



moveDC Multi-Modal Long Range Transportation Plan
Extended Comments by Chapter
July 28, 2014

Comments prepared by Meg Maguire, Sue Hemberger and Monte Edwards

Introduction

The Committee of 100 on the Federal City has reviewed the *moveDC Multi-Modal Long Range Transportation Plan* and we submit the following consolidated comments. Our goal is to ensure that the final moveDC plan is the best possible guide to the city for immediate and long-term public investments and priorities, and an appropriate transportation element in the forthcoming revision of the Comprehensive Plan.

The draft plan has a number of positive features. Significant advances in pedestrian and bicycle access, safety and public education will go a long way to accommodating all road users. Prioritizing pedestrian safety and accessibility is important as we are all pedestrians, and as such, we are the most vulnerable users of the roads and sidewalks. Sustainability – including sustaining and enhancing the beauty of our public rights-of-way -- and environmental stewardship will be given greater attention. And the city will positively reinforce the L'Enfant and McMillan legacies in guiding future development.

Our chief concerns about the draft are detailed in this response and the three appendices attached. To summarize:

- We were astounded to find that the draft is so anemic and lacking in specificity on commuter rail. On several occasions, we detailed our concerns to the moveDC Task Force; and since 2012 we have called on DDOT to develop a DC Rail Plan that is not even mentioned in the moveDC draft plan. Early in the process we submitted information on this topic in writing to the Task Force and consultants but find that it is inexplicably absent from this draft. moveDC needs to explicitly acknowledge that we cannot solve congestion and attendant pollution by DC residents alone but must focus on bringing more workers and visitors into the city by expanded commuter rail.
- The draft plan is *youth-friendly but lifelong-lite* in its near silence on how to meet the needs of the growing families and the elderly for whom bikes, ride-sharing and lengthy transit trips will supplement but not replace their need for a private vehicle. Isn't our collective hope that many of these same young people coming to our city will stay as they mature, raise families and invest their talents and resources in the life of the City, even in their retirement? This would be a more appealing and realistic document if it were to weave both accurate data (see especially *Appendix A: DATA CRITIQUE*) and the narrative on this more inclusive vision throughout the moveDC Plan.
- From the opening chapter, DDOT should be clear that the specific proposals implied on the maps are subject to community scrutiny through ANC hearings, budget approval and oversight. The difficult-to-decipher maps need to be improved and described in the text so that people can

easily understand how streets in their neighborhoods will be affected by corridor improvements, parking policies, transit-dedicated lanes, bike and pedestrian accommodations. At the June 27 Council hearing on the moveDC Plan, citizens from Van Ness St. and Military Rd. expressed alarm that their narrow streets were slated for greatly expanded transit service. How will DDOT reassure residents that this plan provides an overall framework but that the specifics of how the goals will be achieved are not set in place?

We fully agree that the city must move forward with *a blended approach of different transit modes*. Doing nothing is not a viable option. Given existing conditions, we need to significantly expand our transit system to meet our environmental goals – and even simply to prevent our existing quality of life from deteriorating as the city and the region continue to grow. But greater recognition of the role of private vehicles and an emphasis on commuter rail need to be in that blend, and in the current draft they are either distorted or grossly deficient.

We will live with this plan for the next 25 years and it will most likely constitute the transportation element of the next comprehensive plan. We strongly suggest that DDOT arrange neighborhood hearings on the Plan after the current revisions are in place so that people can understand what is on the difficult-to-decipher maps and how DDOT views changes in their neighborhoods.

Chapter 1. The Long View (plus additional general comments affecting content and recommendations)

#1: Chapter I – The Modern City needs to recognize cars along with transit, biking, walking, buses and streetcars.

The Modern City includes people not recognized in the moveDC Plan whose professional and personal lives require private cars – doctors, nurses, teachers, ministers, DC church goers from the region who greatly enrich the life of the city, parents juggling kids’ many activities, people with bad knees (like the authors of these comments) or other health problems that restrict their mobility, people who work odd hours and cannot wait on lonely corners for infrequent buses, construction workers who commute from more affordable communities outside DC – the list could go on and on. DC residents are not just youthful newcomers but people of diverse ages, incomes, needs and preferences. This is reflected in the fact that, while the rate of auto ownership may be decreasing slightly the actual number of cars in DC is increasing with the increasing number of residents. For further discussion of vehicle ownership and other data, see attached *Appendix A: DATA CRITIQUE – 1. Vehicle Ownership Data Critique*

Failure to acknowledge the existence of private car use in this section immediately signals that moveDC chooses to ignore the realities of balancing vehicle ownership – which is up by 20,000 – with other modes of travel through transit, biking and walking.

#2: Chapter I should include more explicit discussion of congestion caused by commuter vehicles with appropriate maps.

- Specifically recognize that most of the congestion in DC is from out-of-DC cars that contribute heavily to pollution and congestion, and state that DC must find ways to greatly reduce this impact. *Seventy-five percent of the cars on DC’s streets during the daytime are from out of DC.*
- Summarize the importance of commuter rail and mention the ambitious expansion plans of Amtrak, VRE and MARC; and the expansion of freight due to expansion of Panama Canal.

Chapter 2. Growth, Travel Patterns, and Needs and Chapter 3. Exploring the Future

#1: Data on population growth and employment forecasts should use MWCOG forecasts based on actual census data from 2000-2010 rather than OP's inflated forecasts that are based on three years of exceptional growth projected out over 25 years.

moveDC includes both MWCOG population and employment forecasts and OP forecasts (which anticipate significantly higher rates of growth), and seems to suggest that the OP forecasts are more up-to-date (see p. 20). *We strongly suggest that MWCOG's estimates should be used rather than OP's.* Not only is it problematic to take three years in which exceptional growth was estimated and project it forward for the next 25 years; there are also good reasons to believe that the post-2010 census estimates OP has relied upon are significantly inflated. By contrast, data from 2000 to 2010 is based on actual census counts rather than on extrapolations. (See *Appendix A: DATA CRITIQUE – 2. Population Estimates*)

#2: The Plan needs to take into account the growth of employment centers in the metropolitan area and the increasing number of DC residents who will work in those areas.

DC operates in a highly competitive environment when it comes to attracting both jobs and residents. As DC becomes a more attractive place to live, Northern Virginia (with the opening of the Silver Line) becomes an increasingly attractive place to locate jobs and to work. As a result, we should expect to see more reverse commutes – i.e. an increasing number of DC residents who travel to work in other jurisdictions. We can't rely on a transit model that assumes that DC residents' transportation needs will all be met within DC. *Getting in and out of the city is an issue not only for suburban commuters but also for DC residents.*

#3: Assertions about vehicle ownership should be based on census data, not on unsupportable claims that "car ownership is decreasing."

As noted in Chapter I above, census data since 1990 suggest that car-ownership rates (and the % of carless households) have been remarkably stable in DC. Yet the text claims "Car-ownership is decreasing." But the only statement that follows is "The District has, by far, the highest percentage of no-vehicle households in the region." While this statement may be true, it does not support the assumptions that there will be fewer number of cars owned by a growing population of residents. This statement also fails to underscore that almost ¾ of DC's workers come from other jurisdictions in the region.¹ (See *Appendix A: DATA CRITIQUE – 1. Vehicle Ownership Data*)

- The data just do not support the claim that there has been a significant change in the numbers of cars owned in DC. Judging from the best available census data, the percentage of carless households in DC has been remarkably stable since at least 1990:

1990: 37.4%

2000: 36.9%

2012: 36.5% (5yr ACS data -- which has replaced the Census long form)

¹ The DMV includes all registered cars and trucks, public and private including commercial. (It is not clear whether they include motorcycles and buses.) DDOT/OP sometimes suggest that only private non-commercial vehicles should be counted yet to our knowledge neither agency has ever provided a count or a justification for excluding commercial vehicles, motorcycles or busses. Whatever it takes to service the population is relevant and should also be counted: Zipcars, Car2Go, UPS trucks, city buses, etc. The issue is what's on the road to meet our needs for delivering people and goods regardless of who owns it. For example, while one may not drive to the supermarket, but if Peapod delivers the groceries to a residence, those groceries still traveled by "automotive" means.

- The average number of cars per MOVEDC has also remained quite stable over that period (about .9 -- while we have a significant number of carless households, we also, of course, have households that own 2 or more cars).

#4: Better documentation both on how transit demand has been modeled (see, e.g., p. 36) and on a number of factual claims (e.g. "Travel is Evolving," p. 32) -- is necessary to assess the validity of DDOT's analysis.

- The most recent/reliable publicly available census data show a 36.7% transit share for DC workers (S0804 ACS 5yr 2012) and a 37.8% share for DC residents (S0802 ACS 5yr 2012). moveDC's 42% figure on transit is ambiguously phrased -- it is unclear whether it is referring to DC residents' commutes to their jobs (wherever located) or commutes to DC jobs (regardless of where the workers come from). Neither figure is 42% -- both are lower. Where does the 42% transit mode share figure (see pp. 33, 38) come from? It is possible that 42% of DC residents commuting to jobs in DC used public transit, but if that's all DDOT is considering, then the document needs to say so, because it's only a partial picture of commuting behavior on DC streets. (See *Appendix A – DATA CRITIQUE 4. Transit Demand*)

#5: Many of the maps in the Plan are difficult to read with little or no commentary on their significance.

- For example, while Chapter II is filled with maps, there is no commentary on their significance. The reader is left with many questions: What are the transportation implications if, as predicted, most increases in residential density occur east of 16th ST NW and most increases in employment density are south of Florida Avenue? How/Have the proposals in moveDC been shaped by these assumptions?

Chapter 4: Policy and Planning Framework and Chapter 5: Implementation

#1: An aggressive approach (as suggested on p. 77) to educating all users on the rules of the road could go a long way towards reducing road tensions.

- The DMV could be tasked with sending every registered motorist a booklet focused on how to share the road with pedestrians and cyclists. And the biking community could increase its efforts to reach its constituency with a code of good biking conduct and practices. Perhaps the Bicycle Advisory Council could put forward those legal changes that would make cycling safer, educate young bikers through the public schools, and suggest ways of enforcing those laws.

#2: Tax incentives and fees to encourage car-lite living should be studied.

- We encourage moveDC to call for a study of incentives and fees to encourage car-lite living. For example, the study would look at the implications of the current registration fee for the first car in each residential unit and a double charge for the second car. How would this system accommodate inter-generational families and single-family households, with multiple employed members? How could this system be monitored and enforced? What might be the unanticipated consequences of such a policy?

#3: While there is tacit support for commuter rail service expansion (p. 91), the discussion is woefully inadequate. There is no mention of the L'Enfant VRE Station improvements, the Long Bridge or SW track issues.

#4: We are very skeptical that the cordon tax as proposed for the CBD will be acceptable to Congress, to many DC residents, to churches or to many businesses located downtown. While revenue from this source is attractive, we caution against using it in any realistic financial projections.

Transit Element and Freight Element

#1: **The plan fails to deal with serious issues related to projected increases in freight, inter-city and commuter passenger service** and does not acknowledge the need for a DC Rail Plan. See *Attachment B: Committee of 100 testimony to Council by Monte Edwards, June 27, 2014* on the moveDC plan relative to commuter and freight rail. Providing practical alternatives to automobile commuting should be the overriding theme of the moveDC Plan. Commuter rail is the most efficient and cost-effective means of doing so. 3/4 of the cars on DC streets during the day are non-DC residents. Several Metrorail stations in downtown DC are at or near capacity and even with planned improvements, their capacity will be exceeded by 2020 (Figure T-2, page T-4). The bridges that bring Metrobuses, commuter buses, intercity buses and private vehicles in from Virginia are badly congested during rush hour.

- The moveDC draft provides no evaluation of the capabilities of the different transit modes to serve projected growth in ridership and does not even mention the recently initiated Amtrak-Virginia commuter service.
- The expansion plans and capabilities of MARC and VRE are not discussed in the draft.
- The moveDC draft ignores key components of our transit infrastructure and fails to deal with how to remedy deficiencies in transit intermodal centers.

moveDC should include the potential of commuter rail to provide a practicable supplement to Metrobus, Metrorail and vehicular commuting.

#2: The discussion of extending the streetcar network fails to include reference to the ongoing search for wireless streetcar operating systems and the two 2010 DC laws on overhead streetcar wires. See *Attachment C: Committee of 100 testimony to Council by Meg Maguire, March 3, 2014* on failure of DDOT to implement DC Code § 9-1173 and § 9-1174. We understand that DDOT intends to comply with the law and remedy this deficiency and we look forward to reviewing their report.

#3: moveDC should take into account the need for 24-7 childcare and public transit. This issue has emerged from the Barry Farms small area plan where residents noted that they work multiple jobs or work overnight and that there are many impediments, including transportation, to successfully holding a nighttime job.

- Has DC collected any data on the times of entry and exiting into DC -- are the majority of workers arriving during traditional morning commuter times?
- Are there trends demonstrating that our public transit needs to be more flexible to accommodate the travel needs of people who do not work conventional hours?

Transportation Demand Management Element and Parking and Curbside Management Element

#1: See Chapters 2 & 3 - #4 above and Appendix A: DATA CRITIQUE re. transportation demand modeling and data on car ownership.

#2: DC does not understand either the supply or the demand for parking. moveDC needs to call for a thorough study of all parking in DC.

The study should include but not be limited to:

- Numbers and types of vehicles registered in DC including individually owned cars and trucks, shared services, taxis, motorcycles, etc.
- Supply and location of parking spaces on streets and in public garages as well as private underground parking (including apartment houses that provide parking underground);
- A sample of license plates in garages to determine how many of these are out-of-state and, based on address data, as well as how close these commuters live to public transportation;
- A study of shared garage arrangements, lessons to be learned and recommendations on the criteria for successful application in DC;
- A study of other experiments in reducing/eliminating parking requirements such as at the Babe's Billiards site redevelopment in Tenleytown, including the effectiveness of bans on residential parking permits for buildings offering no parking; and
- A study of how to use underground resources in the process of redevelopment to take cars and buses off the streets when they are not in use.

#3: The plan should take a fresh look at the potential of the city's underground resources for storing cars and buses when they are not in use. Providing parking has been rejected as stimulating driving, but the effect on car ownership of the failure to provide parking is still not well documented. Once underground and off-street parking in new development is discouraged, the potential to get cars off the streets and store them underground is lost forever. When cars are stored on the streets it makes other choices such as dedicated bus and streetcar lanes, bike lanes, pedestrian friendly sidewalks, etc. much more difficult to implement. DDOT's and OP's thinking about this issue is constricted and shortsighted.

Sustainability and Livability Element

This is one of the strongest elements in the Plan. The many tangible opportunities for environmental stewardship outlined in moveDC can have great appeal for all age and income groups throughout the city.

#1: Wherever urban forestry operations are ultimately located in the agencies – DDOT or DOE – acceleration of this important program will bring many positive environmental benefits to DC.

- The proposed reorganization of DDOT, now undergoing Council and public review, proposes to move tree operations to DDOE. Casey Trees has proposed that operations remain with DDOT and that policy be moved to DDOT. While the Committee of 100 has not taken a position on this issue, we believe in close integration of bold policy goals and efficient operations. Only a small part of the tree canopy is under the control of DDOT (page S-3): DC's tree canopy covers 14,600 acres or 37% of DC, amounting to 1,900,000 trees. Only

148,000 of the trees, or less than 8% are in DDOT ROW and subject to the Urban Forestry programs.

This section of the Plan could be strengthened by making data more clear.

- **Expanding the Tree Canopy Or Keeping up With Losses? (page S-10)**
The math in moveDC regarding trees is not clear. DDOT currently plants 7,000 trees a year. The plan is to increase that to 8,600 trees per year to reach 40% citywide tree canopy by 2032. Planting 8,600 trees for the next 17 years would amount to 146,000 trees. Since we now have 1,900,000 trees for 37% citywide tree canopy, a 3% increase in the tree canopy would require 57,000 additional trees. Is the difference, 89,000 trees over 17 years, the tree mortality/loss rate of 5,060 tree per year?
- **Are DDOT's Stormwater Management Efforts Sufficient? (page S-4):** DC has a land area of 39,400 acres. 43% of land in DC is impervious, or 16,940 acres. 23% of land is public space (9,060 acres) is under jurisdiction of DDOT. In 2012, DDOT restored 3 acres of impervious surfaces. On page S-10 the document states that the agency completed 4 green alleys in 2013 and plans to do four more in 2014 (alleys are not the only type of impervious area in the city.) Thus, DDOT is restoring impervious land at the rate of 0.03% per year.

#2: The glaring inconsistency regarding use of native tree species needs to be corrected.

The document advocates, rightly so, for the use of native tree species but then includes the list of Approved UFA Tree species on which none of a major native species of our area is included. We suggest that the list of trees from the Rock Creek Watershed Tree Association be used instead or as a supplement to the list now referenced.

#3: The plan shows great sensitivity to beautification through environmental design.

DC's Public Realm Design Handbook of 2008 is an excellent guide and should be more widely circulated to ANC's, non-profit organizations and activists who emerge in project-specific planning throughout the city. The same can be said of other documents mentioned in the plan: give them new life for a new generation of those who want guidance in caring for the city.

Appendix A: DATA CRITIQUE

moveDC Multi-Modal Long Range Transportation Plan

July 28, 2014

1. Data Critique: Vehicle Ownership Data

- Census data since 1990 suggest that car-ownership rates (and the % of carless households) have been remarkably stable in DC. Yet the text claims “Car-ownership is decreasing.” But the only statement that follows is “The District has, by far, the highest percentage of no-vehicle households in the region.” While this statement may be true, it does not support the assumptions that there will be fewer number of cars owned by a growing population of residents. This statement also fails to underscore that almost $\frac{3}{4}$ of DC’s workers come from other jurisdictions in the region.²
- Obviously, registration understates traffic, but it's important for DDOT to recognize that the number of vehicles has grown along with the population.

2009	268,974
2010	275,043
2011	279,787
2012	284,905
2013	288,000+

[Source: 2009-12 from DMV submission in Babe’s case; 2013 from Baber’s FY2013 oversight testimony.]

There are at least three other sources of car-ownership data (beyond Census and DMV). Two are based on DMV reporting:

1) MWCOG's TPB does a triennial vehicle census with the next one due out late this year. Their data does the break down of car/light trucks/heavy trucks and looks like it may be consistent with, but slightly lower than, the DMV data given above. (Note: 2-5% of the data DMV gives to TPB can’t be used because if they can't decode the VIN, they can't use the datum.

2) FHWA also publishes vehicle registrations by state in its annual Highway Statistics. Their numbers come out higher than DMV's. When AAA tried to figure out why, their conclusion was that DMV only counts "active" registrations and a car loses its "active" registration (e.g. you can't renew the existing registration) for a variety of reasons -- including things like unpaid parking tickets or child support.

² The DMV includes all registered cars and trucks, public and private including commercial. (It is not clear whether they include motorcycles and buses.) DDOT/OP sometimes suggest that only private non-commercial vehicles should be counted yet to our knowledge neither agency has ever provided a count. Whatever it takes to service the population is relevant and should also be counted: Zipcars, Car2Go, UPS trucks, city buses, etc. The issue is what's on the road to meet our needs for delivering people and goods regardless of who owns it. For example, while one may not drive to the supermarket, but if Peapod delivers the groceries to a residence, those groceries still traveled by "automotive" means.

3) The third source is the National Automobile Dealers Association (NADA) that hires IHS Automotive to come up with their numbers rather than rely on registrations. Registrations don't include diplomats, military, scofflaws, people who live here but retain a legal residence elsewhere, so it's not surprising that NADA's numbers are always higher than the DMV's. Since IHS doesn't publicize their methodology since they sell their estimates, we were unable to understand how they derive their numbers.) Nonetheless, here is the NADA info, collated from their annual publications.

Total Light Vehicles in Operation in DC

	Passenger cars	Light trucks (GVW 1-3)	Total
2008	220,195	54,394	274,589
2009	149,274	68,354	217,628
2010	217,076	54,621	271,697
2011	209,905	56,488	266,393
2012	214,050	95,697	309,747
2013	219,344	101,359	320,703

Source: NADA DATA (2009, 2010, 2011, 2012, 2013, 2014)
 NB: the data from earlier NADA publications isn't commensurable

- As to parking inventory data, off-street inventories are essential given the importance of the parking tax.
- The data just do not support the claim that there has been a significant change in the numbers of cars owned in DC. Judging from the best available census data, the percentage of carless households in DC has been remarkably stable since at least 1990:
 - 1990: 37.4%
 - 2000: 36.9%
 - 2012: 36.5% (5yr ACS data -- which has replaced the Census long form)
- The average number of cars per MOVEDC has also remained quite stable over that period (about .9 -- while we have a significant number of carless households, we also, of course, have households that own 2 or more cars).

2. Data Critique: Population Estimates

moveDC includes both MWCOG population and employment forecasts and OP forecasts (which anticipate significantly higher rates of growth), and seems to suggest that the OP forecasts are more up-to-date (see p. 20). We strongly suggest that MWCOG's estimates should be used rather than OP's. Not only is it problematic to take three years in which exceptional growth was estimated and project it forward for the next 25 years; there are also good reasons to believe that the post-2010 census estimates OP has relied upon are significantly inflated. By contrast, data from 2000 to 2010 is based on actual census counts rather than on extrapolations.

- Inter-census estimates are notoriously unreliable.³ And there is already evidence that the current method for projecting urban populations mistakes churn for growth.⁴ Recently released IRS Statistics of Income (SOI) suggest that the Census Bureau’s domestic migration figures for 2010 to 2011 were significantly higher than actual migration. Additional evidence that post-2010 population growth projections are inflated comes from the fact that, according to the Census Bureau’s own estimates, DC gained just over 6,000 housing units between 2010 and 2013 -- a period in which its population supposedly grew by almost 45,000 people.⁵

3. *Data Critique: Employment*

- DC operates in a highly competitive environment when it comes to attracting both jobs and residents. And, unlike the District, neighboring jurisdictions have access to the resources of their respective states to finance infrastructural improvements, fund public services, and provide development or relocation incentives.
- As DC becomes a more attractive place to live, Northern Virginia (with the opening of the Silver Line) becomes an increasingly attractive place to locate jobs and to work. As a result, we should expect to see more reverse commutes – i.e. an increasing number of DC residents who travel to work in other jurisdictions. We can’t rely on a transit model that assumes that DC residents’ transportation needs will all be met within DC. *Getting in and out of the city is an issue not only for suburban commuters but also for DC residents.*

³ See Debbi Wilgoren, “Census Reports Decline in D.C. Population,” Washington Post, December 22, 2005 (p. B-04) for an account both of the (ultimately) successful 2005 challenge to the Census Bureau’s intercensal estimates of DC’s population in the early 2000s and of the Bureau’s mis-estimation between 1990 and 2000 (when the actual count revealed a change in population of less than 35,000 instead of the projected change of approximately 88,000).

⁴ 2/3 of the US cities that suffered population losses between the 2000 and 2010 census counts simultaneously reversed that trend in the 2011 estimates. <http://moveDC.governing.com/blogs/by-the-numbers/city-populations-increase-following-declines-census-estimates-show.html> Planners in NYC expressed skepticism, pointing out that moveDC “churn” has long characterized the city, and represents a fluidity that is difficult to characterize using the net migration measures presented herein.” They concluded that “While there is little doubt that New York City has experienced a substantial population increase post-2010, it is probably overstated.” <http://moveDC.nyc.gov/html/dcp/html/census/popcur.shtml> To put this more abstractly, the projected levels of urban population growth after the 2010 census may be as much an artifact of changes in statistical methodology as a reflection of actual shifts in population.

In the context of DC, this analysis makes sense – e.g. If a surveyor calls 10 households in DC, odds are she’ll find one that includes a recent arrival. If she calls a similarly small sample in another state, odds are slim that she’ll find someone who recently left DC. The net result is that the American Community Survey (ACS), which now uses very small but very frequent samples, captures in-migration and misses out-migration because newcomers are concentrated in DC, while departees are widely dispersed. That’s why the IRS’s SOI data is more reliable – it’s not a complete picture of DC’s population (non-filers aren’t captured) but it is a robust data set consisting of everyone who filed a return using a DC address in one or both of the years analyzed.

⁵ Compare US Census Bureau, “Annual Estimates of Housing Units” (Chart PEPANNHU) for DC 2013 with US Census Bureau, “Annual Estimates of the Resident Population” (Chart PEPANNRES) for DC 2013. There’s no significant change in vacancies that would explain this discrepancy – i.e. it’s not a situation where, in 2010, we had lots of vacant housing that newcomers filled before we needed to build more to accommodate increased growth through 2013.

- If we want to connect more people to more jobs we need to think carefully about where new residents and new jobs will be located – and to pay attention to the relationship between anticipated wages and housing costs. If, as some analysts predict, DC’s future job growth is likely to be in lower wage industries such as hospitality and other service sectors, the District’s affordability crisis will only worsen, driving more workers outside of the city – and into their automobiles to get to the city. In general, the crucial question here is not just “how much?” but “where?” and “what kind?” Over the past decade, we’ve seen DC office markets outside the CBD shrink. And the Downtown BID is projecting significant office vacancies (20-25%) in the CBD over the next 5-10 years.⁶

4. Data Critique: Transit Demand

- The most recent/reliable publicly available census data show a 36.7% transit share for DC workers (S0804 ACS 5yr 2012) and a 37.8% share for DC residents (S0802 ACS 5yr 2012). moveDC's 42% figure on transit is ambiguously phrased -- it is unclear whether it is referring to DC residents' commutes to their jobs (wherever located) or commutes to DC jobs (regardless of where the workers come from). Neither figure is 42% -- both are lower. Where does the 42% transit mode share figure (see pp. 33, 38) come from? It is possible that 42% of DC residents commuting to jobs in DC used public transit, but if that's all DDOT is considering, then the document needs to say so, because it's only a partial picture of commuting behavior on DC streets.
- The relevant universe should be all DC workers (regardless of residence) plus DC residents who work elsewhere. If you look at that group, close to 868,000 workers commute to and/or from DC – and 55% of them travel by car to do so. While we could not compute transit share for this more comprehensive universe, we know it's less than 38% because both components (DC residents + DC workers) are less than 38%.
- The professed goal of this plan is to reduce "automotive" commutes to 25%. The magnitude of the challenge is to get 200,000 cars off the road during commute hours. If 200,000 seems low it's because the 55% of car-commuters includes carpoolers so there's not one car per car commute.
- Carpoolers raise the question of whether the goal should be to maximize the number of commuters who choose some means other than car or whether we should be trying to minimize the number of cars used in commuting. These are potentially different goals since if you convince 3 members of a 4-person carpool to take public transit, you've shifted the mode of 75% of those commuters but you still have the same number of cars. The problem should be framed to point to strategies for change: With X number of cars, how can we reduce X? Instead the authors seem to frame the issue as a moral one: "People shouldn't use cars to get to work."
- Better data -- and interpretations of the data -- will identify the problems more clearly and lead the city to more effective solutions.

⁶ State of the District 2013, p. 29.