March 18, 2019

Dan Emerine
Manager, Policy and Legislative Affairs Division
Office of the Director
District Department of Transportation
55 M Street, S.E., 7th Floor
Washington, D.C. 20003

Re: Vision Zero/Bicycle-Lane Safety Proposed Rulemaking (66 DCR 1906)

Dear Mr. Emerine:

On March 13, 2019, at a duly noticed, regularly scheduled monthly meeting of ANC 6C, with a quorum of 6 out of 6 commissioners and the public present, the Commission voted 6-0 to adopt the positions set forth in this letter.

ANC 6C strongly supports the objectives of the proposed rulemaking, which clarifies and expands the protections for bicycle lanes in DCMR Title 18. In hopes of further improving upon DDOT’s proposed language, we offer the following technical comments:

- **Section 2405.2**: As written, the amendment to this subsection would result in an ungrammatical sentence. We believe that the language in need of deletion is “when necessary to avoid conflict with other traffic, or”.

- **New section 2405.7**: The rulemaking does not add a corresponding penalty provision to section 2601.1 (civil fines for non-moving violations). This omission should be cured.

We also note that current section 2600.1 (civil fines for minor *moving* violations) contains, oddly, a penalty provision for “stopping, standing, or parking a vehicle in a bicycle lane” (immediately above “Safety zone, driving through”). Because this non-moving violation belongs instead in section 2601.1, and because the current language cites to section 2405.1, from which the existing bike-lane clause is being deleted, we recommend deleting this penalty entry from the table in section 2600.1.
Thank you for giving great weight to the views of ANC 6C.

Sincerely,

Karen Wirt
Chair, ANC 6C