



Government of the District of Columbia  
**Advisory Neighborhood  
Commission 6C**

March 2, 2017

Ms. Alice Kelly  
Manager, Policy and Governmental Affairs  
District Dept. of Transportation  
55 M Street, SE, Suite 400  
Washington, DC 20003

David Glasser  
General Counsel  
District Department of Motor Vehicles  
95 M Street, S.W., Suite 300  
Washington, D.C. 20024

Re: Second Vision Zero Proposed Rulemaking

Dear Ms. Kelly and Mr. Glasser:

On February 8, 2017, at a duly noticed regularly scheduled monthly meeting of ANC 6C, with a quorum of six out of six commissioners and the public present, the current matter came before ANC 6C. The commissioners voted 6-0 to oppose DDOT's second proposed Vision Zero rulemaking.

While ANC 6C supports the effort to reduce traffic fatalities, we feel that the reduction of fines from the first proposed rulemaking is the wrong direction. In our letter dated January 19, 2016 addressing the first proposed rulemaking, we supported high fines as a general method for discouraging the most dangerous driving activities, and argued for *increased* fines over what was proposed for infractions. Instead, the fines as proposed in the second rulemaking are lower than in the first proposed rulemaking. Indeed, the narrative accompanying the latest rulemaking fails even to acknowledge, let alone substantively address, our earlier criticisms.

Additionally and importantly, in the latest Vision Zero draft there is no proportionality between the fine amounts and the seriousness of many offenses. For example, the fine for a driver striking a cyclist—which the first rulemaking would have increased to \$500—is now the same (\$150) as for a cyclist colliding with a pedestrian, despite the far greater likelihood of death or severe injury from the former.

Other violations creating a risk of severe injury are likewise penalized less under the new rulemaking:

- **Driving on the sidewalk.** Under the initial proposal, the fine would have increased to \$200. ANC 6C urged that this be increased, but instead DDOT now proposes an increase only to \$150.
- **“Dooring” a cyclist.** The first rulemaking would have increased the fine for this all-too-common offense to \$100. We urged a higher fine, but here too, DDOT now proposes a fine of merely \$50.

In our prior letter, ANC 6C also urged DDOT to increase the penalty for running a red light—currently \$150—to \$250, and we further urged that the regulations make it a criminal offense (punishable by a fine and up to 90 days in jail) to do so when pedestrians are entering or about to enter the crosswalk. DDOT not only ignored this suggestion, but even lowered the fines for numerous red-light violations (such as “no turn on red”) from the first rulemaking.

Finally, the second proposed rulemaking includes a series of fines directed at cyclists and pedestrians, the most vulnerable populations using our streets and sidewalks. The infractions are ones that likely would result in injury to the pedestrian or cyclist, yet the District is proposing fines on a similar scale to more dangerous actions by drivers of motor vehicles.

While high fines are themselves not a sufficient measure to protect our residents from dangerous traffic, they do send a message that the District is serious about safety. By proposing lower fines and not appropriately scaling them for more serious infractions, DDOT’s latest rulemaking fails to achieve the stated objectives of its larger Vision Zero initiative.

Accordingly, we object to the second proposed rulemaking in the strongest possible terms. It unjustifiably fails to deter dangerous driver behavior, and at the same time fails to properly distinguish between infractions with very different levels of potential harm.

Thank you for giving great weight to the views of ANC 6C.

Sincerely,



Karen Wirt  
Chair, ANC 6C

cc: The Hon. Charles Allen, Councilmember, Ward 6  
The Hon. Mary Cheh, Councilmember, Ward 3 and  
Chair of the Committee on Transportation & the  
Environment