

# Vision Zero Part II: Improvements Underway on Enforcement and Equity

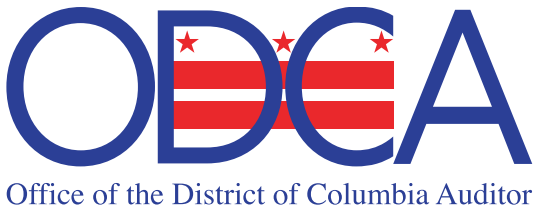
June 5, 2024

A report by the Office of the District of Columbia Auditor



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# Vision Zero Part II: Improvements Underway on Enforcement and Equity

In October 2018, our office received a petition signed by more than 200 traffic safety advocates concerned about Vision Zero implementation amidst rising traffic fatalities in the District. This report examines the traffic enforcement strategies of three District agencies—DDOT, MPD, and DPW—involved in Vision Zero implementation. Because racial equity is an indispensable component of Vision Zero, this report also considers the effect of equity considerations on the agencies' enforcement strategies.

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## ODCA recommends that:

- 1** DDOT augment its policies and procedures to detail how ATE locations are selected and camera performance monitored.
- 2** MPD should conduct comprehensive data analysis to determine if the type, timing, and location of its traffic enforcement actions are effectively targeted to increase traffic safety.
- 3** DPW should target the District's most dangerous streets and drivers, while maintaining productivity through technology updates
- 4** The D.C. Council should work with DMOI to establish a D.C. Official Code definition of a high-risk driver to better enable enforcement through booting and towing.

**177,087**  
(2019)

Total MPD traffic and parking violations, warnings, and arrest charges, respectively, in 2019 (pre-pandemic) and 2022 (post-pandemic)

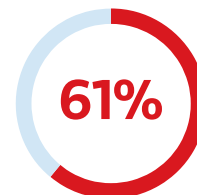
**79,953**  
(2022)

**52**

Total traffic fatalities in D.C. in 2023—a 16-year high.

**170** **342**  
(2021) (2024)

Total number of traffic cameras in 2021 and number to be added in 2024.



Percentage of speed and red-light cameras that were at locations ODCA defined as high-priority



Vehicles that received ATE tickets that were registered in other states. DC has no reciprocal agreements with Maryland or Virginia regarding non-moving violations and ATE fines.

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# Executive Summary

## Why ODCA Did This Audit

In October 2018, our office received a petition signed by more than 200 traffic safety advocates concerned about Vision Zero implementation amidst rising traffic fatalities in the District. This report examines the traffic enforcement strategies of three District agencies—DDOT, MPD, and DPW—involved in Vision Zero implementation. Because racial equity is an indispensable component of Vision Zero, this report also considers the effect of equity considerations on the agencies’ enforcement strategies.

## What ODCA Found

The District Department of Transportation (DDOT) did not deploy ATE cameras at 100% of “high-priority locations,” as outlined in the 2015 Action Plan. While more than half (61%) of the red light and speed cameras were located on the High Injury Network or at hazardous intersections, less than half of the 25 most hazardous intersections had a camera deployed.

The Metropolitan Police Department’s (MPD) 2021 and 2022 traffic violations, warnings, and arrests dropped well below 2018 and 2019 pre-pandemic levels. Most violations and warnings, which made up the majority of MPD enforcement actions, were focused on safety, while most arrest charges were focused on requirements to drive, such as having a valid permit, registration, and tags. MPD did not fully implement its Vision Zero strategies and Patrol District Traffic Plans, monitor effectiveness, or report progress.

The Department of Public Works (DPW) did not target commercial and delivery vehicles for dangerous parking violations. DPW did not enhance its boot and tow program with the

technology and training needed to target habitual offenders with multiple safety-related citations.

While progress has been underway, DDOT, MPD, and DPW had not fully implemented equity procedures, strategies, and data collection into their Vision Zero efforts.

## What ODCA Recommends

- DDOT should augment its policies and procedures to detail how ATE locations are selected and camera performance monitored, including staff and management responsibilities and data sources used to proactively identify locations.
- MPD should conduct comprehensive data analysis to determine if the type, timing, and location of its traffic enforcement actions are effectively targeted to increase traffic safety. Based on that analysis, MPD should align officer training to ensure officers are consistently and equitably enforcing infractions with warnings, violations, and/or arrests.
- DPW should target the District’s most dangerous streets and drivers, while maintaining productivity through technology updates to support geographic analysis and reporting, monitoring prioritization along the High Injury Network and using advanced technology to allow Parking Enforcement Officers, Boot Staff, and Tow Staff to view the types of violations a vehicle has when the license plate number is entered into the handheld devices or License Plate Readers.
- The D.C. Council should work with DMOI to establish a D.C. Official Code definition of a high-risk driver to better enable enforcement through booting and towing.

# Background

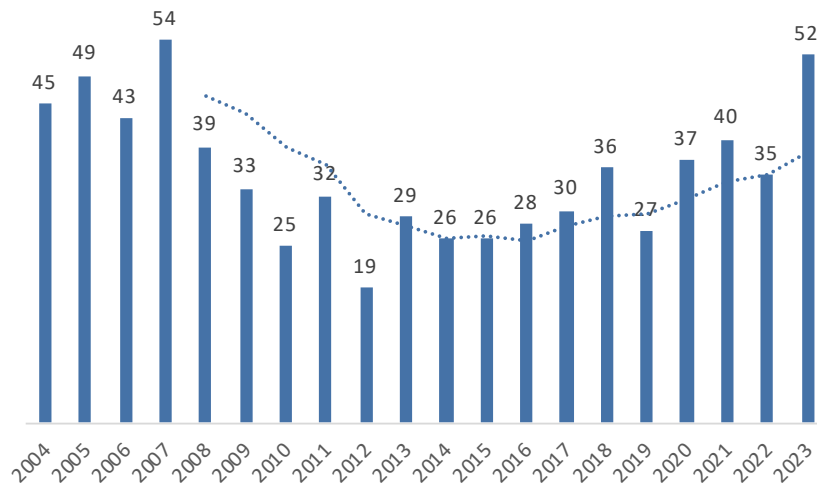
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District of Columbia Mayor Muriel Bowser announced the Vision Zero initiative in 2015 with a goal of eliminating traffic fatalities and serious injuries in the District of Columbia by 2024.<sup>1</sup> Vision Zero was first introduced in Sweden in 1997 and involves a public health approach to reduce severe traffic injuries and fatalities to zero.<sup>2</sup> Various countries across the globe have implemented Vision Zero and seen significant decreases in traffic injuries and deaths, with Oslo, Norway achieving zero traffic fatalities for pedestrians, cyclists, and motorcyclists in 2019.<sup>3</sup>

While the numbers of crashes and injuries decreased in many locations during the pandemic, fatalities in the U.S. went up; the number of U.S. pedestrian deaths reached a 40-year high in 2022, as increases in speeding and risky driving have continued post-pandemic.<sup>4</sup> National Safety Council initial estimates for 2023 show that national motor-vehicle fatalities dropped slightly in 2023 from 2022 (but remained above the 2019 level) while motor-vehicle deaths in D.C. increased 42 percent in that time.<sup>5</sup> As Figure 1 shows, traffic fatalities in D.C. reached a 16-year high in 2023.<sup>6</sup>

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- 1 Muriel Bowser, Mayor, Government of the District of Columbia, "A Plan of Action, Vision Zero," December 2015, (2015 Action Plan) [https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page\\_content/attachments/VZActionPlan\\_forWebsite\\_FINAL-UPDATED\\_Part1.pdf](https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page_content/attachments/VZActionPlan_forWebsite_FINAL-UPDATED_Part1.pdf).
  - 2 According to the Vision Zero Network, the multi-disciplinary approach of Vision Zero represents a shift from viewing traffic deaths as an individual responsibility and being inevitable to a focus on a Safe System approach so that when people make mistakes, severe injury and death are prevented. Focusing on Systems, and not behaviors, is an evolution from the former 'Es' approach, which included Engineering, Education, and Enforcement. Focusing on Systems lessens the need for enforcement and thus centers equity, unlike the traditional traffic safety approach which contributes to racial and economic injustice. See: <https://visionzeronetwork.org/about/what-is-vision-zero/> and <https://visionzeronetwork.org/its-time-to-evolve-beyond-the-es-approach-to-traffic-safety/>. The Safe System approach is also part of the U.S. Department of Transportation's National Roadway Safety Strategy and aims for: safer roads; safer road users; safer vehicles; safe speeds; and post-crash care. Governors Highway Safety Association (GHSA), "Automated Enforcement in a New Era," December 2023. <https://www.ghsa.org/sites/default/files/2023-12/Automated%20Enforcement%20in%20a%20New%20Era%2012-5-23.pdf>, p.7.
  - 3 U.S. Department of Transportation Federal Highway Administration, "Applying a Safe System Approach Across the Globe," <https://highways.dot.gov/public-roads/winter-2022/07>.
  - 4 Muriel Bowser, Mayor, Government of the District of Columbia, "Vision Zero 2022 Update," October 2022. <https://visionzero.dc.gov/pages/2022-update>. GHSA, "Pedestrian Traffic Fatalities by State 2022 Preliminary Data," June 2023, <https://www.ghsa.org/sites/default/files/2023-06/GHSA%20-%20Pedestrian%20Traffic%20Fatalities%20by%20State%2C%202022%20Preliminary%20Data%20%28January-December%29.pdf>, p.6.
  - 5 National Safety Council web pages, "Preliminary Semiannual Estimates," and "2023 State Estimates," <https://injuryfacts.nsc.org/motor-vehicle/overview/preliminary-estimates/> and <https://injuryfacts.nsc.org/motor-vehicle/overview/preliminary-estimates/data-details/>.
  - 6 Metropolitan Police Department (MPD), "20-Year Traffic Fatality Trend," <https://mpdc.dc.gov/page/traffic-data>.

**Figure 1: Traffic Fatalities in D.C., 2004–2023**

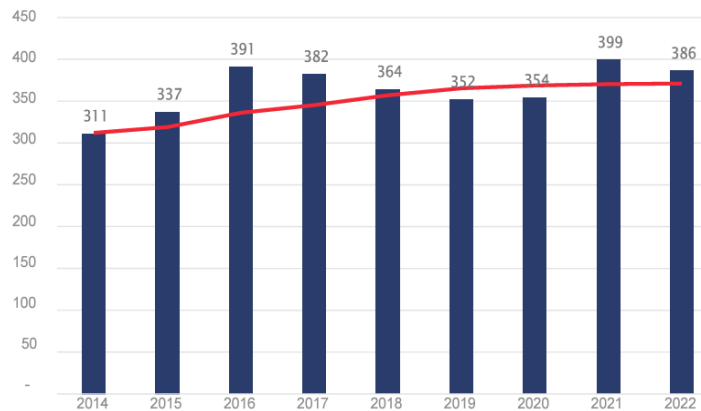


**Note:** D.C. compiles fatalities on a calendar year basis, and this report will present data on a calendar year basis unless otherwise specified.

**Source:** ODCA analysis of Metropolitan Police Department (MPD) data. Dashed line is 5-year moving average.

Although the data in Figure 2 below does not include 2023, it shows that serious injuries in the District increased during the pandemic.

**Figure 2: Serious Injuries Caused by Traffic Crashes in D.C., 2014–2022**



**Note:** Based on MPD data; red line is 5-year rolling average.

**Source:** D.C. Triennial Highway Safety Plan, July 2023.<sup>7</sup>

<sup>7</sup> Deputy Mayor for Operations and Infrastructure (DMOI), D.C. Triennial Highway Safety Plan, July 2023, <https://visionzero.dc.gov/pages/highway-safety-office#Publications>. p.26.

In March 2023, our office released an audit on the District Department of Transportation’s (DDOT) implementation of Vision Zero engineering strategies following a petition signed by more than 200 traffic safety advocates who were concerned about Vision Zero implementation amidst rising traffic fatalities in the District.<sup>8</sup> Appendix A provides a copy of this petition. We found weaknesses in the internal controls, funding, oversight, and District leadership needed to effectively implement Vision Zero engineering strategies.

This report examines the traffic enforcement strategies of three District agencies—DDOT, the Metropolitan Police Department (MPD), and the Department of Public Works (DPW)—involved in the implementation of Vision Zero. Because racial equity is an indispensable component of Vision Zero, this report also considers the effect of equity considerations on the agencies’ enforcement strategies.

## Key District agencies involved in Vision Zero enforcement strategies

Enforcement of traffic safety is a complex issue, with responsibility shared by multiple D.C. government agencies. Of the nine agencies given lead roles in enforcement in D.C.’s 2015 Vision Zero Action Plan, MPD and DDOT had the most enforcement strategies, and with DPW’s responsibility to boot and tow scofflaws, vehicles with two or more unpaid tickets, DPW also plays a key enforcement role.<sup>9</sup> The Vision Zero 2022 Update, released October 2022, had a more focused approach to enforcement, only including five agencies with broader strategies than in 2015.<sup>10</sup> The 2022 Update also focused enforcement on the High Injury Network (HIN), a DDOT-created map resulting from an extensive analysis of crash data that was based on all injury and fatal crash data on all D.C. streets from 2016-2021 and identified HINs with the highest injury and fatal crash density as well as severity.<sup>11</sup> A compilation of enforcement-related Vision Zero strategies for DDOT, MPD, and DPW is provided in Appendix B.

When the Deputy Mayor for Operations and Infrastructure (DMOI) office was established in 2019 it took on Vision Zero oversight, holding regular all-agency meetings and tracking agency progress. In 2023, both the Vision Zero Division and Highway Safety Office transferred from DDOT to DMOI, though DDOT retained several traffic safety programs, including its Traffic Control Officer corps. DDOT continues to implement traffic infrastructure changes, as well as manage the automated traffic enforcement (ATE)

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8 Office of the D.C. Auditor (ODCA), “Vision Zero Part I: DDOT Made Progress on Engineering & Equity but Gaps Remain,” March 16, 2023, <https://dcauditor.org/report/vision-zero-part-i-ddot-made-progress-on-engineering-equity-but-gaps-remain/>.

9 D.C. Official Code § 50-2201.03(k)(1), “Any unattended motor vehicle found parked at any time upon any public highway of the District of Columbia against which there are 2 or more unpaid notices of infraction or vehicle conveyance fees that the owner was deemed to have admitted or that were sustained after a hearing... or against which there have been issue 2 or more warrants may, by or under the direction of a law enforcement officer or member of the Metropolitan Police force or the United States Park Police force or an employee of the District of Columbia Department of Transportation, either by towing or otherwise, be removed or conveyed to and impounded in any place designated by the Mayor or immobilized in such manner as to prevent its operation...” DPW uses the term ‘scofflaw’ to describe vehicles that are “boot-eligible.” <https://dpw.dc.gov/service/booting-and-impoundment>. Further, “boot” is the common term for “immobilization,” as DMV explains that a boot is a device attached to the vehicle’s wheel to immobilize it, <https://dmv.dc.gov/service/booted-or-towed-vehicles>.

10 [Vision Zero 2022 Update](#).

11 Kittelson & Associates, “DDOT Vision Zero Conceptual Design—High Injury Network Methodology,” May 13, 2022, internal document.

program,<sup>12</sup> which previously transferred from MPD to DDOT.<sup>13</sup>

## Vision Zero, racial equity, and law enforcement

Equity is a key theme of the Vision Zero initiative, both nationwide and in D.C. The D.C. government has made racial equity a stated priority since 2020 when the Council of the District of Columbia passed the Racial Equity Achieves Results (REACH) Amendment Act of 2020.<sup>14</sup> The Council Office of Racial Equity (CORE) and the Mayor’s Office of Racial Equity (ORE) were launched in 2021.<sup>15</sup>

Looking at Vision Zero and traffic safety through a racial equity lens, Figure 3 shows that most victims of D.C. traffic fatalities in recent years were Black, while that group comprised only 44.2% of the population.<sup>16</sup>

**Figure 3: Percentage of D.C. traffic fatality victims that were Black, non-Hispanic, 2016–2020**

2016	2017	2018	2019	2020
70%	77%	68%	83%	89%

Source: NHTSA, most recent data available as of January 2024.<sup>17</sup>

- 12 During the audit scope, a publicly available map with camera locations was available on the Vision Zero Crash Dashboard, at <https://visionzero.dc.gov/pages/crash-analysis#analysis>. The map could be seen by selecting “layers” and highlighting “Automated Traffic Enforcement – Cameras.” After the audit scope, DDOT created a new ATE web site which houses an updated ATE map: <https://ate.ddot.dc.gov/>.
- 13 The date of the transfer from MPD to DDOT was prolonged and the exact timing of the transition remains unclear. In 2019, a Mayor’s executive order delegated authority to DDOT. A Council Transportation and Environment Committee report describes that the Executive Order was issued even though the Committee had not accepted the transfer of the ATE program from MPD as it had requested a hearing first. On October 7, 2019, one week after the Mayor’s executive order, a Public Roundtable was held during which the Committee noted its questions were answered and it thus approved the transfer of ATE FTEs and funds from MPD to DDOT in the FY 2022 budget. That report noted the ATE program was in an awkward state during the interim as it was operated by DDOT and still funded by MPD. Mayor’s Order 2019-085, “Delegation – Authority Pursuant to Title IX, Automated Traffic Enforcement...” September 27, 2019; and Transportation and Environment Committee. “Fiscal Year 2022 Committee Budget Report,” July 1, 2021, <https://static1.square-space.com/static/5bbd09f3d74562c7f0e4bb10/t/60dcc163460aee56e1faf522/1625080164706/T%26E+FY22+budget+draft+report.pdf>.
- 14 D.C. Law 23-181, “Racial Equity Achieves Results Amendment Act of 2020,” Effective March 16, 2021. There was also an Emergency version of this law (Act 23-521) that became effective December 7, 2020, and expired on March 6, 2021. Additionally, there was a Congressional Review Emergency version that became effective on March 24, 2021, and expired on June 22, 2021.
- 15 Council Office of Racial Equity (CORE), <https://www.dcraciaequity.org/mission-vision-and-values#:~:text=Our%20Mission,in%20the%20District%20of%20Columbia> and Office of Racial Equity (ORE), <https://ore.dc.gov/page/mission-and-guiding-principles>.
- 16 U.S. Census Bureau interactive web page, “State Profile: Race and Ethnicity in the United States 2010 and 2020 Census,” Select: ‘D.C.’, ‘2020,’ and ‘Black or African American Alone or in Combination,’ <https://www.census.gov/library/visualizations/interactive/race-and-ethnicity-in-the-united-state-2010-and-2020-census.html>.
- 17 NHTSA data contain slightly fewer total fatalities for D.C. than MPD data do; therefore, percentages may be slightly different when accounting for total D.C. fatalities reported by MPD.

This trend reflects transportation inequities. DDOT’s web site explains these as “deep-rooted structural injustices” that have contributed to “disparate access to safe, affordable and efficient transportation” across D.C. communities.<sup>18</sup>

Concerns have also been expressed about the equity of government interactions through enforcement of traffic laws, as roughly 10% of people killed by police in the U.S. in recent years were involved in interactions that began with a traffic stop.<sup>19</sup> These concerns have only increased following high-profile officer involved killings, such as the 2020 murder of George Floyd in Minneapolis.<sup>20</sup> Various sources indicate that Black and other minority drivers are disproportionately stopped for traffic violations.<sup>21</sup> Traffic safety advocates such as the Governors Highway Safety Association (GHSA) and the national Vision Zero Network encourage the use of ATE cameras to lessen inequitable traffic enforcement by lessening the potential for officer bias in in-person traffic interventions.<sup>22</sup>

While not intended to replace in-person enforcement, ATE cameras nevertheless have been found to reduce speeding-related crashes, fatalities, and injuries.<sup>23</sup> ATEs are widely used in countries across Europe as well as Australia and in the U.S., 337 communities used red light cameras and 183 communities used speed cameras as of 2022.<sup>24</sup> The District adopted enabling legislation for cameras, which became effective in 1997,<sup>25</sup> and had implemented 50 red light cameras by 2000. D.C. was recognized in 2007 for its early and comprehensive use of automated enforcement as one of only 11 states then having an automated speed enforcement program.<sup>26</sup> The program grew to 170 cameras in 2021 and will add 342 cameras in 2024.<sup>27</sup>

The role of traditional police traffic enforcement to reduce injuries and fatalities on roads and enforce

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18 DDOT Equity Statement, paraphrased. <https://ddot.dc.gov/page/equity-statement>.

19 Mapping Police Violence: <https://mappingpoliceviolence.us/>.

20 Phillip Atiba Goff, “To Protect the Next George Floyd, We Must Remove the Threat of Police Violence from Everyday Life,” Time Magazine, April 20, 2021, <https://time.com/5956701/george-floyd-justice-police-reform/>; ODCA, “NEAR Act Police Reforms Advance Procedural Justice but Data Initiatives Stall,” September 14, 2023, <https://dcauditor.org/report/near-act-police-reforms-advance-procedural-justice-but-data-initiatives-stall/>, p.22.

21 Stanford Open Policing Project, <https://openpolicing.stanford.edu/findings/>, GHSA, “Equity in Highway Safety Enforcement and Engagement Programs,” August 2021, <https://www.ghsa.org/sites/default/files/2021-09/Equity%20in%20Highway%20Safety%20Enforcement%20and%20Engagement%20Programs%20FINAL%20with%20Date.pdf>, p.3.

22 GHSA, “An Analysis of Traffic Fatalities by Race and Ethnicity,” June 2021, [https://www.ghsa.org/sites/default/files/2021-06/An%20Analysis%20of%20Traffic%20Fatalities%20by%20Race%20and%20Ethnicity\\_0.pdf](https://www.ghsa.org/sites/default/files/2021-06/An%20Analysis%20of%20Traffic%20Fatalities%20by%20Race%20and%20Ethnicity_0.pdf); Vision Zero Network, “Equity Strategies for Practitioners,” 2017, [https://visionzeronetwork.org/wp-content/uploads/2017/11/VisionZero\\_Equity\\_FINAL.pdf](https://visionzeronetwork.org/wp-content/uploads/2017/11/VisionZero_Equity_FINAL.pdf).

23 NHTSA, “Speed Safety Camera Enforcement,” <https://www.nhtsa.gov/book/countermeasures-that-work/speeding-and-speed-management/countermeasures/enforcement/speed-safety-camera-enforcement>

24 Congressional Research Service, “Safety Impact of Speed and Red Light Cameras,” September 28, 2020, <https://crsreports.congress.gov/product/pdf/R/R46552>, p.12; GHSA, “Automated Traffic Enforcement for a New Era,” December 2023, p.8. In 2024, California will become the 25th state to allow use of ATEs.

25 The Fiscal Year 1997 Budget Support Act of 1996, effective April 9, 1997, granted the Mayor the authority to use ATEs to detect moving infractions. D.C. Law 11-198; currently codified at D.C. Official Code § 50-2209.1.

26 S. Shaheen, C. Rodier, and El. Cavanagh, “Automated Speed Enforcement in the U.S.: A Review of the Literature on Benefits and Barriers to Implementation,” October 1, 2007, Submitted to the Transportation Research Board Annual Meeting on July 2007, <https://escholarship.org/content/qt41k1k365/qt41k1k365.pdf>. R. Retting and C. Farmer, “Evaluation of Speed Camera Enforcement in the District of Columbia,” Transportation Research Record 1830 Paper No. 03-4012, <https://www.ihs.org/topics/bibliography/ref/1605>.

27 J. Rogers, S. Dey, R. Rettig, R. Jain, and X. Liang, “Using Automated Enforcement Data to Achieve Vision Zero Goals: A Case Study,” August 1, 2016, <https://ddot.dc.gov/sites/default/files/dc/sites/ddot/publication/attachments/Vision%20Zero%20Photo%20Enforcement%20-%20TRB%20Submission%20-%20Final.pdf>, p.5; DMV FY 2024 Budget, July 14, 2023, <https://www.dccouncilbudget.com/fy-2024-budget>, p.205.

laws governing who can drive is undergoing a transition and being debated in the District. MPD is the key law enforcement agency in the District and traffic stops have been a significant part of MPD's workload.<sup>28</sup> The D.C. Council created the D.C. Police Reform Commission in 2020 to "examine policing practices in the District and provide evidence-based recommendations for reforming and revising policing in the District."<sup>29</sup> It made several traffic enforcement recommendations in 2021, including moving traffic enforcement of violations not causing imminent threats to public safety from MPD to DDOT.

The D.C. Council has been active in trying to address traffic safety and rising fatalities and introduced several recent pieces of legislation, including the Automated Traffic Enforcement Effectiveness Amendment Act of 2023<sup>30</sup> and the Strengthening Traffic Enforcement, Education, and Responsibility ("STEER") Amendment Act of 2024.<sup>31</sup> The Council unanimously approved the latter in February 2024.<sup>32</sup> On the executive side, the Mayor established a Task Force on Automated Traffic Enforcement Equity and Safety in 2023 with a goal of making enforcement more equitable.<sup>33</sup> One of the various topics the task force aimed to examine included approaches to improve ticket compliance, including inter-jurisdictional reciprocity.

The issue of reciprocity with neighboring states for ATE tickets and seeking to ensure non-D.C. residents pay D.C. ATE and parking fines is a large issue for the District.<sup>34</sup> Vehicles registered in Maryland receive a large portion of ATE tickets and subsequently owe a significant amount in fines and fees, as discussed at the end of this report as an Auditor's Concern. In addition, there are a range of additional traffic safety, racial equity, and police reform topics that are the subject of intensive policy discussions in the District and, while important, they are not the focus of our audit.<sup>35</sup>

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28 MPD noted traffic stops were 61% of stops in 2019; 55% in 2020 and that about 6 in 10 stops in 2022 were traffic stops, "mostly where an officer has seen a traffic violation or is responding to a call for service or a crash." MPD "Stop Data Report," January-December 2020, [https://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/publication/attachments/Stop%20Data%20Report\\_september2021\\_v2.pdf](https://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/publication/attachments/Stop%20Data%20Report_september2021_v2.pdf), p.7, and MPD's "MPD Performance Hearing Responses," March 14, 2023, [https://dccouncil.gov/wp-content/uploads/2023/03/SUBMITTED\\_MPD-Perf-Hearing-Responses\\_03-14-23-signed.pdf](https://dccouncil.gov/wp-content/uploads/2023/03/SUBMITTED_MPD-Perf-Hearing-Responses_03-14-23-signed.pdf), p.143.

29 D.C. Act 24-76. Subtitle Q, "Comprehensive Policing and Justice Reform," <https://code.dccouncil.gov/us/dc/council/acts/24-76>; D.C. Police Reform Commission, "Decentering Police to Improve Public Safety," April 1, 2021, <https://dccouncil.gov/police-reform-commission-full-report/>, p.101.

30 Bill 25-422, introduced on July 6, 2023. As of the date of this report, this legislation has not yet been voted out by the Council of the District of Columbia.

31 Act 25-406. This act was transmitted to Congress on March 11, 2024, with a projected law date of May 14, 2024.

32 Others include Bill 25-421 the License Suspension Reform Amendment Act of 2023 and Bill 25-435 the Fraudulent Vehicle Tag Enforcement Amendment Act of 2023, both of which are currently under Council review. Each of these bills addresses broader legal issues within the District's traffic enforcement and adjudication system, and the STEER Act specifically proposes changes in the definition of vehicles that can be booted or towed, which would impact DPW's booting and towing regime.

33 DMOI web page, "Mayor's Task Force on Automated Traffic Enforcement (ATE) Equity and Safety," <https://dmoi.dc.gov/atetaskforce>.

34 D.C. Official Code § 50-2301.12(a) gives the Mayor authorization to establish reciprocal agreements with states or other jurisdictions regarding non-moving and ATE fines. Further D.C. Official Code § 50-2301.12(b) requires the Mayor to negotiate with Virginia and Maryland to establish reciprocal agreements regarding enforcement of such violations.

35 One example is the rise of fake tags and obscured tags which complicates enforcement. A City Administrator-convened task force (p.4-5) addressing this issue did not make any recommendations because it found many of the initial ideas could have "a possible negative impact on people of color." "Pre-Hearing Questions for Deputy Mayor for Operations and Infrastructure Hearing on B24-949, the Booting and Impoundment Reform Amendment Act of 2022, and Traffic Safety in the District," Committee on Transportation and Environment, <https://www.dropbox.com/s/2ygxrel4swr3vn1/DMOI%20Pre-Hearing%20Questions%20-%20Traffic%20Safety.pdf?dl=0>, p.4. A second example is the Clean Hands legislation that was discussed in a Tzedek Report as having implications for the equity of enforcement outcomes "Driving DC to Opportunity: Wealth Should Not Determine Who Gets to Keep Their Driver's License" at <https://www.tzedekdc.org/report-faqs>; and a third example is the issue of adjudication: a March 2023 crash on Rock Creek Parkway in which 3 people were killed by a driver with multiple DUIs who reportedly should not have had a valid license highlighted communication failures between the Department of Motor Vehicles and D.C. courts. For more, see: <https://www.vox.com/23880418/traffic-safety-enforcement-tickets-rock-creek-crash>.

# Objective, Scope, and Methodology

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## Objective

The objective of this audit was to determine if the District Department of Transportation (DDOT), the Metropolitan Police Department (MPD), and the Department of Public Works (DPW) implemented traffic safety enforcement within the Vision Zero initiative effectively and equitably throughout the District.

While the Deputy Mayor for Operations and Infrastructure (DMOI) had oversight responsibilities of various agencies implementing Vision Zero, we did not audit DMOI because it was not directly carrying out traffic enforcement.

## Scope

The audit scope for DDOT and DPW was October 1, 2020, through September 30, 2022 (FYs 2021 through 2022). The audit scope for MPD was calendar years (CYs) 2021 and 2022 as MPD presented data in its Traffic Plan, internal Vision Zero reports, and Annual Reports on a calendar year basis. D.C. compiles fatalities on a calendar year basis, and *this report will present data on a calendar year basis unless otherwise specified*.

For all three of the audited agencies, we requested enforcement data for the period 2018-2022, to have historical data as a benchmark for enforcement performance.

## Methodology

To address our objective, we:

- Reviewed the 2015 Vision Zero Action Plan to identify DDOT, MPD, and DPW’s enforcement-related strategies, cross-referenced these strategies with the Vision Zero 2022 Update, and conducted a risk assessment to select key 2015 strategies for each agency.
  - While the 2015 Vision Zero Action Plan assigned MPD the ATE strategy, we assessed DDOT’s implementation of this strategy during our scope as the ATE program transitioned from MPD to DDOT.
  - While the 2015 Vision Zero Action Plan ATE strategy noted “stop sign, speed, red light, oversize, and overweight” ATE camera violations, we primarily focused our analysis on speed cameras as these were the main type of camera and provided examples of DDOT making assessment, deployment, and rotation decisions.
- Reviewed DDOT, MPD, and DPW budgets, Performance Plans and Performance Accountability Reports (PAR), D.C. Council performance oversight response documents, and relevant Council Committee reports.
- Reviewed D.C. and federal government, academic, advocacy, and news articles on ATEs, traffic safety, enforcement effectiveness and equity, such as Office of the Inspector General reports on traffic enforcement adjudication and D.C.’s Major Crash Review Task Force.

- Received assistance from Emmanuel Lopez, Associate Data Scientist in ODCA's Public Safety Unit, in data preparation, analytics, and visualizations.
- Incorporated research on police and traffic enforcement related topics from Charles Peskin, then-law student at Georgetown University Law Center.
- Interviewed stakeholders from the Bicycle, Multi-Modal Accessibility, and Pedestrian Advisory Councils, advocates from two different organizations promoting bicycle and pedestrian safety and an Advisory Neighborhood Commissioner.
- Interviewed staff from the D.C. Council and DMOI, as well as reviewed the 2022 Multi-Agency Vision Zero Action Tracker and other information from DMOI.
- Assessed the five components of internal control for each agencies' activities related to Vision Zero and traffic safety enforcement.
- Reviewed DDOT's list of ATE cameras operational during our scope and conducted data reliability on that list using the Department of Motor Vehicles (DMV) data.
- As DDOT did not have policies and procedures defining or identifying the "high-priority locations" referred to in the 2015 Action Plan, identified "high-priority locations" as those found in: (1) the Howard University Transportation Research and Data Center's 2018-2020 and 2019-2021 "Traffic Safety Statistics Report for the District of Columbia," specifically the hazardous intersections found in the ranking lists for "Crash Rate," "Crash Frequency," and "Crash Composite Index," and (2) DDOT's 2015, 2020, and 2022 High Injury Network (HIN) corridors lists.
- Determined the proximity of each deployed ATE camera to a "high-priority location" by using an online map to count blocks from the camera to the nearest high-priority location. The reverse process was used to determine the camera closest to each of the top 25 intersections on Howard University Transportation Research and Data Center's 2019-2021 Crash Composite Index.
- Reviewed MPD data to (1) compile numbers of relevant warnings, violations, arrest charges, and parking violations issued each calendar year from 2018–2022, and (2) check the data reliability for each MPD dataset by sorting and filtering the data; checking for voids, duplicates, and missing data; cross checking it with other MPD reported data and discussing with MPD data scientists via email and in meetings.
- Reviewed the 2020, 2022, and 2023 Fatal Crash Reduction Plan and Appendices of seven Patrol District Traffic Plans. For the 2022 Patrol District Traffic Plans, we assessed whether the Traffic Plans' focus violations were supported by best practices, and whether the Traffic Plans' geographic enforcement focus locations were effective and data driven.
- Analyzed five years of DPW booting data (2018-2022) and five years of DPW tow data (2018-2022).
- Analyzed two years of parking violation data (FYs 2021-2022) from DPW and DMV.
- Analyzed parking violation data for FYs 2021 and 2022, filtered to show commercial vehicles registered in D.C., including:
  - To filter for commercial vehicles, we confirmed with the D.C. DMV that commercial vehicles registered in D.C. had a specific license plate format which was the letter "C" followed by five numbers.
  - Requested information via email on commercial license plate formats from the D.C., Virginia, and Maryland DMVs.

A more detailed methodology can be found in Appendix C.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Audit Results

Analyzing Vision Zero’s public health approach to traffic safety on the part of agencies that were not created with that focus—some of which have broad and varied missions far beyond traffic enforcement—is a challenging endeavor. We found that DDOT, MPD, and DPW management had not established all of the components necessary to implement key Vision Zero enforcement strategies and report reliable information about its efforts. Auditors call this process “internal control,” and while not necessarily visible to stakeholders outside of an organization, an effective internal control system increases the likelihood that an agency will achieve its objectives and helps an agency adapt to shifting environments, evolving demands, changing risks, and new priorities.<sup>36</sup>

While each finding in this report digs deeper into the conditions at each agency, Figure 4 provides an overview of the extent to which DDOT, MPD, and DPW management put in place the five internal control components to achieve the objective of implementing key Vision Zero enforcement strategies.

**Figure 4: Assessment of DDOT, MPD, and DPW Internal Control System for Vision Zero Enforcement**

High-level summary of the five components of internal control that help an agency achieve its objectives	DDOT	MPD	DPW
Agency management demonstrates a commitment to integrity, and the environment is structured to assign and delegate authority; is committed to staff development and retention and evaluates performance. <i>(Control Environment)</i>	<b>Strong</b>	<b>Strong</b>	<b>Weak</b>
Agency defines goals and objectives, identifies barriers to achieve those, and responds by mitigating these barriers. <i>(Risk Assessment)</i>	<b>Strong</b>	<b>Moderate</b>	<b>Weak</b>
Policies and procedures and information systems are designed and implemented to achieve objectives and respond to risks. <i>(Control Activities)</i>	<b>Moderate</b>	<b>Moderate</b>	<b>Weak</b>
Internal and external data and communication are high quality and support achieving objectives. <i>(Information and Communication)</i>	<b>Strong</b>	<b>Moderate</b>	<b>Weak</b>
Management monitors activities, evaluates results, and takes action to fix problems. <i>(Monitoring)</i>	<b>Moderate</b>	<b>Moderate</b>	<b>Weak</b>

Source: ODCA analysis.

This figure shows the three agencies’ strengths and weaknesses of the internal control components needed to effectively implement Vision Zero, which are partially explained by the fact that each agency had different missions and histories of Vision Zero involvement. For example, DDOT’s mission includes

36 For important facts and concepts related to internal control, see: Government Accountability Office, “Standards for Internal Control in the Federal Government,” September 2014, <https://www.gao.gov/assets/gao-14-704g.pdf>, p.2. See also ODCA, “The Case for District-Wide Internal Control Standards,” January 8, 2019, <https://dcauditor.org/report/making-the-case-for-district-wide-internal-control-standards/>.

safety, and it housed the Vision Zero Division for years, MPD operations had long included traffic enforcement, and DPW's mission and operations were not explicitly about traffic safety. Our internal control assessment of DPW only related to Vision Zero and did not reflect the agency's other operations. Further, DDOT had a "Strong" Information and Communication component because of its ATE program transparency, including monthly public reporting of newly deployed ATE camera locations, though we found weaknesses in DDOT's ATE program reports to the Council. Our recommendations for all three agencies, if implemented, will strengthen internal control related to Vision Zero.

Much of what we found in our first Vision Zero audit—inadequate administrative support and funding for the multi-agency initiative, and a lack of annual progress reporting—created the conditions for what we found in this second audit.

We readily acknowledge that traffic safety is a challenging and ever-changing environment, Vision Zero is an ambitious goal, and ODCA is not a traffic safety expert. We did not find that any of the agencies were ineffective in providing traffic safety enforcement and in fact our data presentation throughout the report and in the Appendices provides insight into the amount of enforcement taking place. This audit did not measure how the District's use of the various enforcement tools the District selected – ATEs, in-person police activities, booting and towing – compared with other jurisdictions, but it was an assessment of how effectively three key traffic safety enforcement agencies implemented key strategies announced in the 2015 action plan. While our report provides enforcement data analysis and visualizations for each agency, we do not present a measure for effectiveness as that is for the agencies themselves to set, and we present data to provide agencies with what a starting point might look like.

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**DDOT did not deploy ATE cameras at 100% of "high-priority locations," as outlined in the 2015 Action Plan. While more than half (61%) of the red light and speed cameras were located on the High Injury Network or at hazardous intersections, less than half of the 25 most hazardous intersections had a camera deployed.**

With respect to ATE cameras, the 2015 Vision Zero Action Plan directed MPD to: "Strategically deploy photo enforcement. Provide necessary infrastructure for cameras at 100% of high-priority locations.... Use Vision Zero safety map to identify potential locations."<sup>37</sup> As the ATE program transferred from MPD to DDOT, we used these criteria to assess DDOT's ATE deployment.

Additionally, DDOT's 2021 moveDC plan established goals to: "Expand the Automated Traffic Enforcement (ATE) Program and improve the placement of enforcement assets to enhance safety," as well as "Track and report on trends in violations at enforcement sites and the effectiveness of rotating resources."<sup>38</sup> It also stated that the "Vision Zero initiatives focus on high-injury corridors and prioritize funding to those locations."<sup>39</sup>

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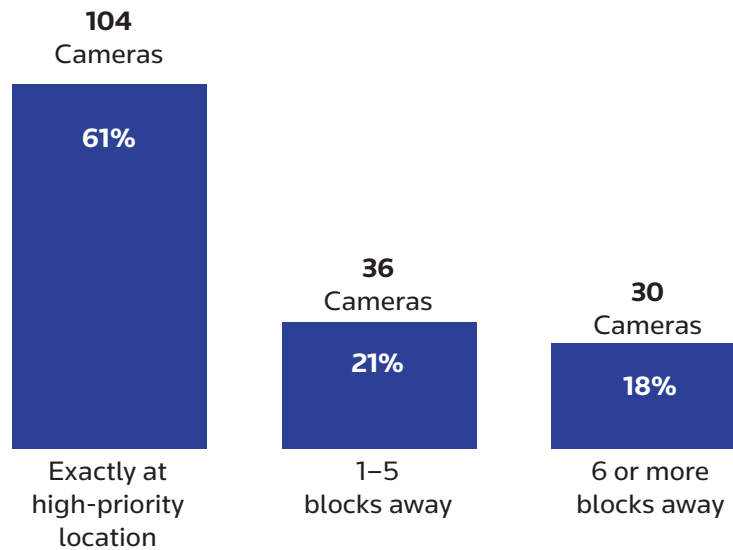
37 [2015 Action Plan](#), p.91. The strategy also included: "Target violations: stop sign, speed, red light, oversize, and overweight." We focused our analysis on speed cameras as it was the part of DDOT's ATE program that was undergoing extensive growth and development, whereas red light cameras were in more fixed locations, and not as subject to DDOT decision making.

38 DDOT, "moveDC" December 2021, <https://movedc.dc.gov/>, p.39.

39 Ibid, p.21.

We found DDOT had efforts underway to enhance ATE camera deployment but did not define “high-priority locations,” making it difficult to know how many locations there were and to ensure 100% of them had the necessary infrastructure. Without a DDOT definition, we defined high-priority locations as being on the High Injury Network (HIN) or ranked in DDOT’s hazardous intersections report, and we assessed whether camera locations matched the locations on either list.<sup>40</sup> Of 170 deployed red light and speed cameras, we found 104 cameras (61%) were at a high-priority location while 30 cameras (18%) were six or more blocks away from the closest high-priority location.<sup>41</sup> Figure 5 shows the distance all 170 cameras were from high-priority locations.

**Figure 5: Distance from ATE Cameras to High-Priority Locations**



Source: ODCA analysis.

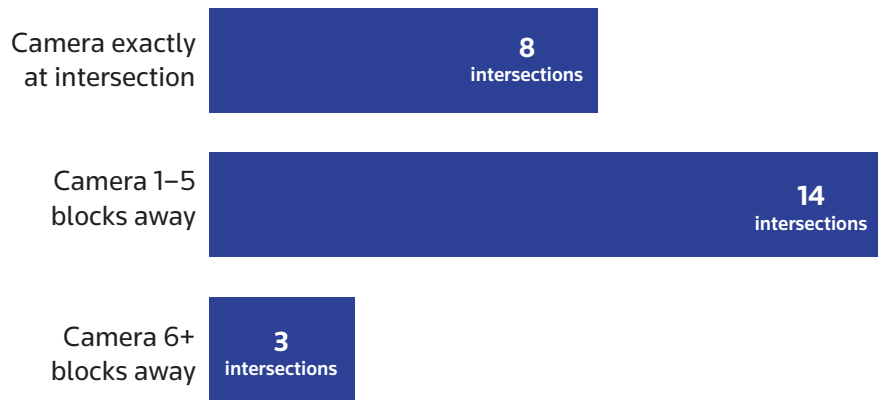
We also found DDOT deployed red light and speed cameras at less than half of the District’s 25 most hazardous intersections,<sup>42</sup> as seen in Figure 6 on the following page.

40 Howard University Transportation Research and Data Center, “Traffic Safety Statistics Report for the District of Columbia (2018-2020),” September 29, 2021, p.85-108.

41 To determine the distance from high-priority locations, we mapped ATE cameras in relation to the HIN and hazardous intersections. For non-exact matches, the number of blocks between the cameras and locations were counted. The audit team did not count cameras that required a full turn to get to the intersection or corridor. This included using directionality to ensure that a camera would impact someone driving through the dangerous location. For more information about impact of cameras at different distances, see additional research cited in: Council’s Office of the Budget Director, “Automated Traffic Enforcement Systems,” January 8, 2024, <https://static1.squarespace.com/static/5bbd09f3d74562c7f0e4bb10/t/659c48193123442f2c5ad51b/1704740890154/Automated+Traffic+Enforcement+Systems.pdf>, p.6.

42 Howard University Transportation Research and Data Center, January 19, 2023, “Draft Report: Traffic Safety Statistics Report for the District of Columbia (2019-2021),” unreleased report, p.94-96.

**Figure 6: Distance from District’s 25 Most Hazardous Intersections to Closest ATE Camera**



**Source: ODCA analysis.**

Additional ODCA analysis of ATE data can be found in Appendix D.

To explain why some high-priority locations lacked ATE cameras, DDOT stated that MPD placed many of the cameras prior to DDOT’s full control of the program. When we analyzed the cameras that DDOT rotated (moved to a different location), we found that DDOT rotated a smaller portion of cameras to high-priority locations than had been in place at high-priority locations at the beginning of our scope.

Instead, not achieving the 100% deployment goal was more correlated to the fact that DDOT had insufficient policies and procedures to define high-priority locations, prioritize them, and detail how camera locations were to be identified, assessed, performance measured, and reported.

Documentation DDOT shared about the process used to select camera locations did not include a definition of high-priority. It also did not include the HIN or the hazardous intersections report as sources to proactively identify potential camera locations, as ODCA used to define high-priority locations.

DDOT stated that it immediately incorporated ATEs into its 311 Traffic Safety Investigation (TSI)<sup>43</sup> process, when transitioning the ATE program from MPD. DDOT received ATE requests for specific locations and sent staff out to those locations to identify all potential traffic calming solutions. While this process expanded the range of possible interventions at a location and allowed for community engagement, the process did not include high-priority locations as a driver of the identification process. DDOT documentation showed multiple sources for requests of ATE camera installation both within and outside of DDOT, as detailed in Figure 7.

<sup>43</sup> The Traffic Safety Investigation process is now called Traffic Safety Input.

**Figure 7: Sources of Requests to DDOT for ATE Camera Installation**

ATE Request Origin	Within DDOT	Outside DDOT
311 requests submitted by residents, Council members, and ANCs		X
Emails from residents, ANCs, Council		X
Fatal crash review process	X	
Engineering and safety studies field visits (Infrastructure Project Management Division and Traffic Operations and Safety Division)	X	
Requests from MPD		X

Source: DDOT ATE Program Siting Criteria and Enforcement Overview and ATE Assessment Tracker.

While it is a best practice for an ATE program to be responsive to the community,<sup>44</sup> DDOT’s process should ensure that the first priority is to advance its Vision Zero and moveDC goals of locating ATE cameras at high-priority locations. After reaching that goal, DDOT can and should respond to community requests for cameras. It is DDOT’s role to bridge that gap but playing that role was more difficult without clear procedures to prioritize that cameras were first assessed at the locations that pose the greatest risk and then balance community requests.

Including the fatal crash review process in its ATE location identification process was consistent with DDOT’s own goals.<sup>45</sup> We reviewed the seven DDOT Fatal Crash Follow-Up memos that recommended ATE cameras and found that DDOT deployed cameras at three locations and that DDOT’s explanations why cameras were not deployed at the remaining four locations incorporated sufficient appropriate analysis.

**The site assessment forms used did not indicate high-priority locations and were incomplete for many ATE cameras.** To determine if a speed camera should be deployed at an identified location, DDOT created a site assessment form.<sup>46</sup> This form reflected best practices to use crash data and community context, including speed and traffic count data, crash history, and pedestrian generators (such as schools, playgrounds, and recreation centers). Despite including best practices, like the location identification process described above, the site assessment form did not identify whether the location was a high-priority location.

Additionally, DDOT did not conduct a site assessment for every deployed ATE camera. In our sample, 33% of the cameras (including a camera reactivated at an MPD legacy site) did not have completed site assessments. DDOT staff explained that they were still in the process of reviewing camera locations like

44 American Automobile Association’s “Automated Enforcement Program Checklist” states that a successful ATE program must “Identify problem intersections and roadways” and that one of the sources is to “Collect resident and roadway user input.” <https://newsroom.aaa.com/wp-content/uploads/2021/05/AE-checklist-May-2021.pdf>.

45 DDOT’s 2018 Major Crash Review Task Force: “DC’s Vision Zero Division, in coordination with other DDOT offices and DC agencies as appropriate, should review fatal and critical injury crashes with an eye toward the cause of the crash from a safety perspective or at [sic] methods of preventing crashes,” [https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page\\_content/attachments/Major\\_Crash\\_Review\\_Task\\_Force\\_report2018\\_FINAL.pdf](https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page_content/attachments/Major_Crash_Review_Task_Force_report2018_FINAL.pdf), p.21.

46 After the site assessment, the location would then be assessed for feasibility (could a camera be safely located by the roadway, etc.) and deployed, but we did not examine this process.

these that were in place when the program was transferred to ensure all cameras were compliant. This incomplete transition was also seen in some ATE program documentation that included references to MPD sergeants instead of specific DDOT staff or divisions.

**ATE camera performance was judged primarily on citations, not crash or speed data.** After site identification, assessment, and deployment, DDOT implemented a camera rotation process “to assign a finite number of cameras to locations which will have the greatest effect on the local community.”<sup>47</sup> This involved determining which active cameras should be moved from their current location. It was a necessary process due to the limited camera inventory in comparison to the large number of requests across the city.

To determine when an ATE speed camera should be rotated, DDOT tracked notices of infractions (NOIs) weekly and monthly.<sup>48</sup> DDOT did not have consistent procedures for measuring camera impact, such as analysis of other safety-related data like crash and speed studies, nor for how to measure impact along the HIN. Staff explained that while they were tracking safety related citations on the HIN it was not yet informing their rotation decisions.

When we asked for analysis of crash statistics before and after ATE camera deployment, DDOT referred to a 2021 study which showed a 30% reduction in injury crashes and a 9% reduction in overall crashes after ATE cameras were installed.<sup>49</sup> DDOT staff stated that they used this type of crash data for rotation decisions in the past, but it was not an ongoing process, as it would require many years of data collection at each site. DDOT staff also said they plan to assess performance more fully when new camera technology incorporates passing data, which is the speed of all vehicles moving past the site.

**DDOT’s semi-annual reports to the Council were delayed and did not contain some key details.** DDOT did not have detailed procedures for complying with the requirement to submit semi-annual ATE program reports to the Council.<sup>50</sup> Procedures would be helpful as we found the D.C. Official Code to be ambiguous about when the first report was due; we interpreted a January 1 and July 1 reporting schedule, though DDOT interpreted the reporting period as March through September with additional time for internal review. DDOT also stated that the program transition from MPD was completed in October 2021, 10 months after we calculated the first report was due. As a result, DDOT submitted only three of the four reports due, and all were delayed, as shown in Figure 8.

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47 DDOT, “FY22 Performance Oversight Questions—Part 1,” <https://dccouncil.gov/wp-content/uploads/2023/02/DDOTPOH.pdf>, p.91.

48 According to DDOT staff, red light cameras are not currently rotated due to their permanent in-ground placement.

49 A. Abdelhalim, L. Bailey, E. Dalphy, and K. Raboy, “Data Enforced: An Exploratory Impact Analysis of Automated Speed Enforcement in the District of Columbia,” June 18, 2021, <https://ieeexplore.ieee.org/document/9565046>. p.4.

50 D.C. Official Code § 50-2209.05, “ATE Reporting to Council” requires DDOT, in consultation with DMV, to report semi-annually to the Council on a variety of data pertaining to ATE.

**Figure 8: Semi-Annual Report to Council Due Dates and DDOT Submissions**

Report Number	Report Due Dates	Date Report Submitted	Delay (Months)
1	January 2021	January 2022	12
2	July 2021	March 2022	8
3	January 2022	September 2022	9
4	July 2022	Not submitted <sup>51</sup>	n/a

Source: ODCA analysis.

The three reports DDOT submitted contained nearly all the required information,<sup>52</sup> as seen in Figure 9, except for the reasons why each new ATE camera location was chosen. DDOT instead included a summary sentence highlighting that camera types and locations were “selected after a traffic safety analysis using crash, traffic volumetric and speed data and location type.”<sup>53</sup>

**Figure 9: DDOT’s Semi-Annual Reports Included Most Required ATE Camera Information**

Report	Top 15 ATE locations by value of citations generated	Breakdown of the jurisdictions where vehicles registered	Amount of ATE citations issued in total and by location	Locations where cameras have been added in the last 6 months	Reasons why each new location was chosen
1	X	X	X	X	
2	X	X	X	X	
3	X	X	X	X	

Source: ODCA analysis.

Without specific explanations for why each ATE camera location was chosen, DDOT was insufficiently reporting its progress placing cameras at high-priority locations and public stakeholders were not given reasons for individual camera changes in a timely manner. This was especially true as DDOT and DMOI

<sup>51</sup> As of April 1, 2024.

<sup>52</sup> D.C. Official Code § 50-2209.05(a) mandates that the reports contain the following information: (1) The top 15 ATE locations by value of citations generated in the District; (2) The breakdown of the jurisdictions where those receiving ATE citations and with outstanding ATE citation debt have their vehicles registered; (3) The locations where cameras have been added in the last 6 months and the reasons why those locations were chosen; and (4) The amount of ATE citations issued in total and by location.

<sup>53</sup> DDOT “Automated Traffic Enforcement Semi-Annual Report,” September 28, 2022, <https://lims.dccouncil.gov/Legislation/RC24-0222>, p.9.

explained that formal semi-annual reports took a long time to get approved, causing delays in the reports reaching the Council and the public.

As the ATE program continues to expand, improving the deployment process is necessary to reduce traffic injuries and ensure public trust. With 342 new cameras budgeted in FY 2024 (122 speed, 140 bus lane, and 80 additional ATE cameras covering stopping, school bus, and vehicle size rules), it is essential that DDOT adopt procedures to ensure cameras are placed at high-priority locations, where pedestrians, cyclists, and drivers are particularly vulnerable to traffic-related injuries or fatalities. DDOT has made progress to address this after the audit period,<sup>54</sup> such as incorporating the HIN into the TSI assessment process,<sup>55</sup> developing a proactive model for placing cameras, and making public its camera location selection methodology.<sup>56</sup>

Program expansion also means public scrutiny will increase, which will likely focus on the placement of specific ATE cameras, and camera revenue could become a greater public concern. DDOT did not have a completed site assessment for the speed camera that has consistently generated the most fines, located on DC 295, the Anacostia Freeway, near exit 1, which issued \$39.7 million in fines during FYs 2021 through 2022, more than double the amount generated by any other ATE camera. DDOT staff acknowledge that the freeway location is not included on the HIN but stated that DC 295 had a high volume of speeders, often in the higher categories of 22 miles per hour over the posted limit.

While DDOT documentation clearly states that “revenue IS NOT a factor in the assessment process,”<sup>57</sup> and generating significant revenue is not itself a problem, as cameras generate tickets based on the number of vehicles exceeding the posted speed limit, policies and procedures should be in place to ensure site assessments and public reports are produced for all deployed cameras. This will provide traffic safety data to justify each deployment and help dispel the concern that “safety cameras are intended primarily for revenue generation.”<sup>58</sup> This concern was highlighted in interviews we conducted as well as in the 2014 D.C. Office of the Inspector General’s report.<sup>59</sup>

Having and sharing completed site assessments for each deployed ATE camera would increase program transparency and better align the program with NHTSA’s best practice to “use transparent, data-driven systems to place and report results to ensure that public safety is the primary interest and not revenue generation.”<sup>60</sup> An explanation for each camera’s location in either the semi-annual report or another

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54 In December 2023, DDOT rolled out new cameras at “locations throughout the District identified by data analysis with the following safety issues: (1) High Injury Network (HIN) locations, as a result of speeding; and (2) local roads with consistent stop sign running.” <https://ddot.dc.gov/release/ddot-deploying-automated-traffic-enforcement-cameras-new-locations-december>.

55 DDOT, “DDOT Traffic Safety Input (TSI) Prioritization Model,” January 6, 2023, <https://ddot.dc.gov/sites/default/files/dc/sites/ddot/DDOT%20Traffic%20Safety%20Input%20%28TSI%29%20Prioritization%20Model.pdf>.

56 DDOT web page, “Selection Methodology for Automated Traffic Enforcement Locations,” <https://ate.ddot.dc.gov/pages/methodology>.

57 DDOT, “ATE Program Siting Criteria and Enforcement Overview,” internal DDOT document, p.9.

58 Vision Zero Network “Elevating Equity in Vision Zero Communications,” November 2016, <https://visionzeronetwork.org/wp-content/uploads/2017/01/VZ-Equity-White-Paper-FINAL.pdf>, p.16.

59 D.C. Office of the Inspector General, “Parking and Automated Traffic Enforcement Tickets- Part 1: Ticket Issuance Practices,” September 2014, [https://oig.dc.gov/sites/default/files/Reports/PATE\\_final\\_9-8-2014.pdf](https://oig.dc.gov/sites/default/files/Reports/PATE_final_9-8-2014.pdf). This report found that a 2014 study intended to “instill public trust that speed cameras are installed by the D.C. government to improve safety and not just increase local revenues” had the “opposite effect,” p.13.

60 NHTSA, “2023 Speed Safety Camera Program Planning and Operations Guide,” January 2023, <https://highways.dot.gov/sites/fhwa.dot.gov/files/Speed%20Safety%20Camera%20Program%20Planning%20and%20Operations%20Guide%202023.pdf>, p.12.

format could also enhance Council oversight of the program and allow Councilmembers and ANCs to provide residents information about why a camera was placed in their neighborhood.

The Vision Zero 2022 Update is outside our audit scope but did include several ATE program performance goals that focus on the program's key risk areas. These goals could be more specific and include benchmarks to measure progress.<sup>61</sup> Our recommendations below would assist DDOT differentiate between new assessments and rotations and clarify the parts of the location identification process during which the HIN should be prioritized and thereby could assist in filling these gaps to achieve performance goals.

Finally, our first Vision Zero report made several recommendations to DDOT about the High Injury Network that also apply to DDOT's effective implementation of the ATE program. These include the need to ensure HIN data sources are identified, HIN sites are regularly assessed, and project selections are based on the HIN.<sup>62</sup>

## Recommendations

1. DDOT should augment its policies and procedures to detail how ATE locations are selected and camera performance monitored, including staff and management responsibilities and data sources used to proactively identify locations.
2. DDOT should ensure the timely and complete reporting of information required in D.C. Official Code § 50-2209.05(a), including detailed explanations for each new ATE camera's deployment and if deemed warranted, recommend amendments to the reporting requirement if an alternative such as data uploads could improve the timeliness and usefulness to the Council and public.

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## **MPD's 2021 and 2022 traffic violations, warnings, and arrests dropped well below 2018 and 2019 pre-pandemic levels. Most violations and warnings, which made up the majority of MPD enforcement actions, were focused on safety, while most arrest charges were focused on requirements to drive, such as having a valid permit, registration, and tags.**

All MPD patrol officers "are strongly encouraged to proactively conduct alcohol enforcement or traffic enforcement during their normal tours of duty."<sup>63</sup> We found MPD established an organizational structure that encouraged officers to proactively conduct traffic enforcement during their tour of duty and during voluntary overtime:

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61 Vision Zero 2022 Update ATE Action Commitments/Goals: "Increase the number of ATE cameras deployed with a focus on the HIN, arterials, and high-speed streets; Enhance safety assessment of new ATE cameras to weight HIN in conjunction with other DDOT processes," <https://visionzero.dc.gov/pages/2022-update>, p.19.

62 ODCA's Vision Zero Part I report recommended on page 17: (2) DDOT should use the High Injury Network to prioritize project selection based on safety and equity. (3) DDOT should create policies and procedures that detail staff roles and responsibilities for the: creation and maintenance of a comprehensive database; development of a High Injury Network; use of the High Injury Network for project selection; and required documentation for project selection, including when projects are not represented in the High Injury Network.

63 MPD, "2022 Fatal Crash Reduction Plan," February 9, 2022, internal document, p.4.

- In both internal and external reporting, MPD highlighted that its “stops play a vital role in Vision Zero and making our streets safe for all users” and it “is committed to working collaboratively within the Department and with the District Department of Transportation (DDOT) in addressing traffic safety issues across the City thus providing safer streets and road[s] for all roadway users in the District of Columbia.”<sup>64</sup>
- MPD was a member of the Vision Zero Working Group and participated in the Major Crash Review Task Force as well as meetings of the Bicycle Advisory Council and Pedestrian Advisory Council.
- The seven Patrol Districts had Traffic Captains who developed data-driven traffic plans to guide officers. Our analysis of these plans is covered in the next finding.
- The Special Operations Division had a Traffic Captain who coordinated with Patrol District Traffic Captains.
- A small Traffic Safety and Specialized Enforcement Section (TSSES) within the Special Operations Division contained the Traffic Safety Unit,<sup>65</sup> and managed planned, proactive, federally funded overtime enforcement.<sup>66</sup> MPD’s in-person enforcement conducted on overtime assignments represented significantly less than MPD’s enforcement actions during normal tours of duty, both are included in all general charts and detailed separately in Figures 14 and 17 on the following pages.

Although the structure remained in place, we found that MPD enforcement actions to respond to traffic and parking infractions (violations, warnings, arrests, and parking tickets), decreased since 2019, as seen in Figure 10 on the following page.

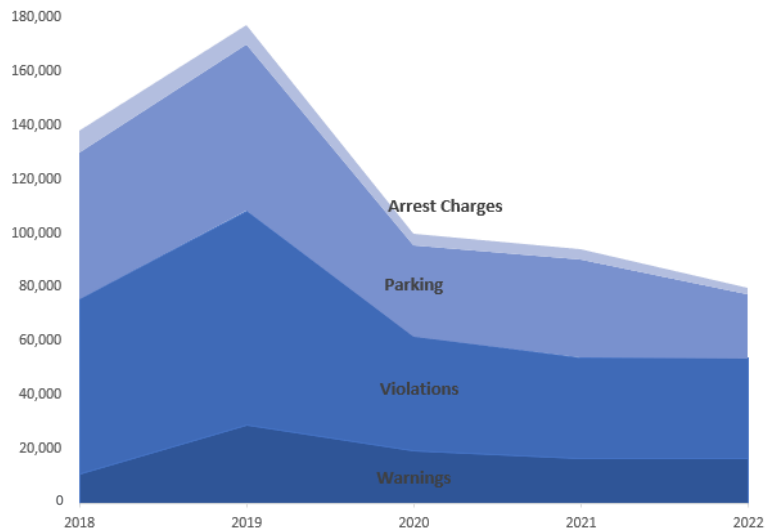
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64 “Stop Data Report: January-December 2020”; internal MPD 2022 Fatal Crash Reduction Plan.

65 It also contained the Major Crash Investigations Unit and the Motor Carrier Safety Unit.

66 MPD overtime is funded by grants from the Highway Safety Office (HSO), which is funded by NHTSA. NHTSA provided guidance on when and where to do overtime traffic enforcement based on inputs such as when highest crash rates occur or where people are failing to wear seatbelts. Other MPD grant-funded activities include regional campaigns, car seat workshops, and officer training.

**Figure 10: MPD Traffic Enforcement Actions, 2018–2022**



**Note: Data for warnings, violations, or arrest charges issued exceeds the number of traffic stops because stops may have multiple warnings, violations, or charges.**

**Source: ODCA analysis of MPD traffic enforcement data.**

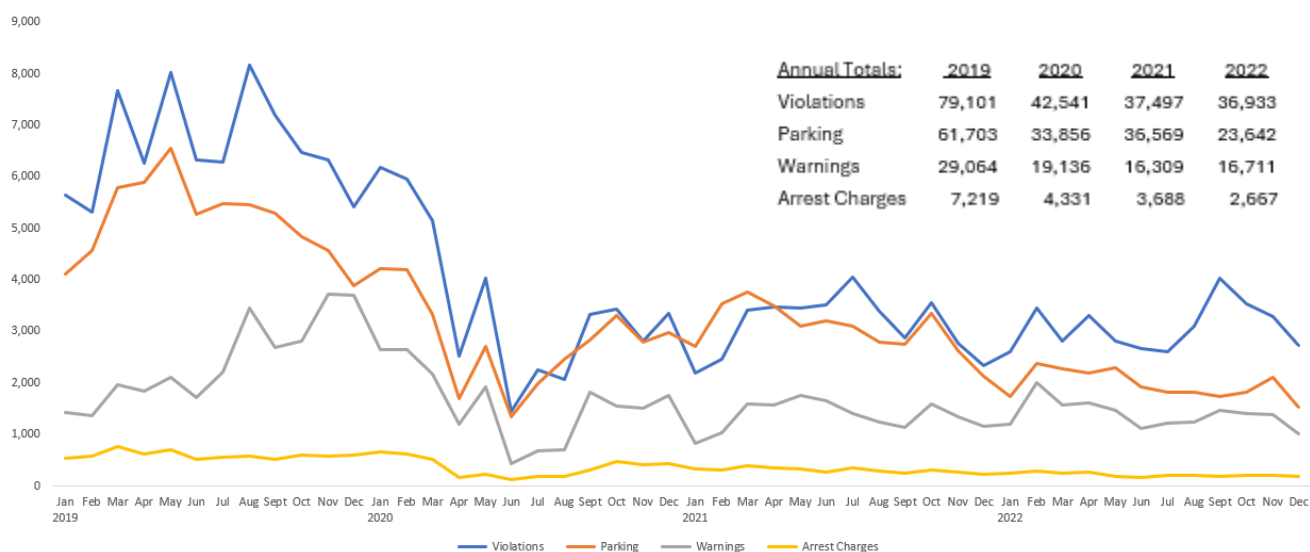
Quantifying MPD enforcement actions may not fully measure the deterrence effect of enforcement and how many infractions may have been avoided, crashes prevented, or lives saved due to the enforcement that is occurring. We present these enforcement data as one measure of officer time and resources dedicated to traffic safety, as a high level MPD official explained that the goal of issuing warnings and violations was to modify people’s behavior and educate them about traffic safety.<sup>67</sup> MPD also provides strictly educational activities, such as seat belt education.

These enforcement declines were consistent with national trends coinciding with the COVID-19 pandemic and increased concern of racial bias in police stops and the potential for negative and potentially fatal interactions from routine traffic stops.<sup>68</sup> Figure 11 details the monthly enforcement counts for 2019–2022 only. While including two years before our audit scope, we highlight this detail as it illustrates the sharp decrease in traffic violations, warnings, and parking citations issued after March 2020, which was an acceleration of a general decline in violations and parking citations that started around September 2019. Traffic warnings were generally increasing through the end of 2019 and followed a similar pattern as violations and parking citations in 2020 and through the end of 2022. Traffic arrest charges were more stable with a notable decrease in April 2020, an uptick in October 2020, and then generally steadily decreasing through the end of 2022.

67 For more information on the challenges of using enforcement actions, such as violations issued, for assessing performance of risk-based activities like police traffic enforcement, see Sparrow, Malcolm K., “Measuring Performance in a Modern Police Organization,” *New Perspectives in Policing*. U.S. Department of Justice, National Institute of Justice, March 2015, NCJ248476, <https://www.ojp.gov/pdffiles1/nij/248476.pdf>.

68 GHSA, “Research Confirms Roadway Safety Benefits of Traffic Enforcement,” June 8, 2022, <https://www.ghsa.org/resources/news-releases/GHSA/NCREP-enforcement22>. A recent audit of King County, Washington found similar police enforcement declines; King County Auditor’s Office, “Traffic Enforcement: Strategies Needed to Achieve Safety Goals,” June 14, 2022, <https://kingcounty.gov/~media/depts/auditor/new-web-docs/2022/traffic-stops-2022/traffic-stops-2022.ashx?la=en>.

**Figure 11: MPD Traffic Enforcement Actions, 2019–2022**



**Note: Data for warnings, violations, or arrest charges issued exceeds the number of traffic stops because stops may have multiple warnings, violations, or charges.**

**Source: ODCA analysis of MPD traffic enforcement data.**

Both internal and external factors contributed to an environment in which MPD officers had both less time and reduced motivation to conduct traffic enforcement. MPD leadership explained that traffic enforcement had not been a top priority in recent years as it was operating with declining staff (MPD had a 13% drop in sworn officers from 2018 to 2023 from 3,855 officers to 3,337),<sup>69</sup> and facing competing priorities such as 911 calls and rising violent crime. Also, before COVID-19 vaccines were available in December 2020, officers tried to reduce close contact with the public.

MPD also received mixed messages from stakeholders about how to balance racial equity concerns and traffic safety goals. Police officials noted a waning community interest in traffic enforcement after the May 2020 murder of George Floyd by police in Minneapolis including advocacy groups calling for MPD to stop doing any or most traffic stops. MPD staff described frustration among officers around lack of adjudication on violations after they were issued, and one expressed that the ‘no pursuit’ policy ties officers’ hands.<sup>70</sup> Officers are said to be resistant to doing traffic enforcement given concerns that when traffic enforcement policies change frequently, officers may risk being disciplined for certain actions that impact their career. Officers also noted that traffic enforcement has the potential for increased paperwork, and court requirements resulting from issuing NOIs or arrests.

69 MPD web page, “Monthly Staffing Reports,” <https://mpdc.dc.gov/page/monthly-staffing-reports>.

70 The “Comprehensive Policing and Justice Reform Amendment Act of 2021” amended D.C. Official Code § 5–365.02 to disallow vehicular pursuits unless certain circumstances applied.

MPD's enforcement continued to decline as risky driving behaviors increased during the pandemic and remained elevated. D.C. traffic fatalities reached a 16-year high in 2023.<sup>71</sup> A recent King County (Washington state) audit of police traffic enforcement found "traffic enforcement can be effective in reducing traffic-related injury and death, depending on the type of intervention."<sup>72</sup>

A lack of clarity on how much in-person traffic enforcement police officers are doing could fuel the public perception that police are not doing much or any. Both a citizen member of an advisory council and a high-level executive branch official expressed concern over a lack of MPD in-person enforcement and the perception that drivers witness dangerous driving but do not see an immediate police response, indicating there are insufficient consequences for dangerous driving.

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### **Violations and warnings were largely safety related while arrest charges were primarily for lack of requirements to drive.**

A decline in enforcement metrics does not necessarily lead to more injuries and fatalities if the enforcement that does occur is visible and well targeted. A recent Austin, Texas audit noted "the type, timing, and location" may be more important than the level of enforcement.<sup>73</sup> Further, the national Vision Zero Network recommends focusing "limited enforcement resources in the locations and on the behaviors where they can do the most good. For example, discouraging the enforcement of minor violations that rarely cause bodily harm and instead focusing on the most statistically dangerous behaviors that cause death and severe injuries, like excessive speed."<sup>74</sup>

We examined the types of MPD enforcement actions and found that most traffic violations and warnings issued were focused on safety (such as running a stop sign or speeding). Most traffic arrest charges (which represented a small number of total enforcement actions) were for a lack of requirements to drive (such as proof of permit, registration, and tags). Parking violations were more difficult to assess because frequently cited violations were broad (e.g. no parking anytime; disobeying official sign) and not clearly safety related.<sup>75</sup> This analysis is detailed in the subsequent sections.

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71 MPD web page, "Traffic Data," <https://mpdc.dc.gov/page/traffic-data>. As more drivers were getting back on the roads in 2021 compared to 2020, NHTSA found that levels of risky driving behaviors such as speeding and not wearing a seatbelt remained elevated in 2021, as compared to 2019 levels. NHTSA, "Continuation of Research on Traffic Safety During the COVID-19 Public Health Emergency: January - June 2021," October 2021, [https://www.nhtsa.gov/sites/nhtsa.gov/files/2021-10/Traffic-Safety-During-COVID-19\\_Jan-June2021-102621-v3-tag.pdf](https://www.nhtsa.gov/sites/nhtsa.gov/files/2021-10/Traffic-Safety-During-COVID-19_Jan-June2021-102621-v3-tag.pdf), p.13.

72 King County Auditor's Office, "Traffic Enforcement: Strategies Needed to Achieve Safety Goals," <https://kingcounty.gov/~media/depts/auditor/new-web-docs/2022/traffic-stops-2022/traffic-stops-2022.ashx?la=en>, p.12.

73 Office of the City Auditor, "Effects of Traffic Patrol on Road Safety," November 2023, [https://www.austintexas.gov/sites/default/files/files/Auditor/Audit\\_Reports/Special\\_Request\\_Effects\\_of\\_Traffic\\_Patrol\\_on\\_Road\\_Safety\\_Nov\\_2023.pdf#:~:text=Studies%20and%20research%20show%20traffic%20enforcement%20can%20promote,went%20down%2C%20serious%20injuries%20and%20deaths%20went%20up](https://www.austintexas.gov/sites/default/files/files/Auditor/Audit_Reports/Special_Request_Effects_of_Traffic_Patrol_on_Road_Safety_Nov_2023.pdf#:~:text=Studies%20and%20research%20show%20traffic%20enforcement%20can%20promote,went%20down%2C%20serious%20injuries%20and%20deaths%20went%20up), p.1.

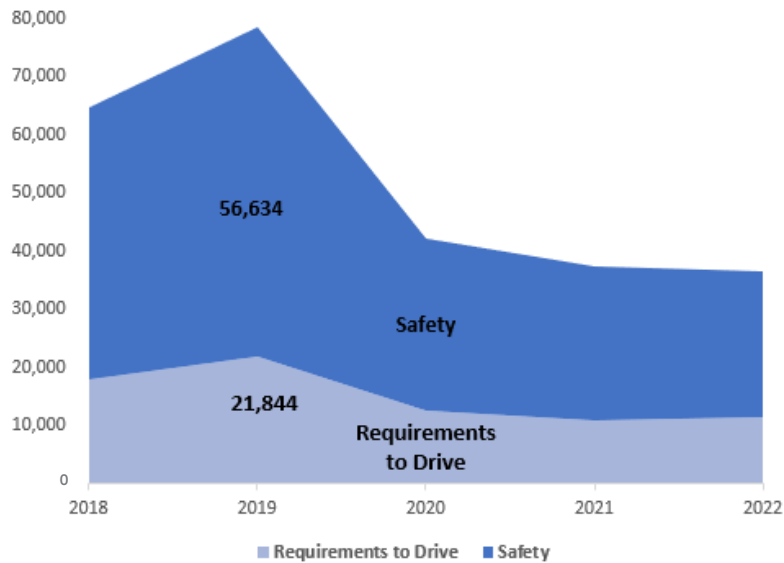
74 Vision Zero Network, "Elevating Equity in Vision Zero Communications," <https://visionzeronetwork.org/wp-content/uploads/2017/01/VZ-Equity-White-Paper-FINAL.pdf>, p.16.

75 ODCA used its own analysis to define the categories of safety and requirements to drive by grouping violations. See Methodology in Appendix C for more detail.

## Traffic Violations

MPD traffic violations issued were largely safety related, as seen in Figure 12.

Figure 12: MPD Traffic Violations by Safety or Requirements to Drive, 2018–2022



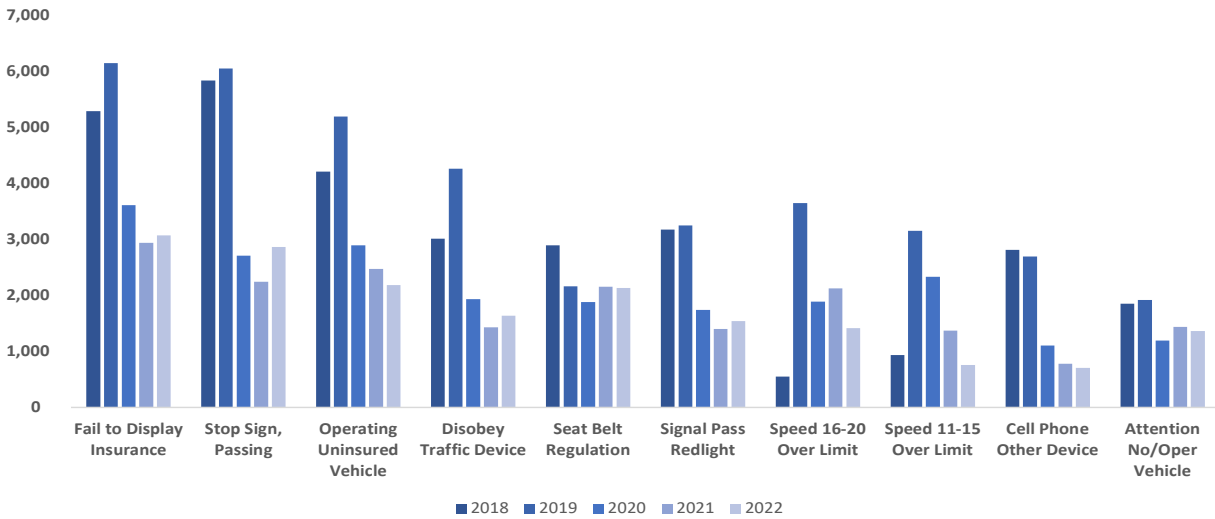
**Note:** Regulations with no MPD violation code enabling categorization of safety or RTD are not shown on the chart and comprise fewer than 1% of violations issued.

**Source:** ODCA analysis of MPD data.

Figure 13 on the following page shows the first and third most issued violations from 2018 to 2022 relate to failure to display or have vehicle insurance (a requirement to drive), while the others were safety related. MPD noted it is required by law to ask all drivers it pulls over for proof of insurance and ticket them if the vehicle is not insured.<sup>76</sup> An officer we rode along with also noted that when officers do not enforce requirements to drive, they may miss having an impact on targeting safety.

<sup>76</sup> Metropolitan Police Academy, “12.3 Traffic Stops,” Approved May 9, 2023, “Required Insurance (§ 31–2403) ... Each owner of a motor vehicle which is required to be registered or for which a reciprocity sticker is required in the District shall maintain insurance.” If a vehicle is insured but a driver did not have proof at the time of a stop, they may show the proof to DMV and get the ticket dismissed.

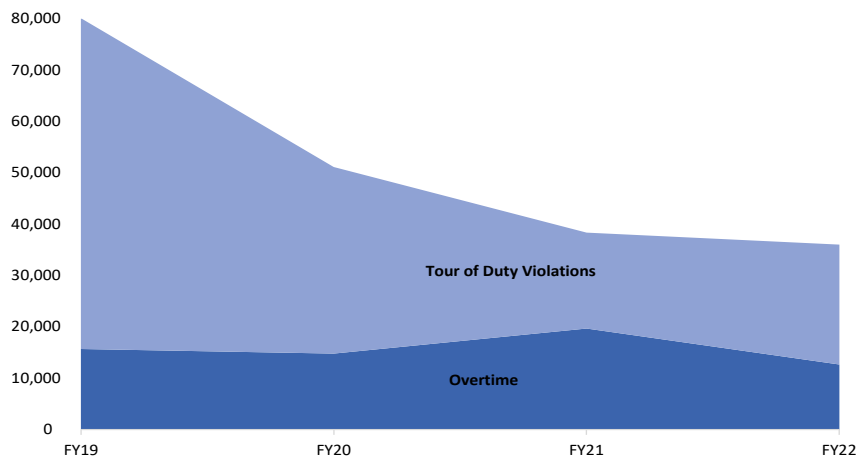
**Figure 13: Top 10 MPD Traffic Violations Issued, 2018–2022**



Source: ODCA analysis of MPD data.

MPD’s grant-funded overtime traffic enforcement--for which officers volunteer and may do special operations at focused locations or go back to their own Patrol District to conduct enforcement--was focused on the most serious risks as defined by NHTSA including Impaired Driving, Occupant Safety (Seatbelt Use), and Pedestrian and Bike Safety. While overtime enforcement NOIs are not identified separately in MPD’s enforcement data the overtime enforcement numbers reported by DDOT in fiscal years (FYs), show it was steady and increased in FY 2021, amidst overall enforcement declines, as shown in Figure 14 below.

**Figure 14: MPD Overtime Enforcement Violations Comprised Small but Steady Share of Traffic Violations Issued, FYs 2019–2022**

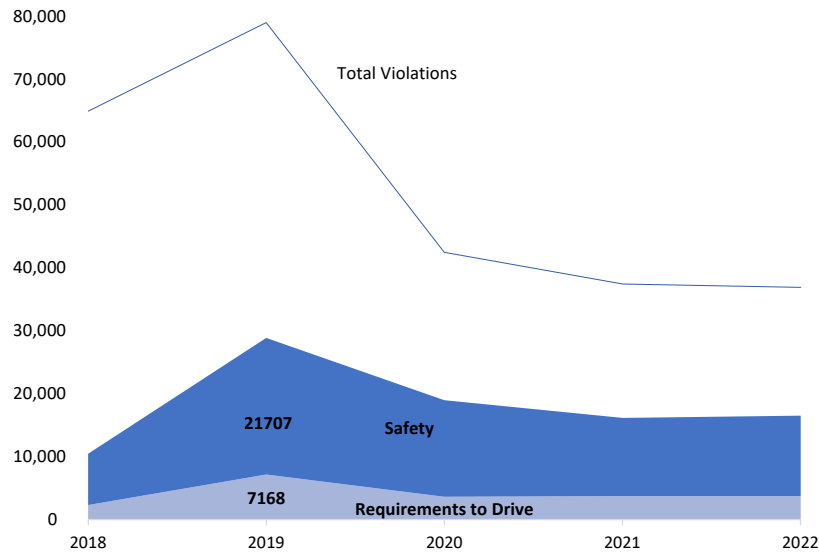


Source: ODCA analysis of MPD data and annual HSO reports.

## Traffic Warnings

MPD issued fewer traffic warnings than violations and most warnings were safety-related, as seen in Figure 15 below.

Figure 15: MPD Traffic Warnings by Safety or Requirements to Drive, 2018–2022



**Note: Regulations with no MPD violation code enabling categorization of safety or RTD are not shown on the chart and comprise fewer than 1% of violations issued.**

**Source: ODCA analysis of MPD data.**

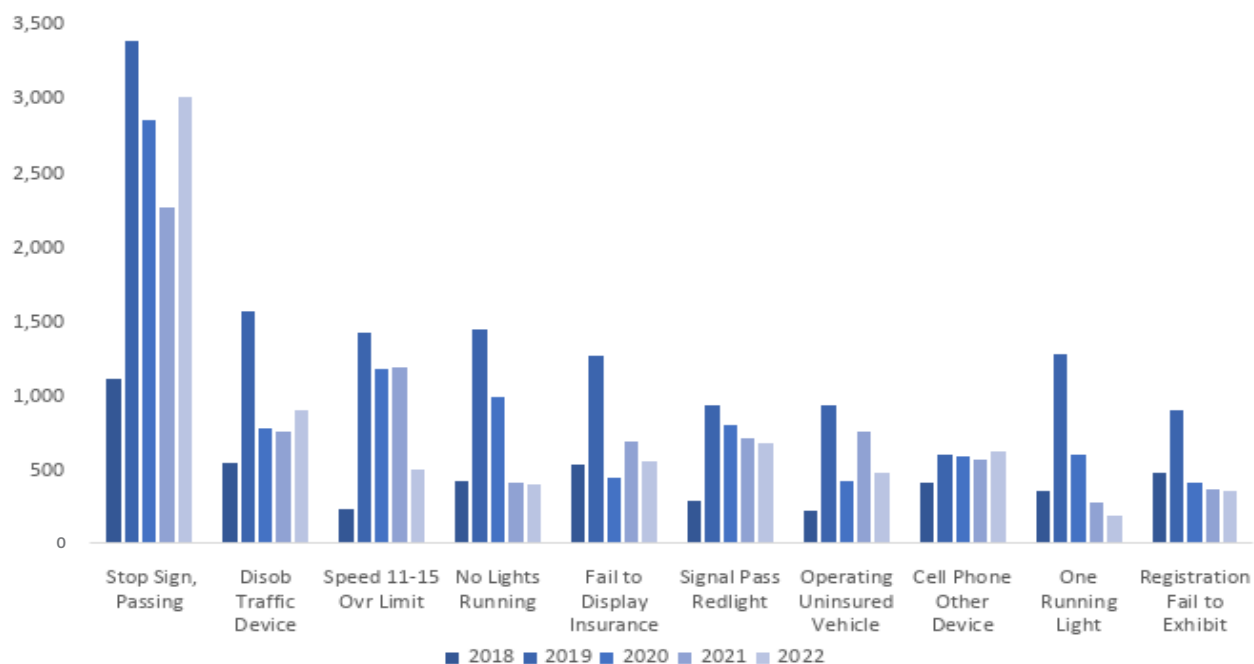
The issuance of traffic warnings decreased after 2019 but has remained steady in recent years (though has not returned to 2019 levels). It is largely up to the officer’s discretion whether to issue a warning or a violation.<sup>77</sup> We noticed variation among the officers we shadowed: one officer noted they try to give everyone a violation, as compared to a warning, so as not to be seen favoring certain drivers, while another officer described their thought process of issuing only a warning when “no harm was done,” versus issuing a violation if the action put someone at risk.

Three of the top ten reasons for warnings issued were for requirements to drive like failures to present proof of insurance (fail to display insurance), have insurance (operating uninsured vehicle), and exhibit registration (registration fail to exhibit), as Figure 16 shows.<sup>78</sup>

<sup>77</sup> MPD, General Order 303-01, “Traffic Enforcement,” September 19, 2023, [https://go.mpdconline.com/GO/GO\\_303\\_01.pdf](https://go.mpdconline.com/GO/GO_303_01.pdf), p.3.

<sup>78</sup> See D.C. Official Code § 5-114.02; 31-2413(a)(7); 31-2403; and 50-1501.02.

Figure 16: Top Ten Traffic Warnings Issued, 2018–2022



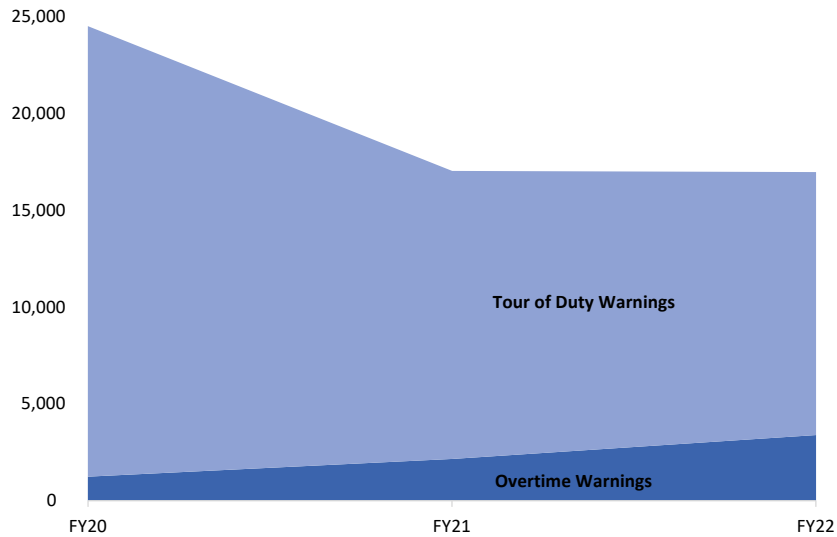
Source: ODCA analysis of MPD data.

Two of the top ten warnings were for vehicle light violations (No Lights Running, One Running Light), which we counted as safety-related violations. The D.C. Police Reform Commission recommended the Council “transfer from MPD to DDOT the authority to enforce traffic and vehicle regulations whose violation does not imminently threaten public safety.” Further the Commission expressed the opinion that light violations do not justify a stop (though it could lead to a violation if connected to a collision or stop based on another infraction).<sup>79</sup> Our analysis points to the need for further study of whether such infractions are truly safety related and if issuing warnings is MPD’s most effective approach.

Traffic warnings issued by officers doing overtime enforcement comprised a small but growing share of MPD traffic warnings, as seen in Figure 17.

79 “Decentering Police to Improve Public Safety: A Report of the DC Police Reform Commission,” <https://dccouncil.gov/wp-content/uploads/2021/04/Police-Reform-Commission-Full-Report.pdf>, p.101-102.

**Figure 17: MPD Overtime Enforcement Warnings Compared to Tour of Duty Warnings, FYs 2020–2022**

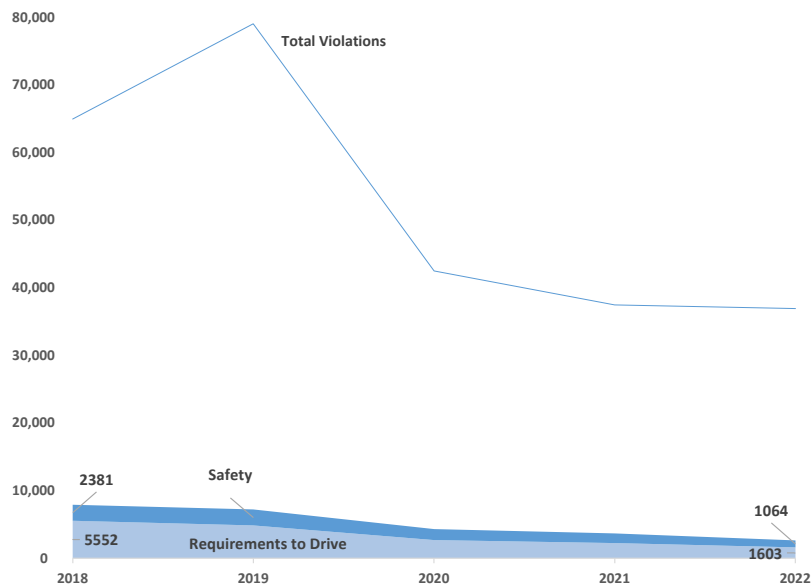


Source: ODCA analysis of MPD data and annual HSO reports.

## Traffic Arrests

MPD issued far fewer traffic arrest charges than traffic violations and warnings between 2018 and 2022. Arrest charges carry a weightier penalty on the recipient, and we found most of the arrest charges were for requirements to drive as compared to safety as seen in Figure 18, which also has a line for Total Violations issued as a comparison.

**Figure 18: MPD Traffic Arrest Charges by Safety or Requirements to Drive for 2018–2022**



Source: ODCA analysis of MPD data.

Figure 19 below shows the first and third most frequently issued charges relate to failure to have a driver’s permit, having a suspended permit, or failure to have proper tags (all requirements to drive), while the second most issued involved impaired driving (safety related).

**Figure 19: Top MPD Traffic-Related Arrest Charges, 2018–2022**



Source: ODCA analysis of MPD data.

We were not able to directly compare overtime enforcement arrests with MPD tour of duty traffic arrests, but overtime arrest numbers appeared to be small in comparison to tour of duty arrest numbers. Appendix E provides a list of MPD Detailed Traffic Arrest Charges, 2018–2022.

### Parking Violations

MPD parking enforcement substantially decreased after 2019. We found that the top two parking violations cited were not clearly safety-related while the third highest was safety-related, Stop/Stand Bike Lane, see Figure 20 below. At the same time several of these parking violations (“No Parking Anytime,” “Disobeying Official Sign,” and “No Standing Anytime,”) are broad and may include parking violations that directly compromise traffic safety making it difficult to group parking violations as we did for traffic violations, warnings, and arrests.

Figure 20: Most Issued MPD Parking Violations, 2018–2022

#	Violation	2018	2019	2020	2021	2022	Total
1	Vehicle Parked on Private Property without Consent*	7,933	7,985	5,793	5,183	4,096	30,990
2	No Parking Anytime	7,645	6,433	4,437	4,759	3,794	27,068
3	Stop/Stand Bike Lane	1,312	3,034	1,205	3,457	1,123	10,131
4	Disobeying Official Sign	2,821	4,642	1,127	556	535	9,681
5	Park In Bus Zone	2,661	3,000	1,267	1,371	646	8,945
6	Fail to Display Current Tags	1,892	2,703	1,251	1,479	840	8,165
7	No Standing Anytime	2,822	1,940	1,173	1,411	676	8,022
8	Abreast	1,971	1,693	1,105	1,674	1,131	7,574
9	NA†	1,151	1,188	1,110	1,482	1,173	6,104
10	Emergency No Parking	1,511	1,924	790	585	568	5,378
	11-238 subtotal	22,608	27,161	14,598	14,612	9,060	88,039
<b>Grand Total - 238 Violations</b>		<b>54,327</b>	<b>61,703</b>	<b>33,856</b>	<b>36,569</b>	<b>23,642</b>	<b>210,097</b>

\* MPD indicated that these violations may be written by officers working off-duty assignments.

† This label used in MPD's data.

Source: ODCA analysis of MPD data.

The District used federal American Recovery Plan Act funds in 2021 to redirect 911 parking-related calls from MPD to DPW to “limit the strain on resources and unnecessary used [sic] of law enforcement staff to handle minor infractions.”<sup>80</sup> It is not clear how MPD’s parking enforcement actions, as represented in the figure above, advanced the District’s traffic safety and equity goals and more attention may be warranted to give additional priority to parking behaviors that pose the greatest safety risk.

### Type of violations issued may have equity implications.

In addition to their importance for safety, the type of traffic violations, warnings, and arrest charges MPD focused on (safety versus requirements to drive) may have implications for racial equity. To increase equity, the Vision Zero Network recommends focusing limited enforcement resources on the most statistically dangerous behaviors that cause death and severe injuries and also notes that “traffic stops for minor

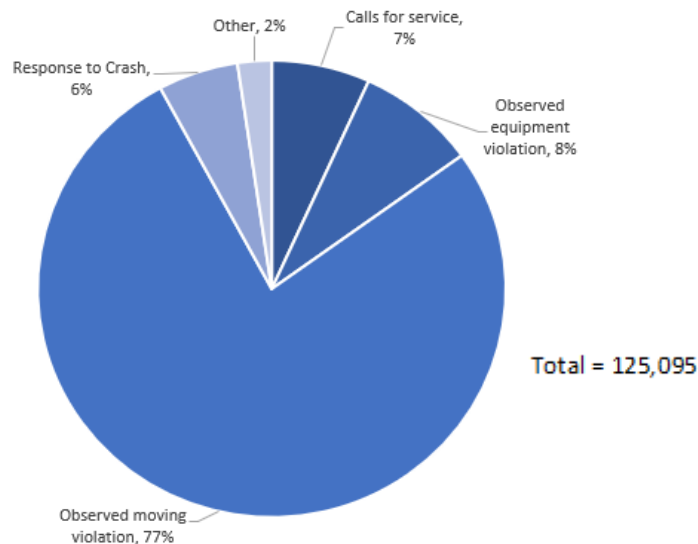
80 District of Columbia, Recovery Plan Performance Report, “State and Local Fiscal Recovery Funds 2021 Report,” [https://oca.dc.gov/sites/default/files/dc/sites/oca/publication/attachments/DC\\_SLFRF%20Annual%20Report%202021%20and%20Project%20Inventory\\_web.pdf](https://oca.dc.gov/sites/default/files/dc/sites/oca/publication/attachments/DC_SLFRF%20Annual%20Report%202021%20and%20Project%20Inventory_web.pdf), p.8.

violations such as driving too slowly or displaying expired tags involve the most blatant racial disparities.”<sup>81</sup> Our analysis of MPD arrest data shows 89% of drivers arrested on legal requirements to drive were Black, and 79% of drivers arrested on safety-related charges were Black. This points to the need for further analysis of racial equity on this issue and across all MPD enforcement data.

After the D.C. Police Reform Commission recommended moving authority to enforce certain traffic and vehicle regulations from MPD to DDOT, repealing some infractions, and prohibiting traffic stops based solely on alleged vehicle operation infractions if not an immediate threat to public safety,<sup>82</sup> then-Deputy Mayor for Operations and Infrastructure testified in 2022 that the executive branch did not support the transfer for multiple reasons. These included safety concerns for DDOT traffic control officers and the need for a robust public education campaign; further, the Deputy Mayor noted the need for information on the scope of current MPD enforcement activities and gaps in traffic enforcement.<sup>83</sup>

ODCA’s review of MPD data shows most of the stops with either a traffic warning or violation issued resulted from an observed moving violation. While our data in Figure 21 is presented only for analytical purposes, it points to officers largely focusing enforcement on safety, as compared to equipment violations.

**Figure 21: Reasons for MPD Traffic Stops, 2020–2022**



**Note: Represents stops that resulted in at least one traffic warning or violation. Stops with two or more reasons listed were counted as “other.”**

**Source: ODCA analysis of MPD data.**

81 Vision Zero Network, “Equity Strategies for Practitioners,” [https://visionzeronetwork.org/wp-content/uploads/2017/11/VisionZero\\_Equity\\_FINAL.pdf](https://visionzeronetwork.org/wp-content/uploads/2017/11/VisionZero_Equity_FINAL.pdf), p.10.

82 Rationale was to allow MPD to focus on serious crime; to increase racial equity given evidence showing enforcement of minor traffic regulations disproportionately and unfairly targets people of color; and for financial considerations given the impacts of fines for minor violations, particularly on lower income persons in the District. Vehicle regulations included those for lights, window tinting, and fenders, for example. “Decentering Police to Improve Public Safety: A Report of the DC Police Reform Commission,” <https://dccouncil.gov/wp-content/uploads/2021/04/Police-Reform-Commission-Full-Report.pdf>, p.101–102.

83 “Pre-hearing questions for Deputy Mayor of Operations and Infrastructure,” Committee on Transportation and Environment Hearing on the Booting and Impoundment Reform Amendment Act of 2022, and Traffic Safety in the District, October 5, 2022, p.2–3.

The trend of increasing traffic fatalities that disproportionately impacts people of color coupled with racial equity concerns around police traffic enforcement point to the need for further study and debate around MPD's role in traffic enforcement. District policymakers, in partnership with MPD, should clarify the District's traffic safety and equity goals and priorities to determine whether changes are needed.

## Recommendations

3. MPD should conduct comprehensive data analysis to determine if the type, timing, and location of its traffic enforcement actions are effectively targeted to increase traffic safety. Based on that analysis, MPD should align officer training to ensure officers are consistently and equitably enforcing infractions with warnings, violations, and/or arrests.
4. Based on MPD's analysis of enforcement actions that promote traffic safety, the D.C. Council committee responsible for law enforcement oversight should determine whether the D.C. Code should be amended to better reflect District policy on where MPD resources should be allocated to increase traffic safety.

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## **MPD did not fully implement its Vision Zero strategies and Patrol District Traffic Plans, monitor their effectiveness, or report on progress.**

We found that MPD took action on its key Vision Zero strategies related to in-person enforcement, yet implementation was incomplete and difficult to measure. Figure 21 details MPD's actions related to these four strategies, including "step-out" enforcement where an officer steps into a crosswalk to enforce vehicles not stopping for pedestrians. The number of violations issued in 2021 and 2022 were often lower than pre-pandemic levels (except for the Bicycle Safety Strategy for which parking in bicycle lane citations showed ups and downs, some pandemic related). Figure 22 also shows there were fewer warnings, but they slowly increased while arrests for impaired driving steadily declined.

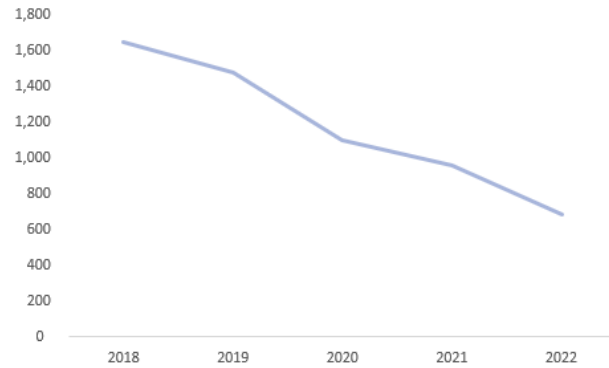
Figure 22: MPD Enforcement of Key 2015 MPD Vision Zero Strategies, 2018–2022

 <p>Protect people on bikes with enhanced enforcement that focuses on improper U-turns through bicycle facilities, parking in/blocking bike lanes, improperly entering mixing zones, dooring, and failure to observe three-foot passing law. Publicly report citations issued on a regular basis via open data on the Vision Zero website.</p>	<h3>MPD Enforcement of Bicycle Safety Strategy</h3>  <table border="1"> <thead> <tr> <th>Year</th> <th>Parking Citations</th> <th>Violations</th> <th>Warnings</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1,300</td> <td>1,800</td> <td>100</td> </tr> <tr> <td>2019</td> <td>3,000</td> <td>1,600</td> <td>400</td> </tr> <tr> <td>2020</td> <td>1,200</td> <td>1,700</td> <td>350</td> </tr> <tr> <td>2021</td> <td>3,400</td> <td>1,800</td> <td>300</td> </tr> <tr> <td>2022</td> <td>1,100</td> <td>1,200</td> <td>300</td> </tr> </tbody> </table>	Year	Parking Citations	Violations	Warnings	2018	1,300	1,800	100	2019	3,000	1,600	400	2020	1,200	1,700	350	2021	3,400	1,800	300	2022	1,100	1,200	300
Year	Parking Citations	Violations	Warnings																						
2018	1,300	1,800	100																						
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2020	1,200	1,700	350																						
2021	3,400	1,800	300																						
2022	1,100	1,200	300																						
 <p>Continue MPD “step-out” enforcement and formally report citation data.</p>	<h3>MPD Enforcement of Step-Out Strategy</h3>  <table border="1"> <thead> <tr> <th>Year</th> <th>Violations</th> <th>Warnings</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1,550</td> <td>150</td> </tr> <tr> <td>2019</td> <td>1,550</td> <td>350</td> </tr> <tr> <td>2020</td> <td>850</td> <td>300</td> </tr> <tr> <td>2021</td> <td>800</td> <td>250</td> </tr> <tr> <td>2022</td> <td>1,150</td> <td>350</td> </tr> </tbody> </table>	Year	Violations	Warnings	2018	1,550	150	2019	1,550	350	2020	850	300	2021	800	250	2022	1,150	350						
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2021	800	250																							
2022	1,150	350																							
 <p>Reduce distracted driving using regular targeted enforcement and step-out enforcement at high-priority locations. Collect and analyze data on drowsy driving.</p>	<h3>MPD Enforcement of Distracted Driving Strategy</h3>  <table border="1"> <thead> <tr> <th>Year</th> <th>Violations</th> <th>Warnings</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>3,200</td> <td>500</td> </tr> <tr> <td>2019</td> <td>3,050</td> <td>800</td> </tr> <tr> <td>2020</td> <td>1,300</td> <td>800</td> </tr> <tr> <td>2021</td> <td>1,100</td> <td>750</td> </tr> <tr> <td>2022</td> <td>1,000</td> <td>800</td> </tr> </tbody> </table>	Year	Violations	Warnings	2018	3,200	500	2019	3,050	800	2020	1,300	800	2021	1,100	750	2022	1,000	800						
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2022	1,000	800																							



Regularly deploy impaired driving check points with Impaired Mobile Processing Unit in high-priority areas on Thursday, Friday, and Saturday nights.

MPD Impaired Driving Arrest Charges



**Note:** Appendix F details the violation codes ODCA used to measure each strategy and counts for each code.

**Source:** ODCA analysis of 2015 Vision Zero Action Plan and MPD data.

Though the distracted driving strategy was to use regular and step-out enforcement at “high-priority” locations, we found that MPD did not document or identify what the high-priority locations would be for this strategy, nor did it report these violations geographically.<sup>84</sup> We tried to map the step-out and distracted driving violations but found that 18% and 44%, respectively, did not have latitude and longitude coordinates, which would make it difficult for MPD to map its implementation of this strategy.<sup>85</sup>

We found that MPD did not create Vision Zero policies and procedures that detail which violation codes to use with each strategy nor did it revise its Traffic Enforcement General Order to reflect Vision Zero. MPD officials noted that they typically would not change General Orders to reflect an initiative like Vision Zero but would share information through training.

<sup>84</sup> MPD’s internal report produced by its contractor Conduent reported citations by Patrol District, but no high-priority locations were identified within.

<sup>85</sup> While the Impaired Driving strategy did not have a similar reporting component, we note the MPD impaired driving arrest charges had nearly complete latitude and longitude data (only 1.4% of rows were missing this data for the 2018-2022 period).

MPD's most comprehensive Vision Zero training, however, did not convey the urgency of in-person traffic enforcement, acknowledging that "some days ... you will not have time to focus solely on traffic enforcement," and instead emphasized that ATE was MPD's program critical to Vision Zero's success. Training offered in 2020 did cover how officers should proactively gather data (violation times of day, pedestrian behaviors, etc.) to share with DDOT, but it had gaps, such as how officers would be held responsible for the activities mentioned in the training or the importance of focusing on high-priority locations. We saw the effect of this gap when we asked an officer how MPD targets certain areas, and they noted that they do not target by location and look to change the behavior of all roadway users. While this may have indicated a commitment to provide equal enforcement District-wide, focusing on the most dangerous roadways is key to Vision Zero and helps ensure limited enforcement resources are not spread too thin.

We found that while MPD reported some data on its progress implementing these strategies, it was not comprehensive nor was it all made public.<sup>86</sup> MPD's internal Vision Zero data reports did not include all violations related to its strategies. For example, the District has a 3-foot passing law but officials note it is challenging to enforce. An officer would need to be able to credibly testify about the distance, possibly while observing the violation from a moving vehicle—highlighting how there were gaps in translating the action plan strategies into action. MPD's 2021 Annual Report enforcement statistics section did not refer to Vision Zero nor include all violations related to the strategies.<sup>87</sup> In fact, it was difficult for our team to measure MPD's performance on "Step-Out" enforcement because MPD could not immediately confirm what the term meant, which is discussed further in Appendix G.

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## **MPD's 2022 Patrol District Traffic Plans were data driven and location focused but not fully implemented.**

MPD produced a 2022 Fatal Crash Reduction Plan, which included individual traffic crash reduction plans (Traffic Plans) for each of the seven Patrol Districts that identified priority violations and geographic areas.<sup>88</sup> We found the priority violations identified in the Traffic Plans were supported by best practices, as Figure 23 details.

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86 The 2016 Vision Zero Progress Report, published March 2017, updated that each of these strategies were "Complete and Ongoing" and for one reporting requirement noted MPD citations are publicly available in open data format. Without knowing which violation names/codes MPD used to enforce the strategies, one would have difficulty assessing MPD's progress with the open data.

87 MPD's 2020 Annual Report included even fewer Vision Zero Action Plan Strategy violations. MPD, Annual Report 2021, <https://mpdc.dc.gov/node/1590556>, p.32; 35; MPD, Annual Report 2020, <https://mpdc.dc.gov/node/1569721>, p.28; 30.

88 In addition, the Plan described MPD's federally funded overtime enforcement activities that are agency-wide and not limited to Patrol Districts -- such as alcohol, bicycle, and pedestrian enforcement and other campaigns such as MPD's School Zone enforcement and education. We could not review a 2021 plan because MPD did not produce it, likely due to events such as Jan. 6, 2021, and the Inauguration; MPD did produce 2020 and 2023 plans.

**Figure 23: Priority Violations in 2022 Patrol District Plans Compared to Best Practices**

Priority Violations	Enforcing this Violation Highlighted as a Best Practice?	Number of Patrol Districts with Priority Violation
Sign/Signal Violations	Yes	6
Speed enforcement	Yes	6
Pedestrian Violations	Yes	4
Bicycle/Bus Lanes	Yes	3
Distracted Driving	Yes	2
DUI enforcement	Yes	2
Vehicles left running unattended	Not Highlighted	2
Aggressive Driving	Yes	1
Blocking the box of an intersection, Illegal left turns, Improper use of lanes, Reckless Driving, Right of Way Violations	Not Highlighted	1

**Note: “Not Highlighted” indicates the audit team did not find evidence to show that enforcing the violation was, or was not, best practice, using three federal research publications on evidence-based countermeasures. These publications were generally centered around traffic safety problem areas (i.e. speeding, impaired driving, distracted driving); we found no documents that focused on which specific violations to enforce.**

Source: ODCA analysis of MPD Traffic Plans using NHTSA and FHWA documents.<sup>89</sup>

We also found that the Traffic Plans’ geographic focus areas largely matched DDOT’s data-informed high-risk priority locations, such as the HIN, as seen in Figure 24.

**Figure 24: Priority Addresses in 2022 Patrol District Plans Overlapped with DDOT High-Priority Locations**

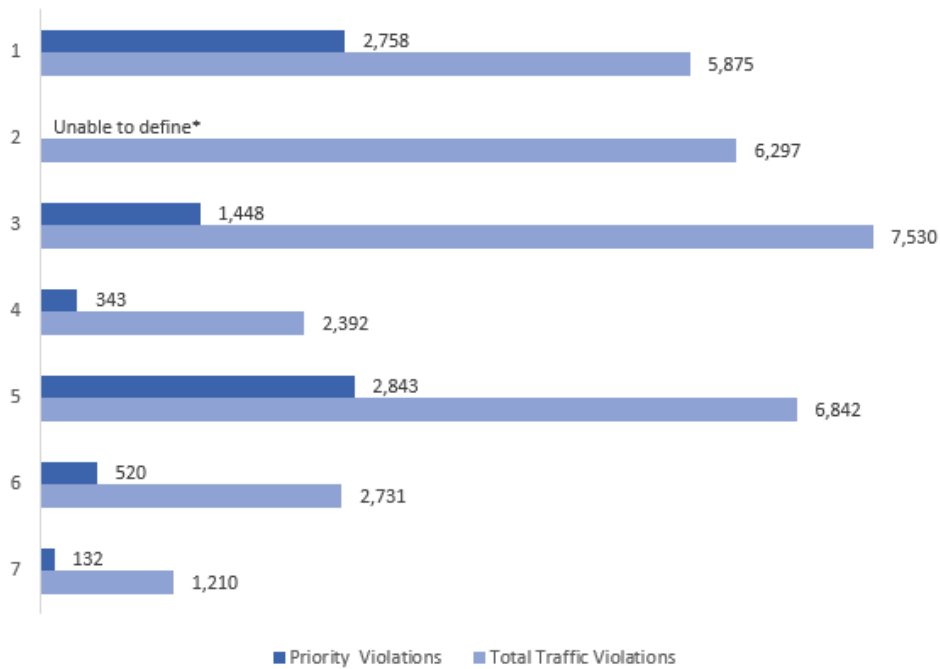
<b># of MPD Priority Addresses (in 7 Traffic Plans)</b>	37	
<b># and % Directly Overlapping DDOT Locations</b>	29	78%
<b># and % Within 5 Blocks of DDOT Locations</b>	36	97%

Source: ODCA analysis of MPD Traffic Plans.

89 NHTSA, “Countermeasures That Work: A Highway Safety Countermeasure Guide For State Highway Safety Offices, Tenth Edition, 2020,” [https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-06/15100\\_Countermeasures10th\\_080621\\_v5\\_tag\\_0.pdf](https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-06/15100_Countermeasures10th_080621_v5_tag_0.pdf); FHWA, “Proven Safety Countermeasures,” <https://highways.dot.gov/safety/proven-safety-countermeasures>; NHTSA, “Synthesis of Studies That Relate Amount of Enforcement to Magnitude of Safety Outcomes,” June 2022, <https://rosap.nhtl.bts.gov/view/dot/62378>.

Despite these priority violations being highlighted as best practices and targeted in the right places and based on DDOT’s high-priority intersections, we found these priority violations were not a large portion of the violations each Patrol District issued in 2022, as Figure 25 details.

**Figure 25: MPD Patrol District Priority Violations and Total Traffic Violations Issued in 2022**



**Note: Parking violations not included in Totals (one Parking violation included in the Priority Violations Issued).**

**\* The 2nd District listed priority violations at intersections or streets; we were unable to comprehensively assess these violations.**

**Source: ODCA analysis of MPD data and Traffic Plans.**

Warnings issued on priority violations were an even smaller portion of total warnings for each District. Figure 25 above shows large differences across Patrol Districts in the proportion of total violations that are priority violations, but we did not conduct deeper analysis to understand these discrepancies. We also found the priority violations were not a large portion of MPD’s total traffic enforcement, shown in Figure 26.

**Figure 26: Priority Violations as Percentage of all MPD, Violations, Warnings, and Arrests, 2022**

MPD Enforcement	Priority Violations	Total Enforcement (includes Priority Violations)	% Priority Violations of Total Enforcement
Violations	8,044	36,933	22%
Warnings	3,039	16,711	18%
Arrest Charges	177	2,667	7%

**Note:** Counts for all MPD enforcement excludes parking violations.

**Source:** ODCA analysis of MPD data and Traffic Plans.

A key reason why priority violations did not show up as comprising a significant portion of the Patrol Districts’ and MPD’s overall traffic enforcement was that MPD was not monitoring the Traffic Plans’ implementation. Officials told us that officers write tickets for violations they see when they are in a position to make a stop and that the Traffic Plans should inform enforcement, not direct or limit it. However, monitoring is a key internal control that would enable MPD to detect whether there were enough resources to ensure focus on priority violations and geographic areas including the possible need to create a roving force or other alternatives. Another reason the Traffic Plans were not fully implemented was the high level of turnover of the Patrol District Traffic Captains, who often left the position within a year.

As discussed above, incomplete implementation of Vision Zero strategies and Patrol District Traffic Plans created gaps in targeted MPD enforcement to reduce traffic fatalities. As the District experienced an upward trend in traffic fatalities and serious injuries, there was a need for MPD to focus its resources on implementing the data-driven, visible, and place-based Vision Zero strategies and Traffic Plan priority violations and target locations.<sup>90</sup> A recent review by the City of Austin of 17 studies of in-person police traffic enforcement found that effective and intentional police enforcement can result in fewer fatalities and serious injuries,<sup>91</sup> which would indicate that when the in-person targeted enforcement is not in place, traffic fatalities and serious injuries can rise.

Moving forward, MPD’s in-person enforcement strategy of traffic laws in the Vision Zero 2022 Update<sup>92</sup> is not specific beyond focusing enforcement on the HIN and other focus areas, so MPD needs to set detailed

90 NHTSA suggests that data-driven, visible, targeted, and place-based (as opposed to traditionally person-based) enforcement is a more efficient and effective way for officers to focus traffic enforcement: “Data-Driven Approaches to Crime and Traffic Safety (DDACTS) Operational Guidelines,” March 2014, [https://www.nhtsa.gov/sites/nhtsa.gov/files/811185\\_ddacts\\_opguidelines.pdf](https://www.nhtsa.gov/sites/nhtsa.gov/files/811185_ddacts_opguidelines.pdf).

91 “Effects of Traffic Patrol on Road Safety,” [https://www.austintexas.gov/sites/default/files/files/Auditor/Audit\\_Reports/Special\\_Request\\_Effects\\_of\\_Traffic\\_Patrol\\_on\\_Road\\_Safety\\_Nov\\_2023.pdf](https://www.austintexas.gov/sites/default/files/files/Auditor/Audit_Reports/Special_Request_Effects_of_Traffic_Patrol_on_Road_Safety_Nov_2023.pdf), p.4-5.

92 See Appendix B for MPD’s Vision Zero 2022 Update strategies.

goals and ensure they are in line with its strategic plans and General Orders.<sup>93,94</sup>

While MPD had some data-driven enforcement efforts underway in its overtime program and a Vision Zero training that listed the top violations most involved in serious crashes, it had not distilled that information to focus on what enforcement activities were most effective at reducing crashes or monitored how its ongoing enforcement was impacting crash rates, serious injuries, or fatalities.<sup>95</sup> MPD had not built on the analysis already done for overtime enforcement and leveraged its data to include all the agency's enforcement efforts (tour of duty, parking enforcement, and overtime) and create a coordinated department-wide enforcement plan focused on the greatest safety risks.

## Recommendations

5. MPD should create specific and measurable Vision Zero goals (such as the number of traffic checkpoints per month in each Patrol District on the HIN) and communicate these goals internally and externally.
6. MPD should establish policies, procedures, and training, to effectively implement these Vision Zero goals, including which violation codes to use for each goal, how to focus on the High Injury Network, and how to assess its enforcement data geographically.
7. MPD should assess staffing capacity and identify solutions (such as a roving District-wide traffic force) to ensure areas that experience higher crime do not get less traffic enforcement and to mitigate traffic captain turnover.

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## DPW did not target commercial and delivery vehicles for dangerous parking violations.

The 2015 Vision Zero Action Plan assigned DPW to: "Deter dangerous parking behavior of commercial and delivery vehicles" including "parking in bicycle lanes, crosswalks, parking abreast/double parking." It was tasked with "publicly report violations monthly via open data on the Vision Zero website."<sup>96</sup>

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93 An MPD official informed us that there is resistance to having goals or targets that could be seen as quotas.

94 MPD's 2023 Strategic Plan highlights that it will conduct at least two Traffic Safety Compliance Checkpoints every month; MPD Strategic Plan Update 2023, "A Vision for Safe Communities Across the District of Columbia," [https://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/service\\_content/attachments/Strategic%20Plan%20Update%202023\\_RDR.pdf](https://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/service_content/attachments/Strategic%20Plan%20Update%202023_RDR.pdf), p.7. This may call for an update to its General Order guiding traffic safety checkpoints to reflect those goals and clarify what constitutes an unsafe driver as it states checkpoints may be "targeted to promote traffic safety interests (e.g., checking driver's licenses, automobile registrations, or usage of seatbelts)"; MPD General Order OPS-308-03, "Traffic Safety Compliance Checkpoints," September 19, 2023, [https://go.mpdconline.com/GO/GO\\_303\\_01.pdf](https://go.mpdconline.com/GO/GO_303_01.pdf), p.10. This may also call for MPD to consider whether checking drivers' license and registration information during a checkpoint supports the agency's equity goals, given that critics have recommended police not conduct traffic checkpoints, citing equity concerns; for example, the D.C. Police Reform Commission recommended: "The Council should prohibit MPD from conducting Traffic Safety Compliance Checkpoints, except in response to repeated community complaints about particular traffic violations that pose an imminent threat to public safety;" "Decentering Police to Improve Public Safety: A Report of the DC Police Reform Commission," p.101. Finally, MPD should collect data and monitor the checkpoints for effectiveness.

95 [The 2015 Action Plan](#) notes that D.C. agencies will "collect, leverage, and share crucial safety data," p.i.

96 [2015 Action Plan](#), Strategy VU-13, p.64 (listed as page 90 on the document).

We found DPW did not target commercial and delivery vehicles for these violations. We also found that DPW did not publicly report the Vision Zero violations issued to commercial and delivery vehicles, as stipulated in the strategy. DPW did not include a field for flagging these vehicles in its information system for issuing parking violations and could not identify these vehicles from license plate data. Parking violation data, including violation types, were available on the D.C. Open Data webpage, but the data could not be filtered to show those issued to commercial and delivery vehicles.<sup>97</sup> DPW did submit monthly ticket reports to DMOI, but the reports only contained ticket production counts and top issuing officers, not the Vision Zero violations.

While DPW did not compile data on deterring dangerous parking behavior of commercial and delivery vehicles, and complete data was not available, our limited data analysis showed that violations issued for parking in bicycle lanes, crosswalks, parking abreast/double parking, as well as violations issued to commercial vehicles registered in D.C.,<sup>98</sup> comprised a small portion of DPW’s FYs 2021 and 2022 total violations issued:

- Of the roughly 1.9 million parking violations DPW issued to all vehicles, not limited to commercial vehicles, the three Vision Zero violations, parking in bicycle lanes, crosswalks, parking abreast/double parking, comprised less than 1%. Figure 53 in Appendix H provides a list of the top violations that DPW issued to all vehicles.
- Our analysis showed that violations issued to commercial vehicles registered in D.C. accounted for only 0.36% of all parking violations DPW issued.
- Of those commercial vehicles registered in D.C., the three Vision Zero violations—parking in bicycle lanes, obstructing crosswalks, and parking abreast/double parking—comprised less than 6% of the violations DPW issued to D.C. commercial vehicles. Each is bolded in Figure 27 and only one was in the top ten parking violations issued.

**Figure 27: Top Ten Violations and Vision Zero Violations Issued to D.C. Registered Commercial Vehicles**

Rank	Violation Type	FY 2021	FY 2022	FYs 2021 and 2022 Total	Percent of Total
1	No Parking Anytime	321	363	684	10%
2	No Parking Street Cleaning	176	397	573	9%
3	Failure to Display Current Tags	135	326	461	7%
4	Disobeying Official Sign	119	340	459	7%

97 Open Data D.C., “Parking Violations issued in May 2023,” <https://opendata.dc.gov/datasets/DCGIS::parking-violations-issued-in-may-2023/explore>.

98 Our analysis of violations issued to commercial vehicles did not include commercial and delivery vehicles registered out of state, or delivery vehicles not registered as commercial. With information provided by DPW and the D.C. Department of Motor Vehicles, we determined that if a vehicle was registered in D.C. as commercial its plate could be identified as starting with the letter “C,” followed by 5 numbers. Commercial and delivery vehicles from states outside of D.C. could not be reliably identified in DPW’s violation data, as there were no identifying license plate formats and no indicators in DPW’s data for a commercial or delivery vehicle.

Rank	Violation Type	FY 2021	FY 2022	FYs 2021 and 2022 Total	Percent of Total
5	No Standing Anytime	211	215	426	6%
6	Park At Expired Meter	83	308	391	6%
7	Fail To Display a Multispace Meter Receipt	75	296	371	6%
8	No Stopping or Standing in PM Rush Hour Zone	78	226	304	5%
9	Fail to Report for Inspection	75	216	291	4%
<b>10</b>	<b>Park Abreast of Another Vehicle</b>	106	159	265	4%
--	(11-18 not shown)	504	850	1,354	20%
<b>19</b>	<b>Obstructing Crosswalk</b>	37	43	80	1%
--	(20-24 not shown)	115	198	313	5%
<b>25</b>	<b>Stopping, Standing, or Parking Vehicle in Bike Lane</b>	29	24	53	1%
--	(26-85 not shown)	221	422	643	10%
<b>Total All 85 Violation Types</b>		<b>2,285</b>	<b>4,383</b>	<b>6,668</b>	

**Note: Percentages add to 101% due to rounding.**  
**Source: ODCA analysis of DPW parking violation data.**

We found some examples of DPW implementing Vision Zero and the three Vision Zero violations, but it was inconsistent and not fully incorporated into DPW efforts to change its parking operations. DPW hired a consultant in FY 2021 to reformulate its parking beats, the routes Parking Enforcement Officers are deployed to detect parking violations and issue tickets, and included a task for recommending new ticketing technology to align with Vision Zero. The study results that we reviewed did not appear to include modifications to parking beats based on the Vision Zero strategies such as focusing on safety related violations or commercial and delivery vehicles.

As part of its Performance Oversight in 2021, the D.C. Council asked DPW for a list of the safety-related parking violations pursued during the Public Health Emergency, and the list that DPW provided included the three Vision Zero violations.<sup>99</sup> In 2022, when DPW launched a safety-sensitive parking violations pilot program called the Rapid Response Team it addressed only one of the three Vision Zero parking violations, “Parking in Bicycle Lanes” shown in Figure 28.

<sup>99</sup> D.C. Council, Performance Oversight 2021, DPW, <https://dccouncil.gov/wp-content/uploads/2021/03/DPW-FY-2020-Performance-Oversight-Responses.Committee-on-Transportation-and-the-Environment.pdf>, p.59; Per Mayor’s Order 2020-045, dated March 11, 2020, a Public Health Emergency for COVID-19 was declared. The public health emergency was ultimately extended through April 16, 2022, via Mayor’s Order 22-043, <https://coronavirus.dc.gov/page/operating-status>.

**Figure 28: Rapid Response Team 11 Safety-Sensitive Parking Violations**

Alley Violation	No Stop Stand Bike Lane
Blocked Driveway	Parked on or Obstructing Sidewalk
Fire Hydrant	Parked on Public Space
Handicap Parking	Private Property Ticket and Tow
No Parking Anytime	Private Property Ticket Only
No Stop Stand Anytime	

**Source: DPW**

Parking Enforcement Officers apparently did not know to prioritize the Vision Zero violations for commercial and delivery vehicles for a number of reasons. While Vision Zero signaled “a new approach to our transportation challenges and a renewed sense of urgency within our city,” DPW leadership did not make significant changes needed to pivot the agency, staff, and operations to this new approach. One factor was the agency having three directors during our two-year scope and there were other vacancies in key leadership positions.<sup>100</sup> Without consistent leadership, key internal controls were not established or updated to help ensure the goals of Vision Zero were enunciated or met.

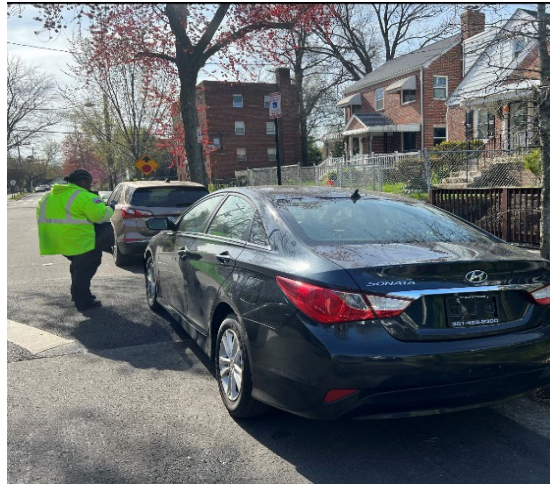
- DPW did not designate a staff member to oversee the 2015 Vision Zero Action Plan implementation, which meant there was not continuous messaging to staff about Vision Zero and the assigned strategies. While some DPW leaders were familiar with Vision Zero and attended Bicycle Advisory Council meetings,<sup>101</sup> we heard from staff that prior to the audit there was not much discussion of Vision Zero, several staff were unaware of what Vision Zero was, and some said (incorrectly) that DPW only became a part of Vision Zero in the last couple of years.
- DPW did not conduct a risk assessment to identify barriers to implementing its Vision Zero strategy, such as complications with identifying commercial and delivery vehicles on the street and in the data.
- DPW did not revise policies and procedures to incorporate its Vision Zero strategies into daily operations, such as how Parking Enforcement Officers were supposed to prioritize these violations over other duties.

100 Mayor’s Order 2023-011, “Appointments – Director, Department of Public Works (Interim, Acting, and Permanent)\ (Christopher Geldart, Christine V. Davis, and Michael A. Carter),” January 20, 2023, <https://www.dcregs.dc.gov/common/NoticeDetail.aspx?noticeId=N128990>. PR25-0071 - Director of the Department of Public Works Timothy Spriggs Confirmation Resolution of 2023, <https://lms.dccouncil.gov/Legislation/PR25-0071>.

101 Section 5 of D.C. Law 23-158. The Vision Zero Enhancement Omnibus Amendment Act of 2020, added the Director of DPW to the Bicycle Advisory Council, <https://code.dccouncil.gov/us/dc/council/laws/23-158>.

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**Figure 29: Parking Enforcement Officer Issuing a Violation**



Source: ODCA

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**Figure 30: Parking Enforcement Officer Issuing Violation for Commercial Vehicle in Bike Lane**



Source: ODCA

DPW's annual strategic objectives, strategic initiatives, and mission statement (agency-wide and parking) failed to mention Vision Zero or traffic safety. The Parking mission for DPW was to

“ensure parking opportunities for District residents, businesses, and visitors...”<sup>102</sup> A revised mission or Vision Zero annual performance goal could have helped staff embrace a traffic safety focus similar to the commitment to DPW’s efficiency and environmental sustainability missions described by staff. A revised mission statement also could have signaled to the public DPW’s Vision Zero responsibilities, as DPW faced pressure to be responsive to community concerns such as abandoned vehicles, and registered-out-of-state and residential parking permit violations. This perception that DPW was not a traffic safety agency was also reflected in the fact that the Committee on Transportation and Environment did not ask DPW any questions about Vision Zero in its pre-hearing oversight questions in either the 2021 or 2022 performance oversight.<sup>103</sup>

By not implementing the commercial and delivery vehicle strategy, DPW did not share in the District-wide responsibility to make the streets safer. Achieving zero traffic fatalities requires an “all-hands-on-deck approach” in which all Vision Zero agencies do their part to transform their operations to improve the safety of District streets—an issue on which DPW employees have expertise and on the ground knowledge, see parking officer issuing a violation in Figure 29.

DPW’s role in traffic safety enforcement continues to be necessary as commercial and delivery vehicle violations are serious safety concerns that force pedestrians, wheelchair users, and bicyclists to go into traffic, as seen in Figure 30.

The lack of DPW written policies on how to enforce the Vision Zero violations for commercial and delivery vehicles was evident during ride-alongs. We observed conflicting enforcement between MPD and DPW employees on where commercial and delivery vehicles should park when delivery spaces were unavailable. This results in confusion and unclear expectations for delivery drivers, cyclists, and other road users.

While DPW’s Vision Zero 2022 Update parking strategy no longer specifies commercial and delivery vehicles, it prioritizes enforcement of the same three violations (parking in bicycle lanes, obstructing crosswalks, parking abreast/double parking).<sup>104</sup>

## Recommendations

8. DPW’s Director should assess risks to Vision Zero implementation, develop policies and procedures with clear staff and management implementation responsibilities, and communicate those strategies and procedures throughout the agency including the message that traffic safety is an agency responsibility.

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102 DPW Parking Mission: “Ensure parking opportunities for District residents, businesses, and visitors by encouraging voluntary compliance with parking regulations,” <https://dpw.dc.gov/page/who-we-are-dpw>.

103 D.C. Council Performance Oversight 2021, DPW, <https://dccouncil.gov/wp-content/uploads/2021/03/DPW-FY-2020-Performance-Oversight-Responses.Committee-on-Transportation-and-the-Environment.pdf> and D.C. Council Performance Oversight 2022, DPW, <https://dccouncil.gov/transportation-and-the-environment-9/dpw-responses-to-cte-fy-2021-2022-performance-oversight-pre-hearing-questions/>.

104 Vision Zero 2022 Update, “DPW enforces primarily parking violations and focuses on high-risk behaviors exhibited by drivers and improper standing or storing of their vehicles in public space (e.g., blocking bicycle lanes, crosswalks, parking abreast/double parking, illegal traffic turns),” p.14.

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## **DPW did not enhance its boot and tow program with the technology and training needed to target habitual offenders with multiple safety-related citations.**

The 2015 Vision Zero Action Plan required that DPW launch an enhanced DPW Boot-Tow-Release program “to ensure dangerous drivers cannot avoid paying fines for violations” and “target habitual offenders with two or more unpaid citations related to safety, e.g. speed, stop sign, crosswalk, red light.”<sup>105</sup>

We found that DPW did not launch an enhanced Boot-Tow-Release strategy to target habitual offenders. DPW did not have or create a definition of habitual offenders or dangerous drivers to prioritize its boot and tow operations, and instead used the scofflaw list, which did not mention vehicles with safety-related citations and speaks only to the number and monetary value of unpaid tickets. The scofflaw list is based on the D.C. Official Code provision which broadly authorizes any unattended motor vehicle with two or more unpaid citations or notices of infraction or warrants to be impounded or immobilized (commonly referred to as “booted”).<sup>106</sup>

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## **Booting: DPW boot crews were not able to target habitual safety offenders or Vision Zero safety-related citations.**

Without a definition of a habitual offender or dangerous driver, DPW was not collecting data on how often it booted these vehicles; see Figure 31 for a vehicle boot. Boot data did not include violation types, but included the amount owed for unpaid citations. Despite DPW boot data not including violation types, as vehicles were only booted for having two or more unpaid citations and not associated with a specific violation, by cross-referencing with DMV data we saw that 66% of vehicles DPW booted and towed had unpaid parking citations and 34% had ATE tickets as seen in Figure 32. While some parking tickets may be related to unsafe driving behaviors, ATE tickets for exceeded speed limits and running red lights are more clearly indicative of unsafe driving.

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<sup>105</sup> [2015 Action Plan](#), p.91. The 2016 Progress Report revised the strategy to remove “to ensure dangerous drivers cannot avoid paying fines for violations,” p.28.

<sup>106</sup> D.C. Official Code § 50-2201.03(k)(1), “[a]ny unattended motor vehicle found parked at any time upon any public highway of the District of Columbia against which there are 2 or more unpaid notices of infraction or vehicle conveyance fees that the owner was deemed to have admitted or that were sustained after a hearing...or against which there have been issued 2 or more warrants may, by or under the direction of a law enforcement officer or member of the Metropolitan Police force or the United States Park Police force or an employee of the District of Columbia Department of Transportation, either by towing or otherwise, be removed or conveyed to and impounded in any place designated by the Mayor or immobilized in such manner as to prevent its operation...”

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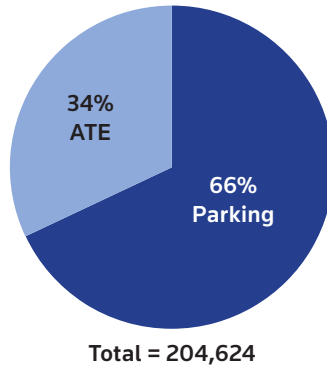
Figure 31: DPW Vehicle Boot



Source: ODCA

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Figure 32: Percentage of Vehicles Booted in FYs 2021 and 2022 for ATE and Parking Violations



Source: ODCA analysis of DPW and DMV violation data.

Figure 55 in Appendix H shows a list of violations received by vehicles booted in FYs 2021 and 2022.

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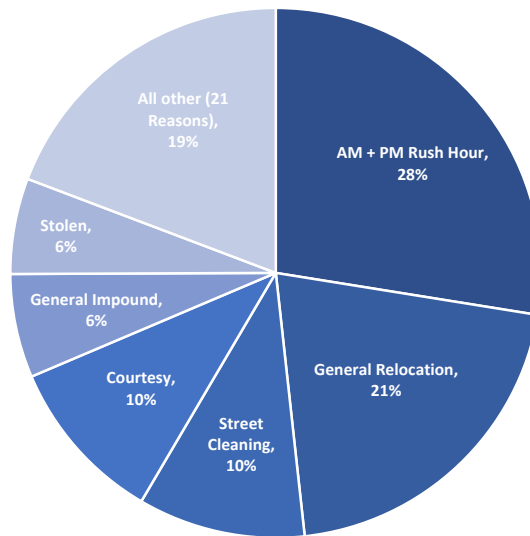
### **Towing: DPW tow crews were not able to target habitual safety offenders or Vision Zero safety-related citations.**

We found that DPW did not enhance its tow program to focus on habitual offenders. DPW did not have procedures to identify habitual offenders with safety related violations, such as how to correlate DMV and DPW data to see unpaid tickets, specifically for safety-related violations. DPW did not collect data on how often it towed habitual offenders with safety-related violations. DPW's data contained a field for the tow

codes that resulted in the vehicle being towed, but this did not include scofflaws or Vision Zero safety-related codes.

As data on the number of habitual offenders towed was not available from DPW, we used the tow data to analyze how DPW utilized its tow resources. The majority of DPW’s tows, nearly 60%, were for vehicles parked in AM and PM rush hour zones, general relocation, and street cleaning. While AM and PM rush hour are clearly not Vision Zero related activities, DPW stated that general relocation may include towing to relocate vehicles that are blocking an intersection, a crosswalk, or a stop sign, two of which are highlighted in the DPW Boot-Tow Vision Zero strategy. While a scofflaw vehicle could have been towed under those common two reasons, any specific targeting DPW did of scofflaws would be categorized as “general impound,” which represented a small amount of DPW’s workload (6%), as seen in Figure 33.<sup>107</sup>

**Figure 33: Reasons DPW Towed Vehicles in FYs 2021 and 2022**

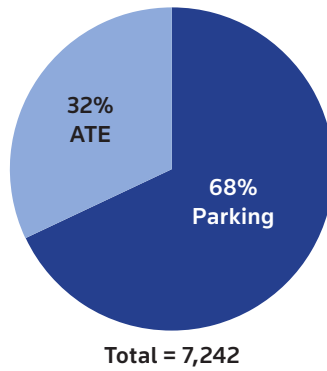


**Source: ODCA analysis of DPW tow data.**

Using tow data from both DPW and DMV, we saw that most vehicles DPW towed five or more times in FYs 2021 and 2022 were for parking violations, rather than ATE violations, as Figure 34 details. Again, while parking tickets may be related to unsafe driving behaviors, ATE tickets indicate unsafe driving by exceeding speed limits, running red lights, and not stopping at a stop sign.

<sup>107</sup> There was a lack of clarity in how scofflaw tows were categorized by the tow crew and reflected in the data as DPW told us that: a scofflaw vehicle could have two or more unpaid citations but still have been towed for an unrelated violation like being parked in an AM rush hour zone; where another tow code was not used by the tow crew, General Impound would be used; and scofflaws were sometimes towed under General Relocation if impound lot space was not available.

**Figure 34: Ticket Types Received by Vehicles Towed 5+ Times in FYs 2021 and 2022**



Source: ODCA analysis of DPW tow data and DMV violation data.

The top 10 violations listed below for all vehicles in FYs 2021 and 2022 show that only one violation listed in the Vision Zero strategies – parking less than 25 feet from a stop sign – was in the top violations that DPW towed vehicles for (violation 10 in Figure 35). Most tows were for violations related to AM and PM rush hours, further reflecting that tows for the Vision Zero strategy were a small part of DPW’s workload. The data reflected the offense the vehicle was in violation of at the time of being towed and did not reflect all unpaid citations that made the vehicle tow eligible.

**Figure 35: Top 10 Violations for Vehicles Towed in FY 2021 and 2022**

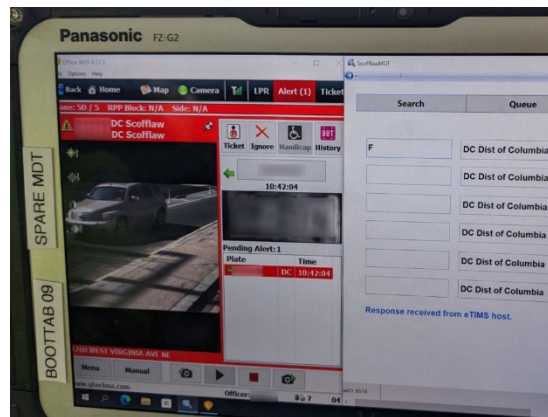
Rank	Violation Type	FY 2021	FY 2022	FYs 2021-2022 Total	Percentage of Total
1	No Parking/Standing PM Rush Hour	2,373	6,473	8,846	22%
2	No Parking/Standing AM Rush Hour	2,941	5,866	8,807	22%
3	No Parking Street Cleaning	2,169	4,941	7,110	18%
4	Emergency No Parking	2,130	4,927	7,057	18%
5	Fail To Display Current Tags	755	1,412	2,167	6%
6	No Parking Zone Anytime	1,019	906	1,925	5%
7	No Standing Anytime	533	551	1,084	3%
8	Dangerous Vehicle Public/Private 1st Offense	520	359	879	2%
9	Loading Zone	331	448	779	2%
<b>10</b>	<b>Stop Sign, &lt;25 Feet From</b>	<b>448</b>	<b>285</b>	<b>733</b>	<b>2%</b>
	<b>Total</b>	<b>13,219</b>	<b>26,168</b>	<b>39,387</b>	

Source: ODCA analysis of DPW tow data.

Figure 56 in Appendix H shows a detailed list of violations for vehicles towed by DPW in FYs 2021-2022.

DPW did not enhance its Boot-Tow-Release program to focus on dangerous drivers because it lacked the technology updates, culture shift, and clear definition of a dangerous driver to target vehicles with safety-related citations. DPW did not have or obtain the technology to target vehicles with safety-related citations. The License Plate Readers and handheld devices that Boot and Tow crews used could not see the types of violations a vehicle had, meaning the crews could not identify and target habitual offenders with safety-related citations, as seen in Figure 36.

**Figure 36: License Plate Reader Showing “Scofflaw” and No Violation Type**



**Source: ODCA**

DPW tow crews also faced competing priorities, as DPW is responsible for many towing activities with some being paramount for the flow of residents and commuters, such as towing during AM and PM rush hours, which DPW stated must remain a priority.

As discussed in the previous finding, DPW leadership had not communicated to staff a focus on traffic safety that would lead to an organizational culture change. Nor had leadership established internal goals related to booting and towing habitual safety offenders. Instead, DPW focused on increasing productivity, as seen in its annual performance workload measures for “number of vehicles immobilized via booting” and “number of vehicles towed.”<sup>108</sup> This productivity priority could create a tension with Vision Zero priorities. We heard from staff that a focus on habitual safety offenders would be an obstacle to productivity, as such targeting would mean that boot and tow crews could pass other vehicles with multiple citations to find one safety-involved vehicle. DPW staff also noted that sometimes tow prioritizations were made when a vehicle with unpaid citations totaling a significant dollar amount was located.

108 Office of the City Administrator, Performance Plans and Reports, DPW, FY 2022, <https://oca.dc.gov/sites/default/files/dc/sites/oca/publication/attachments/DPW22.pdf>, p.2-3.

Without prioritization in DPW booting and towing operations or the ability to target habitual offenders with safety-related citations, those offenders will not be held accountable and will continue to pose a risk to traffic safety.

In addition, by using boots or impound lot space for scofflaws with any violation types, DPW limits space available for habitual safety offenders.<sup>109</sup> While DPW booting crews doubled from two crews to four in FY 2022, there was still not enough boot inventory, tow staff, or impound lot space to address all scofflaws.

DPW's boot and tow strategy was revised in the Vision Zero 2022 Update<sup>110</sup> with a focus on high-risk areas and along the HIN. The recommendations that follow are consistent with DPW implementation of the revised strategy and also support DPW implementation of legislation recently passed by D.C. Council with immobilization provisions for vehicles with repeated traffic tickets.<sup>111</sup>

## Recommendations

9. DPW should target the District's most dangerous streets and drivers, while maintaining productivity through technology updates to support geographic analysis and reporting, monitoring prioritization along the High Injury Network and using advanced technology to allow Parking Enforcement Officers, Boot Staff, and Tow Staff to view the types of violations a vehicle has when the license plate number is entered into the handheld devices or License Plate Readers.
10. The Mayor and the Office of the City Administrator should ensure that DPW has the necessary resources to implement its Vision Zero strategies, including funding for technology and equipment updates.
11. The D.C. Council should work with DMOI to establish a D.C. Official Code definition of a high-risk driver to better enable enforcement through booting and towing of vehicles registered to high-risk drivers.

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## While progress has been underway, DDOT, MPD, and DPW had not fully integrated equity procedures, strategies, and data collection into their Vision Zero efforts.

In addition to the D.C. government mandate to evaluate policies and programs through a racial equity

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109 D.C. Council Committee on Public Works and Operations, DPW FYs 2022-2023 Performance Oversight Questions, <https://dccouncil.gov/wp-content/uploads/2023/03/DPWPOH.pdf>, p.63.

110 Vision Zero 2022 Update, "DPW enforces primarily parking violations and focuses on high-risk behaviors exhibited by drivers and improper standing or storing of their vehicles in public space (e.g., blocking bicycle lanes, crosswalks, parking abreast/double parking, illegal traffic turns)," <https://visionzero.dc.gov/pages/2022-update>, p.14.

111 Act 25-406, Strengthening Traffic Enforcement, Education, and Responsibility (STEER) Amendment Act of 2024, (pending Congressional review at the time of this report's publication) Sec.4. (a)(2), amending D.C. Official Code § 50-2201.02 would add new paragraph adding an additional category of boot eligibility: (8B): "Immobilization-eligible vehicle" means any unattended vehicle found parked on any public highway in the District of Columbia against which: "...(C) The Mayor has assessed 10 or more points under this subparagraph based on convictions, sustained notices of infractions, including infractions detected by the automated traffic enforcement system... or adjudications as a juvenile delinquent, within any consecutive 6-month period," [https://lims.dccouncil.gov/downloads/LIMS/53600/Signed\\_Act/B25-0425-Signed\\_Act.pdf?Id=185807](https://lims.dccouncil.gov/downloads/LIMS/53600/Signed_Act/B25-0425-Signed_Act.pdf?Id=185807), p.5.

lens,<sup>112</sup> the national Vision Zero Network states: “Elevating and framing equity issues effectively and strategically is key to advancing Vision Zero – and conversely, ignoring or mishandling these issues could impede efforts to improve traffic safety.”<sup>113</sup>

The District’s formal racial equity focus was relatively new during our audit scope with plans and processes for racially equitable implementation of Vision Zero strategies still being developed.<sup>114</sup> Figure 37 shows that DDOT, MPD, and DPW had taken different steps and were in different phases of implementing equity in their Vision Zero enforcement strategies.

**Figure 37: Progress of Vision Zero Equity Implementation at DDOT, MPD, and DPW**

	Agency Equity Officer in Place	Agency Equity Statement	Collected Data Relevant to Racial Equity for its Traffic Enforcement Actions	Tools in Place to Assess Equity of Traffic Enforcement Actions
DDOT	X	X		Partial*
MPD	X		X	
DPW		X		

\* DDOT had an Equity Assessment Tool in place, but it did not assess the equity of individual camera placement decisions, rather it assessed the ATE program as a whole.

Source: ODCA analysis of DDOT, MPD, and DPW documentation.

The subsequent sections detail each agencies’ steps and phases to align racial equity best practices with Vision Zero and their traffic safety enforcement activities.

**DDOT used its Equity Assessment Tool to analyze the safety benefits of the ATE program but had not yet established procedures to assess the equity outcomes, the potential financial burdens of over-enforcement, and the geographic and socioeconomic balance of ATE requests.**

Steps taken by DDOT:

- DDOT’s equity team was required to file bi-weekly internal progress reports.

112 CORE and ORE.  
 113 “Elevating Equity in Vision Zero Communications: A whitepaper framing the challenges and opportunities,” p.4.  
 114 A recent research paper presents a model of equity efforts [in government] as requiring tangible steps and phases that agencies can undertake. This organizational culture change may include first creating an equity-oriented vision, followed by incorporating tools and training, and then appointing equity officers so that ultimately the goal of sustaining equity within the organization can be achieved. Dr. Benoy Jacob, “Governing For Equity: Implementing an Equity Lens in Local Government.” [https://icma.org/sites/default/files/Governing%20For%20Equity%20Implementing%20an%20Equity%20Lens%20in%20Local%20Government\\_0.pdf](https://icma.org/sites/default/files/Governing%20For%20Equity%20Implementing%20an%20Equity%20Lens%20in%20Local%20Government_0.pdf).

- DDOT created an Equity Assessment Tool that is to be used for all agency programs.<sup>115</sup>
- DDOT’s strategic plan (moveDC), established an agency-wide equity goal: “Integrate [an] equity assessment tool that DDOT identified as a moveDC strategy to maximize equitable outcomes of projects and programs.”  
DDOT developed an equity statement, which in part states: “DDOT is committed to elevating and advancing transportation equity by evaluating our policies, planning, community engagement and project delivery, to ensure public investments in transportation justly benefit all residents, visitors and commuters.”<sup>116</sup>
- Staff reported that DDOT was experimenting with ways to increase the ATE deterrent effect without increasing cost burdens.

We found that DDOT’s equity assessment tool for the ATE program asked if the project improves safety for people of color and low-income residents. While answering these questions would help to prevent under-enforcement of traffic laws in disadvantaged communities, the tool did not provide for the examination of individual camera locations. Nor did it consider the ATE program as a potential burden that could impact those same communities. Reliance on the Equity Assessment Tool and HIN data could lead to more cameras in disadvantaged communities, leaving them vulnerable to disproportionate fines and fees stemming from ATE cameras.<sup>117</sup>

The Vision Zero Network recommends that “[e]quity considerations should be prioritized in any speed management strategy, including camera programs. Equity concerns raised about cameras include potential for the following: over-enforcement in neighborhoods that are predominantly low-income and/or communities of color, recognizing that street design in these neighborhoods is often geared for speed over safety; disproportionate financial burdens on low-income people, given the regressive nature of fines and fees systems; over-dependence on revenue generated by the programs; lessened urgency to address speed problems in more proactive, design-oriented ways; and others.”<sup>118</sup>

Although DDOT had taken steps to focus on areas of greatest risk, the citizen request model for site assessments used during the audit period (discussed in the first finding), could reward socioeconomically privileged communities for having disproportionately requested ATE cameras while limiting the concentration of cameras in disadvantaged communities. DDOT’s new TSI Prioritization Model, published in January 2023, shows an attempt to mitigate this risk by completing safety and vulnerable user assessments for each traffic safety project under consideration.<sup>119</sup> This includes targeting the top 10 highest priority locations in each ward every quarter.

115 “moveDC,” December 2021, p.70.

116 DDOT web page, “DDOT Equity Statement” <https://ddot.dc.gov/page/equity-statement>.

117 For example, the GHSA notes that camera placement can worsen existing disparities, especially in communities where historical under-investment in transportation infrastructure inadvertently led to high-speed roadways. “Automated Traffic Enforcement in a New Era,” p.18.

118 Vision Zero Network web page, “Vision Zero Success Depends On Prioritizing Safety Over Speed.” <https://visionzeronetwork.org/re-sources/speed-management/>.

119 “DDOT Traffic Safety Input (TSI) Prioritization Model,” January 6, 2023, p.3.

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**While MPD had some racial equity efforts underway, it had not applied those efforts directly to its traffic enforcement activities or assessed whether its traffic enforcement actions were biased or led to inequitable outcomes.**

We found MPD had implemented racial equity efforts, including:

- Developed officer trainings to reduce racial bias.<sup>120</sup>
- Released a Stop Data Report with some racial data analysis.
- Participated in Reimagining Police workshops to examine racial bias in police stops.<sup>121</sup>
- Hired the agency's first Equity Officer in May 2022.<sup>122</sup>

MPD collected data about the racial characteristics of individuals involved in traffic stops, but the data have not yet been analyzed systematically to determine whether it shows evidence of racial or ethnic bias.

Equity was not mentioned explicitly in MPD's Traffic Plans, though the Plans' focus on risky driving behaviors was recommended as a best practice for incorporating equity into enforcement.<sup>123</sup> As previously mentioned, we found a majority of MPD's enforcement resulted from safety-related violations. Specific safety-related violations were identified both in the 2015 Vision Zero Action Plan, and in the 2022 Fatal Crash Reduction Plan, but as discussed in the second MPD finding, these safety-related violations did not comprise a large portion of MPD traffic enforcement.

MPD has published data on the race of persons stopped for a traffic violation since 2019,<sup>124</sup> which is recommended for equity in enforcement.<sup>125</sup> However, without a thorough analysis of its enforcement output data, as discussed in the MPD findings above, it is unclear if MPD's traffic enforcement efforts are equitable for the residents it serves.

ODCA recommended in a recent NEAR Act report that MPD commission an "independent analysis of the outcomes of police stops and whether there is racial or ethnic bias in stops using the preferred research methods identified by The Lab @ DC."<sup>126</sup> Isolating traffic enforcement stops to study them as a subset of all stops would provide important analysis for understanding the equity of MPD's traffic enforcement.

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120 MPD's 2020 Stop Data Report (cite in next footnote) notes two "innovative" training partnerships with "[t]he University of the District of Columbia College, which facilitates a training at the National Museum of African American History and Culture delving into the historical relationship between African Americans and law enforcement; and the U.S. Holocaust Museum, which teaches officers about the role police played in the Holocaust and challenges them to reflect upon their responsibilities today." p.8.

121 MPD, "Stop Data Report, January – December 2020," September 2021; "NEAR Act Police Reforms Advance Procedural Justice but Data Initiatives Stall." The seven-part Reimagining Stops Workshop Series began in the fall of 2020, in conjunction with The Lab @ DC, Georgetown and Howard Universities, and over 130 stakeholders.

122 ORE, "District of Columbia Draft Racial Equity Action Plan FY 2023 – FY 2025," 2022, [https://ore.dc.gov/sites/default/files/dc/sites/ore/page\\_content/attachments/ORE\\_REAP\\_ENGLISH\\_DRAFT.pdf](https://ore.dc.gov/sites/default/files/dc/sites/ore/page_content/attachments/ORE_REAP_ENGLISH_DRAFT.pdf).

123 GHSA, "Equity in Highway Safety Enforcement and Engagement Programs," August 2021; and Vision Zero Network, "Elevating equity in Vision Zero communications: A whitepaper framing the challenges and opportunities," November 2016.

124 "NEAR Act Police Reforms Advance Procedural Justice but Data Initiatives Stall." Per NEAR Act Requirements, Title II, Subtitle G (Improving Stop and Frisk and Use of Force Data Collection).

125 See footnote 119 (GHSA and Vision Zero Network).

126 "NEAR Act Police Reforms Advance Procedural Justice but Data Initiatives Stall," p.55. A planned project for FY 2024 led by DMOI's Highway Safety Office is slated to study equity in MPD traffic enforcement and may fulfill this recommendation, though the researchers point out that "[R]ather than treating our statistical analysis as evidence of wrongdoing, researchers and policymakers utilized (sic.) the annual report as an early warning system that begins, rather than ends, an on-going and data-driven conversations," p.6.

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## DPW did not have plans or processes to guide equity in its parking, booting, and towing operations.

While DPW had an equity statement,<sup>127</sup> we found that:

- DPW did not have an equity officer or designated point person to oversee racial equity implementation within the agency.
- There were not equity plans, policies, or procedures to assess how its parking, booting, and towing operations impede or advance Vision Zero equity principles, though DPW did state that “In FY23, DPW will begin aggressively moving forward with implementing racial equity best practices and toolkits in the agency’s budgeting process, daily operations, plans, and programs by establishing a racial equity framework,” and “conducting racial equity assessments and measuring alignment with equity guidelines.”
- DPW also missed an opportunity to incorporate equity in FY 2021 when DPW hired a consultant to study the deployment of parking enforcement officers but did not include any equity considerations in the tasks or deliverables.
- DPW boot and tow data also did not include precise or reliable geographic information, making it difficult to track and analyze where booting and towing occurs in the District, and whether socioeconomic and geographic inequities exist.

Without equity plans and procedures to guide daily operations, DPW’s parking enforcement activities cannot be expected to demonstrate that they promote equity. Inequitable booting and towing services could disproportionately impact lower-income residents (even if they were not habitual offenders of safety violations) who were experiencing financial hardship and not paying non-safety related parking violations, such as expired meters or residential parking permit violations.<sup>128</sup>

As we explored in the sections above, equity is identified as a necessary component of Vision Zero that should be a focus of enforcement efforts to ensure that implementation does not create a disproportionate impact. For the goal of Vision Zero to be achieved, and not lose community support,<sup>129</sup> it needs to be implemented with an equity lens.<sup>130</sup> Likewise, equity is critical to gaining the support of employees, who recognize that their traffic enforcement work has equity implications. For example, some MPD officers shared sentiments that they were hesitant to issue traffic citations based on the high fine amounts. While a bill was introduced in 2022 to combat the issue of out-of-state vehicles that are often

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127 DPW web page, “Department of Public Works Equity Statement,” <https://dpw.dc.gov/page/department-public-works-equity-statement>.

128 For more discussion about the potentially negative impacts of booting and towing on the District’s Black, Indigenous, and other residents of color, see: CORE, “Racial Equity Impact Assessment for the Strengthening Traffic Enforcement, Education, and Responsibility (“STEER”) Amendment Act of 2023,” December 6, 2023, [dcore.tiny.us/STEER](https://dcore.tiny.us/STEER), p.11-12.

129 Vision Zero 2022 Update, “We are also building upon our conversations with community members and stakeholders on their traffic safety priorities. From our communities, I ask for your input and support as we redesign our highest crash streets and intersections to safely serve all roadway users and consider and assess other strategies for improving the safety of our streets” (Mayor Bowser’s message), p.2.

130 “Elevating Equity in Vision Zero Communications: A white paper framing the challenges and opportunities.”

parked in private garages,<sup>131</sup> a DPW staff member also expressed a concern that booting and towing activities would target DC residents given that they are often parked on the street. See Auditor’s Concern for more on reciprocity.

The District has made significant progress in planning and implementing a racial equity focus into government operations and traffic enforcement in the months following our audit period:

- The Mayor and the Director of the Mayor’s Office of Racial Equity (ORE) in 2024 released the District’s first Racial Equity Action Plan (REAP), a three-year roadmap outlining actions the District will take to close racial equity gaps and measure progress toward a more equitable D.C.<sup>132</sup> A previous draft of the REAP noted that DMOI’s equity council (which includes DDOT and DPW) had been convening monthly since March 2021 to discuss their agencies’ equity work,<sup>133</sup> and the newly released REAP includes a goal that “Agencies establish standing committees, working groups, or teams to support racial equity initiatives and REAP implementation.”<sup>134</sup>
- The Council Office of Racial Equity (CORE) conducted several Racial Equity Impact Assessments of bills related to traffic safety and ATE cameras, which delved into both the potential economic implications as well as the safety outcomes of the bills for Black, Indigenous, and other residents of color.<sup>135</sup>
- The Mayor’s Task Force on Automated Traffic Enforcement Equity and Safety was established in March 2023, and included DDOT, DPW, and MPD representatives.<sup>136</sup> Part of the Task Force’s stated purpose was to review “[p]otential equity concerns related to the sites of existing ATE locations and the standards for siting future ATE locations.” The Task Force is to deliver a final report to the City Administrator on September 30, 2024, with a goal of making enforcement “more equitable.”<sup>137</sup>
- As the number of ATE cameras is expected to surge dramatically in FY 2024, D.C. government is following the best practice for equity to “Support increased use of automated enforcement.”<sup>138</sup>
- DMOI’s Highway Safety Office has partnered with the University of Connecticut to perform an analysis of MPD data, using seven distinct analytical tools, to screen for racially disparate methods of traffic enforcement.
- The Vision Zero 2022 Update had a continued commitment to equity and investing in communities and areas of greatest risk such as focusing on the HIN, although it did not contain performance indicators related to equitable implementation of Vision Zero strategies.<sup>139</sup>

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131 See Cheh letter dated July 14, 2022, accompanying the transmittal of the “Booting and Impoundment Reform Amendment Act of 2022,” B24-949. This bill was not enacted. Introduction, <https://lms.dccouncil.gov/downloads/LIMS/51065/Introduction/B24-0949-Introduction.pdf>.

132 ORE, “District of Columbia Racial Equity Action Plan,” 2024. Page 36 of this plan refers to Vision Zero high crash corridors in a snapshot map of areas of transportation need. [https://ore.dc.gov/sites/default/files/dc/sites/ore/page\\_content/attachments/ORE-REAP-020124.pdf](https://ore.dc.gov/sites/default/files/dc/sites/ore/page_content/attachments/ORE-REAP-020124.pdf)

133 ORE, “District of Columbia Draft Racial Equity Action Plan FY 2023- FY 2025.” REAP timelines range from FY 2023-FY 2025 for agencies to complete the goals and metrics outlined in the plan, [https://ore.dc.gov/sites/default/files/dc/sites/ore/page\\_content/attachments/ORE\\_REAP\\_ENGLISH\\_DRAFT.pdf](https://ore.dc.gov/sites/default/files/dc/sites/ore/page_content/attachments/ORE_REAP_ENGLISH_DRAFT.pdf), p.21.

134 “District of Columbia Racial Equity Action Plan,” p.22.

135 For example: CORE, “Racial Equity Impact Assessment for Bill 25-0425,” December 6, 2023, see: [dcore.tiny.us/STEER](https://dcore.tiny.us/STEER). CORE, “Racial Equity Impact Assessment for Bill 24-1029,” December 20, 2022, see: [dcore.tiny.us/ATERevenue](https://dcore.tiny.us/ATERevenue).

136 DMOI web page, “Mayor’s Task Force on Automated Traffic Enforcement (ATE) Equity and Safety,” <https://dmoi.dc.gov/atetaskforce>.

137 Ibid.

138 DDOT FY 2024 Budget, July 14, 2023, <https://www.dccouncilbudget.com/fy-2024-budget>, p.205; GHSA, “Equity in Highway Safety Enforcement and Engagement Programs,” August 2021, p.7; Vision Zero Network, “Equity Strategies for Practitioners,” 2017.

139 Vision Zero 2022 Update.

## Recommendations

12. DDOT should develop procedures for assessing equity of ATE camera rotation and site assessment decisions which balance gathering data to assess safety impact of the camera locations on the surrounding communities as well data on disparate financial burdens.
13. MPD should conduct an independent analysis of the equity outcomes of police stops and ensure that traffic enforcement stops are isolated to be studied as a subset of all stops, as a planned project with the University of Connecticut aims to do.
14. DPW should obtain more data and work with the Office of Racial Equity to assess in writing how its parking enforcement, booting, and towing operations advance or impede racial equity.

# Auditor's Concern

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## **The District's Vision Zero enforcement efforts are impeded by a lack of accountability for Maryland and Virginia drivers who engage in the majority of the unsafe driving behaviors in the District.**

Eighty percent of violators of District traffic safety laws enforced by ATEs were drivers of vehicles registered in other states. There are various ways that a lack of geographic equity affects the District's traffic enforcement operations:

- DMV data show that vehicles registered to states other than D.C. received the majority of ATE tickets from 2018 through 2022: Maryland received 43%, Virginia 21%, and other states 15%, as Figure 38 illustrates.
- D.C. has limited mechanisms to collect fines/fees associated with ATE cameras or parking tickets issued to vehicles registered in other states. DC does not currently have reciprocal agreements with Maryland or Virginia regarding non-moving violations and ATE fines. MPD-issued moving violations,<sup>140</sup> which are issued based on a driver's license, are subject to reciprocity under the Nonresident Violator Compact, of which the District and Maryland are members, and the Driver License Compact, of which the District, Maryland, and Virginia are members.<sup>141</sup>
- A December 2023 GHSA report "Automated Enforcement in a New Era" includes a best practice for ATE programs to establish persistent offender and reciprocity agreements.<sup>142</sup>

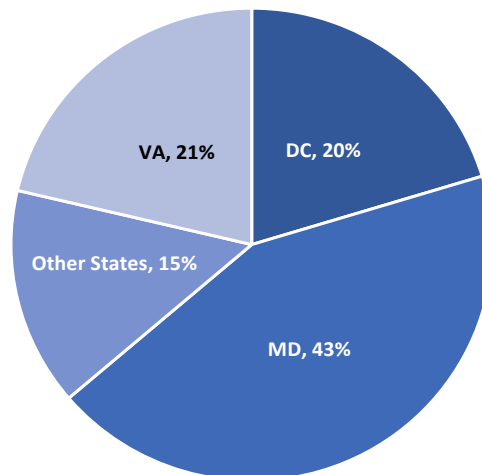
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140 Our analysis showed that 32% of recipients of either a MPD traffic violation or warning were from MD; 28% from D.C.; 19% from VA; 13% unknown, and 8% from other states.

141 The compacts are interstate agreements developed in conjunction with The Council of State Governments (CSG). Driver License Compact: <https://compacts.csg.org/compact/driver-license-compact/>; Nonresident Violator Compact: <https://compacts.csg.org/compact/nonresident-violator-compact/>.

142 This includes establishing penalties for scofflaws (like impounding/ booting), "preventing vehicle re-registrations and inspections and/or prohibiting license renewals," and creating a "plan to address out-of-state violators who fail to pay citations by developing reciprocity agreements with neighboring states." See, GHSA, "Automated Enforcement in a New Era," p.23.

Figure 38: Percentage of Total ATE Tickets Issued, by State of Registered Vehicle, 2018–2022



Note: Totals do not add to 100% due to rounding.

Source: ODCA analysis of DMV data obtained July 6, 2023.

This different accountability structure for D.C. residents and non-residents has several impacts, including:

**Traffic safety.** A lack of incentives for non-residents to adhere to District traffic laws and prioritize safe driving impacts their driving behavior in the District. Drivers who do not pay their traffic fines are not necessarily more dangerous than drivers who pay their fines. Nevertheless DMV’s 2018 through 2022 ATE ticket data shows that vehicles registered in Maryland and Virginia made up the largest share of repeat offenders:

- 45% of vehicles that received two or more ATE tickets were registered in Maryland and 20% of vehicles that received two or more ATE tickets were registered in Virginia.
- 44% of vehicles that received five or more ATE tickets were registered in Maryland and 19% of vehicles that received five or more ATE tickets were registered in Virginia.

If non-residents, especially scofflaws with outstanding tickets, primarily park in private garages or off the streets, they are less likely to be booted or towed,<sup>143</sup> as described in the proposed Booting and Impoundment Reform Amendment Act of 2022.<sup>144</sup>

143 Vehicles owned by DC residents are booted and towed at a rate that is disproportionate to the rate at which they receive traffic tickets; for example, we found that tows for D.C.-registered vehicles comprised 35% of all vehicles towed by DPW in FYs 2021 and 2022, with tows for Maryland-registered vehicles comprising 27% and Virginia-registered vehicles comprising 20%. Tows for vehicles registered in all other states comprised the final 18%.

144 “Booting and Impoundment Reform Amendment Act of 2022,” introduced on July 14, 2022.

**Geographic inequities.** Although 2020 Council legislation required the Mayor to enter reciprocity negotiations with Maryland and Virginia, outreach by the Mayor has not been evident.<sup>145</sup> The legislation required the Mayor to “enter into negotiations with Virginia and Maryland to establish reciprocal agreements” and transmit a report to the Council with the results by September 30, 2021.<sup>146</sup> In a report dated October 4, 2021, the administration stated that, “Prior to the law taking effect the Mayor reached out to the governors of Maryland and Virginia to discuss a reciprocity agreement which met the requirements of the Act.” But “both jurisdictions declined to enter into a reciprocity agreement based on the determination that such an agreement would negatively impact the customer service of their motor vehicle office.”<sup>147</sup> The Mayor submitted a revised report, dated October 9, 2021, changing the language to say, “Prior to the law taking effect, in 2015, the District’s Department of Motor Vehicle staff had informal conversations with Maryland and Virginia motor vehicle staff related to regional enforcement reciprocity.”<sup>148</sup>

In 2023 Council performance oversight testimony, then-Deputy Mayor of Operations and Infrastructure Lucinda Babers noted that also in October 2021, DMOI requested assistance from the Metropolitan Washington Council of Governments (MWCOG) and that a regional roadway safety enforcement letter was developed which did not fully address the District’s request, and that letter was sent in December 2021.<sup>149</sup> She noted in an October 2022 hearing that Maryland and Virginia responded to MWCOG’s letter by saying they wanted “to look at ways to make various ticket related fines more uniform among the three jurisdictions” and Babers noted this was not the intent of the request so they have continued to look for new ways to move forward. She also noted that Maryland indicated that reciprocity would require legislation.<sup>150</sup>

In addition to reaching out to MWCOG, in the October 9, 2021 report to the Council, the Mayor noted that DMOI would partner with the Office of the Chief Financial Officer to “explore alternative [collections] options” that do not involve the other jurisdictions’ motor vehicle offices.<sup>151</sup>

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145 The “Vision Zero Enhancement Omnibus Amendment Act of 2020,” Law 23-158, effective December 23, 2020, authorized the D.C. Mayor to enter negotiations for reciprocity with other jurisdictions for ATE and non-moving violation fines (and required the Mayor to negotiate with Maryland and Virginia). Further the law allowed the Mayor to offer a portion of the funds recovered to states as part of the agreement. This is codified at D.C. Official Code § 50-2301.12.

146 D.C. Official Code § 50-2301.12.

147 Office of the Mayor, “Report on Reciprocity for Non-Moving and Automated Traffic Enforcement Fines,” October 4, 2021, <https://lims.dccouncil.gov/Legislation/RC24-0078>.

148 Office of the Mayor, “Revised Report on Reciprocity for Non-Moving and Automated Traffic Enforcement Fines,” October 9, 2021, <https://lims.dccouncil.gov/downloads/LIMS/48014/Introduction/RC24-0084-Introduction.pdf?Id=127999>.

149 DMOI 2023 Oversight Questions, “The final letter, sent by MWCOG in December 2021, only urged collaboration between the region on automated traffic enforcement (ATE) fines versus the District’s request for ticket payment reciprocity.” <https://dccouncil.gov/wp-content/uploads/2023/02/DMOI-Performance-Oversight-Pre-Hearing-Questions-Final.pdf>, p.19.

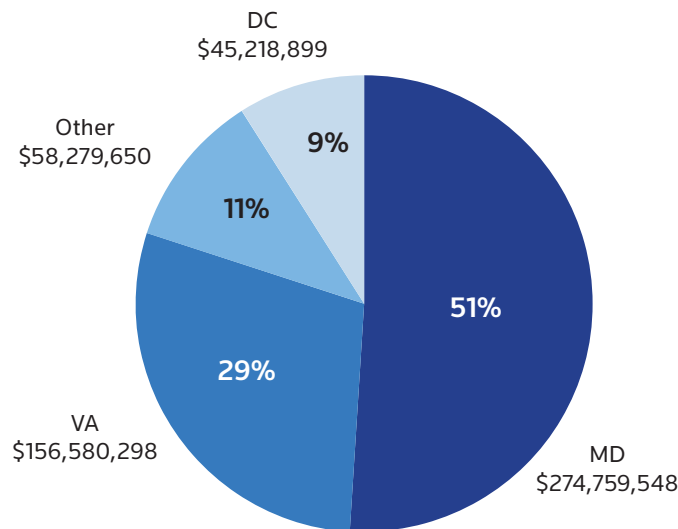
150 “Prehearing Questions for Deputy Mayor of Operations and Infrastructure Hearing on B24-949, the Booting and Impoundment Reform Amendment Act of 2022, and Traffic Safety in the District,” p.12.

151 The report notes that “over 50% of revenues collected from the District’s Amnesty Program has come from Maryland and Virginia drivers.” That report also noted that in 2015 the D.C. DMV had informal conversations with the Maryland and Virginia motor vehicle offices, as well as reached out to MWCOG for coordination, and would report back to the Council in March of 2022. No March 2022 report was found on LIMS. Office of the Mayor, “Revised Report on Reciprocity for Non-Moving and Automated Traffic Enforcement Fines (Updated on October 9, 2021),” <https://lims.dccouncil.gov/Legislation/RC24-0078> and <https://lims.dccouncil.gov/downloads/LIMS/48014/Introduction/RC24-0084-Introduction.pdf?Id=127999>, p.1-3.

**D.C.’s budget and ability to recoup fines owed.** In addition to traffic safety impacts, the lack of ATE and parking ticket reciprocity has significant fiscal implications for the District, as seen in Figures 39 and 40 below. ODCA analysis of five calendar years (2018 through 2022) of DMV ATE ticket data, obtained in July 2023, shows:

- Unpaid fines and fees (including penalties) owed from drivers of vehicles registered out of state totaled \$489,619,496. Of this amount, \$431,339,846, or 81%, was owed by drivers of vehicles registered in Maryland and Virginia. Maryland vehicles owed \$274,759,548, or 51%, and Virginia vehicles owed \$156,580,298, or 29%, as shown in Figure 39.<sup>152</sup>
- Further, according to the DMV, of the \$79 million in outstanding parking tickets owed for just FYs 2021 and 2022, approximately \$60 million or 77% was owed by drivers of vehicles registered out of state, with Maryland and Virginia drivers owing approximately \$49 million or 56% of outstanding parking tickets, as shown in Figure 40.<sup>153</sup>

**Figure 39: Five Year Total of ATE Fines and Fees Owed, by State of Registered Vehicle, 2018–2022**

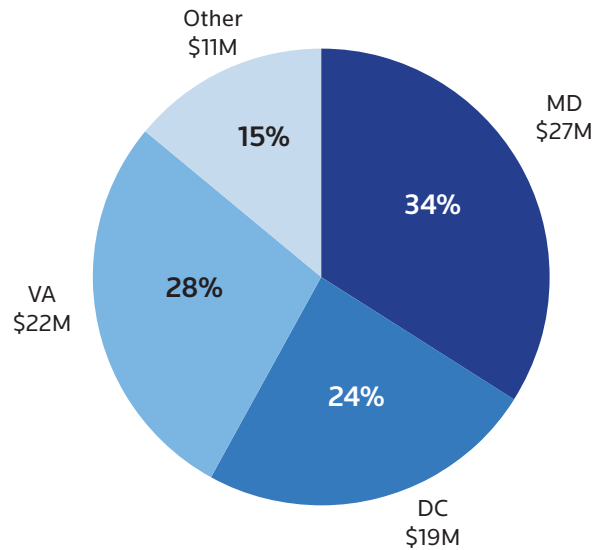


Source: ODCA analysis of DMV data obtained July 6, 2023.

152 Totals may vary slightly due to rounding.

153 DMV, “2023 Performance Oversight Questions,” [https://dccouncil.gov/wp-content/uploads/2023/02/FY22-23-DMV-Performance-Oversight-Pre-Hearing-Questions-FINAL\\_.pdf](https://dccouncil.gov/wp-content/uploads/2023/02/FY22-23-DMV-Performance-Oversight-Pre-Hearing-Questions-FINAL_.pdf), p.40.

**Figure 40: Estimated Parking Tickets Owed by State of Registered Vehicle (\$ and %), FYs 2021 and 2022**



**Note:** ODCA used DMV data of total amount owed in FY 2021 and FY 2022 and percentages of that total for each jurisdiction to estimate totals owed by jurisdiction, and therefore these numbers are approximate and do not add to 100%.

**Source:** ODCA analysis of DMV data.

The D.C. Council recently passed the “Strengthening Traffic Enforcement, Education, and Responsibility (“STEER”) Amendment Act of 2024,”<sup>154</sup> including a provision that allows the Office of the Attorney General (OAG) to bring a civil suit against a driver or a motor vehicle in D.C. Superior Court to recover outstanding fines for speeding or reckless driving, to immobilize the vehicle, and to obtain other remedies, which would include out-of-state drivers.<sup>155</sup>

While the STEER Act provisions for the OAG may prove to be a useful tool for prosecuting some out-of-state dangerous drivers, it does not fully address the issues stemming from the lack of reciprocity as laid out above. One person who served as an invited witness at a May 2023 Committee on Transportation and the Environment roundtable on dangerous driving supported the bill but cautioned that the OAG provision may be resource-intensive, and that it may be more feasible to pursue enforcement by the DMVs in the jurisdictions of offending drivers through the provisions of the Driver License Compact (for serious offenses) and the Nonresident Violator Compact (for minor moving violations).<sup>156</sup>

Considering the significance of the reciprocity issue for the District’s Vision Zero efforts to reduce fatalities and injuries through equitable enforcement of traffic safety laws, as well as the substantial financial

<sup>154</sup> Act 25-406. This act was transmitted to Congress on March 11, 2024, with a projected law date of May 14, 2024.

<sup>155</sup> See Section 4(c) of the STEER Amendment Act of 2024.

<sup>156</sup> Ryan Calder in October 2023 testimony as compiled by the Committee (Committee on Transportation and the Environment Committee Report for Bill 25-0425, “the Strengthening Traffic Enforcement, Education, and Responsibility Amendment Act of 2023” (STEER), December 6, 2023, [https://lims.dccouncil.gov/downloads/LIMS/53600/Committee\\_Report/B25-0425-Committee\\_Report1.pdf?Id=182701](https://lims.dccouncil.gov/downloads/LIMS/53600/Committee_Report/B25-0425-Committee_Report1.pdf?Id=182701). Calder also noted that Virginia withdrew from the Nonresident Violator Compact in 2019, “so civil suits may nevertheless be necessary to pursue Virginia drivers.” p.295.

impact, members of the D.C. Council should continue to press the Executive to take stronger action to obtain full reciprocity with Maryland and Virginia, explore more direct collections processes that do not require going through the Departments of Motor Vehicles, consider a push for changes to the interstate compacts to address reciprocity for ATE tickets, and work with peers in the Maryland and Virginia state legislatures to address this critical issue.

## **Recommendation**

15. The Mayor should follow the requirements of D.C. Official Code § 50-2301.12, to request negotiations with Maryland and Virginia to establish reciprocal agreements regarding non-moving violation fines and ATE fines in the District or propose rescinding the requirement.

# Conclusion

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Across the country, communities are working to achieve traffic safety goals without losing sight of the potential impact these goals can have on racial equity. In D.C., Black residents are experiencing more of the harm posed by dangerous driving behaviors as traffic injuries and fatalities continue to trend upward. Recommendations in this report can help DDOT, MPD, and DPW reverse these trends and simultaneously advance the District’s goals of zero traffic fatalities and equity of processes and practices, specifically reaching a point when race no longer predicts outcomes, such as access to safe transportation.

We recognize that both during and after our audit scope the Vision Zero initiative experienced significant change and growth, such as the ATE program transfer from MPD to DDOT, the 2022 Update to the Action Plan, and the Vision Zero Division move from DDOT to the Deputy Mayor. While our audit findings were restricted to our audit scope and may not recognize the current condition, and enhancements, of the programs, we believe our recommendations are wholly relevant and if implemented will assist the agencies in achieving their objectives

To ensure the ATE program addresses the most unsafe areas in ways that also advance the District’s racial equity goals, DDOT should fully implement policies and procedures to guide proactive ATE camera deployment, assessment, and public reporting.

To prioritize traffic enforcement actions that saves lives and reduces traffic-related injuries, MPD should ensure all patrol officers—not just those in the Traffic division or on overtime enforcement shifts—are visibly targeting the most critical safety violations in the most high-risk locations.

To reflect its important traffic safety role and ensure staff are aware of and prioritizing Vision Zero, DPW should develop and implement policies and procedures so that its parking enforcement, booting, and towing resources impact dangerous driving behaviors and high-risk areas.

While none of the agencies had fully implemented racial equity procedures, data collection, and strategies into their Vision Zero efforts, we are encouraged by the activity that has occurred after our scope to operationalize racial equity at the agency level and in traffic safety enforcement.

For a government-wide initiative as ambitious as Vision Zero to be effective, strong leadership is needed at the agency-level, as well as from the Mayoral-level and the Council. We are encouraged by the recent increase in resources to DMOI’s Vision Zero oversight, the creation of the Mayor’s Task Force on Automated Traffic Enforcement Safety and Equity, and Council policymaking, and we look forward to the executive and legislative branches’ implementation of our recommendations and rigorous Vision Zero oversight.

# Agency Comments

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On April 12, 2024, we sent a copy of this report to the District Department of Transportation (DDOT), Metropolitan Police Department (MPD), and Department of Public Works (DPW) for review and comment. We also sent a courtesy copy to the Deputy Mayor for Operations and Infrastructure (DMOI) given it houses the Vision Zero office. An exit conference was requested and held on May 1, 2024, with ODCA, the three engaged agencies, and representatives from DMOI and the Deputy Mayor for Public Safety and Justice (DMPSJ). DMOI and DMPSJ, along with the Vision Zero Director, jointly responded with comments on May 9, 2024, with concerns about the context and scope of the report. Comments from the three agencies regarding the recommendations directed to the agencies were attached to the May 9, 2024, response. Agency comments are included here in their entirety, followed by ODCA's response.



Kathleen Patterson, Auditor  
Office of the District of Columbia Auditor  
1331 Pennsylvania Avenue N.W., Suite 800S  
Washington, DC 20004

May 9, 2024

Dear Ms. Patterson,

The agencies involved in this report appreciate the work of your team and value the opportunity to improve our process and policies. As Vision Zero is a high priority, we specifically value a close look at our efforts in this regard. By design, audits focus on a single program or question, at a point in the past. We would like to take the opportunity to contextualize and bring readers up to date as the report, by lacking such context, provides an out-of-date and incomplete snapshot of the District's Vision Zero enforcement efforts. Specifically:

- **The report does not place traffic enforcement, or the District's efforts, in context.** The District, like other peer cities, is seeking to build an enforcement system that is strategic and equitable, and to expand beyond traffic safety enforcement that was historically limited primarily to police traffic stops or checkpoints. In many ways, the District has been a leader in equitable traffic enforcement policy and practice for decades, and is currently a leader in the equitable and data-driven use of Automated Traffic Enforcement (ATE).
- None of the broader social context around traffic enforcement is presented, particularly recent developments, nor is there any sort of "reality check" comparison to the efforts, challenges, or trends in any similarly situated cities.
- After the murder of George Floyd, the already close scrutiny of police stops intensified, and community receptiveness to traffic enforcement waned. Indeed, there have been repeated questions from Councilmembers, and calls from various advocacy groups for the Metropolitan Police Department (MPD) to stop doing any or most traffic stops. On the other hand, as traffic fatalities and awareness of the dangers of speeding and reckless driving have increased, others are calling for more in-person enforcement.
- **The report is out of date, making it an inaccurate picture of current practice.** The report covers the status of enforcement as of September 2022, which is over a year and a half ago, and during a period of rapid change. Among other things, the report:
  - Does not reflect District Department of Transportation (DDOT) current processes and evaluations to place and evaluate cameras, or even the full range of camera types currently

in use. The report also mischaracterizes or misrepresents multiple elements of DDOT's process and procedures. DDOT's corrections are included at the end of this document, below DDOT's responses to recommendations.

- Does not acknowledge the ATE program's public-facing web site, which includes every camera on an interactive map, and an explanation of the analysis used to place cameras, camera functionality and evaluation methods for all cameras placed since 2022 and especially as part of the expansion of the program, which began in 2023.
  - Misses current enforcement-related Vision Zero goals and metrics released in October 2022 in the 2022 Vision Zero Update. The report focuses on 2015 Vision Zero goals.
  - Does not acknowledge the Mayor's Task Force on ATE Equity and Safety, established with the goal of evaluating and taking steps to ensure the equity of the ATE program. Further, this report only mentions in passing the Office of Racial Equity, created in 2021, which co-chaired the ATE Task Force and ensures that racial equity is evaluated and built into everything the District does.
  - Does not recognize MPD's commitment to conduct twice-monthly traffic compliance checkpoints focused on the High Injury Network (HIN), which have been operating since summer 2023.
- **The District is a national leader on ATE innovation and building a safer, data-driven, more equitable ATE system.** The District has possibly the most robust ATE system in North America on a per-population basis. The District is setting a standard for other cities and states:
    - The District's ATE program operates out of DDOT (as opposed to being operated by police), reflecting that ATE is a traffic safety tool.
    - The program also operates with a very high level of transparency, and data-driven placement and evaluation of cameras.
    - In the 1990s, the District was one of the first jurisdictions to pass enabling legislation to begin using automation and cameras to enforce traffic violations. Since the early 2000s, the District, along with 23 other states, developed red-light ATE programs and was one of only 12 in the nation that uses ATE for speed violations.
    - As with any new technology, ATE's impacts, benefits, and effects took time to evolve, and the District has been a leader in building a robust and data-driven system of ATE cameras. ATE is still evolving as new technology and new research emerges. From the program's initiation in the 1990s to where it is now, ATE in the District and across the country has substantially evolved.
    - Under DDOT leadership, the District is an industry leader. Currently the District is enforcing red-light, speed, stop sign, bus lanes and zones, and school bus stop-arm violations. On a regular basis, other states and cities reach out to the District ATE program leaders to seek advice on building and managing an ATE program.
  - **Police enforcement works as part of a larger ecosystem**, but this report simply counts MPD citations by type and location and makes one-size-fits-all recommendations. Similarly, by conflating ATE with in-person forms of enforcement, the report ignores that different strategies are appropriate for different forms of enforcement.

- Law enforcement agencies are inherently limited in their officer capacity, and currently MPD is operating with its lowest staffing in more than 50 years. In this environment in particular, the goal is to make traffic enforcement highly visible, thereby influencing behavior and deterring unsafe behaviors; similarly, in-person enforcement can influence behavior and earn goodwill when it is deployed in response to community concerns.
  - Choosing locations for traffic safety enforcement always involves balancing multiple factors, and ATE enforces in places where officer-led enforcement is not feasible or safe. The recommendations in the report ignore these real-life considerations and instead focus on highly prescriptive approaches to targeting MPD enforcement.
  - The report also misunderstands that many “non-safety-related” citations are often issued as part of a traffic stop that was initiated because of a “safety-related violation.” In effect, the recommendation is for MPD officers not to give a driver a citation for driving an unregistered vehicle or driving without insurance, in the context of making a traffic stop for speeding. In fact, District law requires officers to issue two tickets to drivers if they cannot present proof of current insurance, which drives insurance violations to be one of the top ticket categories.
  - The report does not discuss MPD’s high-visibility enforcement efforts, overtime enforcement efforts that focus on pedestrian safety, or the fact that District law and MPD policy limit vehicle pursuits to protect all road users. Instead, the report numerically analyzes citations from MPD’s traffic stops and misses much of the nuanced context around such stops.
- **ATE is highly effective**, but this report leaves that out entirely. The key indicator of the effectiveness of enforcement is not the citations issued or repaid, but rather the proportion of drivers who are deterred from the unsafe behavior in the first place. ATE is extremely effective by this metric. Cameras slow down almost all drivers and increase safety.
    - In fiscal year 2023, the District’s speed cameras cited less than 1% of passing vehicles. Among vehicles that received one ticket, about 70% receive only one. In a summer 2023 poll of DC residents by Vision Zero, a similar proportion of respondents said the cameras influenced the way they drive.
    - Further proof is in the crash data, where a 2019 study in the District showed that speed cameras slow drivers down at all hours of the day, and decrease injury crashes by 30% in the 12 months following their installation.
  - **The “Auditor’s Concern” about reciprocity should be put in context.** We share concerns about unsafe driving by anyone, and we do have fewer accountability mechanisms for out-of-state vehicle owners. However, the report states that “enforcement efforts are impeded by a lack of accountability for Maryland and Virginia drivers,” but in fact, compliance with the cameras is very high, and that is the most important measure of effectiveness; most vehicles that get one ticket get only one; and most tickets are repaid. All of these things – slower speeds, single violations, and solid repayment rates – are true of District, Maryland, and Virginia vehicle owners alike.
    - Importantly, the narrative may be implying that because out-of-state plates receive the majority of tickets, out-of-state vehicles are more likely to violate. But the report misses a step, by failing to determine whether a majority of vehicles on the streets in the District are out-of-state vehicles, and whether their rate of being ticketed is out of proportion with their

presence in the District. A majority of jobs in the District are held by out-of-staters, and District residents may be more likely to commute by Metro, walking, or cycling to work, rather than driving. And as noted above, data show that about 70% of vehicles that receive an ATE citation receive only one – and this is true for vehicles from the District, Maryland, and Virginia – implying that vehicle owners who get one citation are equally unlikely to get a second citation, regardless of state.

- Certainly, there are examples of scofflaws, both out of state and in-state, who fail to repay their tickets. But the bigger picture around ATE cameras is compliance, lower speeds, and fewer injury crashes.
  - A better predictor of likelihood of repayment is the number of tickets received, which is why we acknowledge the need to direct efforts towards influencing the behavior of a small subset of risky drivers and are doing so through a range of mechanisms.
- **Finally, “Vision Zero enforcement” is part of a multi-layered, systems-level approach,** and readers should understand that this report focuses on a small subset of enforcement activities. Particularly with regard to the Department of Public Works (DPW), there are many other elements of their Vision Zero enforcement role.
    - For example, DPW’s rush-hour towing efforts support more reliable transit service and higher transit use, which are key Vision Zero goals.
    - DPW’s enforcement of residential parking permits and parking meters are not “Vision Zero” specific but encourage residents to use transit or other modes instead of driving in some cases.
    - For DPW, the report focuses only on booting and towing. The recommendations would require shifts in the administration of DPW’s programs, but the report does not analyze whether such changes would have a return on investment for traffic safety.

Attached are agency responses regarding the status of recommendations in the report, and below that, DDOT provides corrections to places where the agency disagrees with the report’s factual findings.

Again, we are pleased to share the rapid progress and expansion of the ATE program and other enforcement efforts since September 2022. Thank you for the partnership in making our streets safer for all road users.


Sincerely,



Keith Anderson  
Deputy Mayor for Operations and Infrastructure



Lindsey Appiah  
Deputy Mayor for Public Safety and Justice



Charlie Willson  
Director, Vision Zero Office

Enclosures:

Agency Responses to Recommendations (DPW, MPD, DDOT)

DDOT Corrections to Report Narrative

Addendum 1: Sample DDOT Speed Camera Assessment Form from audit period

Addendum 2: Description of ongoing evaluation Supporting Equity in Traffic Enforcement, by MPD and DC Highway Safety Office

## DPW Response to Recommendations

Everything DPW's Parking Enforcement Management Administration does revolves around safety, even if we don't explicitly say "for safety" or "to aid Vision Zero." The audit results do not take the entire ecosystem into consideration. DPW is one piece of the larger Vision Zero network. We work each day to enforce laws put in place to make the District a safer community.

<p>DPW's Director should ensure that DPW's mission statement is revised to reflect its traffic safety responsibilities.</p>	<p>Under consideration</p>	<p>DPW states that we aim to "Ensure parking opportunities for District residents, businesses, and visitors by encouraging voluntary compliance with parking regulations." Compliance with parking regulations go hand in hand with safety. Regulations were put in place to keep the community safer. <a href="https://dpw.dc.gov/page/who-we-are-dpw">dpw.dc.gov/page/who-we-are-dpw</a> DPW's strategic plan, Vision Zero goals, and other metrics reflect the <i>inputs</i> that DPW needs to meet in order to support Vision Zero.</p>
<p>DPW's Director should assess risks to Vision Zero implementation, develop policies and procedures with clear staff and management implementation responsibilities, and communicate those strategies and procedures throughout the agency.</p>	<p>Agree, already in progress</p>	<p>DPW's Parking Enforcement Management Administration will continue to review Vision Zero recommendations, assess risks, and develop protocols and procedures in alignment with the agency's overall strategic plan.</p>
<p>DPW should target the District's most dangerous streets and drivers, while maintaining productivity through technology updates to support geographic analysis and reporting, monitoring prioritization along the High Injury Network and using advanced technology to allow Parking Enforcement Officers, Boot Staff, and Tow Staff to view the types of violations a vehicle has when the license plate number is entered into the handheld devices or License Plate Readers (LPR).</p>	<p>Agree, in part</p>	<p>We agree that high-dollar scofflaws are highly correlated with risky driving and are aiming specific enforcement efforts towards them. In April 2024, DPW launched a high-dollar scofflaw pilot where we are using data from our license plate readers (LPRs) to create heat maps and target enforcement of vehicles with \$3,000+ in outstanding fines. Dedicated staff are deployed to these hot spot areas to search for high-dollar scofflaws and tow immediately.</p>
<p>The Mayor and the Office of the City Administrator should ensure that DPW has the necessary resources to implement its Vision Zero strategies, including funding for technology and equipment updates.</p>	<p>Agree, already in progress</p>	<p>DPW currently has funding to outfit all our Parking Enforcement vehicles with LPRs and is working with the Highway Safety Office on grant funding to outfit our tow cranes with LPRs and update our technology.</p>

<p>The D.C. Council should work with DDOT, MPD, DPW, and other related agencies (DMV, DMOI) to establish a D.C. Official Code definition of a high-risk driver to better enable enforcement through booting and towing.</p>	<p>Agree, already in progress</p>	<p>DPW is working with the Executive Office, sister agencies, and Council on further clarifying definitions of high-risk drivers. But any definition should reflect a consideration of implementation realities and return on investment to any new definition or change in agency priority. While this recommendation is directed at Council, the agencies are proceeding to address the various types of high-risk drivers, not waiting for legislation.</p>
<p>DPW should obtain more data and work with the Office of Racial Equity to assess in writing how its parking enforcement, booting, and towing operations advance or impede racial equity.</p>	<p>Agree, already in progress</p>	<p>DPW is working with the Mayor's Office on Racial Equity and sister agencies to assess how our services affect racial equity.</p>

## MPD Response to Recommendations

The Metropolitan Police Department (MPD) strives to work with residents and government and community partners to make our roads safer for all users. Chief Pamela A. Smith is committed to enhancing DC’s comprehensive traffic safety efforts. To immediately step up high-visibility enforcement, Chief Smith launched MPD’s Traffic Safety Compliance Checkpoints (TSCC) in June 2023, while she was the Assistant Chief of the Homeland Security Bureau. Since her appointment as Chief in July 2023, Chief Smith has committed to conducting two TSCCs a month. MPD’s Operation ATLAS, launched in December 2023, focuses on quality-of-life issues in neighborhoods, including traffic safety and violations.

Chief Smith is also increasing the Department’s capacity to focus on traffic safety. She has authorized the establishment of a Traffic Enforcement Unit (TEU) that will conduct enforcement citywide. The Department is in its second round of interviews for these new positions. MPD is also ensuring that new officers have the tools to make our roads safer by initiating training in Standardized Field Sobriety Testing during recruit training.

Chief Smith has strengthened MPD’s traffic safety partnerships, including with the DC Highway Safety Office (HSO). In December 2023, MPD and the HSO began working with the University of Connecticut Institute for Municipal and Regional Policy on an Equity in Traffic Stops study. The study is using “[s]even distinct analytical tools...to evaluate whether racial and ethnic disparities are present in the traffic stop data.” Most recently, MPD and HSO coordinated in the placement of a large traffic safety billboard on an MPD building so that it is visible to drivers entering DC on Route 50 / New York Avenue.

These efforts are not addressed in the audit because they are outside the audit period (October 1, 2020 – September 30, 2022). It should be noted that the period of the audit was a time of tremendous flux, for society and policing in general, and DC and MPD specifically. During this time, police staffing decreased to its lowest level in 50 years, leaving less time for proactive enforcement. Perhaps more importantly, the environment for traffic enforcement has changed significantly. For instance, during the COVID pandemic before the introduction of vaccines, MPD made efforts to reduce close contacts with individuals to help slow the spread of the disease and therefore limited traffic enforcement. In addition, after the murder of George Floyd, the already close scrutiny of police stops intensified, and community receptiveness to traffic enforcement waned. This can be a challenging space for officers to navigate.

Recommendation	Response	Response
MPD should conduct comprehensive data analysis to determine if the type, timing, and location of its traffic enforcement actions are effectively targeted to increase traffic safety. Based on that analysis, MPD should align officer training to ensure officers are consistently and equitably enforcing infractions with warnings, violations, and/or arrests.	Agree, in part; already implemented	MPD appreciates the value of data analysis to guide future practices. Indeed, MPD has a strong analytic team focused primarily on issues related to crime. MPD will defer to DMOI (Vision Zero Office and HSO) and DDOT for support in this area. MPD values consistent and equitable enforcement and, as previous auditors reviewing training required under DC Code § 5-107.02 noted, MPD has provided extensive

Recommendation	Response	Response
		<p>training on issues such as legitimacy and procedural justice, implicit bias, and preventing bias. However, MPD does not agree that traffic enforcement efforts should be limited by the type, timing, and location of traffic enforcement identified as having the greatest impact on traffic safety. The issues with one-size-fits-all targets for enforcement are outlined in the multi-agency response above.</p> <p>In addition, MPD must consider:</p> <p><b>Responsiveness:</b> When a community raises a concern, police enforcement is the quickest possible government response because engineering and education are both long-term initiatives. Enforcing violation types and areas only where it would have the biggest impact undermines this flexibility and responsiveness to the community. Moreover, HIN locations are based on analysis of three years of data, so there can be a time lag between when an area becomes a safety concern, and when it is designated a HIN corridor.</p> <p><b>Safety:</b> The locations and times when there are accidents may present higher risks for officers, subjects who are stopped, and anyone else on or near the roadway. Traffic enforcement and response to crashes are some of the most dangerous activities for law enforcement. The District’s investment in its ATE program has allowed enforcement at times and locations where it otherwise might not be safe to do officer-initiated enforcement.</p> <p><b>Traffic flow:</b> Similar to the safety considerations, conducting enforcement at the locations and times where crashes occur may significantly impede the flow of traffic in DC. The smooth flow of traffic is not just about the convenience of residents and commuters. Emergency vehicles must be able to safely and quickly travel through the</p>

Recommendation	Response	Response
		District. ATE allows enforcement without impeding traffic.
Based on MPD’s analysis of enforcement actions that promote traffic safety, the D.C. Council committee responsible for law enforcement oversight should determine whether the D.C. Code should be amended to better reflect District policy on where MPD resources should be allocated to increase traffic safety.	Disagree	MPD disagrees with this recommendation for the reasons outlined in response to the recommendation above. This recommendation would go even further to restrict enforcement by enacting limitations into law. Allocation of law enforcement resources is an Executive function that must stay nimble; it is not a suitable topic for legislation. Council oversight is appropriate, but legislation is inadvisable.
MPD should create specific and measurable Vision Zero goals (such as the number of traffic checkpoints per month in each Patrol District on the HIN) and communicate these goals internally and externally.	Agree, in part; already implemented	Chief Smith has directed the Special Operations Division to coordinate at least two Traffic Safety Compliance Checkpoints (TSCC) every month and has made that commitment publicly. These are primarily focused on the HIN. These comprehensive operations require significant resources, and MPD, which is operating with its lowest staffing in more than 50 years, does not have sufficient resources to commit to conducting seven per month. Each TSCC is staffed with 20 to 30 members, depending on the logistics and safety requirements of the location and time of day.
MPD should establish policies, procedures, and training, to effectively implement these Vision Zero goals, including which violation codes to use for each goal, how to focus on the High Injury Network, and how to assess its enforcement data geographically.	Agree, in part; already implemented	MPD has recently issued updated policy (General Order 303.01 Traffic Enforcement, published September 19, 2023) and will be considering future training on it. However, it does not focus on Vision Zero, as the purpose of our policy library is to guide day-to-day operations, not dictate specific enforcement. Our policy documents provide clear guidelines rather than discussing background information related to programs and initiatives that may evolve over time. Information related to specific programs and initiatives is communicated to employees in other ways. In addition, MPD does not agree that traffic safety is best served by focusing

Recommendation	Response	Response
		<p>only on specific violation codes and locations and ignoring others.</p> <p>It is unclear what the auditor means by training on “how to assess...enforcement data geographically.” MPD can map the more than 80% of its tickets that are issued with electronic ticket writers. Handwritten tickets do not contain X,Y coordinates, but can be analyzed in other ways, such as by block frequency.</p>
<p>MPD should assess staffing capacity and identify solutions (such as a roving District-wide traffic force) to ensure areas that experience higher crime do not get less traffic enforcement and to mitigate traffic captain turnover.</p>	<p>Agree, already implemented</p>	<p>Chief Smith has authorized an expansion of the Traffic Safety Section (TSS) to include a Traffic Enforcement Unit (TEU). The TEU will be conducting enforcement citywide. In addition, the TSS coordinates grant-funded overtime assignments dedicated to traffic enforcement.</p>
<p>MPD should conduct an independent analysis of the equity outcomes of police stops and ensure that traffic enforcement stops are isolated to be studied as a subset of all stops.</p>	<p>Agree, already in progress</p>	<p>The report fails to mention that MPD and HSO are currently working with the University of Connecticut Institute for Municipal and Regional Policy on an Equity in Traffic Stops study. As MPD shared with the auditor, the study is using “[s]even distinct analytical tools...to evaluate whether racial and ethnic disparities are present in the traffic stop data.” A description of the study is appended at the end of this response. It is misleading to say this work is not being done just because it was not done during the period of study.</p>

## DDOT Response to Recommendations

Under the District Department of Transportation (DDOT) leadership, the District continues to be on the front line of innovation and progress using Automated Traffic Enforcement (ATE) to help build a safer and more equitable system. There are several places in the text of the report that mischaracterize or misrepresent key elements of DDOT’s administration of the program, some of which may be corrected for the final, published version. Those corrections are included below DDOT’s response to the recommendations.

Appended at the end of this response is a sample Speed Camera Assessment Worksheet, from the audit period, reflecting some of the responses to the recommendations and corrections to the narrative.

<p>DDOT should establish ATE program policies and procedures that include staff and management responsibilities to proactively define, identify, and monitor high-priority locations through a continuous data-driven process and prioritize those locations for ATE deployment.</p>	<p>Agree, already implemented</p>	<p>After the ATE Bureau moved to DDOT, the agency began formulating policies and procedures resulting in a proactive and reactive data-driven analysis of locations needing traffic calming measures. The transition process began in October 2021 and established a set of Standard Operating Procedures in November 2021. DDOT has continued to strengthen and enhance its site selection process. Today’s process is supported by robust policies and procedures that proactively define, identify, and monitor all locations including High Injury Network (HIN) locations through a continuous data-driven process and prioritize HIN locations for ATE deployment as well as being responsive to all requests.</p> <p>In May 2023, DDOT initiated a process to install proactive speed and red light ATE on the HIN and within School Zones.</p> <p>As of April 2024, DDOT has 33 stop-sign, 43 red-light and 213 speed cameras enabling the program to upgrade and expand its coverage to additional HIN locations. Despite this expansion, installation of red light, speed, and stop sign cameras at all HIN and hazardous locations remains infeasible given the mileage of the HIN. We use the data-driven site selection process to prioritize the deployment of these cameras. The current process is presented in the new ATE website, at <a href="https://ate.ddot.dc.gov/pages/methodology">ate.ddot.dc.gov/pages/methodology</a>. This</p>
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		<p>process also supports the rotation of camera assets to cover additional HIN and hazardous locations.</p> <p>With the completion of the expansion and upgrade of the entire ATE system in April 2024, DDOT will be reviewing driver compliance at legacy locations based on drops in violation volumes, crash trends, overall speed of all traffic especially from the high-speed categories and other factors outlined in DDOT site evaluation methodology.</p>
<p>DDOT should ensure the timely and complete reporting of information required in D.C. Official Code § 50-2209.05(a), including detailed explanations for each new ATE camera’s deployment and if deemed warranted, recommend amendments to the reporting requirement if an alternative such as data uploads could improve the timeliness and usefulness to the Council and public.</p>	<p>Agree, already implemented</p>	<p>In January 2024, the ATE website (<a href="http://ate.ddot.dc.gov/">ate.ddot.dc.gov/</a>) was launched to provide greater transparency and public facing information including the site selection methodology, how cameras work, frequently asked questions, and a map of camera locations. Soon, the website will report individual camera performance metrics.</p> <p>This website and its online dashboard aids in reporting and programmatic transparency of automated traffic enforcement camera data. The dashboard currently provides the ability to sort cameras by ward, type, and status of any camera in the network. Additionally, the ATE team is working to expand available data. The dashboard lends greater utility to the available data and can be updated as cameras are added and/or relocated.</p> <p><a href="http://ate.ddot.dc.gov/pages/methodology">ate.ddot.dc.gov/pages/methodology</a></p>
<p>DDOT used its Equity Assessment Tool to analyze the safety benefits of the ATE program but had not yet established procedures to assess the equity outcomes, the potential financial burdens of over-enforcement, and the geographic and socioeconomic balance of ATE requests.</p>	<p>Agree, in progress (DMOI- and ORE-led)</p>	<p>The Mayor convened the Automated Traffic Enforcement Equity &amp; Safety Task Force in 2023 to holistically consider the equity impacts of the ATE program. The Task Force report is coming soon in 2024, and per Mayor’s Order, the Task Force report will include recommendations for pilot programs to address the equity implications of a fine-based system.</p>

## DDOT Corrections to Report Narrative

### ATE Program

#### 1) Narrative Comments:

a) **P. 1: DDOT should establish ATE program policies and procedures that include staff and management responsibilities to proactively define, identify, and monitor high-priority locations through a continuous data-driven process and prioritize those locations for ATE deployment.**

i) **DDOT Notes: Disagree within the audit period.**

ii) After the Mayor's Order dated effective October 1, 2019, and per the budget effective October 1, 2021, the ATE team moved from MPD to DDOT. DDOT began formulating policies and procedures resulting in a proactive and reactive data-driven analysis of locations needing traffic calming measures. The transition process began in October 2021 and adopted a set of Standard Operating Procedures in November 2021. As a pioneer of this field in the country, DDOT has continued to further strengthen and enhance its site selection process. Today's process is supported by robust policies and procedures that proactively define, identify, and monitor all locations including High Injury Network (HIN) locations through a continuous data-driven process and prioritize HIN locations for ATE deployment as well as being responsive to all requests.

As of November 2021, DDOT began using a data-driven process to assess ATE locations that are both *Reactive* and *Proactive*. ATE conducts a comprehensive site feasibility survey to determine if the proposed location is feasible. If feasible:

- (a) The ATE system is installed to collect testing data for 30 days
- (b) Photo Enforced Signage Installation and field confirmation
- (c) Press Release
- (d) Warning period (30 days)
- (e) Camera go-live, issuing Notice of Infraction (NOI)

The current process is presented in the new ATE website – [ate.ddot.dc.gov/pages/methodology](https://ate.ddot.dc.gov/pages/methodology).

**Average Timeline:** It takes **65-70 days** to turn on the new camera from the Testing and Data Collection Period to issuing Live NOI.

b) **P. 5: The 2022 Update also focused enforcement on the High Injury Network (HIN), a DDOT-created map of the D.C. streets with the most crashes resulting in serious injuries.**

- i) **DDOT Notes: Inaccurate representation.**
  - ii) **This should read** “DDOT-created map is a result of an extensive analysis of crash data that was based on all injury and fatal crash data on all DC streets from 2016-2021 and identified HINs with the highest injury and fatal crash density as well as severity.”
  
- c) P. 13: **DDOT had insufficient procedures to deploy ATE cameras at 100% of “high-priority locations.” While more than half (61%) of the red light and speed cameras were located on the High Injury Network or hazardous intersections, less than half of the 25 most hazardous intersections had a camera deployed.**
  - i) **DDOT Notes: Disagree.**
  - ii) DDOT recommends language should **updated to say** insufficient “resources” not “procedures.” ATE had approximately 140 cameras available in the audit timeframe. Additionally for a true comparison the auditor needs to clarify their definition of a High Priority location. In the absence of a clear definition provided, we conclude the team is referring to all the intersections on the High Injury Network (HIN). Given that there are 56.5 miles of HIN with over 800 intersections, 140 cameras cannot provide 100% coverage. It is important to note that speed cameras are deployed to enforce middle of the block speeding issues, while red light cameras enforce signalized intersections only. This means that 100% coverage was not possible given the resources available at the time. It is also important to note that ATE is one tool in DDOT’s toolkit and DDOT uses many other engineering interventions.
  - iii) Since April 2024, DDOT has 33 stop-sign, 43 red-light and 213 speed cameras enabling the program to upgrade and expand its coverage to additional High Injury Network (HIN) locations. Despite this expansion, installation of red light, speed, and stop sign cameras at all HIN and hazardous locations remains infeasible given the mileage of the HIN. We use the data-driven site selection process to prioritize the deployment of these cameras. The current process is presented in the new ATE website – [ate.ddot.dc.gov/pages/methodology](https://ate.ddot.dc.gov/pages/methodology). This process also supports the rotation of camera assets to cover additional HIN and hazardous locations.
  
- d) P.13: **We found DDOT had efforts underway to enhance ATE camera deployment but did not define “high-priority locations,”** making it difficult to know how many locations there were **and to ensure 100% of them had the necessary infrastructure.** Without a DDOT definition, we defined high-priority locations as

being on the High Injury Network (HIN) or ranked in DDOT's hazardous intersections report.

- i) **DDOT Notes: Disagree.**
- ii) DDOT developed a data-driven site selection process, which has been used from November 2021. The current process is presented in the new ATE website – [ate.ddot.dc.gov/pages/methodology](https://ate.ddot.dc.gov/pages/methodology).

e) **P. 15: DDOT did not proactively identify high-priority locations as potential sites for ATE cameras.** When transitioning the ATE program from MPD, DDOT stated that it immediately incorporated ATEs into its Traffic Safety Investigation (TSI)39 process. DDOT received ATE requests for specific locations and sent staff out to those locations to identify all potential traffic calming solutions. While this process expanded the range of possible interventions at a location and allowed for community engagement, the process did not proactively identify and include high-priority locations, such as those on the HIN or ranked in the Howard University hazardous intersections report.

- i) **DDOT Notes: Disagree.**
- ii) Since November 2021, new camera locations were recommended using a data driven method that has evolved into this public document: [ate.ddot.dc.gov/pages/methodology](https://ate.ddot.dc.gov/pages/methodology). This uses factors such as crash history, crash analysis, site conditions, land usage and roadway class to identify ATE as an effective solution. The recommended sites are further evaluated by ATE to determine feasibility. If found feasible an ATE camera is deployed.
- iii) The **proactive** deployment process began in May 2023 and nearly 170 new cameras became available to DDOT. In this deployment, all new camera locations are prioritized on the High Injury Network and within School Zones.

f) **P.16: The site assessment process did not capture high-priority locations and was incomplete for many ATE cameras.** To determine if a speed camera should be deployed at an identified location, DDOT created a site assessment form. This form reflected best practices to use crash data and community context, including speed and traffic count data, crash history, and pedestrian generators (such as schools, playgrounds, and recreation centers). Despite including best practices, like the location identification process described above, the site assessment form did not capture whether the location was a high-priority location.

- i) **DDOT Notes: Disagree during the audit period.**
- ii) Since November 2021, DDOT has been using [ate.ddot.dc.gov/pages/methodology](https://ate.ddot.dc.gov/pages/methodology) to select sites. ATE receives recommendations for all new cameras from the TESD team. TESD evaluations use Tier-based High Injury Network (HIN) locations list

combined with their selection analysis methodology. The identification of the location as being on the HIN has been added to the evaluation and assessment form. Locations resulting from the process were used in the rotation of cameras in January 2022 and not again until after contract award in May 2023 when additional cameras were available.

- g) **P. 16: Additionally, DDOT did not conduct a site assessment for every deployed ATE camera.** In our sample, 33% of the cameras (including a camera reactivated at an MPD legacy site) did not have completed site assessments. DDOT staff explained that they were still in the process of reviewing camera locations like these that were in place when the program was transferred to ensure all cameras were compliant. This incomplete transition was also seen in some ATE program documentation that included references to MPD sergeants instead of specific DDOT staff or divisions.
- i. **DDOT Notes: Inaccurate representation.**
  - ii. None of the MPD legacy camera locations were selected using the [DDOT site evaluation methodology](#). However, the TESD proactive and reactive site assessment process is currently in place and has been used for all new camera locations since November 2021. This process resulted in the rotation of legacy assets to new speed locations in January 2022. After award of the ATE contract in May 2023, all new locations have been through the DDOT evaluation methodology and ATE camera feasibility evaluation.
- h) **P.16: ATE camera performance was judged primarily on citations, not crash or speed data.** After site identification, assessment, and deployment, DDOT implemented a camera rotation process “to assign a finite number of cameras to locations which will have the greatest effect on the local community.” This involved determining which active cameras should be moved from their current location. It was a necessary process due to the limited camera inventory in comparison to the large number of requests across the city.

**DDOT Notes:**

- i) **DDOT Notes: Disagree.**
- ii) Since November 2021, new camera locations are determined using [DDOT site evaluation methodology](#). Under DDOT leadership, ATE and safety staff coordinated a new process for site assessments. Since November 2021, new camera locations were assessed using a data driven site assessment process; this process evolved and become the current [DDOT site evaluation methodology](#). In May 2023, DDOT initiated a process to install proactive

speed and red light ATE on the High Injury Network and within School Zones.

- i) **P18:** Without specific explanations for why each ATE camera location was chosen, **DDOT was insufficiently reporting its progress placing cameras at high-priority locations and public stakeholders were not given reasons for individual camera changes in a timely manner.** This was especially true as DDOT and DMOI explained that formal semi-annual reports took a long time to get approved, causing delays in the reports reaching the Council and the public.

- i) **DDOT Notes: Disagree**

- ii) DDOT worked to develop the ATE bi yearly report and delivered reports covering October 2020 to March 2021— [lims.dccouncil.gov/Legislation/RC24-0119](https://lims.dccouncil.gov/Legislation/RC24-0119), April 2021 to September 2021 — [lims.dccouncil.gov/Legislation/RC24-0147](https://lims.dccouncil.gov/Legislation/RC24-0147) and October 2021 to March 2022 — [lims.dccouncil.gov/Legislation/RC24-0222](https://lims.dccouncil.gov/Legislation/RC24-0222). The reason for moving to new location was listed in each report: Camera types and locations are selected after a traffic safety analysis using crash, traffic volume and speed data, and location type. If approved as a suitable site for ATE, a review for feasibility is then conducted prior to installation. Camera performance is monitored at all sites, and cameras are rotated based on performance (i.e., when ticket issuances drop to a level indicating compliance), thus making cameras available for other recommended sites.

- j) **P. 19: DDOT did not have a completed site assessment for the speed camera that has consistently generated the most fines, located on DC 295, the Anacostia Freeway, near exit 1, which issued \$39.7 million in fines during FYs 2021 through 2022, more than double the amount generated by any other ATE camera.** DDOT staff acknowledge that the freeway location is not included on the HIN but stated that DC 295 had a high volume of speeders, often in the higher categories of 22 miles per hour over the posted limit.

- i) **DDOT Notes: Inaccurate representation.**

- ii) This is a legacy location installed prior to adopting DDOT's data-driven methodology and is still active. All legacy locations will be reevaluated using [DDOT site evaluation methodology](#). It is important to note that the camera is serving its purpose to slow speeding drivers as they enter the District of Columbia from Maryland, crossing over the state line. It is imperative to slow drivers and set speeds that are more appropriate to the District interstates and context as an urban area to reduce the frequency and severity of crashes.

**District of Columbia Department of Transportation  
Speed Camera Site Assessment Worksheet**

**Location:** 1200-1400 Eastern Avenue NE

**Posted Speed Limit:** 25 MPH

**Date:** June 2021

Criteria	Details						
<b>Crashes</b>	<ul style="list-style-type: none"> <li>• 2018 – 2020 (three years).</li> <li>• 111 police-reported crashes, 40 of which (36%) involved injuries.</li> <li>• 3 pedestrian crashes; 0 Bicycle crashes.</li> <li>• 0 Fatal crashes.</li> <li>• Most common crash types – Left Turn (36 crashes); Rear End (25 crashes); Side Swipe (13 crashes). A majority of the left turn crashes occurred at the Minnesota Ave/Addison Road intersection, which is at the northern end of the 1400 Block.</li> </ul>						
<b>Existing Conditions</b>	<p>Land use is low to medium-density residential, with multifamily buildings along 1300 and 1400 Blocks of Eastern Avenue NE. A place of worship and public storage facility is also present at the 1400 Block. The 1200 and 1300 blocks have one travel lane in each direction, extending to two lanes when approaching the 1500 Block, with on street parking present along the entire study area.</p> <p>An unsignalized crosswalk exists at the intersection with 50<sup>th</sup> Street NE/Cougar Lane (on 1300 Block). Aerial photography from March 2021 indicates these crosswalks are not of the high-visibility type.</p>						
<b>Enforceable Daily Speed Violations (11+ MPH over limit)</b>		<b>1200 Block</b>		<b>1300 Block</b>		<b>1400 Block</b>	
		<b>NWB</b>	<b>SEB</b>	<b>NWB</b>	<b>SEB</b>	<b>NWB</b>	<b>SEB</b>
	<b># Violations</b>	5,028	383	2,409	1,091	3,432	633
	<b>Total Vehicles</b>	8,116	9566	8,889	10,392	8,403	7,573
	<b>% of All Vehicles</b>	58%	4%	27%	11%	41%	8%
<b># Daily Speed Violations (11+ MPH over limit) by Time of Day</b>	<b>NWB</b>	Midnight – 3 AM: 190 3 AM – 6 AM: 381 6 AM – 9 AM: 740 9 AM – Noon: 764			Noon – 3 PM: 968 3 PM – 6 PM: 828 6 PM – 9 PM: 670 9 PM – Midnight: 489		
	<b>1200 Block SEB</b>	Midnight – 3 AM: 35 3 AM – 6 AM: 33 6 AM – 9 AM: 51 9 AM – Noon: 50			Noon – 3 PM: 62 3 PM – 6 PM: 31 6 PM – 9 PM: 47 9 PM – Midnight: 76		
<b># Daily Speed Violations (11+ MPH over limit) by Time of Day</b>	<b>NWB</b>	Midnight – 3 AM: 110 3 AM – 6 AM: 136 6 AM – 9 AM: 256 9 AM – Noon: 437			Noon – 3 PM: 529 3 PM – 6 PM: 348 6 PM – 9 PM: 284 9 PM – Midnight: 311		
	<b>1300 Block SEB</b>	Midnight – 3 AM: 68 3 AM – 6 AM: 154 6 AM – 9 AM: 189 9 AM – Noon: 141			Noon – 3 PM: 194 3 PM – 6 PM: 111 6 PM – 9 PM: 123 9 PM – Midnight: 112		

<b># Daily Speed Violations (11+ MPH over limit) by Time of Day</b>	<b>NWB</b>	Midnight – 3 AM: 245 3 AM – 6 AM: 349 6 AM – 9 AM: 521 9 AM – Noon: 476	Noon – 3 PM: 622 3 PM – 6 PM: 374 6 PM – 9 PM: 449 9 PM – Midnight: 399
	<b>SEB</b>	Midnight – 3 AM: 58 3 AM – 6 AM: 79 6 AM – 9 AM: 82 9 AM – Noon: 80	Noon – 3 PM: 139 3 PM – 6 PM: 45 6 PM – 9 PM: 79 9 PM – Midnight: 73
<b>1400 Block</b>			
<b>Pedestrian Generators</b>	These are residential blocks with a few pedestrian generators, including a place of worship and public storage facility on the 1400 Block. Schools and recreation centers are located three blocks west of the 1200 and 1300 blocks. Near-side bus stops are located at the Quarles Street NE (1400 Block) and Meade Street NE (1200 Block) intersections.		
<b>School Zone?</b>	No		
<b>Additional Information</b>	North of Antelope Lane, the 1400 Block of Eastern Avenue NE is a 4-lane road (two lanes in each direction) with parking allowed on the southeastbound direction (unsigned). South of this location, the remaining portion of Eastern Avenue NE (through the 1200 Block) is a 2-lane road (one lane in each direction) with parking allowed at all times.		
<b>ATE Requested by</b>	Traffic Operations and Safety Division		
<b>Speed Camera Recommended?</b>	<p>Yes, based on number/percentage of daily enforceable speed violations, particularly in the northwestbound direction of the 1200 and 1400 Blocks. Based on these high-enforceable locations, a camera sited along the 1300 Block (between the two locations) is ideal. This location can be within the vicinity of the unsignalized crosswalk at 50<sup>th</sup> Street NE/Cougar Lane, which can benefit from slower speeds.</p> <p>The nearest camera is located on the 800 Block of northwestbound Eastern Avenue NE. Siting a camera might require a reduction in curb parking.</p>		

# Supporting Equity in Traffic Enforcement

## Highway Safety Office

Fiscal Year 2024 Project

### Executive Summary

Ensuring equity in traffic enforcement is paramount to achieving Mayor Bower's goal of zero roadway crashes, injuries, and fatalities. In partnership with the University of Connecticut, the Highway Safety Office (HSO) will evaluate enforcement strategies across the District of Columbia in a spirit of partnership. The mission of the HSO to support law enforcement requires a review of existing data to measure our effectiveness in pursuing equity, an evaluation of District-wide approaches to enforcement, and an action plan to enhance our culture that ensures equity in traffic stops through the District.

The Highway Safety Office, a longtime partner of the Metropolitan Police Department, requests the support of MPD in ensuring equity in the traffic stops conducted by the agency. The HSO will then attempt to provide additional resources, training, and technical assistance to enhance existing efforts.

### Project Details

The HSO will produce a report that is organized to lead the reader through a host of descriptive and statistical tests that vary in their assumptions and level of scrutiny. The intent behind this approach is to apply multiple tests as a screening filter for the possibility that any one test (1) produces false positive results or (2) reports a false negative. Seven distinct analytical tools are used to evaluate whether racial and ethnic disparities are present in the traffic stop data. The demography of motorists will be grouped into four overlapping categories to ensure a large enough sample size for the statistical analysis. Although much of the analysis focuses on stops made of Black (Hispanic or non-Hispanic) and Hispanic motorists (any race), the analysis will also conduct aggregate groupings of all non-white motorists (Hispanic or non-Hispanic) as well as a combined sample of Black and Hispanic motorists. In terms of identifying departments or state police barracks in individual tests, the estimated disparity (i.e. the higher likelihood of stopping a minority motorist) must have been estimated with at least a 95 percent level of statistical significance for either Black or Hispanic motorists alone. Put simply, under the rigorous conditions set by each test, there must have been at least a 95 percent chance that either Black or Hispanic motorists are more likely to be stopped (or searched) at a higher rate relative to Caucasian non-Hispanic motorists. The report will consist of several sections that are outlined below.

#### I. Characteristics of Traffic Stops

The first section of a department analysis will examine general patterns of traffic enforcement activities in DC. Department and patrol/district activity information will be summarized to identify variations in traffic stop patterns to help law enforcement and local communities understand more about traffic enforcement.

#### II. Solar Visibility Analysis

The statistical analysis would begin by first presenting a method referred to as the Solar Visibility Analysis, also referred to as the Veil of Darkness test. It is used to assess the existence of racial and ethnic disparities in stop data. The test is a statistical technique that was developed by Jeffery Grogger and Greg Ridgeway (2006) and published in the Journal of the American Statistical Association. The Veil of Darkness analysis examines a restricted sample of stops occurring during the "inter-twilight window" and assesses relative

differences in the ratio of minority to non-minority stops that occur in daylight as compared to darkness. The inter-twilight window restricts stops to a fixed window of time throughout the year when visibility varies due to seasonality as well as the discrete daylight savings time shift. This technique relies on the idea that, if police officers are profiling motorists, they are better able to do so during daylight hours when race and ethnicity are more easily observed. After restricting the sample of stops to the inter-twilight window and controlling for things like the time of day and day of week, any remaining difference in the likelihood that a minority motorist is stopped during daylight is attributed to disparate treatment. This analytical approach is considered the most rigorous and broadly applicable of all the tests that we conduct. The Solar Visibility Analysis will be applied to DC's policing data as a method of ascertaining whether there exist racial or ethnic disparities in the rate of traffic stops. The traffic stop data will be matched with astronomical data collected from the United States Naval Observatory (USNO). The USNO data allows for the delineation between periods of daylight, darkness, and twilight. The analyses will be carried out using the traffic stop data for the department and patrol/district boundaries. Individual patrols/districts identified in this first portion of the analysis will then be put through a series of robustness checks on the initial findings.

The detailed components of this portion of the deliverables include the following elements:

- A) Solar Visibility Analysis for each calendar year and three-year or five-year aggregate
  - Department-level analysis
  - Patrol/District-level analysis
- B) Robustness Checks for Districts Identified using Solar Visibility Analysis for each calendar year and three-year or five-year aggregate
  - Latitude/Longitude controls
  - Disaggregation by citation
  - Disaggregation by enforcement code
  - Discrete shift in visibility around Daylight Savings Time
  - Control for misc. requests\*

### III. Synthetic Control Model

Internal benchmarking of policing data using inverse propensity score weighting has recently entered the criminal justice literature through notable applications by McCaffrey et al. (2004), Ridgeway (2006) and Ridgeway and MacDonald (2009). These applications have focused on using inverse propensity score weighting to construct an internal benchmark for individual officers. In a similar fashion, we will apply this methodology for the purposes of constructing synthetic control for each individual department using stops made by other departments that are similar in terms of pre-treatment (pre-stop) observables. Specifically, we generate propensity scores using pre-stop observable characteristics and weight observations in other districts using this measure of overall similarity. Although we are unable to fully capture geographic differences in the risk-set of motorists on the roadway, we use the synthetic control methodology for comparing the rate that which minority motorists are stopped in specific districts. The synthetic control methodology will be applied to patrol districts in DC's policing data. First, we will estimate a propensity score for each district using pre-stop observable characteristics from the individual district and other districts in DC. Next, we will weight stops made by other districts using the inverse propensity score and create a synthetic control that can be used to compare outcomes. Lastly, we will use doubly-robust estimation to compare the probability a minority motorist is stopped relative to a Caucasian across treatment and control. As a final robustness check on our findings, we will construct balancing tables and check whether each of the identified districts has a control group that accurately captures the pre-stop observable

characteristics used to construct the propensity score. The detailed components of this portion of the deliverables include the following elements: A. Synthetic Control Analysis a. Synthetic control at the district level, i.e. using the officer analysis methodology at the district level.

#### IV. Descriptive Statistics

There are three techniques that are descriptive in nature and compare district-level data to two benchmarks (statewide average, and resident population). These methods are referred to as population benchmarks and are commonly used to evaluate racial disparities in police data across the country. The statewide average comparison provides a simple and effective way to establish a baseline for all departments from which the relative differences between patrol district stop numbers and the average for the department are compared. A comparison to the department average is presented alongside the context necessary to understand differences between local jurisdictions. The other population benchmark comparison limits the analysis to stops involving only residents of the community and compares them to the community demographics based on the most recent decennial census for residents age 16 and over. Although any one of these benchmarks cannot provide by itself a rigorous enough analysis to draw conclusions regarding racial disparities if taken together with the more rigorous statistical methods they do serve as a useful tool.

#### V. Stop Disposition Test

The next analytical tool used in the analysis would test for disparities in the outcomes of traffic stops using a model that examines the distribution of dispositions conditional on race and the reason for the stop. Specifically, we test whether traffic stops made of minority motorists result in different outcomes relative to their White non-Hispanic peers. This test can be performed on data containing all violations observed by the police officer prior to making a traffic stop and where we would include a control for the number of total violations. In practice, data on traffic stops typically only contain the most severe reason that motivated the stop. In the absence of data on the full set of violations observed by police officers, we suggest that the reader interpret results from this test as providing descriptive evidence to be viewed in concert with other such empirical measures.

#### VI. Post-Stop Hit Rate

Lastly, an analysis of post-stop outcomes would use a hit-rate approach following a technique published in the Journal of Political Economy by Knowles, Persico and Todd (2001). The hitrate approach relies on the idea that motorists rationally adjust their propensity to carry contraband in response to their likelihood of being searched by police. Similarly, police officers rationally decide whether to search a motorist based on visible indicators of guilt and an expectation of the likelihood that a given motorist might have contraband. According to the model, a demographic group of motorists would be searched by police more often than white non-Hispanic motorists if they were more likely to carry contraband. However, the higher level of searches should be exactly proportional to the higher propensity for this group to carry contraband. Thus, in the absence of racial animus, we should expect the rate of successful searches (i.e. the hit-rate) to be equal across different demographic groups regardless of differences in their propensity to carry contraband. In this test, discrimination is interpreted as a preference for searching minority motorists that shows up statistically as a lower hit rate relative to Caucasian motorists. Note that this test inherently says nothing about disparate treatment in the decision to stop motorists as it is limited in scope to vehicular searches. The KPT Hit-Rate analysis will be applied to DC's policing data as a method of ascertaining whether there exist racial or ethnic disparities in post-stop behavior. First, we will apply the methodology in a canonical

manner by examining the rate that searches result in contraband across demographic groups. Next, we will extend the traditional methodology by creating a hitrate style test for the disposition of stops and examining the warnings rate across demographic groups. These analyses will be carried out using the traffic stop data for the patrol districts individually and in aggregates. Individual patrol districts identified in this first portion of the analysis will then be put through a series of robustness checks on the initial findings.

The detailed components of this portion of the deliverables include the following elements:

- a. Hit-Rate Analysis (Contraband findings and warnings) for each calendar year and three-year or five-year aggregate
  - Department-level analysis
  - Patrol District-level analysis
- b. Robustness Checks for Patrol Districts Identified using Hit-Rate Analysis for each calendar year and three-year or five-year aggregate.
  - Disaggregation by search rationale
  - Disaggregation by guilt definition
  - Exploring the possibility of separating equilibrium\*

The entirety of the analysis is designed to be utilized as a screening tool by which researchers, law enforcement administrators, community members, and other appropriate stakeholders focus resources on those areas displaying the greatest level of disparities in their respective stop data. Racial and ethnic disparities in any traffic stop analysis do not, by themselves, provide conclusive evidence of racial profiling. Statistical disparities do, however, provide evidence of the presence of idiosyncratic data trends that warrant further analysis.

In order to determine if a patrol district's racial and ethnic disparities warrant additional in-depth analysis, we will review the results from some of the analytical sections of the report. It is our recommendation that a patrol district be identified with statistically significant racial and ethnic disparities that warrant additional analysis if they meet any one of the following criteria:

- I. A statistically significant disparity in the one-year or three-year/five-year Solar Visibility analysis
- II. A statistically significant disparity in the one-year or three-year/five-year KPT hit rate and Stop Disposition analyses.

We provide results from the Synthetic Control method and Descriptive Statistics to provide additional context to the overall analysis. Due to the limitations of census data, which forms much of the foundation of these measures, it is more appropriate to limit the use of these tests. We also believe that the inclusion of a three-year or five-year aggregate analysis significantly improves our ability to utilize more sophisticated statistical techniques, especially in areas with small annual sample sizes.

In short, our overall goal is to identify any statistically significant racial and ethnic disparities in traffic stop data by using a variety of statistical tests. These tests will be applied to the data in the hope of providing a comprehensive approach based on the lessons learned from academic and policy applications. Our explanations of the mechanisms and assumptions that underlie each of the tests are intended to provide policymakers and the public with enough information to assess the data and draw their own conclusions from the findings.

We understand that the nature of policing differs from one community to another based on a variety of unique factors. Police administrators must deal with a variety of crime and disorder problems. Traffic stop disparities can be influenced by factors such as the location of crashes, high call-for-service

volume areas, high crime rate areas, and areas with major traffic generators such as shopping and entertainment districts, to name a few. Police administrators make decisions about how to effectively deploy police resources based on the needs of the community.

In the University of Connecticut's experience, police agencies are limited in their capacity to comprehensively analyze the factors that contribute to their racial and ethnic disparities. Researchers that simply point out racial and ethnic disparities can unintentionally contribute to a further divide between law enforcement and the communities they serve. Rather than treating our statistical analysis as evidence of wrongdoing, researchers and policymakers utilized the annual report as an early warning system that begins, rather than ends, an ongoing and data-driven conversation. This study can identify the areas that require a deeper dive into their data to identify specific policies and enforcement activities driving the disparities. This phase of the process includes a quantitative and qualitative analysis at the patrol level and individual officer level. The goal is to collaborate with police and the community to develop practical solutions to both reduce racial and ethnic disparities in traffic enforcement and improve the safety of our roadways through reduced traffic crashes

# ODCA Response to Agency Comments

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We appreciate the Deputy Mayors' response to the draft report and the audited agencies' responses and concurrence with many of our recommendations. We also appreciate that DDOT, DPW, and MPD noted they have either implemented or will be implementing many of our recommendations.

As a result of the agencies' comments and supporting documentation provided, ODCA made some revisions to the report. We changed the report title to provide a fuller picture of all agencies' enforcement and equity actions. We detail below the revisions made and our responses to specific points in the order raised in the agency comments.

DMOI/DMPSJ emphasize the view that the District has been a leader in equitable traffic enforcement; however, a comparison with outside jurisdictions was not in the scope of our audit. We clarified that we did not measure any of the agency's enforcement activities against other jurisdictions. We measured key strategies assigned to the agencies in the District's 2015 Vision Zero Action Plan. In the Background section, we added a sentence noting the District's early use of automated enforcement to reflect that it was an early adopter of ATE in the U.S.

While DMOI/DMPSJ contend we did not present adequate social context around traffic enforcement, our Background section discusses equity as a key theme of Vision Zero, the District's prioritization of equity in recent years, as well as discussing traffic safety and traffic enforcement through a racial equity lens in D.C. We provided this context and acknowledged the mixed messages that MPD has received about its role in traffic safety as one of various causes for its declining traffic enforcement. And as the traditional role of police traffic enforcement is undergoing a transition, we provide detailed MPD data to contribute to those conversations. Further, this context directly relates to the District's increasing reliance on ATE as an enforcement strategy that researchers have found to be effective at reducing crashes, injuries, and fatalities, and which advocates note improves equity.

DMOI/DMPSJ questioned the report's timeframe. While there has been significant growth in ATE use since the audit scope ended, audits always look backward and are built on the premise that we cannot improve in the future without analyzing the past. One reason for inviting agency response is to provide any relevant update on agency actions outside of our scope. Documenting past practices and providing recommendations to strengthen internal control should be useful to all three agencies as they work to improve traffic enforcement effectiveness while adapting to an ever-changing environment. To address some specific points:

- Agency comments note we did not acknowledge the ATE program's public-facing web site which included a map of cameras, and in the final report Background section we mention the Crash Dashboard that contains a map of ATE Cameras and a link to DDOT's new ATE web site and camera map, which became active in 2024.
- Agency comments indicate we did not acknowledge the Mayor's Task Force on ATE Equity and Safety though we reported on the Task Force in the draft report and added additional mentions in the final report.
- Agency comments indicate we did not recognize MPD's commitment to conduct twice-monthly

traffic compliance checkpoints focused on the HIN; however, these were out of our scope and we mention them in both our second MPD finding and related MPD recommendation.

We agree with the DMOI/DMPSJ statement that police enforcement is part of a comprehensive traffic system. We believe that presenting MPD enforcement counts is one way of measuring police enforcement activities, and that the analysis and presentation of data in our report will be valuable to the public and various stakeholders. In making recommendations for MPD, we relied on a review of the literature including the national Vision Zero network, various NHTSA documents, and other recent audits of traffic enforcement, as well as audit best practices to develop recommendations that could assist MPD as it faces mixed messages on whether it should do more or less traffic enforcement.

DMOI/DMPSJ contend that the audit misunderstands “non-safety-related citations.” We note that current law requires MPD to issue certain tickets (e.g., for lack of insurance) and we intentionally presented the data in this way to highlight the breakdown of safety and non-safety enforcement activities and to inform any future conversations of MPD’s enforcement activities in this context.

We appreciate the context DMOI/DMPSJ provided about ATE’s overall effectiveness and noting that most drivers pay their tickets. The issue of reciprocity is important to residents and policymakers alike; Council legislation on the topic, as well as its inclusion in the Mayor’s Task Force on ATE Safety and Equity all reflect that concern. In response we added further details on the Mayor’s lack of action related to the reciprocity statute and amended the recommendation based on the specific language in the statute.

While our report recognized DPW’s competing priorities and workload responsibilities, we did not view RPP and parking meter enforcement, nor rush hour towing as part of DPW’s contribution to Vision Zero or traffic safety as these responsibilities were not outlined as key actions in the 2015 Action Plan. Further, while these actions likely contribute to DPW’s mission of ensuring parking opportunities for residents and visitors, neither function is directly related to ensuring traffic safety which was the focus of this report.

As a result of DPW comments, ODCA revised three DPW recommendations. As DPW leadership told us that their mission statement was sufficient, we removed a recommendation that DPW revise its mission statement to reflect traffic safety, and instead revised Recommendation 8 to include that DPW’s Director should ensure the agency’s responsibility in traffic safety is known throughout the organization. We also revised Recommendation 11 as a result of DPW comments to make it clear that DPW enforcement focuses on vehicles driven by high-risk drivers. To assist with tracking implementation, we revised Recommendation 11 to direct Council to work with DMOI, rather than listing the relevant agencies, given that DMOI oversees Vision Zero Implementation.

ODCA presented MPD’s and the Highway Safety Office’s work with the University of Connecticut to study the equity of traffic stops in a section detailing progress made after the audit scope and to further highlight this work. Based on agency comments, we added a mention of this study in Recommendation 13.

MPD did not agree with Recommendation 3 that traffic enforcement efforts should focus on the type, timing, and location of traffic enforcement identified as having the greatest impact on traffic safety, as it found this would limit its flexibility. As noted above, ODCA relied on a review of relevant literature to develop recommendations for how to best focus traffic enforcement for the greatest safety benefit given

MPD's declining traffic enforcement activities to ensure the enforcement it is conducting is both equitable and effective. MPD notes other concerns such as responsiveness and traffic flow, and ODCA encourages MPD to develop a plan for Vision Zero traffic enforcement that takes these factors into consideration while prioritizing safety.

MPD disagreed with the recommendation that the relevant Council Committee determine whether D.C. Code should be amended to better reflect District policy on where MPD resources should be allocated to increase traffic safety. We present the data analysis and subsequent recommendation based on a review of relevant literature to further assist the District as it grapples with the police's role in traffic enforcement given equity and traffic safety goals. Our recommendations flow from the important role of in-person police traffic enforcement for safety while also encouraging a conversation to ensure enforcement activities are both equitable and effectively targeted.

We acknowledge the concerns that we did not mention the deterrence effect of enforcement or view in-person enforcement as part of a larger system, and added a note that such presentations cannot, as a practical matter, include statistics on the positive effects of enforcement such as crashes avoided or lives saved.

While MPD noted that it does not agree that traffic safety is best served by focusing only on specific violation codes and locations and ignoring others, the 2015 Vision Zero Action Plan highlighted specific violations the agency would focus on which provided the basis for our assessment of the agency's implementation of this plan. Further, given that the 2022 Vision Zero Update specifies that all traffic enforcement be focused on the HIN, ODCA is providing recommendations that build on MPD goals set out in both Vision Zero Plans.

MPD indicated confusion over what was meant by "How to assess ... enforcement data geographically." Because a goal in the 2015 Vision Zero Action Plan was to focus certain strategies on high-priority locations, ODCA tried to map some of the strategies, and we found geographic data missing. Perhaps MPD data do contain other geocoded fields that we did not have access to, but, using the latitude and longitude fields we received from MPD, we did not find full geographic information that would allow for mapping.

To better account for the ATE program policies and procedures DDOT was developing during our scope, we edited the first recommendation to replace "establish" policies and procedures with "augment." DDOT noted that it began using a data-driven process to assess locations that are both reactive and proactive but the documentation provided and interviews with staff described a process that did not involve proactive site identification. It did include best practices being used in the site assessment and feasibility portions of the program.

As a result of new DDOT documentation provided to us after receiving the draft report, we deleted a statement that "DDOT did not proactively identify high-priority locations as potential sites for ATE cameras." The documentation provided did not label sites as "high priority" or show how DDOT proactively identified them from HIN or other data sources, but it was evidence of potential camera sites being referred internally, and Figure 7 was updated to add the two DDOT divisions identified as sources of camera referrals.

We also removed language stating that the requests for cameras were “largely reactive.” The updated [website](#) DDOT provided shares a methodology for a new proactive system, but the audit team was unable to confirm its implementation as it was after the scope of the audit. The May 2023 update of the TSI program did include the HIN and school zones but this process still involved receiving location recommendations from community complaints rather than producing them based on internal data. We further edited the recommendation to make the need for proactive location identification clear while recognizing the data already in use by DDOT.

To address DDOT’s point that there were insufficient resources to deploy cameras at 100% of high-priority locations, we removed language that there were “insufficient procedures to deploy ATE cameras” and simplified it to “did not deploy ATE cameras at 100% of high-priority locations.” We did not determine that cameras should cover 100% of the HIN, as DDOT notes, and we concur with DDOT that that would not be feasible. We assessed how many active cameras were deployed on the HIN or the Howard University’s Hazardous Intersections report. Based on new information from DDOT, we also updated the description of the HIN development to better reflect the types of crash data that went into the methodology.

Based on DDOT comments and discussion with staff, we amended language that previously noted that DDOT’s site assessment *process* did not *capture* high-priority locations to instead note that the site assessment *form* did not *identify* high priority locations. We are pleased that DDOT notes it has added this identification after the audit scope.

DDOT stated that the draft report provided an inaccurate representation of deployed cameras’ site assessments, but we disagree. We found that MPD legacy cameras were not the only cameras without site assessment forms. Also, our report explains that during the audit, DDOT was in the process of reviewing camera locations, the stages of which DDOT details in its comments. We expect that DDOT’s ATE program policies and procedures will detail staff responsibilities for ensuring that all deployed cameras have completed assessment forms or are reassessed.

DDOT noted that it disagrees that ATE camera performance was judged primarily on citations and describes a new process. The site evaluation methodology DDOT references, however, is for identifying new camera locations, which is different from measuring existing camera performance to inform camera rotation decisions. Our revisions to Recommendation 1 seek to clarify that DDOT’s ATE program policies and procedures should detail the data sources used for monitoring camera performance, as well as related staff and management roles and responsibilities.

# Summary of Report Recommendations

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Our audit identified 15 recommendations that could improve operations at DDOT, MPD, and DPW, as well as the District-wide Vision Zero initiative.

Findings	Recommendations
DDOT did not deploy ATE cameras at 100% of “high-priority locations.” While more than half (61%) of the red light and speed cameras were located on the High Injury Network or at hazardous intersections, less than half of the 25 most hazardous intersections had a camera deployed.	<ol style="list-style-type: none"><li>1. DDOT should augment its policies and procedures to detail how ATE locations are selected and camera performance monitored, including staff and management responsibilities and data sources used to proactively identify locations.</li><li>2. DDOT should ensure the timely and complete reporting of information required in D.C. Official Code § 50-2209.05(a), including detailed explanations for each new ATE camera’s deployment and if deemed warranted, recommend amendments to the reporting requirement if an alternative such as data uploads could improve the timeliness and usefulness to the Council and public.</li></ol>
MPD’s 2021 and 2022 traffic violations, warnings, and arrests dropped well below 2018 and 2019 pre-pandemic levels. Most violations and warnings, which made up the majority of MPD enforcement actions, were focused on safety, while most arrest charges were focused on requirements to drive, such as having a valid permit, registration, and tags.	<ol style="list-style-type: none"><li>3. MPD should conduct comprehensive data analysis to determine if the type, timing, and location of its traffic enforcement actions are effectively targeted to increase traffic safety. Based on that analysis, MPD should align officer training to ensure officers are consistently and equitably enforcing infractions with warnings, violations, and/or arrests.</li><li>4. The D.C. Council Committee on the Judiciary and Public Safety should determine whether a D.C. Official Code change is necessary to reflect the District’s changing traffic enforcement priorities.</li></ol>

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Findings	Recommendations
<p>MPD did not fully implement its Vision Zero strategies and Patrol District Traffic Plans, monitor effectiveness, or report progress.</p>	<ol style="list-style-type: none"> <li>5. MPD should create specific and measurable Vision Zero goals (such as the number of traffic checkpoints per month in each Patrol District on the HIN) and communicate these goals internally and externally.</li> <li>6. MPD should establish policies, procedures, and training, to effectively implement these Vision Zero goals, including which violation codes to use for each goal, how to focus on the High Injury Network, and how to assess its enforcement data geographically.</li> <li>7. MPD should assess staffing capacity and identify solutions (such as a roving District-wide traffic force) to ensure areas that experience higher crime do not get less traffic enforcement and to mitigate traffic captain turnover.</li> </ol>
<p>DPW did not target commercial and delivery vehicles for dangerous parking violations.</p>	<ol style="list-style-type: none"> <li>8. DPW’s Director should assess risks to Vision Zero implementation, develop policies and procedures with clear staff and management implementation responsibilities, and communicate those strategies and procedures throughout the agency including the message that traffic safety is an agency responsibility.</li> </ol>
<p>DPW did not enhance its boot and tow program with the technology and training needed to target habitual offenders with multiple safety-related citations.</p>	<ol style="list-style-type: none"> <li>9. DPW should target the District’s most dangerous streets and drivers, while maintaining productivity through technology updates to support geographic analysis and reporting, monitoring prioritization along the High Injury Network and using advanced technology to allow Parking Enforcement Officers, Boot Staff, and Tow Staff to view the types of violations a vehicle has when the license plate number is entered into the handheld devices or License Plate Readers.</li> <li>10. The Mayor and the Office of the City Administrator should ensure that DPW has the necessary resources to implement its Vision Zero strategies, including funding for technology and equipment updates.</li> <li>11. The D.C. Council should work with DMOI to establish a D.C. Official Code definition of a high-risk driver to better enable enforcement through booting and towing.</li> </ol>

Findings	Recommendations
<p>While progress has been underway, DDOT, MPD, and DPW had not fully implemented equity procedures, strategies, and data collection into their Vision Zero efforts.</p>	<ul style="list-style-type: none"> <li>12. DDOT should develop procedures for assessing equity of ATE camera rotation and site assessment decisions which balance gathering data to assess safety impact of the camera locations on the surrounding communities as well data on disparate financial burdens.</li> <li>13. MPD should conduct an independent analysis of the equity outcomes of police stops and ensure that traffic enforcement stops are isolated to be studied as a subset of all stops, as a planned project with the University of Connecticut aims to do.</li> <li>14. DPW should obtain more data and work with the Office of Racial Equity to assess in writing how its parking enforcement, booting, and towing operations advance or impede racial equity.</li> </ul>
<p>Auditor’s Concern: The District’s Vision Zero enforcement efforts are impeded by a lack of accountability for Maryland and Virginia drivers who engage in the majority of the unsafe driving behaviors in the District.</p>	<ul style="list-style-type: none"> <li>15. The Mayor should follow the requirements of D.C. Official Code § 50-2301.12, to request negotiations with Maryland and Virginia to establish reciprocal agreements regarding non-moving violation fines and ATE fines in the District or propose rescinding the requirement.</li> </ul>

# Appendices

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# Appendix A

Petition from Advocates

October 24, 2018

Ms. Kathleen Patterson  
717 14th Street, NW  
Suite 900  
Washington, DC 20005

cc: DC Inspector General Daniel Lucas, Councilmember Mary Cheh, Councilmember Charles Allen

via electronic submission to [odca.mail@dc.gov](mailto:odca.mail@dc.gov)

Dear Ms. Patterson,

We are writing as DC's road users - cyclists, pedestrians, scooter riders, drivers - and DC taxpayers to request the Office of the DC Auditor launch an in-depth audit into the DC Vision Zero initiative. By 2024, the DC Vision Zero initiative aims to end traffic fatalities by creating safe streets, protecting vulnerable road users, and preventing dangerous driving. Yet since the program was launched in 2015, traffic fatalities in the District have been on the rise<sup>1</sup>. Since June 2018 alone, at least three cyclists, three pedestrians and one scooter rider have been killed by drivers on DC roads<sup>2</sup>. That's seven people in a city of 700,000 residents, or one fatality per 100,000 DC residents.

So now we ask you: If the Mayor-backed initiative created to eliminate traffic fatalities is not working, we want to know why and to what extent its costing DC taxpayers.

Thank you for considering our request.

Sincerely,  
Rachel Maisler and Matthew Sampson  
Washington, DC

DC Residents:

Adam Gould	Amber Gove	Anthony T. Nigrelli
Adriana Stringer	Amy Johnson	Arielle Mccarthy
Alejandra Goyenechea	Anders Pedersen	Ashik Siddique
Alex Baca	Andrea Vaught	Ben Shih
Alex Merrill	Andrew Francis	Blair Tamara
Ali Chope	Andrew Miller	Blaire Thomson
Alison Cody	Andrew Riedy	Bradley Phillips
Amber Gershman	Anthony Dunn	Brian Mosley

<sup>1</sup> <https://mpdc.dc.gov/page/traffic-fatalities>

<sup>2</sup> <https://wamu.org/story/18/10/05/memorial-ride-cyclist-killed-driver-shuts-constitution-ave-rush-hour/>

Bryant Turnage	Ezra Deutsch-Feldman	Kyle Brewer
Cara Richards	Flynn Mahoney	Leah Babins
Caroline Sap	Gaby Gollub	Leah Fantl
Caroline Timbers	Gavin Baker	Leif Brostrom
Cassandra Kane	George Koors	Lesly Jones
Catherina Celosse	Geri Rosenberg	Lynda Laughlin
Charles Hofmann	Gina LaBorde	M. Beth Peralta-Reed
Charles Yeakey	Grace Pooley	M. Mindy Moretti
Cheryl Wilson	Gregory Matlesky	Marisa Ontko
Chris Wheeler	Griffin Winton-LaVieri	Mark Eckenwiler (Commissioner, ANC 6C04)
Christina Barry	Guy Edwards	Mark Sussman
Christina McCoy	Gwen Rubinstein	Martha Dye
Christine Kulumani	Hailey Rohn	Matthew Dickens
Christopher Mrstik	Hannah Martin	Matthew Eide
Colin Reusch	Hayden Higgins	Max Richman
Conor Shaw	Huma Imtiaz	Maya Brennan
Corey Holman	Ian Coleman	Meg Ball
Craig Chester	Ivana Ng	Megan Browndorf
Cyrus Habib	J. I. Swiderski	Meredith Dougherty
Daniel Ridge	Jacqueline French	Michael Eichler
Daniel Schep	Jade Silver	Michael Forster
Danny Lesh	Jake Gysland	Michael Zwirn
David Fathi	James Earl	Misha Heller
David Joseph	Jamie Evans	Moira McCauley
David Magilner	Janaina Stanley	Mysiki Valentine
David Ramos	Jason Argo	Nathan Wittstruck
David Salovesh	Jason Leppig	Nick Hargreaves
David Tumblin	Jeanne Kapln	Nick Lyell
Dawn Wooten	Jeffrey Baker	Nik Philipsen
Denise Fleming	Jeffrey Iannuzzi	Patrick Kennedy
Devan Tracy	Jeffrey McManus	Paul Lagoy
Doug Trapp	Jenny Crawford	Peter Krupa
Dustin Maghamfar	Jess Pezley	Philip Schwartz
Elizabeth Farry	Jessica Luna	Rachel Lesniak
Elizabeth Hearn	Jillian Molina	Randall Myers
Elizabeth Rudd	Joe Flood	Robert Fitzgerald
Elizabeth S- McClain	Jon Dougherty	Ross Wallen
Elizabeth samuel-M	Jona Elwell	Rudi Riet
Ellis Davis	Jonathan Renaut	Russell Mawn
Emily Russel	Joshua Hertzberg	Ryan Keefe
Eric Breitenstein	Karen Ramsey	Sam Brinton
Erika Gardner	Katy Lang	Sam Mencimer
Evan Yeats	Keith Ivey	Samuel Sherwood
Eve Zhurbinskiy	Kirstin Fearnley	

Sarah Young  
Sean A. Maiwald  
Sean Conway  
Sierra White  
Talia Coutin

Tara Varghese  
Taylor Bates  
Taylor Sholler  
Timothy Stackhouse  
Timothy Wooten

Tucker Cholvin  
Yasmeen Schuller  
Zach Leshner  
Zachary Eldredge

Non-resident DC Road Users:

Aaron Raphael  
Amanda Collier  
Andrea Kirk  
Arthur Frey  
Caner Geyik  
Christy Regenhardt  
Dan Behrend  
Doug Smith  
Edith Brashares  
Gillian Burgess  
Gina Cicotello  
Gretchen Goldman  
James Engelhardt

James Ortmann  
Jessie Wilson  
Joel Biatch  
Justin Isbell  
Kevin Schaeffer  
Kylar Engelmann  
Laura Montiel  
Leigh-Ann Friedel  
Leslie Gehring  
Lisa Fuller  
Lissa Bell  
Lyz Moore  
Mandy Katz

Michelle Newmark  
Monica Morin  
Myles  
Nadine Beck  
Nils Franco  
Paris Watson  
Paul Wasneski  
Philip Koopman  
Robin Butler-LeFrancois  
Rodney Smith  
Rumi Matsuyama  
Tricia Koroknay-Palicz

## **Appendix B:**

Compilation of 2015 and 2022 Vision Zero Action Plan Enforcement  
Strategies for DDOT, MPD, and DPW

## Appendix B: Compilation of 2015 and 2022 Vision Zero Action Plan Enforcement Strategies for DDOT, MPD, and DPW.<sup>157</sup>

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
DDOT/ DCRA	Increase Enforcement and protection for pedestrians and people on bikes in work zones and in parking garages. Educate development/construction stakeholders and develop green building code elements for safe transportation.	
DDOT	Accelerate use of bicycle counting stations to determine the number of bike trips made in the District per year in key locations to better understand exposure rates. Establish pedestrian counting stations to determine the number of pedestrian trips made per year in key locations. Utilize private sector partnerships and smart-phone applications to enable crowdsourcing of data and encourage resident participation. Make data publicly available on Vision Zero website.	
DDOT	Install full truck-route signage in the District to direct larger vehicles. Accelerate truck counting program. Publicize, monitor, and enforce truck routes.	
DCTC <sup>158</sup> / DDOT	Establish baseline data for seatbelt usage for drivers and passengers of public vehicles for hire. Set a future target for minimum of compliance.	

<sup>157</sup> [2015 Action Plan](#); [Vision Zero 2022 Update](#). The 2015 Action Plan labeled strategies as Data, Enforcement, Education, or Engineering.

<sup>158</sup> D.C. Taxicab Commission (now the Department of For-Hire Vehicles)

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
MPD/DDOT	<p>Strategically deploy photo enforcement. Provide necessary infrastructure for cameras at 100% of high-priority locations. Target violations: stop sign, speed, red light, oversize, and overweight. Use Vision Zero safety map to identify potential locations.</p> <p><b>ODCA Note:</b> This strategy was assigned to MPD in the 2015 Action Plan before the transition to DDOT oversight of the ATE program during the audit scope.</p>	<p>ATE includes red light enforcement, stop sign enforcement, and speed enforcement. ATE is able to reduce speeding with its mere presence on the street, with data showing that more than 70% of ticketed drivers learn their lesson immediately, and only receive one citation.</p> <ul style="list-style-type: none"> <li>■ Increase the number of ATE cameras deployed with a focus on the HIN, arterials, and high-speed streets</li> <li>■ Increase the types of ATE deployed to support new Bus Lane Cameras, as well as Red Light Cameras, Stop Sign Cameras, and more as approved by the D.C. Council</li> <li>■ Enhance safety assessment of new ATE cameras to weight HIN in conjunction with other DDOT processes</li> </ul>
DDOT	<p>Pilot 25 MPH “Arterial Safe Zones” on two major streets. Pilot “Safe Neighborhoods” with 20 MPH traffic calming in two residential neighborhoods. Create 15 MPH “Safe Zones” around schools, parks, and high concentrations of seniors or youth to apply slower speed limits for expanded hours. Support with Automated Traffic Enforcement. Evaluate safety impact.</p>	
DDOT	<p>Publish geospatial analysis of safety-related citations issued and adjudicated. Hold quarterly safety meetings to refine enforcement strategies based on safety outcomes.</p>	
DDOT	<p>Annually publish Vision Zero progress report.</p>	

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
DDOT	<p>Improve response times to and from scenes of crashes via quick clearance and move-over laws.</p>	<p>MPD/FEMS: The time between when a crash occurs, to an emergency call, to dispatch and arrival of first responders is critical in the survivability of a crash. MPD and FEMS drivers are trained on navigating District streets and work to respond as quickly, accurately, and efficiently as possible.</p> <ul style="list-style-type: none"> <li>■ Explore methods to reduce or optimize response times and accuracy of dispatch to the scene of a crash</li> </ul> <p>MPD/DDOT: Within 24 hours, MPD officers meet DDOT Staff at the crash location to review crash details. Within a week, a multidisciplinary team at DDOT reviews the site of the crash to determine further safety treatments.</p> <ul style="list-style-type: none"> <li>■ Continue post fatal crash coordination and data dashboard work</li> </ul>
DDOT		<p>Traffic Control Officers (TCO): This program funds officers to be trained on and control traffic to enhance safety and manage traffic at key locations such as schools, large events, and congested areas.</p> <ul style="list-style-type: none"> <li>■ Expand Traffic Control Officer (TCO) recruitment to meet demand at schools, and other high-risk locations</li> <li>■ Enhance TCO training to increase protections for vulnerable users</li> </ul>

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
DDOT/ MPD		<p>When a crash occurs, MPD officers are dispatched to conduct a criminal investigation, collect data, and work to complete an investigation. DDOT pulls from the MPD crash data system to maintain a Crash Data layer on the DC Open Data Portal and populate the Vision Zero Injury and Fatality Crash Dashboard. DDOT and MPD, among others, participate on a Traffic Records Coordinating Committee (TRCC), which examines data issues and seeks to address them.</p> <ul style="list-style-type: none"> <li>■ Collect accurate and complete data at each injury and fatality reported crash</li> <li>■ Continue to track data and validate it with a focus on quality improvements</li> <li>■ MPD to identify and fix traffic record (crash data) issues</li> <li>■ Improve quality of crash data information by providing specific training to officers on crash data importance</li> </ul>
MPD	<p>Protect people on bikes with enhanced enforcement that focuses on improper U-turns through bicycle facilities, parking in/blocking bike lanes, improperly entering mixing zones, dooring, and failure to observe three-foot passing law. Utilize subject-matter-expert police officers on bicycles. Publicly report citations issued on a regular basis via open data on the Vision Zero website.</p>	

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
MPD	Continue MPD “Step-Out” enforcement and formally report citation data. <sup>159</sup>	<p>Enforcement of traffic laws, especially speed limits, will be focused on the HIN and other focus areas as determined by MPD and in consultation with community and other agencies.</p> <ul style="list-style-type: none"> <li>■ Coordinate with other agencies (MPD, DFHV, DPW, and DDOT) to prioritize in-person enforcement at key locations</li> <li>■ Ensure safety enforcement is highly visible and reported publicly to increase transparency and promote safety effects</li> </ul>
MPD	Regularly deploy impaired driving check points with Impaired Driving Mobile Processing Unit in high-priority areas on Thursday, Friday, and Saturday nights.	<p>Impaired Driving Enforcement: This program funds officer time to enforce traffic safety laws related to impaired driving laws to take dangerous drivers off of the streets.</p> <ul style="list-style-type: none"> <li>■ Run saturation patrols in high-issue areas and during major holidays and local events (e.g., Nationals games)</li> </ul>
MPD	Establish standard protocol with local hospitals for chemical testing of patients suspected of impaired driving, replicate memorandum of understanding with all DC trauma centers.	
MPD	Reduce distracted driving using regular targeted enforcement and step-out enforcement at high-priority locations. Collect and analyze data on drowsy driving.	
MPD	Prevent reckless behavior on all-terrain-vehicles (ATVs) and motorized dirt bikes through strategic enforcement and education campaigns. Expand ability to impound illegal ATVs.	

<sup>159</sup> Presented as a second part of the strategy to deploy photo enforcement, which was originally assigned to MPD in 2015.

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
MPD		<p>Safe Routes to Schools: This program funds officers to be trained on and control traffic to enhance safety for school children.</p> <ul style="list-style-type: none"> <li>■ Deploy officers to school areas during drop-off and pickup hours in identifiable areas</li> </ul>
MPD		<p>Vehicle Safety Enforcement: MPD handles enforcement of critical vehicular safety offenses.</p> <ul style="list-style-type: none"> <li>■ Enforcement of street legal requirements, especially critical safety infractions such as illegal tints</li> </ul>
DPW	<p>Deter dangerous parking behavior of commercial and delivery vehicles: parking in bicycle lanes, crosswalks, parking abreast / double parking. Publicly report violations monthly via open data on the Vision Zero website.</p>	<p>DPW enforces primarily parking violations and focuses on high-risk behaviors exhibited by drivers and improper standing or storing of their vehicles in public space (e.g., blocking bicycle lanes, crosswalks, parking abreast/double parking, illegal traffic turns).</p> <ul style="list-style-type: none"> <li>■ Expand and target parking enforcement in key high-crash areas for high risk behaviors (e.g., parking in bicycle lanes, crosswalks, parking abreast/double parking)</li> <li>■ Expand boot/tow team to increase number of vehicles booted in excess of daily/weekly average</li> </ul>
DPW	<p>Launch enhanced DPW Boot-Tow-Release program to ensure dangerous drivers cannot avoid paying fines for violations. Target habitual offenders with two or more unpaid citations related to safety, e.g. speed, stop sign, crosswalk, red light, gridlock, oversize, or overweight.</p>	

Lead Agency (if DDOT, MPD, or DPW is lead agency)	2015 Strategy	2022 Strategy
DPW	<p>Enhance coordination between DPW Drug and Alcohol Testing division and supervisors of CDL employees to develop smaller groups for train the trainer sessions on drug and alcohol policy. Target a 9.5% increase over the FY 2015 number of CDL drivers who complete annual drug and alcohol policy training.</p>	<p>District Fleet: DDOT and DPW own and operate a fleet of maintenance vehicles, trucks, passenger vehicles and more. Drivers of these vehicles must go through Commercial Driver’s License (CDL) certification and trainings.</p> <ul style="list-style-type: none"> <li>■ As fleet is replaced and updated ensure it meets NCAP, commercial vehicle safety, and other standards to the highest extent feasible</li> <li>■ Ensure all DDOT drivers are compliant and up to date on CDL and other safety training</li> </ul>

# Appendix C

## Detailed Methodology

To determine whether DDOT, MPD, and DPW implemented traffic safety enforcement within the Vision Zero framework effectively and equitably, we:

- Reviewed the 2015 Vision Zero Action Plan to identify DDOT, MPD, and DPW’s enforcement-related strategies, cross-referenced these strategies with the Vision Zero 2022 Update, and conducted a risk assessment to identify key 2015 strategies using the criteria of whether the strategy: (1) Was in both the 2015 and 2022 Vision Zero Action Plans; (2) Had a high dollar impact; (3) Had a high number of people impacted; (4) Had been identified by stakeholders as an area of concern; and (5) Was relevant to data and information sharing between the audited agencies. As a result of this risk assessment and an analysis of MPD traffic enforcement data, we selected: one DDOT strategy; four MPD strategies; and two DPW strategies.
  - While the 2015 Action Plan assigned MPD the ATE strategy, we selected this strategy to assess DDOT’s implementation of this strategy as the ATE program transitioned to DDOT during our scope.
- Reviewed DDOT, MPD, and DPW budgets, Performance Plans and Accountability Reports (PAR), D.C. Council performance oversight response documents, and relevant Council Committee reports.
- Reviewed D.C. Code, General Orders/regulations, and proposed legislation pertaining to traffic safety and enforcement, as well as listened to D.C. Council public roundtables.
- Reviewed D.C. and federal government, academic, advocacy, and news article publications on ATEs, traffic safety, enforcement effectiveness and equity, such as the Office of the Inspector General reports on traffic enforcement adjudication and a report from D.C.’s Major Crash Review Task Force.
- Interviewed stakeholders from the Bicycle, Multi-Modal Accessibility, and Pedestrian Advisory Councils, advocates from two different organizations promoting bicycle and pedestrian safety; and an Advisory Neighborhood Commissioner.
- Interviewed staff from the D.C. Council and DMOI, as well as reviewed the 2022 Multi-Agency Vision Zero Action Tracker and other information from DMOI.
- Assessed the five components of internal controls for each agencies’ activities related to Vision Zero and traffic safety enforcement.

To determine if DDOT effectively implemented the 2015 Action Plan ATE strategy, we:

- Reviewed research on ATE effectiveness from federal government and various other sources.
- Interviewed DDOT leadership and staff working on Vision Zero and ATE operations and placement.
- Reviewed DDOT’s list of ATE cameras operational during our scope and conducted data reliability on that list using DMV data.
- Identified “high-priority locations” as those found in: (1) the Howard University Transportation Research and Data Center’s 2018-2020 and 2019-2021 “Traffic Safety Statistics Report for the District of Columbia,” specifically the high-hazardous intersections found in the ranking lists for “Crash Rate,” “Crash Frequency,” and “Crash Composite.” (2) DDOT’s 2015, 2020, and 2022 High Injury Network (HIN) corridors lists.
- Determined proximity of each deployed camera to a “high-priority location” by using an online map to count blocks from the camera to the nearest HIN corridor or high-hazardous intersection. The reverse process was used to determine the nearest camera to each of the top 25 intersections on Howard University Transportation Research and Data Center’s 2019-2021 crash composite list.

- Analyzed DDOT’s siting criteria, documentation of its Traffic Safety Investigation/Input process, and ATE site feasibility studies to understand the sources of ATE requests and identification of potential camera locations.
- Created a judgmental sample of 15 rotated cameras by selecting cameras with both the highest and lowest fine issuances from each 6-month period of the audit scope to capture more cameras in 2022 than in 2021 and to exclude cameras for which we had already requested an assessment and were told it did not exist. We then requested site assessments from DDOT for the cameras in our sample to test for assessment and rotation best practices.
- Reviewed DDOT’s 73 Fatal Crash Memos from fatalities that occurred from FYs 2021 through 2022 to identify those that contained ATE recommendations. Then, obtained information from DDOT to determine if the recommendations were completed and how many yielded ATE deployment.
- Reviewed D.C. Code and DDOT semi-annual reports to the D.C. Council to determine if DDOT complied with ATE reporting requirements. Worked with ODCA’s General Counsel to determine a reasonable reporting schedule and with this framework we then assessed each submitted reports’ timeliness, as well as completeness.
- Requested and obtained from the DMV’s contractor, Conduent, five years of ATE ticket and fine issuances and examined ATE ticket data for vehicle registration, ticket type, and repeat offender status.

To determine if MPD effectively implemented its 2015 Vision Zero Action Plan strategies and other key traffic safety goals, we:

- Conducted general research on police traffic enforcement effectiveness and equity, including from sources such as the International Association of Chiefs of Police (IACP).
- Reviewed D.C.’s Police Reform Commission report; MPD’s 2020 Stop Data Report; the Lamberth Consulting Bias Policing Project; other cities’ audits of traffic enforcement and equity; and Vision Zero Network papers.
- Conducted two ride-alongs with MPD officers conducting traffic enforcement; and met with several officers at MPD traffic headquarters.
- Interviewed MPD leadership, various MPD officers (including one Traffic Captain) and a retired MPD official formerly involved in traffic enforcement.
- Reviewed MPD’s General Orders related to Traffic Enforcement and Equity; MPD’s Annual Reports; MPD’s Stop Data Report; MPD’s 2015, 2019, 2020, and 2023 Vision Zero Training Materials; and internal Vision Zero reports.
- Worked with MPD and reviewed documentation to determine which violation codes to use for each Action Plan strategy.
- Reviewed three MPD data sets to compile numbers of relevant warnings, violations, arrest charges, and parking violations issued each calendar year (from 2018-2022) and checked the data reliability for each MPD dataset by sorting and filtering the data; checking for voids, duplicates, and missing data; cross checking it with other MPD reported data and discussing with MPD data scientists via email and meetings. Specifics for each MPD data set:
  - For MPD Notice of Infraction (NOI)/Traffic Stop data, excluded rows with only voided tickets, representing 0.5% of the NOI data MPD provided; kept rows containing both a “Live ticket”

or “Live warning” and a voided ticket(s) with same code as MPD noted a violation could have been validly voided and then reissued afterward. Found potential duplicate entries for about 2% of the rows of stops containing the same time, date, and officer information; however, most contained different demographic data such as race, gender, and state of residence and thus were not deleted. Created a unique row of data (delimited the data) for every warning or violation issued at a single traffic stop, to view and analyze total warnings and violations issued, and sorted MPD violations and warnings into categories of “requirements to drive” (RTD) or “safety” for presentation, using a 3-person ODCA team to decide whether the 700+ codes were more related to safety or RTD. Analyzed MPD violation and warning data by fiscal year to compare it to overtime enforcement data presented in HSO annual reports.

- For Traffic Arrest data, analyzed arrest charges separately; determined how many arrests had more than one charge; and sorted MPD arrests into categories of “requirements to drive” or “safety” for presentation (using MPD categorization provided with the data).
- For MPD Parking Ticket data, removed parking violations marked as “void approved” as MPD confirmed these were successfully voided tickets. Voided parking tickets still represent the use of officer time/resources and comprised 2% of the data.
- Reviewed the 2020, 2022, and 2023 Fatal Crash Reduction Plans and Appendices of seven Patrol District Traffic Plans. For the 2022 Plans, we assessed:
  - Whether the Traffic Plans’ focus violations were supported by best practices or included equity. Our sources of criteria included: NHTSA Countermeasures that Work (2020); U.S. Department of Transportation Synthesis of Studies That Relate Amount of Enforcement to Magnitude of Safety Outcomes (2022); FHWA Proven Safety Countermeasures; Vision Zero Equity Strategies for Practitioners; GHSA recommendations for Equity in Highway Safety Enforcement and Engagement Programs (2021).
  - The performance of each Patrol District by using the priority violations each Patrol District identified for enforcement focus in their Traffic Plans and cross checked these with a review of the MPD violation code descriptions, as the Plans did not highlight specific codes.
  - Whether Traffic Plans’ geographic enforcement focus locations were effective, and data driven by matching MPD’s locations with DDOT’s high-priority intersections.
- Reviewed MPD’s federally funded overtime enforcement by reviewing MPD grant applications to the Highway Safety Office (HSO); then-DDOT HSO annual reports which contained MPD data; a NHTSA Management Review of then-DDOT’s HSO grant. Also compared four years of FY data reported by MPD in the HSO annual reports to MPD enforcement data.

To determine if DPW effectively implemented its 2015 Vision Zero Action Plan strategies, we:

- Reviewed documentation provided by DPW, such as policies and procedures, a training PowerPoint, a Parking Beats Study, and a list of the Rapid Response Team program’s safety-sensitive parking violations.
- Reviewed DPW’s organizational structure and Director confirmations on the D.C. Register.
- Conducted ride-along field visits with DPW’s Abandoned Vehicles Investigation division, Parking Enforcement Officers, and a Boot Team member and attended a DPW PEO roll call.
- Interviewed current and former staff from DPW, including leadership.

- Analyzed five years of DPW booting data (CY 2018-2022) and five years of DPW tow data (CY 2018-2022).
- Analyzed five years of parking violation data (CY 2018-2022) from DPW and DMV.
  - Performed data reliability on data sets received from DPW and the DMV.
  - Received approval from DPW to use the DMV data sets for some analysis.
- Analyzed parking violation data for FY 2021 and FY 2022, filtered to show commercial vehicles registered in D.C., including:
  - To filter for commercial vehicles, we confirmed with the D.C. DMV that commercial vehicles registered in D.C. had a specific license plate format which was the letter “C” followed by five numbers.
  - Requested information via email on commercial license plate formats from the Virginia and Maryland DMVs.
- Reviewed Open Data monthly violation uploads on the Vision Zero website.

To determine if DDOT, MPD, and DPW equitably implemented key Vision Zero strategies, we:

- Reviewed research and best practice documentation about racial equity and traffic safety.
- Interviewed staff from DDOT’s equity office.
- Watched and/or reviewed transcripts from the D.C. ATE Equity and Safety Task Force.
- Reviewed DDOT’s Equity Assessment Tool for the ATE Program.
- Reviewed agency equity statements.

# Appendix D

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## Selected DDOT ATE Camera Program Data

**Figure 41: ATE Speed Cameras, by Total FYs 2021 and 2022 Fines Issued**

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Total Months Active
DC295 SE 1 MILE N/O E/1 S/B (WZ)	39,682,000	11
4200 BLK SOUTHERN AVE SE NE/B	16,200,100	8
2500 BLK INDEPENDENCE AVE SE NE/B	15,554,300	12
DC295 SW .05 MILE S/O EXIT 1 N/B	14,294,100	24
600 BLK KENILWORTH AVE NE S/B	14,225,550	24
2200 BLOCK K ST NW E/B	11,854,250	24
2200 BLK K ST NW W/B	11,227,950	24
600 BLK NEW YORK AVENUE NE W/B	8,402,450	24
2800 BLK N CAPITOL ST NW S/B	8,245,050	20
2200 BLK SOUTH DAKOTA AVE NE SE/B	7,951,600	24
DC295 SE 0.4 MILES S/O E/2 S/B (WZ)	7,648,400	6
3700 BLK SOUTHERN AVE SE SW/B	5,378,150	24
DC 295 .4 MI S/O PENN AVE SE SW/B	5,198,850	19
1400 BLK SOUTHERN AVE SE SW/B	5,067,500	24
100 BLK MICHIGAN AVE NW E/B	5,013,650	24
1400 BLK KENILWORTH AVE NE S/B	4,630,250	24
3100 BLK ALABAMA AVE SE NE/B	4,590,650	24
1900 BLK BRANCH AVE SE N/B	4,558,350	24
2300 BLK GOOD HOPE RD SE NW/B	4,490,450	24
3300 BLK NEW YORK AVE NE E/B	4,471,450	24
4000 BLK WHEELER ROAD SE N/B	4,231,200	8
DC295 NE AT BENNING RD EXIT N/B	3,961,550	24
1900 BLK SOUTHERN AVE SE NE/B	3,733,250	24
2600 BLK WISCONSIN AVE NW N/B	3,704,800	24
800 BLK EASTERN AVE NE E/B	3,625,650	24
1400 BLK BLADENSBURG RD NE S/B	3,431,000	24

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Total Months Active
3 <sup>RD</sup> ST TUNNEL NW N/B BY MA AVE	3,250,550	24
3000 BLK N CAPITOL ST NW S/B	3,236,250	24
200 BLK RIGGS RD NE E/B	3,196,600	24
4600 BLK MASSACHUSETTS AVE NW NW/B	3,171,050	24
600 BLK NEW YORK AVE NE E/B	2,927,450	24
2000 BLK BRANCH AVE SE S/B	2,820,000	24
3900 BLK E CAPITOL ST SE E/B	2,769,900	24
2900 BLK MILITARY RD NW E/B	2,714,700	24
5800 BLK NEW HAMPSHIRE AVE NE SW/B	2,528,950	24
600 BLK MISSOURI AVE NW SE/B	2,246,900	24
5100 BLK LOUGHBORO RD NW W/B	2,231,200	24
2300 BLK N CAPITOL ST NE N/B	2,214,900	7
5700 BLK MACARTHUR BLVD NW N/B	2,144,750	24
3900 BLK SOUTH DAKOTA AVE NE SE/B	1,929,250	17
3200 BLK FORT LINCOLN DRIVE NE S/B	1,875,000	24
1600 BLK NEW JERSEY AVE NW S/B	1,814,750	24
1300 BLK NEW JERSEY AVE NW N/B	1,813,350	23
1300 BLK EASTERN AVE NE NW/B	1,790,400	7
4000 BLK EAST CAPITOL ST NE W/B	1,714,700	22
3900 BLK SOUTH DAKOTA AVE NE NW/B	1,704,350	24
3700 BLK MASSACHUSETTS AVE SE NW/B	1,648,200	22
DC295 NE .1MILE S/O EASTERN AVE N/B	1,548,950	20
2600 BLK WISCONSIN AVE NW S/B	1,538,450	24
2500 BLK MARTIN LUTHER KING AVE SE	1,526,650	24
3000 BLK PENNSYLVANIA AVE SE NW/B	1,428,100	24
1100 BLK BLADENSBURG RD NE NE/B	1,370,000	21
4600 BLK BLAGDEN AVE NW SW/B	1,338,200	22
4700 BLK MACARTHUR BLVD NW S/B	1,317,550	24

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Total Months Active
2500 BLK N CAPITOL ST NE N/B	1,300,600	8
2600 BLK LINCOLN RD NE N/B	1,274,350	24
4800 BLK S DAKOTA AVE NE NW/B	1,260,050	6
5300 BLK EASTERN AVE NE SE/B	1,239,400	24
3 <sup>RD</sup> ST TUNNEL NW S/B BY 3 <sup>RD</sup> ST	1,201,500	24
1700 BLK N CAPITOL ST NE N/B	1,200,300	7
1700 BLK C ST NE W/B	1,172,800	23
3100 BLK 4 <sup>TH</sup> ST NE N/B	1,064,250	22
SUITLAND PK W/B @ STANTON RD SE	1,050,950	8
16 <sup>TH</sup> ST S/B @ COLORADO AVE NW	975,050	24
3700 BLK S DAKOTA AVE NE SE/B	969,300	6
6600 BLK BLAIR RD NW S/B	916,000	24
4200 BLK SOUTHERN AVE SE SW/B	898,900	11
5200 BLK 14 <sup>TH</sup> ST NW S/B	880,100	24
DC295 .7 MILES S/O EASTERN AVE NE S	860,800	3
800 BLK RIDGE RD SE NW/B	852,200	24
100 BLK IRVING ST NW W/B	846,050	21
5700 BLK MACARTHUR BLVD NW S/B	828,850	21
3400 BLK MLK JR. AVE SE SW/B	795,800	8
2900 BLK ARIZONA AVE NW S/B	784,700	3
4200 BLK EASTERN AVE NE SE/B	770,100	22
1300 BLK H ST NE E/B	714,100	14
4300 BLK RESERVOIR RD NW E/B	676,050	24
3400 BLK WHEELER ROAD SE S/B	674,350	8
1400 BLK N CAPITOL ST NE N/B	658,500	16
MILITARY RD W/B @ 14 <sup>TH</sup> ST NW	635,600	24
1100 BLK MICHIGAN AVE NE W/B	619,900	24
1300 BLK 9 <sup>TH</sup> ST NW S/B	619,750	5

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Total Months Active
1800 BLK ALABAMA AVE SE NE/B	618,300	2
4900 BLK 16 <sup>TH</sup> ST NW N/B	588,700	7
3600 BLK EASTERN AVE NE SE/B	575,600	17
NEW YORK AVE SW/B @ N CAPITOL ST NE	541,100	12
400 BLK RHODE ISLAND AVE NW E/B	523,450	24
1100 BLK 17 <sup>TH</sup> ST NE S/B	511,900	14
2500 BLK GEORGIA AVE NW S/B	494,850	21
5500 BLK E CAPITOL ST SE E/B	484,400	22
2200 BLK IRVING ST SE W/B	470,300	2
100 BLK FLORIDA AVE NW NW/B	416,050	8
1600 BLK BENNING RD NE W/B	413,500	2
MALCOLM X AVE E/B @ OAKWOOD ST SE	398,650	7
4700 BLK RESERVOIR RD NW SE/B	357,450	7
2800 BLK BENNING RD NE E/B	297,750	16
4400 BLK CLERMONT DR NE S/B	292,050	8
6700 BLK 16 <sup>TH</sup> ST NW N/B	281,300	11
3500 BLK MASSACHUSETTS AVE NW E/B	268,850	8
5700 BLK KANSAS AVE NW SW/B	268,050	3
2400 BLK 18 <sup>TH</sup> ST NE S/B	255,100	8
4400 BLK MLK JR AVE SW S/B	229,650	7
3600 BLK PARK PL NW S/B	210,000	24
200 BLK MASSACHUSETTS AVE NW NW/B	194,550	9
4600 BLK NEBRASKA AVE NW SW/B	174,100	10
500 BLK FLORIDA AVE NE SE/B	154,100	14
600 BLK MARYLAND AVE NE SW/B	153,750	11
2200 BLK FRANKLIN ST NE W/B	152,500	6
4700 BLK SOUTHERN AVE SE NE/B	152,100	1
3100 BLK S DAKOTA AVE NE SE/B	148,050	1

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Total Months Active
4500 BLK RIVER RD NW SE/B	133,400	4
400 BLK IRVING ST NW E/B	120,950	6
4100 BLK SOUTHERN AVE SE SW/B	88,550	1
3700 BLK 13 <sup>TH</sup> ST NW S/B	66,150	7
4300 BLK SOUTH CAPITOL ST SW S/B	58,000	1
3400 BLK GEORGIA AVE NW S/B	52,950	2
1500 BLK RHODE ISLAND AVE NE SW/B	50,400	7
2500 BLK PORTER ST NW W/B	49,350	10
1500 BLK GALLATIN ST NE NW/B	47,950	5
1400 BLK E CAPITOL ST NE W/B	41,800	1
1600 BLK MONROE ST NE E/B	32,900	9
3400 BLK GEORGIA AVE NW N/B	22,950	2
1800 BLK C ST NE E/B	16,600	2
34 <sup>TH</sup> ST N/B @ QUEBEC PL NW	10,950	1
MONROE ST E/B @ 16 <sup>TH</sup> ST NE	10,250	1
300 BLK OKLAHOMA AVE NE W/B	6,700	1
UNIT BLK IRVING ST NW E/B	2,650	0
100 BLK 49 <sup>TH</sup> ST NE N/B	2,650	4
4700 BLK EASTERN AVE NE SE/B	1,850	2

**Note: Does not include additional amounts assessed as penalties, or show the amounts collected.**

**Source: ODCA analysis of DDOT and DMV data.**

**Figure 42: ATE Red Light Cameras, by Total of FYs 2021 and 2022 Fines Issued**

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Months Active
I-695 OFF RAMP E/B @ 11 <sup>TH</sup> ST SE	3,754,500	15
S CAPITOL RAMP S/B BEFORE I ST SW	3,389,350	24
N CAPITOL ST N/B @ RIGGS RD NE	2,127,750	24
NEW YORK AVE W/B @ FLORIDA AVE NE	1,577,500	24
PENNSYLVANIA AVE W/B @ MINNESOTA SE	1,394,400	24
GEORGIA AVE S/B @ MISSOURI AVE NW	1,370,850	24
12 <sup>TH</sup> ST N/B @ CONSTITUTION AVE NW	1,145,350	24
K ST W/B @ 25 <sup>TH</sup> ST NW	1,091,750	24
N CAPITOL ST N/B @ HAREWOOD RD NE	1,090,400	24
INDEPENDENCE AVE E/B @ 3 <sup>RD</sup> ST SW	1,044,500	24
N CAPITOL ST S/B @ H ST NW	1,033,900	24
PENNSYLVANIA E/B @ SOUTHERN AVE SE	916,650	24
16 <sup>TH</sup> ST N/B @ OAK ST NW	868,400	24
NEW YORK AVE W/B @ BLADENSBURG RD NE	702,350	24
N CAPITOL ST S/B @ GALLATIN ST NW	627,900	24
NEW YORK AVE SW/B @ N CAPITOL ST NE	602,300	24
PENNSYLVANIA AVE SE/B @ 27 <sup>TH</sup> ST SE	599,350	24
E CAPITOL ST E/B @ TEXAS AVE SE	592,950	17
CONSTITUTION AVE W/B @ 15 <sup>TH</sup> ST NW	553,450	24
M ST W/B @ WHITEHURST FRWY NW	495,500	24
14 <sup>TH</sup> ST S/B @ U ST NW	424,200	24
16 <sup>TH</sup> ST S/B @ COLORADO AVE NW	420,950	24
14 <sup>TH</sup> ST N/B @ K ST NW	419,200	24
WISCONSIN AVE N/B @ BRANDYWINE NW	417,450	24
E CAPITOL ST W/B @ BENNING RD NE	377,850	24
CONNECTICUT AVE N/B @ MILITARY NW	355,750	24
NEW YORK AVE E/B @ BLADENSBURG RD NE	353,400	24

Camera Location	FYs 2021-2022 Total Fines Issued (\$)	Months Active
14 <sup>TH</sup> ST N/B @ C ST SW	324,250	23
MILITARY RD W/B @ 14 <sup>TH</sup> ST NW	323,400	24
BRANCH AVE N/B @ ALABAMA AVE SE	316,600	24
BLADENSBURG RD N/B @ NY AVE NE	316,450	24
K ST E/B @ 27 <sup>TH</sup> ST NW	269,200	24
S DAKOTA SE/B @ BLADENSBURG RD NE	266,500	24
RHODE ISLAND AVE SW/B @ REED ST NE	240,400	24
CONNECTICUT AVE S/B @ PORTER ST NW	229,850	18
MT OLIVET SE/B @ W VIRGINIA AVE NE	224,850	20
CONNECTICUT AVE N/B @ CALVERT ST NW	202,500	24
NEBRASKA AVE NE/B @ FESSENDEN ST NW	154,600	24
CONNECTICUT AVE S/B @ NEBRASKA NW	104,000	17
SUITLAND PKWY W/B @ STANTON RD SE	96,300	22
16 <sup>TH</sup> ST S/B @ IRVING ST NW	86,450	16

**Note:** Does not include additional amounts assessed as penalties, or show the amounts collected.  
**Source:** ODCA analysis of DDOT and DMV data.

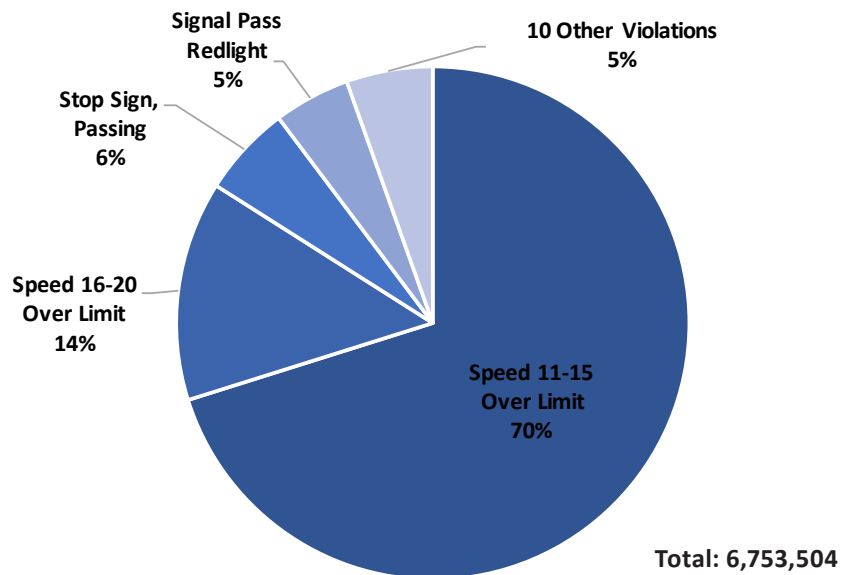
Figure 43: ATE Speed and Red Light Camera Fines Issued in FYs 2021 and 2022, by Ward

Ward	Number of Cameras in Ward (FYs 2021–2022)	Total ATE Camera Fines Issued (FYs 2021–2022)
1	8	\$6,870,200
2	15	\$34,334,550
3	21	\$18,272,650
4	19	\$22,476,450
5	45	\$63,552,300
6	13	\$19,728,650
7	33	\$84,027,950
8	16	\$84,447,550
<b>Total</b>	<b>170</b>	<b>\$333,710,300</b>

Note: Does not include additional amounts assessed as penalties or show the amounts collected.

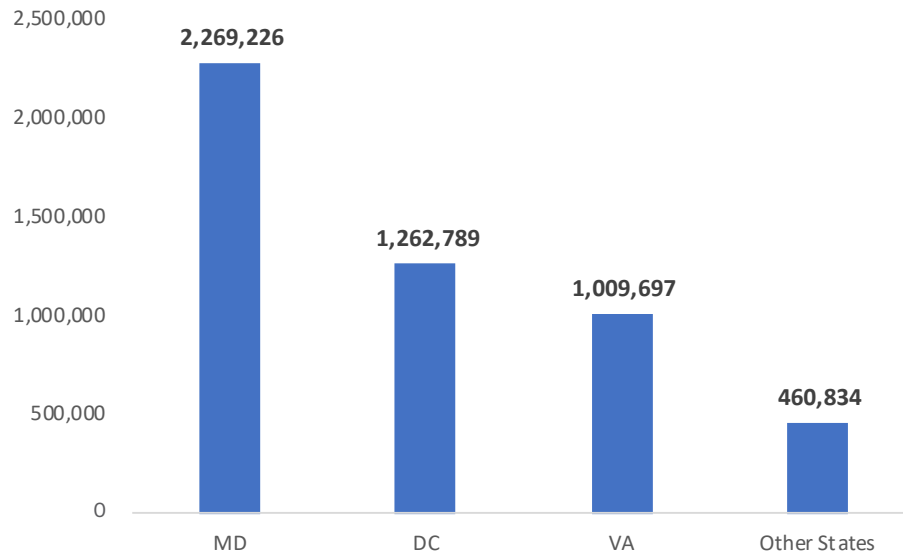
Source: ODCA analysis of DDOT and DMV data.

Figure 44: ATE Tickets Issued, by Type, 2018-2022



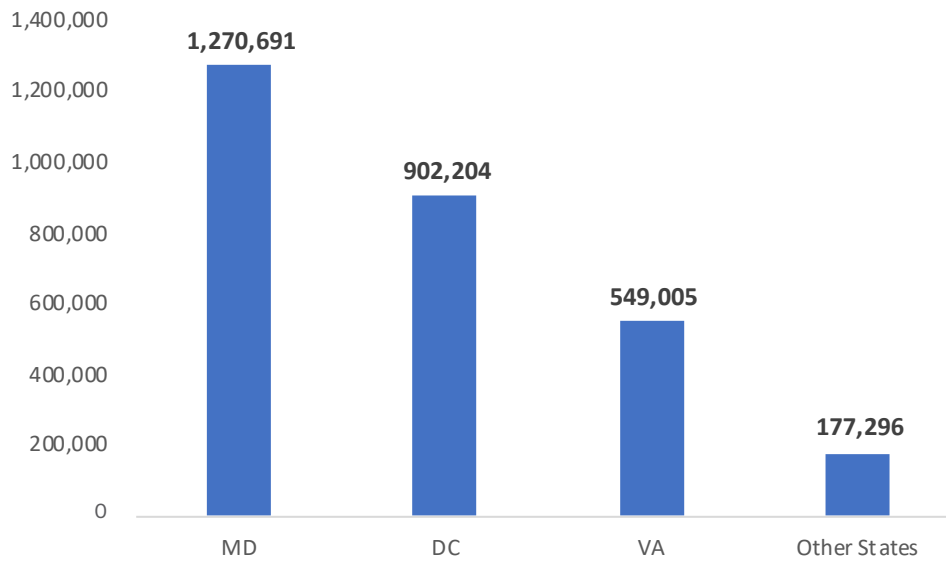
Source: ODCA analysis of DMV data.

**Figure 45: Number of Vehicles Receiving 2+ ATE Tickets, by State of Registration, 2018–2022**



Source: ODCA analysis of DMV data.

**Figure 46: Number of Vehicles Receiving 5+ ATE Tickets, by State of Registration, 2018–2022**



Source: ODCA analysis of DMV data.

# Appendix E

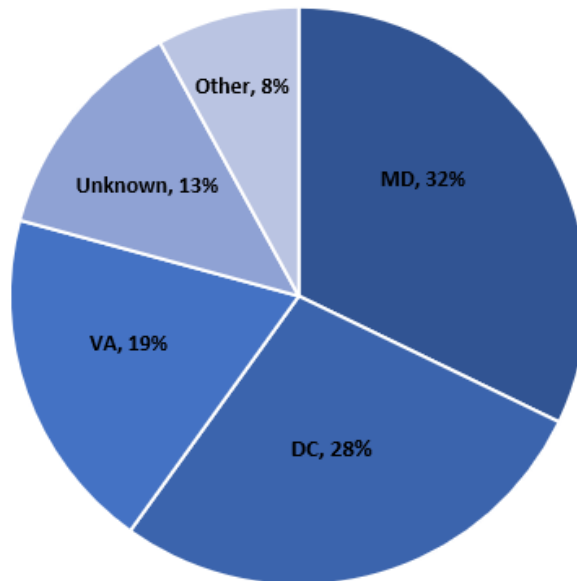
## Selected MPD Enforcement Data

Figure 47: MPD Stop Data with Traffic Violations or Warnings Issued, 2018–2022

	2018	2019	2020	2021	2022	Total (2018-2022)
Traffic Stops With at Least 1 Violation Issued	48,998	59,733	31,564	28,234	27,641	196,170
Total Violations Issued	65,005	79,101	42,541	37,497	36,933	261,077
Traffic Stops With at Least 1 Warning Issued	9,407	25,595	17,477	14,462	15,330	82,271
Total Warnings Issued	10,567	29,064	19,136	16,309	16,711	91,787

Source: ODCA analysis of MPD data.

Figure 48: MPD Traffic Violation and Warning Recipients, by State of Driver’s License, 2018–2022



Note: Represents stops containing at least one warning or violation.

Source: ODCA analysis of MPD data.

Figure 49: MPD Arrests and Arrests Charges, 2018–2022

	2018	2019	2020	2021	2022	Total (2018-2022)
Arrests (stop level)	6,500	5,948	3,337	2,744	2,043	20,572
Arrests Charges	7,933	7,219	4,331	3,688	2,667	25,838

Note: There may be multiple arrest charges at one stop. From 2018 through 2022, 15,950 arrests had one charge; 3,881 had two charges; 533 had three charges; and 71 had four or more charges.

Source: ODCA analysis of MPD data.

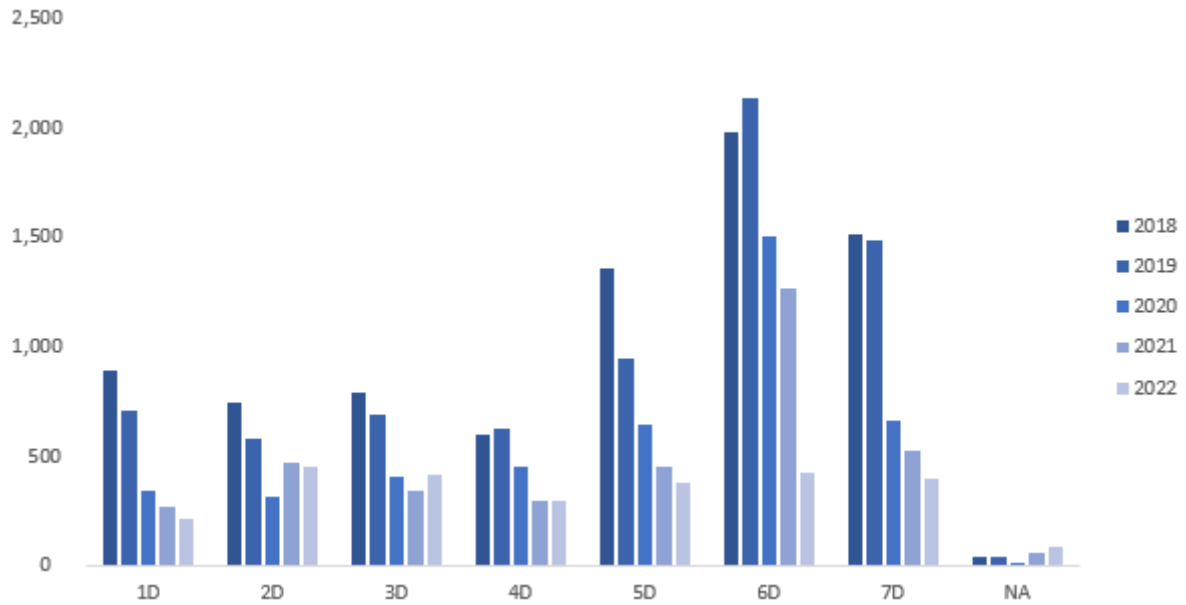
Figure 50: Detailed MPD Traffic Arrest Charges, 2018–2022

Charge Description	2018	2019	2020	2021	2022	Total (2018-2022)
No Permit	3,049	3,198	1,576	1,300	979	10,102
Driving Under Influence-1st Offense	1,234	1,055	790	654	345	4,078
Loaning Registration, Misuse of Temporary Tags	577	461	300	420	217	1,975
Counterfeit Tags	222	472	429	338	225	1,686
Permit Suspended- Operating After Suspension	1,062	138	109	51	36	1,396
Leaving After Colliding- Property Damage	276	259	234	235	185	1,189
Permit Revoked- Operating After Revocation	338	339	143	87	60	967
Driving Under the Influence of Alcohol or a Drug	167	189	115	161	323	955
Reckless Driving	175	168	140	78	91	652
Speed (30 Or over)	90	322	76	21	13	522
Driving Under Influence - 2nd Offense	153	129	84	87		453
Allow Operation with Improper Tags	161	130	58	41	44	434
Leaving After Colliding - Personal Injury	45	36	40	41	51	213
Operation of all-terrain vehicles and dirt bikes	56	50	26	21	31	184

Charge Description	2018	2019	2020	2021	2022	Total (2018-2022)
Speeding and reckless driving	46	12	10	44	11	123
Driving Under the Influence - 3rd or Subsequent Offense	34	29	36	21		120
Driving While Intoxicated - 2nd Offense	26	39	38	10		113
No Permit- 2nd Offense	32	31	6	5	16	90
Leaving After Colliding - Risk to Others	24	25	11	10		70
No Permit - 3rd Offense	31	13	13	3	9	69
Leaving After Colliding - Property Damage	23	10	18	14		65
Counterfeit Vehicle Docs	18	19	13	9	4	63
Operating While Impaired	11	18	9	11	6	55
Fail to Exhibit Registration	26	14	12	1		53
Fail To Exhibit Permit	16	14	4	4	4	42
Altered Tags	9	16	8			33
Driving Under the Influence - 4th Offense	6	6	10	11		33
Driving While Intoxicated - 3rd or Subsequent Offense	7	6	16	3		32
Fail To Exhibit License	8	7	1	1	5	22
Driving While Intoxicated - Under 21	7	3	1	3	1	15
Improper Use of Dealer Tags	2	5	4	3		14
Altered Registration	1	4	1			6
Display Expired Tags		2			4	6
DUI; Violations; Penalties					4	4
Aggravated DUI	0	0	0	0	2	2
Operating While Impaired - 3rd Or Subsequent Offense	1				1	2
<b>Total</b>	<b>7,933</b>	<b>7,219</b>	<b>4,331</b>	<b>3,688</b>	<b>2,667</b>	<b>25,838</b>

Source: ODCA analysis of MPD data.

Figure 51: MPD Traffic-Related Arrest Charges, by Police District, 2018–2022



Note: One percent of the data were labeled NA in the Police District field.

Source: ODCA analysis of MPD data.

# Appendix F

Detailed MPD Violation Data for Key 2015 Vision Zero Action Plan Strategies

## Appendix F: Detailed MPD Violation Data for Key 2015 Vision Zero Action Plan Strategies

### Violation T Codes and Parking P Codes Listed Below Each Strategy



#### Improper U-turns through bicycle facilities

(Note: MPD stated there was no separate violation or code for U-Turns through bicycle facilities.)

**T184** – U-Turn Violation; **T571** – Improper Turn

T184	2018	2019	2020	2021	2022
Violations	597	676	1,315	1,440	881
Warnings	66	208	225	179	162

T571	2018	2019	2020	2021	2022
Violations	422	276	126	99	98
Warnings	32	61	55	31	69

#### Parking in/blocking bike lanes

**P385** – Stop/Stand Bike Lane

P385	2018	2019	2020	2021	2022
Parking violations	1,312	3,034	1,205	3,457	1,123

#### Improperly entering mixing zones

(Note: MPD stated there was no specific violation or violation code for this. Two may apply.)

**T810** – Failure to Yield to Right of Way (ROW) to Bicyclist

**T210** – Fail to Yield ROW

T810	2018	2019	2020	2021	2022
Violation	8	11	13	12	18
Warnings	0	3	1	0	2

T210	2018	2019	2020	2021	2022
Violation	370	350	186	189	129
Warnings	11	47	10	22	8

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## Dooring

### T083 – Open Door to Traffic

T083	2018	2019	2020	2021	2022
Violations	133	126	50	58	45
Warnings	2	5	5	2	1

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## Failure to observe three-foot passing law

*(Note: MPD stated this is challenging to enforce – an officer would have to be able to credibly testify about the distance, possibly while potentially having been in a moving vehicle while observing it.)*

### T219 – Passing a Bicycle Without Caution

T219	2018	2019	2020	2021	2022
Violations	248	190	68	66	66
Warnings	1	28	15	6	13

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## Step-Out Enforcement (see Appendix G for more detail)

*(Note: MPD shared two violation codes that are primarily used.)*

### T107 – No Yield Right of Way

### T759 – Fail to Yield Right of Way to Pedestrian

T107	2018	2019	2020	2021	2022
Violations	1,142	1,150	639	617	516
Warnings	85	226	140	109	104

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T759	2018	2019	2020	2021	2022
Violations	410	437	217	214	645
Warnings	51	110	119	132	232

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## Distracted Driving

**T590** – Distracted Driving

**T591** – Cell Phone Use

**T813** – Mobile Phone in CMV (Commercial Motor Vehicle)

**T915** – Cell Phone Taxi

T590	2018	2019	2020	2021	2022
Violations	245	164	71	105	124
Warnings	46	87	95	72	119

T591	2018	2019	2020	2021	2022
Violations	2,817	2,697	1,107	781	706
Warnings	408	603	591	563	628

T813	2018	2019	2020	2021	2022
Violations	2	14	20	12	20
Warnings	3	11	8	11	19

T915	2018	2019	2020	2021	2022
Violations	187	201	105	193	63
Warnings	50	117	124	90	75

Note: The violation code T814 – Texting in CMV was not included above in the Distracted Driving violations summary because no violations or warnings were issued in 2018-2022.

## Impaired Driving

	2018	2019	2020	2021	2022
Arrest Charges	1,646	1,474	1,099	961	682

See Figure 50 for list of different Impaired Driving charges.

Source: ODCA analysis of MPD data and Vision Zero 2015 Action Plan.

# Appendix G

## Case Study on MPD Step-Out Enforcement

## Appendix G: Case Study on MPD Step-Out Enforcement

Two of MPD's 2015 Vision Zero Action Plan strategies were to perform "step-out" enforcement,<sup>160</sup> yet it was not easy to determine what exactly this enforcement was and how it was tracked by MPD. When first asked what "step-out" meant, some staff were not familiar with the term and not able to immediately define the phrase and it took some back and forth to determine it was the crosswalk decoy operation that officers perform to educate drivers of the need to stop for pedestrians in unsignalized crosswalks and to issue violations to drivers who do not stop, as Figures 52 illustrates.<sup>161</sup>

**Figure 52: Step-Out Enforcement Crosswalk Operation: Officer Steps into Crosswalk (left) and then Officers Issue Violations at Next Block (right)**



Source: ODCA, January 2023. Bladensburg Road NE, Washington, D.C.

We then moved to measure how much step-out enforcement MPD conducted, but this proved difficult, too. Several violations in the MPD data had the words "yield" or "pedestrians" that could be related, but with no MPD policies and procedures clarifying how officers implemented step-out enforcement, we looked to other sources. We found that other than the 2016 progress report,<sup>162</sup> there was incomplete and inconsistent reporting of how often step-out enforcement occurred and how many relevant traffic violations were issued.<sup>163</sup>

MPD confirmed that officers would typically use the violation codes for No Yield Right of Way (ROW) and Fail to Yield ROW to Pedestrian to enforce the step-out operations. Figure 53 below shows that from 2018

<sup>160</sup> See [2015 Action Plan](#), pages 52 and 53, "Continue MPD "Step-Out" enforcement and formally report citation data," and "Reduce distracted driving using regular targeted enforcement and step-out enforcement at high-priority locations (emphasis added)."

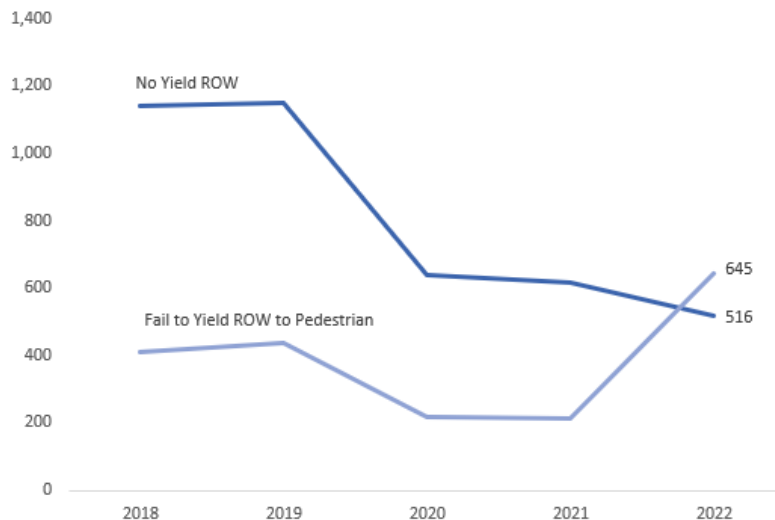
<sup>161</sup> A DMOI representative also confirmed that this was what step-out enforcement meant.

<sup>162</sup> The 2016 Vision Zero Action Plan Progress report reported the number of citations issued "for infractions such as failure to yield to pedestrians in a crosswalk, distracted driving, and crossing without the right-of-way," though not with detailed violation names or codes. See 2016 Progress Report: <https://visionzero.dc.gov/pages/overview#reports>.

<sup>163</sup> MPD's internal Vision Zero reports did not list step-out enforcement, though it listed the violation for Failure to Yield Right-of-Way to Pedestrian. MPD's 2021 annual report included five years (2017-2021) of data for "Colliding w/ or Failure to Yield to Pedestrian/Bike," though it did not mention Vision Zero. MPD, Annual Report 2021, <https://mpdc.dc.gov/node/1590556>, p.35. MPD's 2020 annual report did not include any data for "Colliding w/ or Failure to Yield to Pedestrian/Bike," nor did it mention Vision Zero. MPD, Annual Report 2020, <https://mpdc.dc.gov/node/1569721>, p.30.

to 2020 enforcement of these violations generally decreased, and from 2021 to 2022, as one increased, the other decreased. This could mean one code was switched for another or simply that different officers use different codes, either way it complicates tracking the data on this operation.

**Figure 53: Number of Violations MPD Issued for Step-Out Enforcement: No Yield Right of Way (ROW) and Fail to Yield ROW to Pedestrian, 2018-2022**



**Source: ODCA analysis of MPD data.**

We raise these reporting issues because when we did a ride along with MPD officers, they showcased this operation, as they were proud of it and put a lot of resources into it. During the operation they pulled over many cars - it was highly visible for other drivers and pedestrians thanked officers during the operation. MPD's step-out enforcement was highlighted in a 2017 Washington Post article calling them a "crackdown designed to protect pedestrians," and the International Association of Directors of Law Enforcement Standards and Training (IADLEST) linked to the article on a page of resources for implementing Data Driven Crime and Traffic Safety.<sup>164</sup>

An officer risks his or her life by stepping into the crosswalk to enforce these pedestrian walkways and educate drivers to slow down and stop when someone is waiting to cross. Step-out enforcement reflects the importance of pedestrian safety and is also dangerous for officers and therefore should be monitored to assess ongoing progress and effectiveness.

<sup>164</sup> The Washington Post, "D.C. crackdown aimed at protecting pedestrians—sometimes from themselves," May 16, 2017, <https://www.washingtonpost.com/news/tripping/wp/2017/05/16/d-c-crackdown-aimed-at-protecting-pedestrians-sometimes-from-themselves/>; and IADLEST's listing of Highly Visible Enforcement Strategies which includes "Washington D.C. Pedestrian Safety Strategy," at <https://www.iadlest.org/training/ddacts/documents>.

# Appendix H

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## Selected DPW Data

**Figure 54: Violations DPW Issued to All Vehicles in FYs 2021 and 2022, by Total Number Issued**

Violation Description	Total Issued (FYs 2021–2022)
Failure To Display Current Tags	166,682
No Parking Street Cleaning	152,242
Disobeying Official Sign	146,336
Fail To Display A Multi-space Meter Receipt	135,419
No Parking Anytime	125,809
Residential Permit Parking Beyond Limit w/o Permit	111,470
No Stopping Or Standing In PM Rush Hour Zone	100,393
Park At Expired Meter	98,478
No Standing Anytime	83,371
Unauthorized Vehicle In Loading Zone	72,222
Registered Out Of State Automobile (Rosa)	58,799
No Stopping Or Standing In AM Rush Hour Zone	52,482
No Front Tags	51,400
Relocate Tow Fee	33,375
Park In A Bus Zone	31,943
Parked Within 25 Feet Of A Stop Sign	30,542
Failure To Secure DC Tags	30,080
Park Overtime In Timed Zone	26,935
Park Within 10 Feet Of A Fire Hydrant	24,903
Stand Or Park In Alley	23,773
Fail To Report For Inspection	23,135
Emergency No Parking	22,779
Fail To Display Current Inspection Sticker	21,434
No Stopping Anytime	19,162
Park In A Designated Entrance	16,265
Vehicle On Private/Public Property Without Consent	16,096
Park Within 5 Feet Of Driveway Or Alley	14,971

Violation Description	Total Issued (FYs 2021–2022)
Residential Permit Parking 3rd Offense Calendar Year	12,068
Park Overtime At A Meter	11,344
Individual w/ Disabilities Only Unauthorized Use Reserved Space	11,096
Residential Permit Parking 2nd Offense Calendar Year	10,642
Passenger Loading Zone	10,304
No Stopping Or Standing Anytime	9,715
Park In Reserved Space For Motorcycles Only	7,944
Expiration Time On Meter Receipt Lapsed	7,708
Meter, Fail To Deposit Payment	7,474
Park Abreast Of Another Vehicle	7,307
No Parking Specific Hours	7,022
Obstructing Crosswalk	6,887
Park In Official Parking Permit Only Space	6,445
Parked On Designated Vendor Area	4,947
Park In School Zone	4,789
No Rear Tags	4,402
Stopping, Standing Or Parking Vehicle In Bike Lane	4,133
Park With Left Wheel To The Curb	3,866
Not Parked In A Meter Space	3,763
Park On Taxicab Stand	3,749
Reserved Residential Space Persons W/ Disabilities	2,565
Fail To Display Multi Space Receipt Ballpark Event	2,451
Park Less Than 40 Feet From An Intersection	2,203
No Parking 7 AM To 6:30 PM	2,156
Park On Or Under An Elevated Structure	1,959
Government Vehicle Parking Only	1,937
Expired Inspection Rejection Sticker	1,920
Park On Public Space	1,808

Violation Description	Total Issued (FYs 2021–2022)
Dangerous Vehicle On Private/Public Property Violation 1	1,569
Park Less Than 25 Feet From An Intersection	1,422
Streetcar-Park, Stop Stand Vehicle Guideway/Platform	1,198
Fail To Properly Affix Validation Stickers	1,180
Fail To Display Meter Receipt In A Loading Zone	1,173
Park On Sidewalk Or Area Reserved For Pedestrians	1,148
Parked In Driveway Or Alley To Obstruct Sidewalk	1,115
Park In Reserved Embassy Space	995
Individual w/ Disabilities Meter No Proof Of Payment	941
Park In Median, Island, Or Safety Zone	888
Parked In A Reserved Car Sharing Space	875
RPP Beyond 2 Hour Period w/o Valid Permit Ballpark Zone	718
Park Vehicle In Front Of A Barricade	663
Obstructing Entrance Of Parking Garage, Door Or Gate	522
Park Within 20 Feet Of A Bus Stop Or Zone	514
Park In A Fire Lane	469
Park To Reduce Roadway To Less Than 10 Feet	447
Park More Than 12 Inches From Curb	423
Obstructed Tags	367
Fail To Park Parallel	345
Fail To Display Multi-Space Meter Receipt Properly	319
Abandon Vehicle On Public/Private Property Violation 1	291
Motor Running Unattended	285
Park On Median, Island, Or Safety Zone	284
Opposite Or Beside Construction Site Obstructing Traffic	254
Overtime At Meter Ballpark Event	227
Vehicle > 22' Public Street Front Dwelling, School, Hospital	195
Obstruct An Intersection	131

Violation Description	Total Issued (FYs 2021–2022)
No Parking Except Electric Vehicle Being Charged	122
Park On Sightseeing Stand	118
Valet Parking/Staging Zone	117
Residential Permit Parking Ballpark Zone 2nd Offense Calendar Year	116
Individuals w/ Disabilities Amount Of Payment Has Lapsed	112
Fail To Display Current DC Vehicle Tags	105
RPP Ballpark Zone 3rd Offense Calendar Year	102
Expiration Time On Meter Receipt Lapsed Ballpark Event	96
Trailer, Front Dwelling, School, Hospital	86
Bus Lane, Unauthorized Vehicle Parked In	85
Improper Display Of Tags	83
Expired Handicap Meter	71
Oversized Commercial Vehicle Parked At A Meter	68
Overtime At A Multi-Space Meter In A Loading Zone	54
Veh > 8' Wide Public St, Front Dwelling, School, Hospital	53
Park Between Island Or Safety Zone	43
Deposit Payment To Extend Time Beyond Meter Limit	34
Expired Multi-Space Meter Receipt In Loading Zone	29
Park Within 20 Feet Of A Firehouse Entrance	29
Meter Ball Park Event, Fail To Deposit Payment	26
RPP Beyond 2 Hour Period w/o Valid Permit Ballpark Event	25
Fail To Display Residential Parking Permit	25
Meter Ball Park Event, Deposit Additional Payment	24
Meter Illegal Parking In Ballpark Zone	23
Not Parked In Parking Meter Space Ballpark Zone	21
Unauthorized Use Individual w/ Disabilities Park Private	21
Fail To Display Multi-Space Parking Meter Receipt Ballpark Zone	19
Veh >15 Pass, Public Street Front Dwelling, Sch, Hosp,	17

Violation Description	Total Issued (FYs 2021–2022)
Fail To Remove Expired Residential Parking Permit	17
Not Parked In Parking Meter Space Ballpark Event	16
Dangerous Veh On Private/Public Prop Solid Waste Viol 1	15
Overtime At Meter Ballpark Zone	13
Park In Bus Stop Or Zone During Rush Hour	13
Fail Display Multi Space Receipt Properly Ballpark Event	12
Driver More Than Five Feet From Taxi	11
Vehicle Haul Trash, Debris Or Junk	10
Park On A Lawn	10
Individual w/ Disabilities Parked Beyond Time Limit	10
Parked Less Than 3 Feet From Another Vehicle	10
Park Within Twenty-Five Feet From A Yield Sign	8
Park At Curb In Loading Zone	8
Illegal At Meter Ball Park Event	8
Overtime Ball Park Event	7
Meter Additional Payment To Extend Time Beyond Limit Ballpark Zone	7
No Standing Commercial Vehicle	6
RPP Ballpark Events 2nd Offense Calendar Year	6
Parking On Snow Emergency Route When Prohibited	6
Failure To Display Multi-Space Receipt Properly Ballpark Zone	6
Dangerous Vehicle On Private/Public Property Violation 2	5
Residential Permit Parking 3rd Offense Ballpark Event	5
Illegal At Meter	4
Commercial vehicle- Non Load Zone Meter Space Prohibited Times	4
Excessive Idling	4
Oversized Vehicle At Meter Ball Park Event	4
Abandon Veh Private/Public Property Solid Waste/Rat	3
Fail To Lock And Remove Key From Ignition When Parked	3

Violation Description	Total Issued (FYs 2021–2022)
Park More Than 72 Hours	2
Commercial vehicle - Non Load Zone Meter w/o Annual Or Day Pass	2
Park Within 25 Feet Of A Mailbox	2
Oversized Vehicle At Meter Ballpark Zone	2
Forged Temporary Parking Placard	1
RPP Fail To Remove Expired Sticker Ball Park Zone	1
Dangerous Vehicle On Private/Public Property Violation 3	1
Vending Using Individual w/ Disabilities Park Privileges	1
Abandon Vehicle On Public/Private Property Violation 2	1
Commercial Permit Park Decal, Fail Display Properly	1
Provide False Information To Obtain RPP Permit	1
RPP Improper Use Of Visitor Permit Ballpark Zone	1
RPP Fail To Properly Display Current Sticker Ballpark Event	1
Display Meter Receipt From Meter Outside Area Ballpark Zone	1
<b>Total</b>	<b>1,874,031</b>

Source: ODCA analysis of DMV Data.

Figure 55: Violations Issued to Vehicles DPW Booted in FYs 2021 and 2022, by Total Number Issued

Violation Description	Total Issued (FYs 2021–2022)
Failure To Display Current Tags	14,536
Fail To Display A Multi-space Meter Receipt	12,030
No Parking Street Cleaning	10,889
Disobeying Official Sign	10,171
No Parking Anytime	8,773
Residential Permit Parking Beyond Limit w/o Permit	8,200
Park At Expired Meter	6,774

Violation Description	Total Issued (FYs 2021–2022)
Failure To Secure DC Tags	5,688
ROSA (Registration Out of State Automobile)	5,561
No Standing Anytime	4,988
No Stopping Or Standing In PM Rush Hour Zone	3,735
No Front Tags	3,440
Unauthorized Vehicle In Loading Zone	3,157
Fail To Report For Inspection	3,005
Park Overtime In Timed Zone	2,740
No Stopping Or Standing In AM Rush Hour Zone	2,721
Fail To Display Current Inspection Sticker	2,426
Relocate Tow Fee	2,425
Parked Within 25 Feet Of A Stop Sign	2,072
Park Within 10 Feet Of A Fire Hydrant	1,643
Emergency No Parking	1,630
Park In A Bus Zone	1,467
Residential Permit Parking 3rd Offense Calendar Year	1,265
Park Within 5 Feet Of Driveway Or Alley	1,230
Park Overtime At A Meter	1,204
Stand Or Park In Alley	1,007
Park In A Designated Entrance	929
Vehicle On Private/Public Property Without Consent	895
No Stopping Anytime	892
Meter, Fail To Deposit Payment	763
Residential Permit Parking 2nd Offense Calendar Year	677
Expiration Time On Meter Receipt Lapsed	601
Passenger Loading Zone	549
No Stopping Or Standing Anytime	526
Individual w/ Disabilities Only Unauthorized Use Reserved Space	443

Violation Description	Total Issued (FYs 2021–2022)
Obstructing Crosswalk	419
No Parking Specific Hours	370
Park In School Zone	345
Park Less Than 25 Feet From An Intersection	264
Expired Inspection Rejection Sticker	242
Park In Reserved Space For Motorcycles Only	222
Fail To Display Multi-space Receipt Ballpark Event	219
Not Parked In A Meter Space	219
Park In Official Parking Permit Only Space	214
Park Less Than 40 Feet From An Intersection	212
Park Abreast Of Another Vehicle	185
Fail To Properly Affix Validation Stickers	174
Park On Public Space	171
Parked On Designated Vendor Area	167
Reserved Residential Space Persons w/ Disabilities	162
Stopping, Standing Or Parking Vehicle In Bike Lane	139
Park On Taxicab Stand	138
Individual w/ Disabilities Meter No Proof Of Payment	117
Government Vehicle Parking Only	86
No Parking 7 AM To 6:30 PM	83
Park In Median, Island, Or Safety Zone	71
Streetcar-Park, Stop Stand Vehicle Guideway/Platform	61
Parked In A Reserved Car Sharing Space	58
Park With Left Wheel To The Curb	57
Park On Or Under An Elevated Structure	51
Parked In Driveway Or Alley To Obstruct Sidewalk	47
Residential Parking Permit Beyond 2 Hour Period w/o Valid Permit Ballpark Zone	41
Park In Reserved Embassy Space	37

Violation Description	Total Issued (FYs 2021–2022)
Park Vehicle In Front Of A Barricade	37
Improper Display Of Tags	36
No Rear Tags	36
Park On Sidewalk Or Area Reserved For Pedestrians	32
Obstructing Entrance Of Parking Garage, Door Or Gate	31
Fail To Display Multi-space Meter Receipt Properly	28
Park Within 20 Feet Of A Bus Stop Or Zone	27
Park In A Fire Lane	26
Fail To Park Parallel	23
Fail To Display Meter Receipt In A Loading Zone	22
Park More Than 12 Inches From Curb	21
Park On Median, Island, Or Safety Zone	19
Park To Reduce Roadway To Less Than 10 Feet	17
Dangerous Vehicle On Private/Public Property Violation 1	15
Opposite Or Beside Construction Site Obstructing Traffic	15
Individual w/ Disabilities Amount Of Payment Has Lapsed	13
Obstruct An Intersection	13
Overtime At Meter Ballpark Event	13
Bus Lane, Unauthorized Vehicle Parked In	11
Parking On Snow Emergency Route When Prohibited	11
Fail To Remove Expired Residential Parking Permit	10
Residential Parking Permit Ballpark Zone 3rd Offense Calendar Year	9
Expiration Time On Meter Receipt Lapsed Ballpark Event	8
Expired Handicap Meter	8
No Parking Except Electric Vehicle Being Charged	8
Residential Permit Parking Ballpark Zone 2nd Offense Calendar Year	8
Motor Running Unattended	7
Obstructed Tags	6

Violation Description	Total Issued (FYs 2021–2022)
Abandon Vehicle On Public/Private Property Violation 1	4
Fail To Display Current DC Vehicle Tags	4
Park On Sightseeing Stand	4
Meter Illegal Parking In Ballpark Zone	3
Valet Parking/Staging Zone	3
Deposit Payment To Extend Time Beyond Meter Limit	2
Driver More Than Five Feet From Taxi	2
Fail To Display Multi-Space Parking Meter Receipt Ballpark Zone	2
Meter Ball Park Event, Fail To Deposit Payment	2
Not Parked In Parking Meter Space Ballpark Event	2
Oversized Commercial Vehicle Parked At A Meter	2
Overtime At A Multi-space Meter In A Loading Zone	2
Fail Display Multi Space Receipt Properly Ballpark Event	1
Fail To Display Residential Parking Permit	1
Fail To Lock And Remove Key From Ignition When Parked	1
Failure To Display Multi-Space Receipt Properly Ballpark Zone	1
No Standing Commercial Vehicle	1
Not Parked In Parking Meter Space Ballpark Zone	1
Overtime Ball Park Event	1
Park Within 20 Feet Of A Firehouse Entrance	1
Park Within Twenty-Five Feet From A Yield Sign	1
Vehicle > 8' Wide Public Street, Front Dwelling, School, Hospital	1
<b>Total</b>	<b>134,175</b>

Source: ODCA analysis of DMV and DPW data.

**Figure 56: Violations Issued to Vehicles DPW Towed in FYs 2021 and 2022, by Total Number Issued**

Violation Description	Total Issued
No Parking/Standing PM Rush Hour	8,846
No Parking/Standing AM Rush Hour	8,807
No Parking Street Cleaning	7,110
Emergency No Parking	7,057
Fail To Display Current Tags	2,167
No Parking Zone Anytime	1,925
No Standing Anytime	1,084
Dangerous Veh Public/Private 1st Offense	879
Loading Zone	779
Stop Sign, <25 Ft From	733
Park Within 20 Feet of a Bus Stand or Zone	581
No Tag Rear Display	573
Disobeying Official Sign	524
No Standing Specific Hours	520
No Tag Front Display	465
Streetcar Guideway	401
No Parking Specific Hours	384
Stopping Prohibited By Sign	292
Fire Hydrant, < 10 Feet Of	261
School Zone	180
Alley/Driveway, < 5 Feet Of	170
Courtesy Relocation Tow	145
Public Space	143
No Parking 7am-630pm	140
Crosswalk, Obstructing	127
Abandoned Vehicle Public/Private Property 1st Offense	123
Alley, In	119

Violation Description	Total Issued
Reduce Roadway Width To < 10 Ft	119
Park Abreast Of Another Vehicle	110
Park In Entrance To Designated Building	80
Fail To Report For Inspection	77
Vehicle On Private Property Without Consent	75
Reserved Space Motorcycle	69
Passenger Loading Zone	63
Left Wheel To Curb	62
Intersection, < 40 Feet Of	46
Fail To Display Current DC Vehicle Tags	44
Fail To Display Inspection Sticker	41
Individual w/ Disability Only Unauthorized	34
Reserved Residential Space Disability	33
Bus Stop, <20 Feet Of	30
Taxi/Cab Stand, On	22
Streetcar Platform	22
Barricade, In Front Of	21
Intersection, < 25 Feet Of	20
Excavation/Construction, Alongside Of	19
Park In Official Parking Permit Only Space	18
Delineated By Solid Lines, In	15
Intersection, Obstruction	14
Sidewalk, On	14
No Parking Street Cleaning Warning Only	12
Entrance, Obstruction	11
Vehicle > 22', Public St Front Dwelling, Sch, Hosp	10
Parked In Driveway Or Alley To Obstruct Sidewalk	9
Inspection Rejection Expired	9

Violation Description	Total Issued
Dangerous Vehicle w/ Solid waste/Rat Harborage 1st Offense	7
Bus Stop Zone Rush Hour	6
Fail To Secure DC Tags Or Reciprocity Sticker	6
Dangerous Vehicle Pub/Private 2nd Offense	4
Park More Than 12 Inches From Curb	4
Trailer, Public Street Front Dwelling, School, Hospital	3
Vendor Stand, On	3
Emergency Snow Route, On	3
Bus Lane, Unauthorized Vehicle Parked In	3
Reserved For Car Sharing Vehicle Only	3
Dangerous Vehicle Public/Private 3rd Offense	1
Delineated By Raised Curb	1
Abandoned Vehicle Hazardous Waste/Rat Harborage 1st Offense	1
Fire Station Driveway < 20ft	1
Vehicle > 8' Wide, Public St Front Dwelling, School, Hospital	1
Park On A Lawn	1
<b>Total</b>	<b>45,682</b>

Source: ODCA analysis of DPW data.

# About ODCA

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The mission of the Office of the District of Columbia Auditor (ODCA) is to support the Council of the District of Columbia by making sound recommendations that improve the effectiveness, efficiency, and accountability of the District government.

To fulfill our mission, we conduct performance audits, non-audit reviews, and revenue certifications. The residents of the District of Columbia are one of our primary customers and we strive to keep the residents of the District of Columbia informed on how their government is operating and how their tax money is being spent.

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