



WalkBoston

June 28, 2006

Commissioner Luisa Paiewonsky
Massachusetts Highway Department
10 Park Plaza, Suite 3170
Boston, MA 02116

Attn: Bonnie Polin, MHD Project Manager
Casey Woodley, Cambridge Systematics Project Manager

Dear Commissioner Paiewonsky:

WalkBoston is pleased to comment on the Guiding Principles for the Massachusetts Highway Safety Plan (MHSP) and believes that the moment is ripe for Massachusetts to emphasize the safety of pedestrians as a fundamental element of our transportation system. We look forward to fuller specifics in the final document about strategies that the Commonwealth will take to make our roadways and sidewalks safer for pedestrians. We met with MHD and Cambridge Systematics staff on June 26th and were pleased that many of the comments contained in this letter were well received, and will likely be included in future versions of the document.

Massachusetts is one of 30 states participating in the development and implementation of State Comprehensive Highway Safety Plans. In light of Massachusetts' path-breaking Project Development & Design Guide, we hope that the State will be equally strong in addressing pedestrian safety.

To that end, we request that the MHSP draft principles be improved by adopting the following underlying goal for pedestrian safety:

Design and manage the roadway system (through design speed, signals, intersection geometry, sidewalks, crosswalks, roadway design, etc.) to reduce the risks to pedestrians and reduce pedestrian fatalities and injuries.

Principles and strategies that would give real meaning to this goal fall into the six basic areas outlined below:

Spending – Dedicate a portion of the state's safety spending for pedestrians that is proportional to their fatality rate (approximately 17% of traffic fatalities are pedestrians). Among the strategies that should be pursued are:

- Create a line item for pedestrian improvements, including safety improvements to hazardous pedestrian locations, in the state's transportation budget.
- Permit federal safety dollars to be used to ameliorate particularly important local pedestrian safety problems.

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Traffic Speeds – Speed is the number one killer of pedestrians. If a vehicle traveling 45 miles per hour hits a pedestrian, there is an 85% likelihood the pedestrian will be killed. Thus, the MHSP should provide for roadway speeds that are safe for our multi-modal roadway users by:

- Developing roadway design and enforcement strategies and programs to slow vehicle speeds in areas where there are significant numbers of pedestrians or disproportionate exposure to risk.
- Reducing the prevailing speed limit from 30 mph to 25 mph to enhance pedestrian safety in urbanized areas.
- Designing new roadways, and modifying existing roadways, to ensure that their design speeds are safe for multi-modal users.
- Increasing enforcement of speed limits, particularly in areas with substantial pedestrian volumes (e.g. community centers, school zones) or high pedestrian accident locations.

Comprehensive Practitioner and Driver Education – The creation of a safer multi-modal roadway system will require changes in design, enforcement and education at both the state and local level. For example, while the new Project Development & Design Guide requires pedestrian sensitive design of state projects, it also serves to guide the design of local roadway projects. Elements of practitioner education should include:

- Training of local public works, planning and land use practitioners on the Project Development & Design Guide and its multi-modal design approach is an important element of the MHSP. This training must include all elements of the roadway system including design speeds, roadway geometry, signals, and intersection design.
- Training state and local police about the importance of enforcement of traffic laws that affect the safety of pedestrians (and all roadway users) including: speed limits, yielding to pedestrians in crosswalks, no right turn on red locations, and no passing of school buses.
- Snowy and icy sidewalks often force pedestrians into the dangerous practice of walking in streets – often narrowed by snow. Falling due to snowy and icy conditions is also a real threat to pedestrians, and every winter sees a spike in emergency visits due to falls. As part of the MHSP Massachusetts should develop and implement a “social marketing” effort to improve property owners’, localities’ and agencies’ understanding of the importance of sidewalk clearance a component of pedestrian safety.
- Including information on pedestrian movement in the drivers’ training manual and tests. Specific information about elders, children and slow-moving pedestrians should be included within this training.

High Pedestrian Accident and Volume Locations – A multi-disciplinary approach to improvement of these locations should be included in the plan with specific measures to improve safety including:

- Installation of countdown WALK signals. Studies show pedestrian countdown signals reduce pedestrian accidents by 50%.
- Utilization of design techniques that will increase drivers’ awareness of pedestrian presence including roadway geometry, signage, and lighting. Specifically address the issue of the double threat (when one driver stops at a crosswalk and the second driver,

not seeing the pedestrian, proceeds across the crosswalk) and cell phone usage. Consider limiting cell phone usage, particularly in urbanized areas.

- Enforcement measures targeted to these locations.

Safe Routes to Schools (SRS) – SRS programs are a highly effective way to motivate a wide variety of community actors in pedestrian safety including local police, school personnel, parents, school neighbors, local public works and transportation staff, and of course, children. SRS programs are by their nature multi-disciplinary and include elements of engineering, education and enforcement. The state’s Highway Safety Plan should include:

- Building suburban sidewalks to schools.
- Implementation of an effective statewide Safe Routes to Schools program.

Data – Developing an accurate method for collecting pedestrian death and injury data, may be the most important function of the Massachusetts Highway Safety Plan. Without adequate data to guide the State’s safety spending, we are unable to devise effective countermeasures. Currently, the State’s police injury data is inadequate in numbers, causation and locations of incidents.

- A comprehensive study comparing police injury reports with EMT data, screening accuracy and locations of crashes, and developing a new method for collecting and recording pedestrian injury information is crucial. Without knowing how severe the pedestrian injury problem is, where and what kind of crashes exist, we cannot make the most effective safety improvements to our roadway system.
- Crash and injury data should be collected and released on a quarterly basis, and data should be readily available and easily found (MHD website for example). Data should be in a form, and analyzed, so that it can be easily used as a resource and research tool to identify thematic concerns and specific locations in need of improvement. It should also be in a form that allows historic comparisons and easy identification of trends. MHD should publicize the status and change of pedestrian safety on a quarterly basis.

WalkBoston looks forward to more concrete guiding goals and principles in the next iteration of the plan, with a shift of focus from raising awareness to making substantial and ongoing physical, enforcement and educational improvements.

Thank you for your consideration of our recommendations. We look forward to working with the Department and its consultants on this important effort and receiving your responses to our comments.

Very Truly Yours,



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Executive Director



Ann Hershfang
Advocacy Co-Chair



Jon Seward
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