



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

Representing the communities of Burleith, Georgetown, and Hillandale

3265 S Street, NW • Washington, DC 20007

(202) 724-7098 • anc2e@dc.gov

July 3, 2022

Councilmember Mary Cheh
Chair, Committee on Transportation and the Environment
Council of the District of Columbia
1350 Pennsylvania Avenue NW, Suite 108
Washington, DC 20004
mcheh@dccouncil.us

RE: DC Council Bill B24-0673 – the “Safer Intersections Amendment Act of 2022”

Dear Councilmember Cheh,

On May 31, 2022 ANC 2E held its regularly scheduled public meeting, which was properly noticed and attended by five commissioners, constituting a quorum. At this meeting the Commission adopted the following resolution by a vote of (4-0-1) with regard to the above-referenced matter:

On February 18, 2022, Councilmember Cheh, along with Councilmembers Nadeau, Allen, Lewis George, and Henderson, introduced the “Safer Intersections Amendment Act of 2022”. The intent of this amendment is critical – to support Vision Zero, which seeks to eliminate traffic fatalities and serious injuries by 2024. Simultaneously, this amendment also addresses the city’s goals of reducing the share of commute trips made by single-occupancy vehicles to 25% by 2032. Councilmember Cheh notes that in order to accomplish both of these worthy initiatives, our traffic laws must reflect these goals. To line up these stated goals with roadway laws, the Councilmembers propose two changes to our traffic code:

1. largely prohibiting right turns at red lights, and
2. legalizing and prescribing elements of the “Idaho Stop” for riders of personal mobility devices. The Idaho Stop allows riders to treat red lights as stop signs and to treat stop signs as yield signs.

ANC 2E has spoken with Councilmember Cheh’s legislative assistant who noted that the DC Council’s Committee on Transportation and the Environment will be marking up a bill that will contain portions of the “Safer Intersections Amendment Act of 2022” at some point before the DC Council’s July recess. With this in mind, the ANC hereby

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shares its comments and concerns about the proposed “Safer Intersections Amendment Act of 2022”.

Regarding Restricting Right Turns at Red Lights

On January 2, 2019, ANC 2E voted unanimously to support a resolution which addressed the establishment of “no turn on red” restrictions at selected signalized intersections via the District Department of Transportation’s (DDOT) Notice of Intent (NOI) #18-227-TOA. As part of that resolution, the ANC stated:

“As for the purpose of this NOI, ANC 2E expresses concern that if there is no ability to turn right on red, there may be no time that pedestrians are held at this crossing area and, as such, the right-turning traffic from 29th Street NW will hold up any left or northbound traffic when the light finally turns green. While the ANC supports DC’s Vision Zero goals, the ANC has concerns about unintended consequences of this proposed change. Per the ANC’s previous correspondence with DDOT, the ANC requests clarification on how this change, if implemented, will affect traffic in the neighborhood. As such, ANC 2E cannot support NOI #18-227-TOA in its current form and looks to DDOT to provide clarification and remedies for the concerns expressed herein.”

ANC 2E is grateful that proposed changes to “no turn on red” were not made in Georgetown.

New legislation is now being proposed by the DC Council which would eliminate the ability to make a right turn on red citywide except in very limited circumstances. Specifically, the proposed language reads:

- (c)(1) DDOT may permit motor vehicle operators to make a right turn when facing a red traffic control signal at an intersection only if the agency:
 - “(A) Determines that allowing a motor vehicle operator to make a right turn when facing a red traffic at an intersection control signal would improve safety at that intersection; and
 - “(B) Publishes the agency’s rationale for why permitting motor vehicle operators to make a right turn when facing a red traffic control signal would improve safety at that intersection on the agency website.
- “(2) Motor vehicle level of service shall not be a basis for the determination made under paragraph (1)(A) of this subsection that permitting motor vehicle operators to make a right turn when facing a red traffic control signal would improve safety at that intersection.

ANC 2E applauds the committee for actively taking steps to ensure that critical Vision Zero goals are met. The ANC shares the committee’s concerns about rising traffic fatalities and serious injuries and wholly supports legislation that, as a core goal, aims to reduce such injuries and fatalities. However, the ANC notes that there are also certain

scenarios where the potential for significantly deteriorated traffic conditions could result as an unintended consequence of this legislation being proposed. Specifically, the ANC is concerned that this language does not address any scenario where significant vehicular traffic is moving across a principal arterial and while significant numbers of pedestrians are also visiting a highly trafficked commercial corridor, as is the case in Georgetown and, likely, in other highly trafficked mixed-use neighborhoods across the city.

Should this proposed legislation be passed, ANC 2E can envision a scenario across M Street NW and Wisconsin Avenue NW in Georgetown where right-turning vehicles will be held at almost all times until pedestrians finishing crossing the street, which is often at the end of the light cycle. The result of the vehicles being held will be building traffic congestion that is blocks long because vehicles will rarely have the opportunity to make a right turn, as is born out even today when trucks block turn lanes in places like, for instance, the intersection at Wisconsin Avenue and M Street NW. Upon examination, at this intersection, when the turn lane is blocked with trucks, right turning vehicles join the forward (northbound) moving traffic lane but must wait for pedestrians to stop crossing the street in order to make a right turn, to travel east, off of northbound Wisconsin Avenue NW. Because cars waiting to make a right turn limit the number of cars able to move through the intersection during any light cycle, as intended, blocks long backups build. While the ANC certainly appreciates the significant safety related concerns predicating this new legislation, the ANC notes that we make these suggestions not because of individual vehicular users' sense of convenience but rather because we believe that the real potential for the unintended consequence of significant traffic backups on this principal arterial merit exceptions to the "no turn on red" rulemaking proposed in order to avoid new and massive blocks long traffic backups, particularly during rush hour.

If such exceptions to the right turn on red ruling are deemed inappropriate, ANC 2E asks the committee to contemplate other engineering strategies to ensure traffic conditions do not deteriorate at certain intersections citywide, including adding right turn arrows at relevant intersections in order to provide vehicles the necessary time to move through intersections safely without unnecessarily holding forward moving traffic.

Regarding New Idaho Stop Rulemaking

The second policy change contemplated in this legislation is, as Councilmember Cheh writes, to "legalize and prescribe elements of a practice commonly called the "Idaho Stop" for riders of bikes, e-bikes, scooters and other personal mobility devices. The Idaho Stop allows riders to treat red lights as stop signs and treat stop signs as yield signs." Councilmember Cheh notes in her cover letter that "By adopting this legislation, the District would join eleven other states that have already adopted versions of the Idaho Stop."

ANC 2E notes that, according to the most recent National Highway Traffic Safety Administration (NHTSA) fact sheet on this topic, only four states allow both treating red

lights as stop signs and treating stop signs as yield signs. The ANC asks the committee why it believes that both elements are safe and appropriate in our dense urban city, noting that the four states which have this legislation in place are Arkansas, Idaho, Oklahoma, and Utah, where the ANC imagines the roadway conditions differ from our dense urban communities. Even Delaware, which Councilmember Cheh notes has experienced a significant 23% drop in bike related crashes at stop signs, only allows bikers to treat stop signs as yields. Delaware does not allow bikers to proceed through red lights.

ANC 2E strongly supports the creation of safer conditions for micromobility users. The ANC looks forward to learning more about how the Idaho Stop would improve conditions on roadways, understanding the committee's examination of the tradeoffs, and receiving information, importantly, about how the committee envisions changes related to the Idaho Stop would be enforced.

Commissioner Lisa Palmer (2E05@anc.dc.gov) is the Commission's representative in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'LP', written over a faint horizontal line.

Lisa Palmer
Vice Chair, ANC 2E