



COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, NW
WASHINGTON, D.C. 20004

CHRISTINA HENDERSON
Councilmember, At-Large

Committee Member
Government Operations and Facilities
Health
Labor and Workforce Development
Transportation and the Environment

August 10, 2022

Director Everett Lott
District Department of Transportation
250 M St SE
Washington, DC 20003

Dear Director Lott,

As you may know, my colleagues and I have been engaged in conversation about how to improve traffic safety and accountability. The District has lowered speed limits and is deploying various traffic calming tools, but enforcement also must be part of the conversation. Over the years, we have sought to move away from using the Metropolitan Police Department (“MPD”) for routine traffic safety enforcement, and as a result have relied more on our automated traffic enforcement (“ATE”) program. Per DDOT, as of this month, there are 92 active cameras at various sites around DC, and I believe there is a plan to add more than 100 more new cameras before the end of this calendar year.

From an enforcement and accountability standpoint, however, the ATE program needs some work. If you are pulled over by an MPD officer for going 25 miles an hour over the posted speed limit, you receive a fine as well as 5 points assessed against your driving record. If an ATE camera captures your vehicle going 25 miles an hour over the posted speed limit, you only receive a fine, but consequences are limited if you choose not to pay. Due to a combination of Council actions over the years, accountability components of the ATE program have been weakened, but it also has not changed the behavior of some very dangerous drivers on our streets. I am trying to work on legislation to change this, but the lack of transparent information from DDOT about the ATE program is making it incredibly difficult.

As part of the Fiscal Year 2021 Budget Support Act of 2020, the Council required DDOT, in consultation with the Department of Motor Vehicles, to report on aspects of the ATE program on a semi-annual basis ([DC Code § 50-2209.05](#)). One component DDOT was asked to include was the locations where cameras have been added in the last 6 months and the reasons why those locations were chosen. As you know, one of the persistent criticisms of the ATE program is that camera placement is driven by revenue, not traffic safety. Further, that the number of cameras in the eastern areas of the city versus the west results in predominately black neighborhoods

bearing the brunt of automated traffic enforcement. The Council requested justification for the new locations to help dispel these notions. It is important information as we work to foster trust in the effectiveness of ATE as the District seeks to move away from using police officers for traffic safety enforcement.

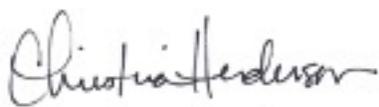
Thus, you can imagine my disappointment and frustration when I read DDOT's most recent ATE report for the second half of Fiscal Year 2021 ([RC24-147](#)) and found the response on this matter wholly inadequate at best. Between April 1, 2021 and September 30, 2021, ten new speed cameras were added and one new stop sign camera. As for the reasons for each location, DDOT simply wrote:

“Camera types and locations are selected after a traffic safety analysis using crash, traffic volumetric and speed data and location type. If approved as a suitable site for automated traffic enforcement, a review for feasibility is then conducted prior to installation.”
(pg.13)

This response provides absolutely no insight. What did the traffic safety analysis of these locations show? How many crashes, if any? Were these locations selected in part by the request of Advisory Neighborhood Commissions or community organizations based on ongoing issues? We have a responsibility to be transparent, but I also think as a government we have a responsibility to educate and explain. Opponents of ATE will look at the [most recent list](#) of camera enforcement sites and hone in on numbers without context. The public will look at the recent ATE report which is supposed to provide clarity and be confused. For example, according to the report a camera was added at the 4100 block of Southern Ave SE sw/b and 4700 block of Southern Ave SE ne/b on July 29, 2021. About a month later, on September 9, 2021, two cameras were added to the 4200 block of Southern Ave SE. It would have been helpful if the reported indicated the cameras from July were actually removed.

Those of us who believe that the ATE program can be improved and promote traffic safety are hamstrung in our efforts by the lack of documentation provided by DDOT. Therefore, I am asking that DDOT provide **detailed** justification based on your traffic safety analysis for each new camera added in the District between January 1, 2022 and August 1, 2022. As crash, traffic volumetric, and speed data was used as the basis for the decision to place cameras in those locations, I know that your agency has this information on hand. This will greatly help in efforts to strengthen the ATE program. I look forward to receiving your response by August 24, 2022. Further, it is my hope that DDOT will include this level of detail in future ATE reports to the Council. If you or your staff have any questions, please feel free to reach out to me or contact my Legislative Director Gabrielle Rogoff at grogoff@dccouncil.us.

Best,



Christina Henderson
Councilmember, At-Large

DISTRICT DEPARTMENT OF TRANSPORTATION

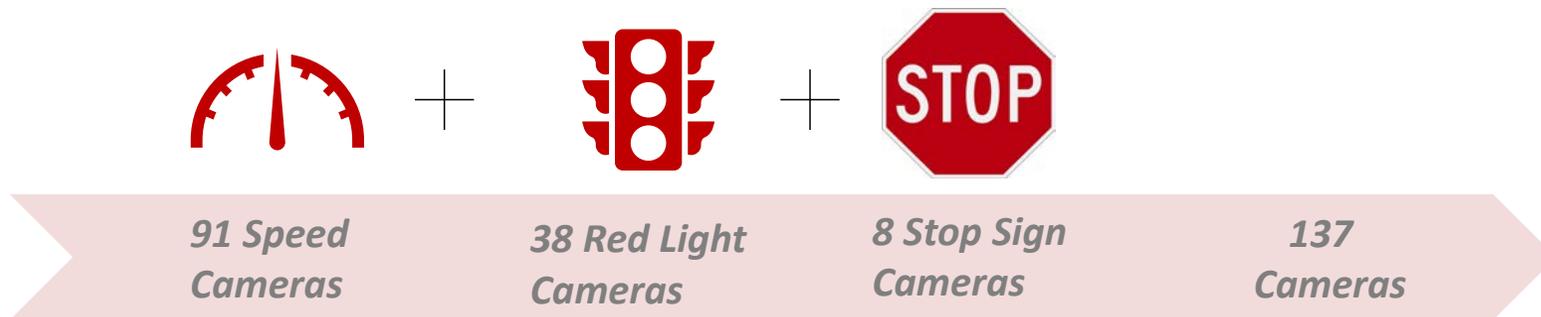


ATE Program Siting Criteria and Enforcement Overview



Program Overview

- The Automated Traffic Enforcement (ATE) program uses photo-enforcement cameras as a traffic calming measure to enforce traffic laws and to reduce violations along DC's streets and intersections.
- After locations are analyzed by the Traffic Safety Investigation team, the ATE team determines deployment feasibility and if approved completes signage, distributes a press release, and deploys the camera with a 30-day warning period.





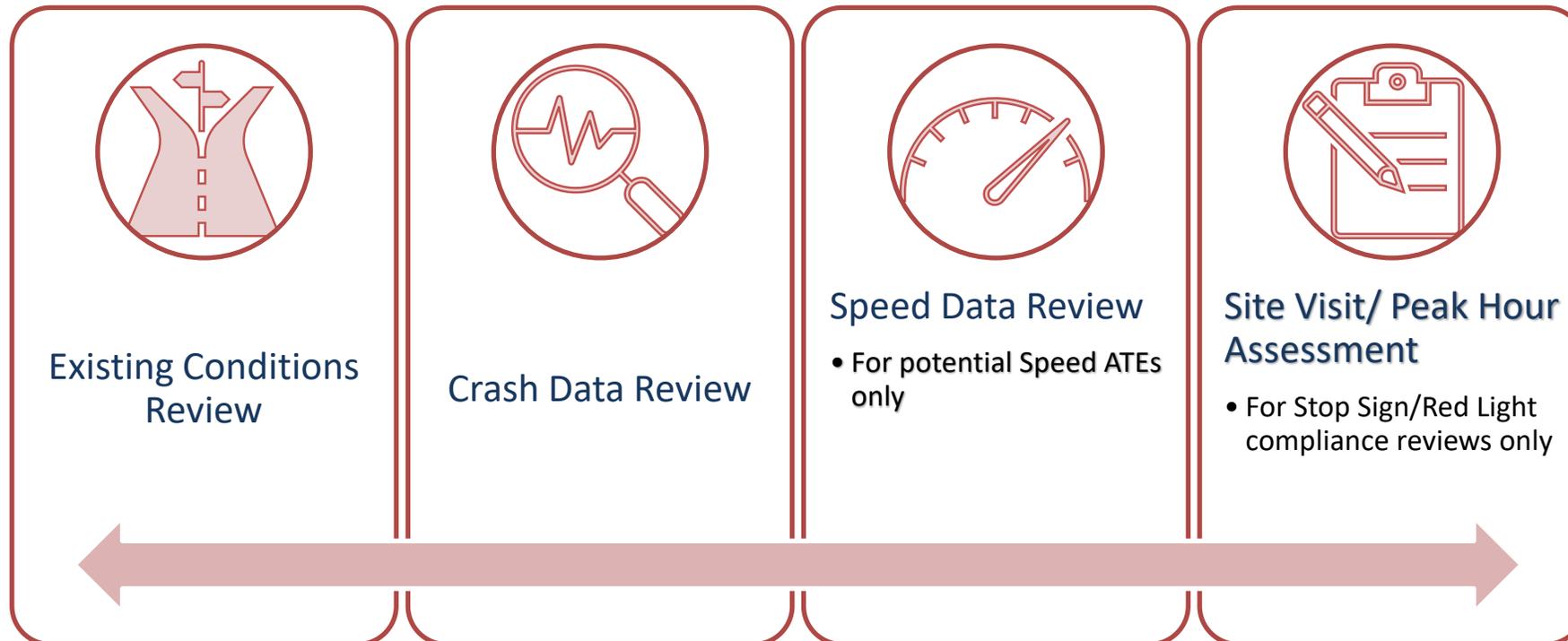
Request Origins

- 311 Requests submitted by residents, CMs & ANCs
- Emails from residents, ANCs, Council (routed internally to the Safety Team)
- Fatal Crash Review Process
- Engineering & Safety Studies Field visits
- Requests from MPD



Criteria Used for Screening Process

Requests will be analyzed by Traffic Safety Assessment team using the following metrics



Screening Process Cont.

Existing Conditions Review → Analysis of existing roadway profiles with focus on pedestrian and bicycle infrastructure and nearby pedestrian generators.

Crash Data Review → Available Police-Reported Crash Data Review for the past 3 years with an emphasis on persistent crash types or patterns. Vulnerable user crash analysis is a focus.

Speed Data Review → 48-hour continuous speed data is collected and analyzed along the subject block. Data is broken down by three hours blocks to review if speeding occurs during a particular time of day, including overnight hours.

Site Visit (Peak Hour Assessment) → On-site field visit is made to assess the level of violations at the intersection.

Example of Safety Assessment Worksheet

District of Columbia Department of Transportation Speed Camera Site Assessment Worksheet

Location: 200 -700 Malcolm X Avenue SE

Posted Speed Limit: 30 MPH

Date: August 2021

Criteria	Details									
Crashes	<ul style="list-style-type: none"> Jan 2018 – July 2021 (3.5 years). 118 police-reported crashes, 34 of which involved injuries. 2 Fatal crashes—Left Turn crash at the MLK Jr. Avenue intersection (500-600 Block) and Pedestrian crash at the north leg crosswalk of the Oakwood Street (300-500 block) intersection. 6 pedestrian crashes; 0 Bicycle crashes. Most common crash types – Rear end (25 crashes); Side swiped (21 crashes) 									
Existing Conditions	<p>Land use is low-to-medium residential. All intersections along the corridor are unsignalized, with the exception of MLK Jr. Avenue.</p> <p>The roadway profile along the corridor consists of the following:</p> <ul style="list-style-type: none"> Between 2nd Street and Newcomb Street: one travel lane, one bike lane, and one parking lane. Between Newcomb Street and MLK Jr. Ave: two travel lanes with sharrows. Between MLK Jr. Ave and 8th Street: two travel lanes with a parking lane on the south curb. <p>Parking regulation along the corridor consists of the following:</p> <ul style="list-style-type: none"> Unrestricted parking is available in both directions from the 200 block to the 300 block. Unrestricted parking is available in the westbound direction from the 300 block to the 500 block. Unrestricted parking is available in the eastbound direction from the 300 bl no par No pa MLK Jr Unres MLK Jr in wes Unres 600 bl directi <p>Aerial photogr crosswalks are (north leg) into Oakwood Stre and west legs)</p>									
	<table border="1"> <tr> <td>Pedestrian Generators</td> <td>Yes, Friendship PCS South East Elementary School MLK Jr. Avenue), Martin Luther King Jr. Elementary via MLK Jr. Avenue), Greater Fellowship FGBC (on Street), and the Entertainment and Sports Arena (Sycamore Drive).</td> </tr> <tr> <td>School Zone?</td> <td>No</td> </tr> <tr> <td>Additional Information</td> <td></td> </tr> <tr> <td>ATE Requested by</td> <td>Traffic Engineering and Safety Division</td> </tr> <tr> <td>Speed Camera Recommended?</td> <td>Yes, a camera is recommended in the eastbound c The percentage of enforceable vehicles (13% on tl with the fatal pedestrian crash near the 300 block may reduce speeds along a stretch of roadway the freeway off-ramp to a residential street.</td> </tr> </table>	Pedestrian Generators	Yes, Friendship PCS South East Elementary School MLK Jr. Avenue), Martin Luther King Jr. Elementary via MLK Jr. Avenue), Greater Fellowship FGBC (on Street), and the Entertainment and Sports Arena (Sycamore Drive).	School Zone?	No	Additional Information		ATE Requested by	Traffic Engineering and Safety Division	Speed Camera Recommended?
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School Zone?	No									
Additional Information										
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Enforceable Daily Speed Violations (11+ MPH over limit)	200 Block		300 Block		500 Block		600 Block		700 Block	
	WB	EB	WB	EB	WB	EB	WB	EB	WB	EB
# Violations	1,044	193	280	942	61	606	9	0	0	4
Total Vehicles	6,713	7,339	6,358	7,038	6,907	6,005	4,820	4,889	2,890	2,167
% of All Vehicles	16%	3%	4%	13%	1%	10%	0%	0%	0%	0%
# Daily Speed Violations (11+ MPH over limit) by Time of Day	WB	Midnight – 3 AM: 58 3 AM – 6 AM: 112 6 AM – 9 AM: 183 9 AM – Noon: 155				Noon – 3 PM: 162 3 PM – 6 PM: 142 6 PM – 9 PM: 125 9 PM – Midnight: 109				
	EB	Midnight – 3 AM: 17 3 AM – 6 AM: 10 6 AM – 9 AM: 24 9 AM – Noon: 21				Noon – 3 PM: 27 3 PM – 6 PM: 29 6 PM – 9 PM: 34 9 PM – Midnight: 34				
# Daily Speed Violations (11+ MPH over limit) by Time of Day	WB	Midnight – 3 AM: 26 3 AM – 6 AM: 34 6 AM – 9 AM: 51 9 AM – Noon: 40				Noon – 3 PM: 32 3 PM – 6 PM: 36 6 PM – 9 PM: 35 9 PM – Midnight: 28				
	EB	Midnight – 3 AM: 60 3 AM – 6 AM: 44 6 AM – 9 AM: 145 9 AM – Noon: 155				Noon – 3 PM: 151 3 PM – 6 PM: 125 6 PM – 9 PM: 144 9 PM – Midnight: 119				
# Daily Speed Violations (11+ MPH over limit) by Time of Day	WB	Midnight – 3 AM: 8 3 AM – 6 AM: 7 6 AM – 9 AM: 10 9 AM – Noon: 8				Noon – 3 PM: 8 3 PM – 6 PM: 8 6 PM – 9 PM: 8 9 PM – Midnight: 6				
	EB	Midnight – 3 AM: 53 3 AM – 6 AM: 35 6 AM – 9 AM: 107 9 AM – Noon: 83				Noon – 3 PM: 89 3 PM – 6 PM: 57 6 PM – 9 PM: 97 9 PM – Midnight: 89				
# Daily Speed Violations (11+ MPH over limit) by Time of Day	WB	Midnight – 3 AM: 3 3 AM – 6 AM: 1 6 AM – 9 AM: 3 9 AM – Noon: 2				Noon – 3 PM: 0 3 PM – 6 PM: 1 6 PM – 9 PM: 0 9 PM – Midnight: 1				
	EB	Midnight – 3 AM: 0 3 AM – 6 AM: 0 6 AM – 9 AM: 0 9 AM – Noon: 0				Noon – 3 PM: 0 3 PM – 6 PM: 0 6 PM – 9 PM: 0 9 PM – Midnight: 0				
# Daily Speed Violations (11+ MPH over limit) by Time of Day	WB	Midnight – 3 AM: 0 3 AM – 6 AM: 0 6 AM – 9 AM: 0 9 AM – Noon: 0				Noon – 3 PM: 0 3 PM – 6 PM: 0 6 PM – 9 PM: 0 9 PM – Midnight: 0				
	EB	Midnight – 3 AM: 1 3 AM – 6 AM: 0 6 AM – 9 AM: 0 9 AM – Noon: 0				Noon – 3 PM: 0 3 PM – 6 PM: 1 6 PM – 9 PM: 0 9 PM – Midnight: 3				

311 Request & Next Steps



- The ATE analysis takes on average 10 days once data has been collected
- Given our resources we can complete at most 8-10 ATE assessments per month
- We have completed 67 assessments this calendar year and are on pace to complete ~120 (more than double last year)

Additional Considerations

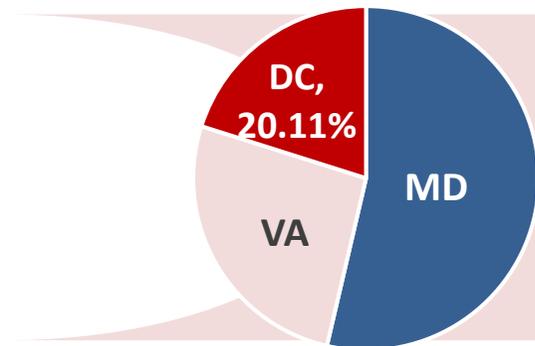
- Once the recommendation regarding camera installation is made, the ATE team assesses the area for installations. Siting considerations include but not limited to:
 - Presence of line of sight necessary to capture the evidence of violation
 - Technician's ability to install and service the cameras
 - Other potential safety issues created by the installation
 - ADA and accessibility concerns

There is no minimum distance required between the cameras

We have more than one camera along high crash corridors

Revenue, Equity, and Other Considerations

- Revenue IS NOT a factor in the assessment process
- ATE revenue goes into the General Fund, not to DDOT
- Vendors have no economic upside from the revenue collected.
- There is no evidence of disparate impacts to minority communities nor to low-income drivers
- ATE does not capture race, gender, income, ethnicity of the registered owner of the owner of the vehicle



Only 20% of citations issued to DMV registered plates are issued to vehicles registered in the District

Big Picture Policy Considerations

- Points for ATE Violations
- Enforcement of Moving Violations by DDOT
- Fine Equity



District Department of Transportation

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