

June 28, 2006

VIA FACSIMILE & EMAIL

Casey Woodley
Cambridge Systematics, Inc.
100 CambridgePark Drive, Suite 400
Cambridge, MA 02140

Re: Comments on Draft Guiding Principles for the Massachusetts Strategic Highway Safety Plan

Dear Casey:

The Massachusetts Bicycle Coalition (MassBike) is pleased to participate in the ongoing process of developing the Massachusetts Strategic Highway Safety Plan. The process has brought together diverse user groups in a unique opportunity to gain visibility into each other's concerns in the context of creating a unified vision for safety. In that spirit, MassBike presents the following comments on the Draft Guiding Principles for the Massachusetts Strategic Highway Safety Plan.

Before addressing the emphasis area in which MassBike has been most directly participating (Higher-Risk Transportation System Users), we want to take a step back to look at the overall statement of the problem in Chapter 1.0. The problem statement sets the tone for the entire plan, and should thus take appropriate notice of all relevant user groups. However, as currently written the problem statement focuses on motor vehicles, whereas later the Guiding Principles clearly recognize the presence of both non-motorized and non-vehicular users. MassBike proposes that (i) the problem statement be broadened to focus on "road safety," not "motor vehicle" safety, and (ii) the fatality and injury statistics include the TOTAL number of bicyclist injuries and fatalities, not just the minority that is motor vehicle related. Such data is readily available from the MA Department of Public Health.

The remainder of MassBike's comments concern Chapter 4 of the Guiding Principles. We will address Section 4.6 first, as that section has been the focus of MassBike's involvement to date, then we will offer bicycle-related comments on the other sections of Chapter 4.

Section 4.6 Higher-Risk Transportation System Users

Throughout the Guiding Principles, the stated goals have focused on actually effecting positive change to improve safety, and this is the case for both Young Drivers and Older Drivers in section 4.6. However, the goals stated for Pedestrians and Bicyclists are very different, calling only for "Rais[ing] the awareness of bicyclist safety" We propose that the goal with respect to bicyclists be clarified and stated as follows:

Reduce the number of fatalities and injuries involving bicyclists.

In the "Overall Strategies" section, the second bullet states:

Ensure compliance with national design standards as transportation-related design guidelines are established and/or updated.

It would be more accurate, as well as consistent with the current MHD Project Development and Design Guidebook to revise that bullet as follows:

Ensure compliance with Massachusetts and national design standards as bicycle-related design guidelines are established and/or updated, including the MHD Project Development and Design Guidebook.

Under the final bullet (“additional strategies”), we propose the following revisions and additions:

- *Increase bicycle helmet usage through a public education and awareness campaign*
- *Increase enforcement of bicycle-related laws against all transportation system users, including motorists and bicyclists*
- *Consider bicycle accommodations/sidewalks in new projects, in accordance with the MHD Project Development and Design Guidebook and national standards*
- *Correct misconceptions and increase awareness of bicycle-related laws by all transportation system users through a public education and awareness campaign*
- *Survey public awareness and attitudes towards bicyclists, and the extent of bicycling, in Massachusetts*
- *Endorse and advertise Bicycling Skills classes offered by MassBike*

Section 4.1 Data Systems

Under the “Additional strategies” bullet, we propose the following additions:

- *Create a system to record bicycle accidents, as bicyclists are required by state law (Ch 85, Sec 11B(11)) to report all crashes with damages in excess of \$100, not just those involving a motor vehicle*
- *Change the Crash Report form so that a bicycle can be one of the involved vehicles, not just an object hit*

Section 4.2 At-Risk Driver Behavior

Under the “Additional strategies” bullet, we propose adding the following section:

Bicycles

- *Reduce wrong-way bicycling through a public education and awareness campaign*
- *Reduce bicycling at night without lights through a public education and awareness campaign*

Section 4.3 Infrastructure Safety

Under the “Additional strategies” bullet, in the “Lane Departure” section, there is a bullet regarding “Reallocate total two-lane roadway width (lane and shoulder) to include narrow buffer median.” This is clearly intended to prevent head-on crashes, but it must be noted that this could create travel lanes and/or shoulders too narrow for safe bicycle use.

Also under the “Additional strategies” bullet, we propose adding the following section:

Bicycles

- Avoid putting rumble strips on roads open to bicyclists (i.e., all but express divided highways). Make sure that any rumble strips used on such roads are bicycle-friendly in design and placement.
- Create a program to downsize existing rotaries and convert them into modern roundabouts.
- Insure that only bicycle-safe drain grates are installed on roads open to bicyclists.
- Create a program to identify and replace parallel-slot drain grates on roads open to bicyclists.
- Create a program to identify diagonal railroad track crossings and add warning signs and additional pavement width to facilitate bicycles crossing at a right angle.
- Create a program to identify bridges with metal decks and retrofit them to be bicycle-safe where possible and add warning signs.
- Place warning signs whenever steel plates are in use on a road.
- Identify locations where there is high-speed traffic and insufficient room in the right lane for a car and bicycle to share side by side. Post regulatory signs, such as "Change lanes to pass bicyclists" or "Narrow lane: pass bicyclists with care."
- Create a Massachusetts Sign Manual that conforms with the MUTCD and require that all jurisdictions post only signs that conform with the manual.

Section 4.4. Public Education and Media

Under the "Additional strategies" bullet, we propose the following additions:

- Provide legally accurate information about the right of bicyclist to use public roads in the Drivers Manual, on the RMV and DOT websites, on all road maps produced by the state, in the Driver's Education curriculum, etc.
- Use public service announcements on TV and radio, and also print advertising, to distribute existing information about the rights of bicyclists.
- Update and recodify the Law of the Road in the Massachusetts General Laws, and consider adopting the Uniform Vehicle Code, as have 49 other states.

Finally, in Appendix C, Table C.3, please update the MassBike contact person to be David Watson.

Thank you for your consideration of these comments. MassBike very much appreciates the opportunity to participate in this process. Please feel free to contact me if you have any questions.

Very truly yours,

David Watson
Executive Director

cc: Commissioner Luisa Paiewonsky, MHD