

CAPITOL HILL RESTORATION SOCIETY



December 20, 2013

Sanjay Kumar, P.E.
Program Manager, Anacostia Waterfront Initiative
DC Department of Transportation
IMPA/District Department of Transportation
55 M Street, SE
Washington, D.C. 20003
By mail and email to: sanjay.kumar@dc.gov

Subject: Barney Circle and Southeast Boulevard Transportation Planning Study

Dear Mr. Kumar:

As requested at the public meeting concerning this study held on November 21, 2013, the Capitol Hill Restoration Society (CHRS) submits comments concerning the subject study. CHRS representatives Beth Purcell and Shauna Holmes attended the November 21 meeting, along with over 200 other concerned residents.

Summary

With one possible exception, DDOT has failed to show that this project is needed. Any increase in green space is minimal. Most of the residents attending the November 21 meeting apparently saw no benefit to underground parking. Having seen DDOT's presentation and concepts, CHRS contends that DDOT has shown no need for this \$20 million project. We believe that the real purpose of this project is to open the door to the "park road," a commuter road from Barney Circle to RFK Stadium, which CHRS continues to oppose. We believe that this project is an example of "segmentation" at its worst. DDOT should be upfront about its plans for the park road, shelve this study, and open a new comprehensive study covering the Southeast Boulevard, Barney Circle and the park road.

DDOT has also failed to show that the project will improve the health and welfare of the Capitol Hill community. In fact, the project will worsen the already poor air quality for residents of L Street, SE and nearby areas. The evidence available from the project concepts show that

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highway traffic will be closer to L Street, and will worsen the air quality and health. DDOT has failed to study how the proposed concepts affect air quality.

One element of this project may be beneficial -- the pedestrian and bicycle connection to the waterfront. DDOT's concepts for the Southeast Boulevard show how the connection could be constructed, including a ramp to the south side, leading down to the waterfront. However, DDOT's concepts for the Southeast Boulevard show a connection wide enough for two automobiles, and that the connection could easily be converted to vehicle use. CHRS believes that the pedestrian and bicycle connection is a good idea and that that it should be possible to construct a pedestrian and bicycle connection without the Southeast Boulevard. There are pedestrian and bicycle connections over highways that are not part of any overpass for vehicles. We urge DDOT to study this alternative, which should cost far less than \$20 million.

Increased air pollution from a Southeast Boulevard will harm the Capitol Hill community

Even if it were needed, the Southeast Boulevard should not be built if it will increase air pollution for nearby residents. Any benefits of the boulevard cannot justify the harm to residents' health from increased air pollution. Significant pollutants in motor vehicle emissions which are harmful to humans include:

- Carbon monoxide (CO) is a colorless gas emitted from combustion of motor vehicles burning fossil fuels (e.g., gasoline). Prolonged exposure to high levels of CO can cause headaches, drowsiness, or heart disease.
- Ozone (O₃), the main ingredient in smog, which interferes with the transfer of oxygen within the body.
- Small particulate matter (PM_{2.5}) Particles of soot and smoke (resulting from motor vehicles) smaller than 2.5 microns in size are particularly dangerous to humans because they penetrate the human respiratory system's defenses, damage the respiratory tract, and penetrate into the lungs.

Ozone and PM_{2.5} are associated with serious public health problems including premature mortality, aggravation of respiratory and cardiovascular disease, aggravation of existing asthma, acute respiratory symptoms, chronic bronchitis, and decreased lung function.

There is data on the current air quality near the 1400 block of L Street, SE. See Virginia Avenue Tunnel Draft Environmental Impact Statement (DEIS), Appendix C.¹ The Environmental Protection Agency (EPA) establishes National Ambient Air Quality Standards (NAAQS) for pollutants. According to EPA, the area near L Street is currently a maintenance area for carbon monoxide (CO), a marginal nonattainment area for ozone (O₃) and a nonattainment area for small particulate matter. Maintenance is a good score for air quality. Nonattainment means that the area is not in compliance with NAAQS. DEIS page 4-35. This means that people on the

¹ The DEIS shows a Limit of Disturbance near the 1400 block of L Street, SE. DEIS Appendix C.

area near the 1400 block of L Street are already breathing elevated (nonattainment) levels of small particulate matter, a dangerous pollutant.

The next question is how any of the Southeast Boulevard concepts will affect the air quality for people on L Street, SE. A number of studies have shown that people living or otherwise spending significant time within 200 meters +/- of major highways are exposed to freshly-emitted air pollutants of particulate matter, oxides of nitrogen and CO more than people living at a greater distance, even compared to living on busy urban streets. Relative concentrations of these airborne emissions decrease exponentially between 17 and 150 meters downwind from the highways, while at 300 meters measurable emissions concentrations were the same as at upwind sites.² This means that decreasing the distance of the road from people living on L Street, SE will result in increasing the air pollution. The chart below shows the approximate distances between L Street, SE and the Southeast Boulevard in the various concepts.³

Concept	SE Blvd below or at grade with L Street, SE	Distance from L Street to SE Blvd in feet	Distance from L Street to SE Blvd in meters
2A	At grade of L Street	76 feet	24.9 meters
2B	At grade of L Street	76 feet	24.9 meters
3A	Below L Street	54 feet	17.7 meters
3B	Below L Street	54 feet	17.7 meters
4A	Below L Street	134 feet	43.9 meters
4B	Below L Street	136 feet	44.5 meters

The Southeast Freeway is approximately 55 feet below L Street, SE, which likely reduces effects of air pollution. (There is no section/measurement for no-build (Concept 1).) Looking at the other concepts, it is possible to assess the distance between L Street and the Boulevard. In all the concepts, the nearest edge of the road is within 200 meters of L Street. Concept 2A and 2B move the boulevard to the same level as L Street, and within 24.9 meters of L Street. It appears that Concept 3A and 3B move the road closest to L Street, at 17.7 meters. Concepts 4A and 4B move the road furthest from L Street, at approximately 44 meters. Concepts 4A and 4B appear to have more contiguous green space, which would make Concepts 4A and 4B the best from a public health standpoint. DDOT has presented no data in this study concerning the effects of the project on the health of area residents. If in fact, one of more of the concepts will reduce air pollution on and near L Street, SE, DDOT needs to research, demonstrate, and communicate these findings. In a cost/benefit analysis for the Southeast Boulevard, the costs are increased air

² Hitchins J, Morawska L, Wolff R, Gilbert D. Concentrations of submicrometre particles from vehicle emissions near a major road. *Atmospheric Environment*. 2000;34:51–59. doi: 10.1016/S1352-2310(99)00304-0. <http://www.ehjournal.net/content/6/1/23>.

³ Measurements were calculated using the sections for the concepts. The sections provide measurements for some elements, such as the pedestrian path (10 feet). Where the sections omitted measurements, a distance was calculated using the same scale as the elements with measurements. One foot equals 0.305 meters.

pollution, and a detrimental effect on the health of residents. The benefits are a possible increase in green space and parking for intermodal transportation. People's health must come first. The Southeast Boulevard should not be built.

Underground parking for the proposed Southeast Boulevard

At the November 21 meeting, there was discussion of potential uses for an underground multi-modal parking facility. Apparently few residents saw a need for underground parking. As one resident remarked, "Most of us do not have a bus." Parking for people attending games at the planned soccer stadium was mentioned. The soccer stadium will be more than 14 blocks from the Southeast Boulevard, a long walk. If soccer fans arrive on buses, those buses can drop people off at the stadium and then park the buses at the RFK Stadium lots. Many soccer fans will probably use Metrorail, as do many baseball fans attending Nationals games. People attending large events in Washington often arrive by charter buses, which park at the RFK Stadium lots, and then walk to the Stadium-Armory Metro.

Several residents at the November 21 meeting expressed concerns about public safety problems with underground parking, which we share. CHRS believes that DDOT has still not identified any need for underground parking, or for the project as a whole.

No "Park Road"

The harm to public health and the minimal benefits of the project clearly point to the real purpose of the project, which is to open the door to building a "park road" from Barney Circle to RFK Stadium. The Barney Circle concepts show an exit to a park drive. The Barney Circle project is an example of "segmentation" of a large comprehensive transportation project into mini-projects in an attempt to avoid the public's scrutiny of the comprehensive project.

The RFK Stadium Access Road is a narrow paved road running from Barney Circle to RFK Stadium. Vehicle access is generally barred, and the access road is seldom used, and has been opened for vehicle access during certain RFK Stadium events. For these reasons, it is safe and enjoyable to walk and bicycle on the RFK Stadium access road which is part of the Anacostia Riverwalk Trail. Preservation of natural habitat is a goal of the Anacostia Waterfront Initiative.

For several years, since at least the Middle Anacostia River Crossings Transportation Study (2005), DDOT has mentioned constructing a 1.6 mile road for vehicles from Independence Avenue to Barney Circle, passing along the Anacostia River, through the RFK Stadium property, and next to Reservation 13 and Congressional Cemetery. By DDOT's estimates, 5,000 vehicles a day would use the park road.⁴ CHRS believes, as do many in the community, that this would be a commuter road running through our neighborhood. There is no need for a park road:

⁴ DDOT's Middle Anacostia River Crossings Transportation Study, (2005) p. 6-4, "Project 9: RKF Stadium Access Road Resurfacing/Rehabilitation," discusses "... opening the existing RFK Stadium Access Road for daily traffic. ... This roadway is seen by some as a viable option for providing access to

- The park road is not needed for development of Reservation 13. The developers' detailed responses to the RFI for Reservation 13 contemplated access to Reservation 13 only from 19th Street, Independence Avenue, and Massachusetts Avenue extended (as well as other nearby extended streets). There is no park road on any of their proposals. See DMPED December 2008 Reservation 13 public meeting materials. These developers were willing to invest hundreds of millions of dollars, based on the existing streetscape, and without any park road.
- We also note that the National Capital Planning Commission requires that Massachusetts Avenue, SE terminate in a circle on the west side of the river.
- RFK Stadium is already accessible by vehicle from 17th Street, SE (which is two-way from Barney Circle to Potomac Avenue). See "More Changes Ahead for 11th Street Bridge," Washington Post, March 10, 2013, p. C-2.

Any park road would destroy wildlife habitat, and increase noise and pollution. It would also destroy this section of the Anacostia Riverwalk Trail, one of DC government's outstanding accomplishments. CHRS opposes any park road, and opposes any changes or upgrading of the RFK Stadium Access Road.

Pedestrian and bicycle connection to the waterfront or vehicle connection to the waterfront

Many people cheered when DDOT announced at the meeting on November 21, 2013 that there would be only pedestrian and bicycle connections and no vehicle connections from L Street to the waterfront.⁵ This is very good news -- CHRS advocated an exclusively pedestrian and bicycle connection in its comments to the February 21, 2013 meeting. However, we question whether DDOT is really committed to a no-vehicle connection. All the concepts for the Southeast Boulevard show a narrow pedestrian/bicycle path (10 feet wide in the sections for the concepts), but the connection to the waterfront is much wider than the pedestrian/bicycle path, and wide enough to allow two automobiles to pass in opposite directions at the same time. There will be traffic signals to cross the Southeast Boulevard which could be used by pedestrians, bicyclists, or motorists. Only bollards prevent vehicles from traversing the connection to the waterfront. Bollards are easy to remove. The concept drawings represent what DDOT plans to build, and DDOT has put the community on notice. If DDOT truly intends to build a connection

the Capitol Hill area, Independence Avenue and Kenilworth Avenue via the East Capitol Street Bridge. Several issues currently make this project difficult to implement. First it is estimated that if opened to everyday commuter traffic, the access road would carry approximately 5,000 vehicles per day." This estimate appears very low, and further traffic studies are needed. The report notes that the road would need to be widened and partially realigned, and continues, "At this time it is uncertain if an agreement could be reached among the numerous stakeholders who utilize the access road to implement the necessary improvements." The estimated cost in 2005 was \$1,132,000. This estimate appears very low.

⁵ See "Results from Preliminary Travel Demand Models." The four-lane Southeast Boulevard and no-vehicle connection to the Southeast Boulevard was selected to be carried forward for further study. The other alternatives were not carried forward.

that can only be used by pedestrians and bicyclists, DDOT must revise all the concept drawings to show a narrow connector suitable only for pedestrians and bicyclists, and announce publicly that the connection will be for pedestrians and bicyclists only.

It appears that it would be possible to build a pedestrian and bicycle connection to the waterfront without building the Southeast Boulevard. See for example the pedestrian and bicycle overpass on US Route 50 near the Seven Corners shopping center. CHRS urges DDOT to explore this possibility.

Kentucky Avenue/17th Street, SE

CHRS commends DDOT for adding these streets to the study area. There is an inexpensive project that DDOT could undertake that would improve safety at the 17th Street and Potomac Avenue intersection. Seventeenth Street is one-way southbound. As drivers on 17th Street approach Potomac Avenue, it is clearly marked that the right-hand lane is right- turn only onto Potomac Avenue. The left-hand lane is marked left-turn or straight. Nevertheless, many drivers in the right-hand lane do not turn right as required, but instead go straight, angering the drivers in the left-hand lane. Minor road-rage is the constant result. In 2009 (or earlier) at a public meeting held at 921 Pennsylvania Avenue, SE, a DDOT representative promised that DDOT would fix this problem as follows: On the southwest corner of the intersection of 17th Street and Potomac Avenue, a concrete bulb-out would be built on 17th Street. Drivers in the right-hand lane at this intersection would realize that if they failed to turn right as required, they would drive right into the concrete bulb-out on the other side of the intersection, and this would encourage them to turn right. This bulb-out was never built. Please build it now.

Sincerely,

Janet Quigley

Janet Quigley
CHRS President

cc:

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