52-2: For which origin/destination pairs within the study area are the only routes indirect and circuitous?

Q. 52-3: What fraction of all origin/destination pairs do these indirect/circuitous-only pairs represent?

Comments on Chapter 7

53. Under the section “Neighborhood Cohesion” the DEIS states that “connectivity within neighborhoods would be unchanged. Connectivity on both sides of the Anacostia River is anticipated to be enhanced” On the contrary, connectivity on Capitol Hill is substantially diminished by the existing structure, which is a form of urban blight. This blight is a psychological obstacle to connectivity within and among the Anacostia, Fairlawn and Capitol Hill neighborhoods. It is equivalent to a physical barrier because it diminishes individuals’ willingness to pass from one area to another. Regarding Visual Impacts, the EIS states, “One set of

large man-made structures will be replaced by another set of large, man-made structures” and “most of the differences are subtle.” Instead of replacing one bad structure for another, this situation makes a strong case for removal of the Southeast/Southwest Freeway and construction of a local bridge and an expanded transit system.

54. In Anacostia Park, the areas of the park that are most accessible from Good Hope Road and from nearby housing will suffer from vastly diminished parkland due to conversion to transportation uses.

55. The EIS includes no mitigation strategy for the impact on woodland and scrub-shrub habitat.

Q. 55-1: What are the mitigation measures for this loss of habitat?

56. In Section 7.2.2, p. 7-10, under Parks and Recreation, the claim is made that the Virginia Avenue Park will experience a net benefit: “the potential mitigation measures planned for Anacostia Park and Virginia Avenue Park are expected, however, to result in a net benefit to those parks in spite of the proposed impacts.”?

Q. 56-1: What is the justification for this statement, considering the park will be reduced in size by about one-fourth in options II, III, and IV?

Q. 56-2: What mitigation measures are planned?

Q. 56-3: How much new parkland will be provided?

Q. 56-4: How far from the existing Virginia Avenue Park will the new parkland be?

Q. 56-5: Will the new parkland be on the same side of the Southeast/Southwest freeway as Virginia Avenue Park?

57. On Page 7-3, in the section covering Neighborhood Plans, one Ward 6 objective is “to minimize traffic congestion.”

Q. 57-1: How is this reconciled with the traffic model results that show increased traffic on several local streets in Ward 6?

Comments on Chapter 8

58. In Section 8.2, the DEIS states that future traffic volumes were calculated “to represent future roadway networks” by including transportation projects listed in MWCOG’s Constrained Long-Range Plan and Transportation Improvement Program, however no list of such projects is contained in the DEIS.

Q. 58-1: What presently un-built transportation projects were included in the traffic modeling?

59. Section 8.3, and Exhibits 8-1 and 8-2 only show traffic volumes on the Southeast freeway as far west as 2nd street SE.

Q. 59-1: Were traffic volumes further west on the Southeast/Southwest freeway and on I-395 calculated as part of the traffic modeling?

Q. 59-2: If so, what are the traffic volumes in each Alternative, and in the no-build, at the Southeast/Southwest Freeway interchange with South Capitol Street, where the Southeast/Southwest freeway merges with I-395, in the I-395 North tunnel, and on the 14th Street bridge?

60. Section 8.3.2: The DEIS shows that additional capacity of the 11th Street Bridges will increase traffic volumes on 11th Street SE by 4000 cars/day, on M Street SE by 10000 cars/day, and on Pennsylvania Avenue SE by 2600 cars/day.

Q. 60-1: What steps will be implemented to mitigate this additional traffic on a densely populated, pedestrian- and transit-oriented neighborhood?

Q. 60-2: On Tyler Elementary School and its recreation areas at 11th & I Streets SE?

Q. 60-3: On Van Ness Elementary School on M Street SE?

Q. 60-4: On the Arthur Capper senior housing complex on M Street SE?

Q. 60-5: On historic Lincoln Park?

Q. 60-6: On pedestrian and bicycle access to the Eastern Market and Potomac Avenue Metro stations?

Q. 60-7: On pedestrian and bicycle access to neighborhoods commercial areas?

Q. 60-8: On efforts to revitalize neighborhoods commercial areas, especially along Pennsylvania Avenue SE near Barney Circle and near Randle Circle?

61. In Section 8.3.4, the definition of “induced traffic” is substantially different from the one that MWCOG uses. Induced traffic is not a “shift,” as the DEIS states, but the actual generation of additional traffic as the result of expanded roadway capacity. The definition used by MWCOG in Publication #21653 is: “Any increase in total daily travel over an entire transportation system that results from a change in transportation system capacity.” In light of the definition used in the DEIS, it is likely that the entire discussion of induced traffic is flawed.

Q. 61-1: Why does the DEIS use a definition of induced traffic that is substantially different from MWCOG’s?

Q. 61-2: How has the method the DEIS uses to study induced traffic been validated?

Q. 61-3: In particular, can this method accurately predict the traffic conditions that developed in the case study that MWCOG’s induced traffic report examined, those on I-270 in Maryland after expansion from 6 to 12 lanes, using the data that was presented to justify the expansion in the first place?

We note that Section 8.3.2, p. 8-6, does acknowledge induced traffic: “As a primary arterial in a fully developed urban environment, any reduction in demand along Pennsylvania Avenue as a result of the 11th Street bridges project provides the opportunity for traffic from other nearby facilities to utilize excess capacity. Therefore, the total volume of traffic on Pennsylvania Avenue is expected to remain fairly static. . .”

62. Section 8.3.5: The DEIS clearly states that all four build alternatives will increase traffic on the 11th Street Bridges.

Q. 62-1: Is increasing traffic on the 11th Street bridges a goal of this project?

Q. 62-2: Shouldn’t DDOT be working to reduce traffic volumes?

63. In Section 8.7.2, p. 8-16, it is stated that “Pedestrian and bicycle access to the park will be maintained along the existing Good Hope Road corridor, either through a tunnel or pedestrian/bicycle bridge, as well as provided along the new access road.” The maps all show the proposed pedestrian tunnel to be approximately 2300 feet from Good Hope Road.

Q. 63-1: How can this pedestrian tunnel be said to be in the “Good Hope Road corridor”?

64. Section 8.8.2: The DEIS states that most of the build alternatives would decrease travel times between selected points by 3-4 minutes. Given that 37% of District households do not own a vehicle, improving travel time by 3-4 minutes for motorists does not seem to be the best way to spend \$500 million of scarce transportation funds.

65. Section 8.10, re: Safety impacts on pedestrians and bicyclists: While all four build alternatives could provide a welcome increase in pedestrian and bicyclist safety on the bridges themselves, increased traffic in neighborhoods, particularly on 11th Street SE, M Street SE and Pennsylvania Avenue SE will endanger them. Additionally, the at-grade crossing of freeway ramps in Alternatives II,III, and IV is troubling, as most bicycle accidents are the result of crossing and turning movements.

Q. 65-1: What steps will be implemented to mitigate the effect of increased traffic on bicyclists?

Q. 65-2: How has the bicycle safety of at-grade freeway ramp crossings in Alternatives II,III, and IV been evaluated?

66. Section 8.12 states that the corridor is not a “major link for long-distance freight movement.” The study needs to examine the possibility that it would become a major link if DC-295 were connected directly to the bridge leading to the Southeast freeway.

Q. 66-1: What is the justification for assuming that the corridor would not become a major freight link if DC-295 were connected to the bridges?

67. Re: section 8.13

Q. 67-1: Will bicycle and pedestrian access across the bridges be maintained throughout construction?

Comments on Chapter 9

68. In general, Chapter 9 of the DEIS falls far short of what 23 USC 138 (popularly known as “section 4(f)”) requires. Although it discusses existing park amenities and features, it provides no detail regarding how the impacts (which are not minor) of the various build alternatives on Anacostia Park, Virginia Avenue Park and the Anacostia Community Boathouse will be mitigated. We are especially concerned about the loss of a substantial portion of land in both parks to expanded freeway facilities. Given the major impacts, it is not appropriate to wait until the final EIS to identify mitigation strategies.

69. Section 9.1: The DEIS cites 49 USC 303.

Q. 69-1: Since the 11th Street Bridges is a highway project, isn’t the relevant law 23 USC 138 rather than 49 USC 303?

70. Section 9.1: 23 USC 138 allows for negative impacts on parks and historic sites only if “there is no feasible and prudent alternative to the use of such land and such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use.” The DEIS falls far short of this standard.

71. Section 9.1.2: The Code of Federal Regulations interprets 23 USC 138 to require that if parkland is taken or impacted by a highway project, then a net benefit must be provided. The DEIS fails to identify any specific net benefits. Given the scarcity of parkland on both sides of the bridge and the loss of a major recreation amenity (Anacostia Community Boathouse), such mitigation measures should be identified early in the process, not in the final EIS when opportunity for public comments is limited.

72. Section 9.3.1: The DEIS frames this issue as either destroy buildings in a low-income, minority, historic neighborhood or take some parkland. This “either/or” scenario is disingenuous at best.

Q. 72-1: Why does DDOT limit the scope of the project only to alternatives that set up this “either/or” scenario?

73. Section 9.3.1: The DEIS limits its evaluation only to physical impacts. The DEIS should look at the increased noise and air pollution impacts on parks and historic neighborhoods on both sides of the river.

74. In Section 9.3.1, the avoidance alternative considers east-of-the river connections similar to Alternatives II and III, but not Alternative I. Since Alternative I does not include an interchange between the Anacostia Freeway and the local bridge, it involves fewer ramps, and it is more likely that a feasible avoidance alternative could be found based on Alternative I than on the other Alternatives.

Q. 74-1: Why was no avoidance alternative considered that had no interchange between the local bridge and the Anacostia freeway?

Q. 74-2: Why was no avoidance alternative considered that did not involve ramps connecting the bridges to DC-295, but used an at-grade intersection instead?

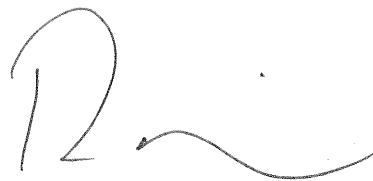
75. Section 9.7: The taking of land from Virginia Avenue Park appears to violate Section 6(f) of the Land and Water Conservation Fund Act. Given the scarcity of federal park and conservation funds, we question the wisdom of doing so without clearly identifying mitigation measures in the immediate vicinity of this park.

Q. 75-1: Does the Land and Water Conservation Fund Act allow for the conversion of land acquired or improved with its funds to other uses if mitigation measures are implemented?

Q. 75-2: Would the District of Columbia be required to return Land and Water Conservation Fund money to the Federal Government if portions of Virginia Avenue Park were taken in order to build this project?



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