



IN REPLY REFER TO:
NCPC FILE No. 7918

MAR 08 2018

Mr. Jeff Marootian
Director
District Department of Transportation
55 M Street, SE
Suite 400
Washington, DC 20003

Re: NCPC Comments on the DDOT Dockless Bikeshare Demonstration Program

Dear Mr. Marootian,

Thank you for providing the National Capital Planning Commission (NCPC) the opportunity to comment on the District Department of Transportation (DDOT) dockless bikeshare system demonstration program. NCPC supports a multi-modal transportation system that includes bicycling, consistent with the policies set forth in the *Comprehensive Plan for the National Capital: Federal Elements*. In our September 15, 2017 comment letter, NCPC requested that DDOT further consult with federal agencies on the demonstration program, given the potential impacts to federal properties. We appreciate your staff's participation in federal stakeholder meetings, discussions, and coordinating with vendors.

Through the demonstration program, we understand that DDOT is considering permanently allowing dockless bicycles on public space administered by DDOT. In absence of clear guidelines, dockless bicycles impact federal resources, including security and access, and can be inconsistent with existing federal regulations and guidelines. It is critical that DDOT continues to work directly with the federal agencies to address federal concerns and issues. We request further clarification on how the vendors will ensure successful integration of the dockless bikeshare system within Washington, DC and region in the future. This comment letter summarizes verbal and written concerns from federal agencies and provides NCPC staff recommendations on the demonstration program.

Based on our research and coordination regarding the dockless bikeshare demonstration program, we believe a permanent program may improve mobility, access to destinations, and recreational opportunities. However, prior to commencing such a program, it is important to thoroughly review and determine how these issues will be effectively addressed among all stakeholders, including the District of Columbia, federal partners, and prospective vendors. We need to ensure that a permanent program would be successfully implemented by the vendors over the long-term.

Background

As the seat of the federal government and the symbolic center of the nation, the federal government maintains a significant percentage of land and attractions in the Nation's Capital. The City is home to some of the nation's most important cultural and historic national resources including the National Mall, US Capitol, White House, federal buildings, Smithsonian Institution museums, and memorials. Citizens and visitors expect to access and utilize these facilities, whether employment, recreational, or tourist. As the number of residents and visitors to the City continues to increase, it is important to improve access and mobility to these destinations.

Most agencies have regulations or guidelines relevant to bicycling. NCPC compiled a sampling of these regulations that would apply to dockless bicycles (See Appendix). While not a comprehensive account, it nonetheless demonstrates DDOT needs to further explore and clarify the permissions included in the dockless bicycle program.

While providing a new transportation mode for users, dockless bicycles have also negatively impacted federal government operations, and diverted limited resources away from mission-critical activities. Due to the dockless nature of the program, federal agencies have particularly expressed concerns with parking. Dockless bicycles have been parked in inappropriate locations on federal property throughout the demonstration program, in part due to a lack of permanent infrastructure associated with the system. When dockless bicycles are left in a manner that is inconsistent with federal regulations or guidelines, property managers and security officers have to address them through removal or other measures.

Dockless bicycles are particularly problematic when they pose a potential security threat to visitors, employees, or federal property. Such concerns have emerged at several facilities, including the White House, US Capitol, and Pentagon. US Secret Service personnel indicated dockless bicycles constitute a nuisance when they are left unattended in or adjacent to protected zones, warranting a response from officers and diverting valuable resources away from security operations. Federal agencies have conveyed that improper parking can result in temporary closure of areas causing disruptions.

Recommendations

Given the variety of substantial ongoing concerns with the demonstration program, NCPC staff has developed recommendations for dockless bicycles concerning federal property. We recommend incorporating the following elements into the District of Columbia's regulatory system and/or vendor contracting requirements:

- Dockless bicycles shall be parked in bicycle racks or areas otherwise designated for public bicycle parking on federal land. The District of Columbia should work with stakeholders to identify additional designated bicycle parking areas on or near federal property.
- Entrances to buildings, driveways, sidewalks, loading platforms, fire hydrants, and bus loading/unloading areas shall remain fully accessible.
- As articulated in current National Park Service regulations, bicycles are allowable on sidewalks outside of the memorials; however, users must walk their bicycles through the memorials. Dockless bicycles should be parked in the bicycle racks at each monument and memorial.
- Dockless bicycles parked on federal property and left unattended for longer periods than allowed, may be impounded by the property owner/manager/superintendent, or security officer.
- The District of Columbia and vendors should work with the appropriate federal stakeholders to identify the costs and responsible parties associated with removing bicycles that are parked in inappropriate locations on federal property.
- Dockless bicycles are not allowed on secured federal campuses, except in locations designated as appropriate in accordance with conditions established by the property owner, manager, or superintendent.
- In coordination with vendors, the District of Columbia should specifically work with federal agencies that have special security needs to facilitate regulatory and public educational solutions.
- The District of Columbia should coordinate with adjacent jurisdictions regarding dockless bicycles that leave the jurisdictional limits of Washington, DC.

Conclusion

Prior to any expansion or implementation of a permanent dockless bicycle system, we request that DDOT and vendors develop terms and conditions to effectively address the above listed concerns, including by means of public education, improved infrastructure, regulatory standards, and enforcement. This will help minimize disruptions at federally-owned facilities, avoid impoundment, and reduce costs, while improving the transportation system, recreational opportunities and access to civic destinations.

Mr. Jeff Marootian

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Specifically, we suggest developing a Memorandum of Agreement between the District of Columbia, vendors, and the appropriate federal stakeholders to document agreed terms and conditions, including restricted areas, designated bicycle parking areas, vendor penalties, and any other dockless bikesharing restrictions.

NCPC staff appreciates DDOT's effort to coordinate the dockless bikeshare demonstration program with the federal government and look forward to bringing the process to resolution. We are prepared to help DDOT identify regulations, standards, and provisions to address the federal issues and concerns noted above. If you have any questions, please contact Kael Anderson at 202-482-7273.

Sincerely,

A handwritten signature in dark ink, appearing to read "Marcel Acosta", written in a cursive style.

Marcel Acosta
Executive Director

Appendix

cc: Mr. Sam Zimbabwe, District Department of Transportation
Ms. Tammy Stidham, United State Department of Interior, National Park Service
Mr. Dawud Abdur-Rahman, United States General Services Administration
Ms. Anne Trowbridge, Smithsonian Institution
Mr. Frederick Lindstrom, United States Commission of Fine Arts

Federal Properties with Bicycle Regulations/Guidelines

Note: Many federal agencies have individual regulations and guidelines relevant to bicycling on their property. NCPC compiled a sampling of these regulations with a map indicating where these regulations would apply (see page 8). This is not a comprehensive list of federal regulations pertinent to bicycles.

Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
1	United States Capitol Grounds <i>(Architect of the Capitol and U.S. Capitol Police)</i>	Traffic Regulations for the United States Capitol Grounds Promulgated by the Capitol Police Board § 13.6 Parking and Securing Bicycles Amended July 28, 2017	<u>§ 13.6. PARKING AND SECURING BICYCLES</u> §13.6.10. PERMISSIBLE BICYCLE PARKING No person shall park his bicycle on Capitol Grounds in any place other than a bicycle rack or other area designated specifically for the parking of bicycles. §13.6.20. PARKED BICYCLES Any bicycle parked in a parking garage or secured designated staff parking lot must have a valid permit issued by the Senate Committee on Rules and Administration or the Committee on House Administration. Any bicycle parked in any other public parking area, including a bicycle rack, does not need to have a permit. §13.6.30. TWENTY-FOUR HOUR TIME LIMITATION A person may secure a bicycle in accordance with the provisions of this chapter for a period of not more than twenty-four (24) consecutive hours, by means of a lock or similar device, in accordance with the requirements of this chapter. Any bicycle secured in excess of twenty-four (24) consecutive hours may be seized by the U.S. Capitol Police. §13.6.40. SECURED BICYCLE CANNOT IMPEDE TRAFFIC A person may secure a bicycle in accordance with the provisions of this chapter by means of a lock or similar device as long as securing the bicycle does not obstruct or unduly impede traffic or pedestrian movement and as long as securing bicycles has not been forbidden by any signage or notice. §13.6.50. SECURING BICYCLES PROHIBITED IN CERTAIN AREAS No person shall secure a bicycle to any of the following publicly-owned facilities: a. Fire hydrants; b. Police and fire call boxes; c. Electric traffic signal poles; d. Fences; e. Stanchion, bollard or any publicly-owned pole or post used as support; f. Tree, shrub or plant; g. Bench, fountain, fixture or object temporarily or permanently attached or appended to any structure or building; §13.6.60. BUILDINGS AND IMPROVED AREAS No person shall park a bicycle: a. Upon a highway other than the roadway against the curb; or b. Upon a sidewalk, against a building or any other fixture or improved area not specifically designated by this chapter. §13.6.70. TAMPERING PROHIBITED No person shall tamper with any bicycle that has been locked, placed in a bicycle rack or otherwise secured.

Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
			<p><u>§ 15.4. MOTORIZED BICYCLES</u></p> <p>§15.4.10. MINIMUM AGE No motorized bicycle shall be operated upon any public space on Capitol Grounds by any person who is less than sixteen (16) years old.</p> <p>§15.4.20. SIDEWALKS No person shall operate a motorized bicycle on any sidewalk, path or bicycle route on Capitol Grounds.</p> <p>§15.4.30. ROADWAY A motorized bicycle may be operated on any part of a roadway designated for the use of bicycles.</p> <p>§15.4.60. CARRYING ARTICLES No person shall operate or ride a motorized bicycle while carrying any package, bundle, or article which prevents the operator from keeping at least one hand on the handle bars.</p> <p>§15.4.70. WARNING DEVICE No person operating a motorized bicycle shall sound any warning device at any intersection so as to interfere with the obedience to the instructions of official traffic control signals or to the directions of a police officer.</p> <p>§15.4.80. NO CLINGING No person riding upon a motorized bicycle shall attach himself, herself or the device upon which he or she is riding, to another bicycle, low-speed vehicle or play vehicle or any other vehicle.</p> <p>§15.4.90. RIDING ABREAST Persons riding upon a roadway shall not ride more than two abreast except on paths or part of roadways set aside for the exclusive use of bicycles. Persons riding two abreast shall not impede the normal and reasonable movement of traffic and, on a lane roadway, shall ride within a single lane.</p> <p>§15.4.100. YIELD TO PEDESTRIANS IN CROSSWALK A person operating a motorized bicycle while crossing a roadway in a crosswalk shall have all the rights and duties applicable to a pedestrian under the same circumstances, except that they must yield to pedestrians on the sidewalk or crosswalk.</p> <p>§15.4.120. EMERGING AND ENTERING The operator of a motorized bicycle emerging from or entering an alley, driveway, or building shall yield the right-of-way to all pedestrians upon approach to the sidewalk or the sidewalk area extending across any alleyway. Upon entering the roadway, the operator shall yield the right-of-way to all vehicles approaching on said roadway to the extent necessary to safely enter the flow of traffic.</p>

Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
			<p>§15.4.130. OVERTAKING AND PASSING</p> <p>a. A person operating a motorized bicycle may overtake and pass another vehicle only under conditions which permit the movement to be made with safety.</p> <p>b. A person operating a motorized bicycle may overtake and pass other vehicles on the left or right side, staying in the same lane as the overtaken vehicle, or changing to a different lane, or riding off the roadway, as necessary to pass with safety.</p> <p>c. If a lane is partially occupied by vehicles that are stopped, standing, or parked in that lane, a person operating a motorized bicycle may ride in that or in the next adjacent lane used by vehicles proceeding in the same direction.</p> <p><u>§ 16.11. RESTRICTED VEHICLES</u></p> <p>§16.11.10. COMMERCIAL AND AGRICULTURAL VEHICLES</p> <p>No person shall operate any commercial, recreational, agricultural, construction vehicle or truck on any street, highway, or driveway within Capitol Grounds, except while actually transacting business at the Capitol Buildings, provided that the vehicle is essential to the transaction. That transaction must involve an administrative, housekeeping or support function or duty necessary to the maintenance of the Capitol Buildings or an official function of the United States Congress. All such vehicles must be security screened through the United States Capitol Police Off-Site Delivery Center, or such other screening security as determined by the Board.</p> <p><u>§ 16.12. SALE OF GOODS, COMMERCIAL ACTIVITY AND SOLICITATION</u></p> <p>§16.12.30. COMMERCIAL ADVERTISING</p> <p>No person shall display, place or maintain a sign, placard, or other form of advertisement unless officially authorized to do so.</p>
		Title 40 - PUBLIC BUILDINGS, PROPERTY, AND WORKS Chapter 51 - UNITED STATES CAPITOL BUILDINGS AND GROUNDS	<p><u>§ 5104 - Unlawful activities</u></p> <p>(c) Sale of Articles, Display of Signs, and Solicitations.—A person may not carry out any of the following activities in the Grounds:</p> <p>(1) offer or expose any article for sale.</p> <p>(2) display a sign, placard, or other form of advertisement.</p> <p>(3) solicit fares, alms, subscriptions, or contributions.</p>

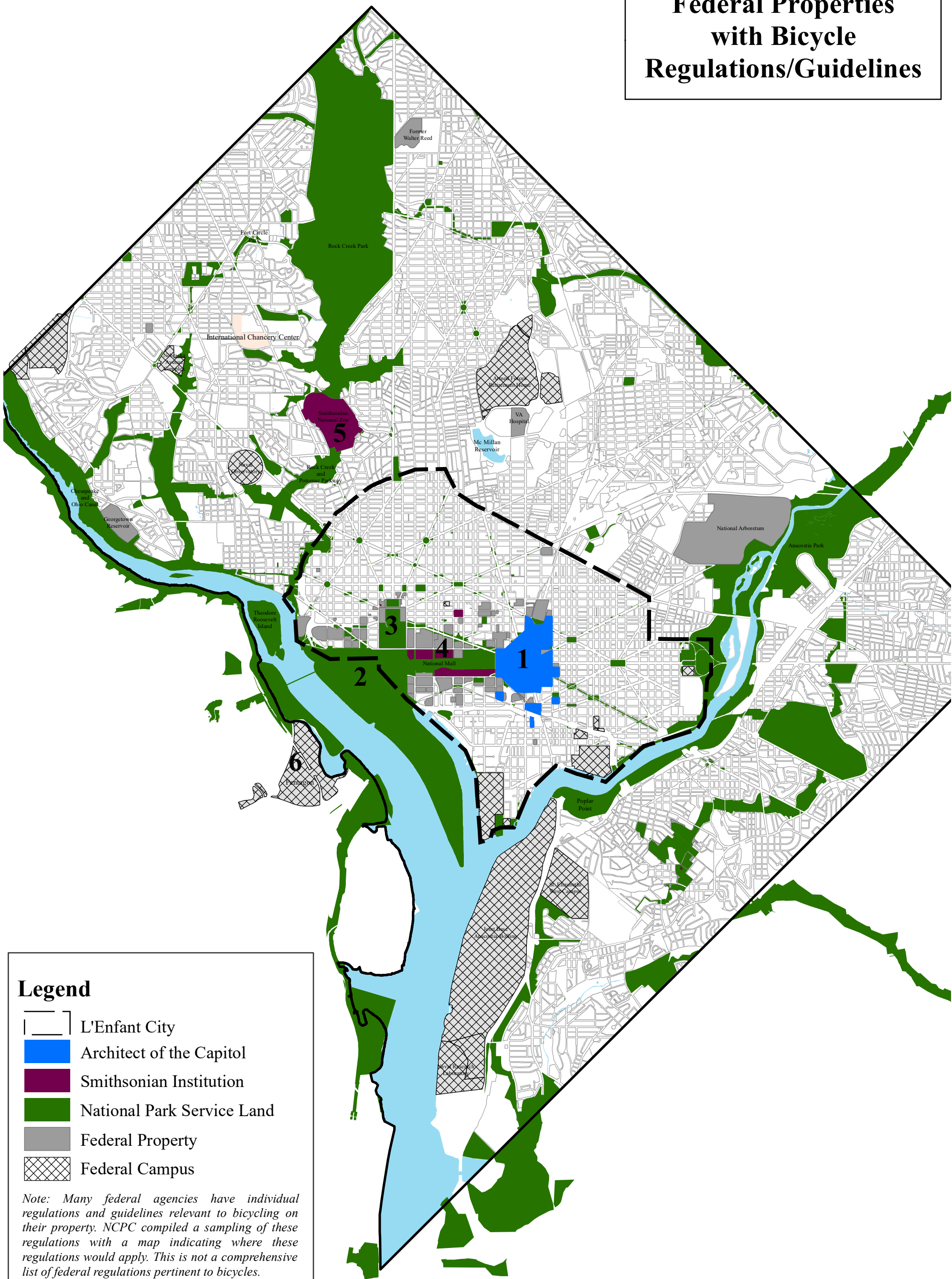
Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
2, 3	National Park Service Land <i>(U.S. National Park Service, U.S. Park Police, and U.S. Secret Service)</i>	Title 36 – Parks, Forests, and Public Property	<u>§ 2.22 Property</u> (a) The following are prohibited: (1) Abandoning property. (2) Leaving property unattended for longer than 24 hours, except in locations where longer time periods have been designated or in accordance with conditions established by the superintendent. (3) Failing to turn in found property to the superintendent as soon as practicable.
		Chapter I – National Park Service, Department of the Interior	(b) <i>Impoundment of property.</i> (1) Property determined to be left unattended in excess of an allowed period of time may be impounded by the superintendent. (2) Unattended property that interferes with visitor safety, orderly management of the park area, or presents a threat to park resources may be impounded by the superintendent at any time.
		Part 2 – Resource Protection, Public Use and Recreation	
		§ 2.22 Property	
		§ 4.30 Bicycles	<u>§ 4.30 Bicycles</u> (a) Park roads. The use of a bicycle is permitted on park roads and in parking areas that are otherwise open for motor vehicle use by the general public. (b) Administrative roads. Administrative roads are roads that are closed to motor vehicle use by the public, but open to motor vehicle use for administrative purposes. The superintendent may authorize bicycle use on an administrative road. (d) Existing trails. The superintendent may authorize by designation bicycle use on a hiking or horse trail that currently exists on the ground and does not require any construction or significant modification to accommodate bicycles. (f) Closures and other use restrictions. A superintendent may limit or restrict or impose conditions on bicycle use or may close any park road, parking area, administrative road, trail, or portion thereof to bicycle use, or terminate such condition, closure, limit or restriction after taking into consideration public health and safety, natural and cultural resource protection, and other management activities and objectives; (g) Other requirements. (1) A person operating a bicycle on any park road, parking area, administrative road or designated trail is subject to all sections of this part that apply to an operator of a motor vehicle, except §§ 4.4, 4.10, 4.11, 4.14, and 4.15. (h) Prohibited acts. The following are prohibited: (1) Bicycle riding off of park roads and parking areas, except on administrative roads and trails that have been authorized for bicycle use. (2) Possessing a bicycle in a wilderness area established by Federal statute. (3) Operating a bicycle during periods of low visibility, or while traveling through a tunnel, or between sunset and sunrise, without exhibiting on the operator or bicycle a white light or reflector that is visible from a distance of at least 500 feet to the front and with a red light or reflector that is visible from at least 200 feet to the rear. (4) Operating a bicycle abreast of another bicycle except where authorized by the superintendent. (5) Operating a bicycle while consuming an alcoholic beverage or carrying in hand an open container of an alcoholic beverage. (6) Any violation of State law adopted by this section.

Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
2	National Park Service Land – National Mall and Memorial Parks <i>(U.S. National Park Service and U.S. Park Police)</i>	National Mall and Memorial Parks Superintendent's Compendium, CODE OF FEDERAL REGULATIONS TITLE 36, CHAPTER 1 December 13, 2006	<u>D) Transportation or Vehicles in National Mall and Memorial Parks</u> 2) Motorized Personal Mobility Devices. Unless operated by a person with a disability, motorized personal mobility devices may only operate on sidewalks or multi-use trails in the following locations: a) On the National Mall and Memorial Parks adjacent to 3rd, 4th, 7th, and 14th Streets and between Constitution and Independence Avenues NW; b) Along Pennsylvania Avenue from 3rd to 15th Streets NW, including Freedom Plaza; c) Along Ohio Drive SW between East Basin Drive and the entrance of East Potomac Golf Course d) National Mall route; e) West Potomac Park loop. These designated park sidewalk routes are more fully described in the National Mall and Memorial Parks Record of Determination for Segways® or other motorized personal mobility devices - Authorized Route map dated March 22, 2010. This is available on the park website at nps.gov/nama or by writing the park superintendent. Users of motorized personal mobility devices must also adhere to the following operating standards, most of which are also required under District of Columbia regulations on safe use of electric personal assistive mobility device: <ul style="list-style-type: none">No person under 16 years of age may operate a motorized personal mobility device.A person shall operate any motorized personal mobility device in a safe and non-hazardous manner so not to endanger oneself or any other person. The maximum speed of the motorized personal mobility device will not exceed more than 8 M.P.H.Motorized Personal Mobility Devices should be parked alongside the bicycle racks at each Monument and Memorial (see attached Appendix B for a map providing these locations). 4) Bicycles. a) 36 CFR 4.30 prohibits the use of bicycles except on park roads, in parking areas, and on routes designated for bicycle use. Bicycles are allowable on sidewalks outside of the memorials; however, bicycle users must walk their bicycles through the memorials and along Tidal Basin walks. Bicycles are not allowed on the steps, colonnades, or within the chambers of District of Columbia War Memorial, Lincoln, and Thomas Jefferson memorials, nor allowed inside the Washington Monument. b) Commercial or guided bicycle groups are not permitted in any 36 CFR 7.96 restricted area. c) Bicycles should be parked in the bicycle racks at each Monument and Memorial (see attached Appendix B for a map providing these locations). 5) No Vehicles on Turf. No unauthorized vehicles (including golf carts, carts, trucks, bicycles) are allowed to drive or park on park turf.

Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
3	National Park Service Land – President’s Park <i>(U.S. National Park Service and U.S. Secret Service)</i>	President’s Park 2017 Superintendent’s Compendium October 1, 2017	<u>C. Public Use Limitations</u> 6). Rollerblades, skates, skateboards, bicycles. Pursuant to 36 CFR 1.5, 2.20, 4.30, rollerblades, skates, skateboards, bicycles are permitted on roadways and most sidewalks in the park except for the White House sidewalk and the interior sidewalks of First Division Monument, Sherman Park and Lafayette Park, to ensure pedestrian safety and to protect park resources.
		Title 36 – Parks, Forests, and Public Property Chapter I – National Park Service, Department of the Interior, Part 7 Special Regulations of the National Park System § 7.96 National Capital Region	<u>§ 7.96 NATIONAL CAPITAL REGION</u> (viii) No parcel, container, package, bundle or other property shall be placed or stored on the White House sidewalk or on the west sidewalk of East Executive Avenue NW., between Pennsylvania Avenue NW., and E Street NW., or on the north sidewalk of E Street NW., between East and West Executive Avenues NW.; Provided, however, that such property, except structures, may be momentarily placed or set down in the immediate presence of the owner on those sidewalks. (ix) The following are prohibited in Lafayette Park: (A) The erection, placement or use of structures of any kind except for the following... (4) For the purpose of this section, the term “structure” includes props and displays, such as coffins, crates, crosses, theaters, cages, and statues; furniture and furnishings, such as desks, chairs, tables, bookcases, cabinets, platforms, podiums and lecterns; shelters, such as tents, boxes and other enclosures; wagons and carts; and all other similar types of property which might tend to harm park resources including aesthetic interests. Provided however that the term “structure” does not include signs; bicycles, baby carriages and baby strollers lawfully in the Park that are temporarily placed in, or are being moved across, the Park, and that are attended at all times while in the Park (the term “attended” is defined as an individual being within three (3) feet of his or her bicycle, baby carriage or baby stroller); and wheelchairs and other devices for the handicapped in use by handicapped persons.
4	Smithsonian Institution Buildings and Grounds <i>(Smithsonian Institution)</i>	36 CFR - Parks, Forests, and Public Property Part 504 – Rules and Regulations Governing Smithsonian Buildings and Grounds	<u>§ 504.13 Vehicular and pedestrian traffic.</u> (a) Drivers of all vehicles in or on the premises shall drive in a careful and safe manner at all times and shall comply with the signals and directions of the guards and all posted traffic signs. (b) The blocking of entrances, driveways, walks, loading platforms, or fire hydrants in or on property is prohibited. Parking without authority, or parking in unauthorized locations or in locations reserved for other persons or contrary to the direction of posted signs, is prohibited. This paragraph may be supplemented from time to time by the issuance and posting of such additional traffic and parking directives as may be required, and such directives shall have the same force and effect as if made a part thereof.

Map Number (see pg. 8)	Federal Property	Regulations/Guidelines	
5	National Zoological Park of the Smithsonian Institution <i>(Smithsonian Institution)</i>	36 CFR - Parks, Forests, and Public Property Part 520 – Rules and Regulations Governing the Buildings and Grounds of the National Zoological Park of the Smithsonian Institution	<u>§ 520.14 Vehicular and pedestrian traffic.</u> (a) Drivers of all vehicles in or on the premises shall drive in a careful and safe manner at all times and shall comply with the signals and directions of the police and all posted traffic signs. (b) The blocking of entrances, driveways, walks, loading platforms, or fire hydrants in or on property is prohibited. Parking without authority, or parking in unauthorized locations or in locations reserved for other persons or contrary to the direction of posted signs, is prohibited. This paragraph may be supplemented from time to time by the issuance and posting of such additional traffic and parking directives as may be required, and such directives shall have the same force and effect as if made a part thereof.
		Park Rules (available at: https://nationalzoo.si.edu/visit/park-rules)	Self-propelled wheeled devices such as scooters, bicycles, skate boards, wheelie shoes and other such devices may not be ridden within the Zoo.
6	Pentagon Reservation <i>(Department of Defense, Washington Headquarters Service)</i>	The Pentagon Transportation Management Plan April 2015	There are a number of bicycle parking locations throughout the Pentagon Reservation. The largest of these is in the south accessible parking area just outside Corridor 2. Throughout the Pentagon Reservation there are approximately 46 bicycle racks with space for 680 bicycles. For security reasons, bicycle parking on the Reservation is reserved for Pentagon employees/DoD badge holders only. Along with the additional employee bike racks, WHS will install a public bike rack at the Hayes Street Parking Lot as part of the Pentagon South Pedestrian Safety Project. Note: currently there is no timeline available on when this project will begin.
		Title 32 – National Defense § 234 Conduct On The Pentagon Reservation	<u>§ 234 CONDUCT ON THE PENTAGON RESERVATION</u> § 234.1. DEFINITIONS Vehicle. Any vehicle that is self-propelled or designed for self-propulsion, any motorized vehicle, and any vehicle drawn by or designed to be drawn by a motor vehicle, including any device in, upon, or by which any person or property is or can be transported or drawn upon a highway, hallway, or pathway; to include any device moved by human or animal power, whether required to be licensed in any state or otherwise. § 234.18 — ENFORCEMENT OF PARKING REGULATIONS Parking regulations for the Pentagon Reservation shall be enforced in accordance with the Pentagon Reservation Parking Program and State law; violating such provisions is prohibited. A vehicle parked in any location without authorization, or parked contrary to the directions of posted signs or markings, shall be subject to removal at the owner's risk and expense, in addition to any penalties imposed. The Department of Defense assumes no responsibility for the payment of any fees or costs related to such removal which may be charged to the owner of the vehicle by the towing organization. This section may be supplemented from time to time with the approval of the Director, Washington Headquarters Services, or his designee, or the Installation Commander, by the issuance and posting of such parking directives as may be required, and when so issued and posted such directive shall have the same force and effect as if made a part hereof.

Federal Properties
with Bicycle
Regulations/Guidelines



Legend

- L'Enfant City
- Architect of the Capitol
- Smithsonian Institution
- National Park Service Land
- Federal Property
- Federal Campus

Note: Many federal agencies have individual regulations and guidelines relevant to bicycling on their property. NCPC compiled a sampling of these regulations with a map indicating where these regulations would apply. This is not a comprehensive list of federal regulations pertinent to bicycles.

This map is being provided for information and illustrative purposes only. It does not reflect an official position or conclusion of the National Capital Planning Commission. No conclusions or decisions to act or refrain from acting should be made based on this map without conducting an independent analysis with reference to the original source information.

