



July 22, 2009

Mr. Gabe Klein, Director  
District Department of Transportation  
2000 14<sup>th</sup> Street, NW, 6<sup>th</sup> Floor  
Washington, D.C. 20009

Dear Mr. Klein:

This is in regard to the design of the combined streetcar and bus stops to be constructed in conjunction with the current Great Streets project on H Street, NE. Recently, we have become aware that the 25-foot middle portion of these combined stops is designed for a 15-inch reveal curb height to accommodate wheelchair access to the center door of streetcars. This will present unacceptable safety and operational issues for Metrobus customers and operators as well as creating obstacles that could result in damaged buses.

Metrobus service on H Street-Benning Road is provided by a mix of 40-foot standard buses and 60-foot articulated coaches, all of them with wheelchair access at the front door. Metro has recently acquired a fleet of BRT-style CNG-powered articulated coaches specifically to provide service on this important line, the fourth busiest in the Metrobus system. A review of the physical reality of the design of the coaches and the design of the stops identifies the following problems:

1. The combined stop design contemplates buses pulling to the end of the platform where a lift or ramp could be deployed at a 7-inch curb. However, this would position the back door to open at the 15-inch curb. Passengers exiting thru the back door would be required to step up onto the streetcar platform, especially if the bus operator has deployed the kneeling feature which lowers the bus. Since bus riders are accustomed to stepping down to lower curbs, this unexpected step up would create a tripping hazard.
2. Since buses do not operate on a fixed guideway, it is likely that some operators will stop too close to the curb so that when the back doors open out, the bottom of the doors would strike the

**Washington  
Metropolitan Area  
Transit Authority**

600 Fifth Street, NW  
Washington, DC 20001  
202/962-1234

By Metrorail:  
Judiciary Square—Red Line  
Gallery Place-Chinatown—

Red, Green and  
Yellow Lines

By Metrobus:  
Routes D1, D3, D6, P6,  
70, 71, 80, X2

Mr. Gabe Klein  
Page 2

high curb or the wheel skirts would hit the curb as the bus pulls away. In addition to damaging the equipment, buses would have to be taken out of service, resulting in missed trips for customers.

3. Other operators might stop too far from the curb in order to avoid contact with the raised platform, thereby leaving too large a gap between the bus step and the high curb. With 500 operators at the Bladensburg Garage who could potentially operate a bus on H Street, it is unrealistic to expect that buses will always be operated exactly as the stop design anticipates. These issues with back door operation could also cause more passengers to exit thru the front door, increasing stop dwell time.
4. It should also be noted that it is not entirely clear on the available design documents that stop designs will provide sufficient space at all stops to accommodate the ADA landing pad requirement, nor the location of shelters, quality of the lighting or how bus stop flags, schedules, service information, Next Bus LED signs or route maps will be accommodated.

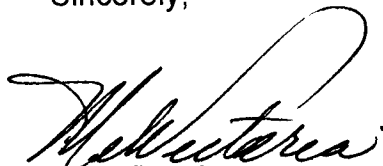
Since streetcar operation on H Street is still several years away, we request that the combined stops be constructed at this time with a standard 7 to 8-inch reveal curb height throughout their 70 to 90-foot length to effectively accommodate buses in the near term. This would facilitate a future systems-based design solution incorporating the requirements applicable at that time.

If this is not feasible, then we request that the curb extensions at the combined stops be lengthened to accommodate a 62-foot long coach, with a necessary loss of parking, in order to create a separate, adjacent stop for buses with a uniform 7 to 8-inch curb reveal throughout. These same requests also apply to the design of joint-use stops to be placed along Martin Luther King, Jr. Avenue for the Anacostia streetcar project.

Mr. Gabe Klein  
Page 3

Either of these options would allow Metrobuses to continue to serve stops at these busy locations. With our heightened emphasis on customer safety, it is imperative that facilities not be designed in a way to create built-in safety hazards and operational compromises. Metro is very supportive of this project and is currently engaged in development of the operations plan to make use of this important investment. We are committed to working with your staff to achieve a design that meets functional needs for both bus and streetcar.

Sincerely,

A handwritten signature in black ink, appearing to read 'Milo Victoria', with a large, sweeping flourish at the end.

Milo Victoria  
Assistant General Manager  
Department of Bus Services

Cc: Freddie C. Fuller II, DDOT MTA  
Kathleen Penny, DDOT IPMA  
Karina Ricks, DDOT TPPA  
Gerald C. Francis, DGM  
Emeka C. Moneme, CAO  
Leroy Jones, BTRA District 1  
James J. Hughes, IPLN  
James R. Hamre, BPLN  
Art Lawson, GOVR