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COUNCIL MEMBER, 26TH DISTRICT, QUEENS

September 11, 2025

Honorable Ydanis Rodriguez, Commissioner
NYC Department of Transportation (DOT)
55 Water Street
New York, NY 10041

Dear Commissioner Rodriguez,

Thank you for your August 11, 2025 response (DOT-703820-Z5S3) to my June 26 letter regarding DOT's daylighting report. While I appreciate the time your agency dedicated to responding, many of your responses left more questions than answers, providing minimal information to justify the DOT's methodology. Therefore, I respectfully ask that DOT respond to the following points and questions:

1. Multiple peer-reviewed research studies have shown the benefits of daylighting and the safety risks of vehicles parked in intersections, which your report fails to address.
 - a. [A study from Montreal](#) – a city with similar pedestrian density characteristics to NYC – found that parking within 5 meters (16 feet) of an intersection increased pedestrian injuries "significantly" at all types of intersections.
 - i. Notably, the study states: "The results show that besides traffic and pedestrian volumes, intersection characteristics contribute to pedestrian injuries. The reduction of traffic lanes, parking prohibition near intersections and implementation of appropriate pedestrian refuge areas would improve pedestrian safety."
 - ii. It is important to note that this study uses 1999-2008 data, at a time when vehicles were also much smaller and visibility was not nearly as poor as it is today due to SUVs with significantly higher hood height.
 - b. A separate study found that [the role of the physical and traffic environment has a significant impact on child pedestrian injuries, notably the design of intersections:](#)
 - i. "The association of vehicles parked on the street with pedestrian injury risk remained significant...The results of this analysis would indicate that residential streets with a high proportion of multifamily residence, over 50% of the curb occupied with parked vehicles, and a large number of pedestrians observed in unenclosed areas should receive high priority for intervention programs to reduce pediatric pedestrian injuries. The analysis

suggests that on these streets, measures to reduce the amount of street parking (thus increasing visibility) and reductions in vehicular speed should be considered to decrease pedestrian injuries.”

- ii. “In a case–control study of child pedestrian injuries, the number of parked vehicles was the strongest risk factor on residential streets.”
 - c. Lastly, [this study](#) from Hong Kong, a city denser than NYC, found that “...the presence of curb parking close to intersections was associated with an elevated risk of pedestrian crashes. Based on our results, if curb parking were allowed at a crossing area, the risk of pedestrian crashes would increase by about 20%. Although on-street parking can provide friction to slow vehicles and act as a buffer for pedestrians, the vehicles parked on the streets indeed obscure vision between motorists and pedestrians. One direct countermeasure is to restrict on-street parking, especially at peak hours with heavy pedestrian activities.”
 2. Your response on the methodology’s use of bus stops as a sufficient proxy is evasive and insufficient, as you state: “for this broader look, we used hydrant zones and bus stops as proxies for non-hardened daylighting as they mimic, and may even exceed, the levels of no-parking compliance in non-hardened daylight zones.” Yet, multiple studies discredit the use of bus stop data for a study such as this.
 - a. The aforementioned Montreal study found that intersections with bus stops, even when controlled for characteristics, have higher crash rates than otherwise similar nearby intersections without bus stops. This directly calls into question your bus stop "daylighting" findings as a comparable metric.
 - b. [Another study found](#) that bus stops on approach to an intersection (the type named in DOT’s report) are more dangerous than ones located after the intersection, showing that the blocked visibility of buses is the primary issue, not the act of daylighting an intersection:
 - i. “In addition, relocating bus stops from the near side to the far side of intersections can increase the visibility and conspicuity of pedestrians by decreasing the number of pedestrians who enter the roadway in front of a stopped bus. It has been shown that bus stop relocation significantly decreases the percentage of pedestrians who enter the roadway in front of a stopped bus at signal controlled intersections.”
 - c. Why does DOT rely on such a data-faulty method to make a generalized assessment in the study, when past research has shown daylight intersections are categorically different from bus stops? Relying on such disparate data metrics is misleading and harmful.
 3. Your response regarding the statistical analysis of the hydrant zone data (comment #4) further emphasizes the problems with this approach:

- a. Contrary to DOT's claim in your response, DOT's footnote on page 33 states "*Other outcome variables studied but discarded due to redundancy and lack of statistical significance.*" Is this footnote incorrect? Regardless, this answer indicates a misunderstanding of what "exploratory" analysis entails. DOT can do a *pilot study* to explore different variables to then inform a subsequent study on an *entirely separate and independent dataset* in which you do your actual hypothesis testing. In this second study DOT could then indeed focus on the variables that the pilot study suggested were the most relevant. That, however, is not what DOT did here. DOT cannot "explore" variables in the same dataset, pick the ones you like, and then only report statistics on those. This is called [double dipping](#) or [p-hacking](#) and is a big statistical faux pas. Given the far-reaching implications of the study, this is simply irresponsible. Since DOT "explored" these other variables in the current dataset, DOT must include the total number of tests done in your multiple comparisons correction.
 - b. "*Given the overwhelmingly statistically significant, homogenous nature of our hydrant zone findings, we did not believe that a GLM would advance the goals of the study.*" Was it considered that the "overwhelmingly statistically significant" results are due to your use of hundreds of t-tests (see above) without correcting for the family-wise error rate here? This is exactly why DOT should have used a GLM or similar approach.
 - c. Multiple comparisons correction is not optional, and this is not a matter of preference or opinion. Since DOT does not report actual statistics here (when reporting results of a t-test, the standard is to report t-value, df, and p-value), nor your correction factor, it is impossible to evaluate any of these results. And this is on top of the major concerns regarding the dataset itself and the overall analysis approach.
4. Your response regarding the statistical analysis of the before/after study (comments #5 and #8) further emphasizes the problems with this approach:
- a. If sample sizes are too small, DOT should not compute inferential statistics. Descriptive statistics would have been fine, with a note that the sample sizes were insufficient to compute reliable inferential statistics on the subgroups, but DOT cannot present these flawed results and then draw main conclusions from them. Moreover, it does not appear DOT applied multiple comparisons correction anywhere here, when DOT absolutely should have.
 - b. "*No statistical claims were made regarding subgroup comparisons. Report p. 41 and 43 make an informal reference to one subgroup finding being "higher" than the full hardened daylighting finding.*"
 - i. This "informal reference" is not supported by DOT's own results, as DOT did not perform the required analysis. DOT cannot simply look at these values and claim they are different. The appropriate statistical analysis

here would have been an ANOVA directly comparing the groups (this could then have been followed with post hoc t-tests to compare the individual groups). However, before DOT does that, it would have to resolve several critical issues, including 1) that neckdowns are already included in the hardened daylighting group (i.e., the groups as currently defined are not even independent), 2) that these groups have very different sample sizes, and 3) that the neckdown group is severely underpowered.

- ii. Further, it is misleading to now characterize this statement as an “informal reference”, when on page 2 of the report DOT presents it as one of your three main findings: “*Hardened daylighting (...) had a statistically significant safety benefit with relation to pedestrian injuries, **but was less effective than other street safety treatments.***”

DOT used this neckdown subgroup result (with an uncorrected p-value of 0.02 and worryingly small sample size, and without performing the appropriate statistical comparison) to discredit the positive effect of hardened daylighting. (It is unclear what “other treatments”, plural, even refers to here, since even in DOT’s own uncorrected analysis only neckdowns have a significant p-value.) DOT cannot have it both ways. Either DOT made “no statistical claims” and only made an “informal reference”, but then this conclusion cannot feature in the executive summary as a main finding of the study.

Given that DOT has used its report to publicly oppose universal daylighting, a safety measure which is embraced by 44 states—including New York, it is imperative that the above questions and points be addressed. Further, I recommend that DOT retract or publish an addendum to its report that clarifies that a more rigorous study should be conducted before conclusions can be inferred from the existing data.

Thank you for your time and attention to this important matter. I request a response in writing by October 1, 2025.

Sincerely,



Council Member Julie Won
26th District
New York City Council