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1	DRAFT Public Comments and Responses for Policy Advisory Committee Review August 9, 2016							
2	Received Date	Method	Name/Organization	Page #	Topic	Comment	Response	Notes
3	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-11, Table 6.4	Distracted Driving Actions	Adopt and revise current distracted driving law to remove loopholes and be consistent with Federal guidance. Comment: Portland Police have told PBOT staff that current state law is difficult to enforce. We also know that current state law makes allowances for behaviors—such as use of hands-free devices—that research indicates are unsafe. As you note in your report, data on distracted driving is lacking, but we suspect that distracted driving plays a role in the nearly 51% of Portland’s deadly crashes linked to dangerous travel behaviors.	Affirms draft language	No change
4	7/19/2016	Email	Joe Marek, Clackamas County	p. 4-4, Figure 4.3	Economic Crash Costs by Region	Figure 4.3 shows the economic cost of crashes in Oregon by region. It might be interesting to show in that graph the economic cost of crashes along with the production value of the economy in each area. What I wonder is the percentage cost of crashes to the economy of each area of the state. Is the economy of Eastern Oregon more heavily impacted by the cost of crashes versus the Portland Region? Adding this component may help better tell the story of the cost of crashes for each region and their effect on the economy.	This addition would be of interest to many plan users, but it is out of scope for the analysis that was requested for this plan.	In the next update of the plan: Consider adding economic analysis that includes the cost of crashes relative to regional economies
5	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-6, Table 6.1	Impaired Driving Actions	Improve DUUI arrest and adjudication processes. Suggestion: Specifically call out the need to reduce delays in processing DUUI cases and to streamline DUUI prosecution. We also recommend prioritizing this action as a Tier 1 item. A report produced by local DUUI experts found that delays in our current system blunt the effect of DUUI enforcement.	The spirit and intent of this comment are shared by the TSAP Policy Advisory Committee. Measures to improve adjudication of all traffic violations include better training for court officials to get to outcomes with a stronger deterrent effect. The timeliness of adjudication was not raised in PAC deliberations.	Suggest PAC discussion of this for possible minor change to action or new action related to adjudication of DUUI charges
6	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 60	"Safety First"	To carry out the plan, safety and crash data and remediation needs to reflect the “safety-first” approach and be part of the criteria for every STIP and every other project or funding application. Additionally, there must be assurance that all changes to roadways are consistent with this plan and include safety measures. Page 5-1 contains the statement that the goals, policies, and strategies in the TSAP present a “safety-first” perspective. This is a powerful statement that needs more attention. A “safety-first” perspective, in combination with the training and other activities noted in the plan, is indeed what is needed to real the vision.	Safety is the first priority of ODOT's Mission statement and is a consideration in all projects.	No change

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7	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-22, Table 6.10	Bicycle Actions	Evaluate the safety impacts of innovative bicycle facilities. Continue implementing the most effective. Suggestion: Revise this action to require physical separation of people biking and people driving, contingent on roadway design and usage. For example, ODOT could develop standards that require protected bicycle facilities when a threshold is reached for motor vehicle volumes and average operating speeds. PBOT is currently preparing guidelines to support the design, construction and maintenance of protected bikeways in Portland.	The broad language used in the plan was settled upon due to conditions including regional and local differences, high volume roadways with limited right-of-way, limited budgets and the fact that a lot of innovation is currently under way, making prescriptive measures somewhat limiting. PBOT's work on guidelines and emerging data may inform a decision to define thresholds and other more specific measures in subsequent iterations of the TSAP	In the next update of the plan: Consider whether there is a role for ODOT in setting thresholds for decision to provide separate bike facilities or other measures for active transportation modes
8	7/29/2016	Email	Peter Russell, Deschutes County	N/A	Budget for Achieving Zero Deaths	Plans typically have cost estimates of varying magnitudes. The draft TSAP provides no cost estimates anywhere of what it will take to achieve ODOT's Vision Zero of no fatalities or life-altering crashes on State highways, City streets, or County roads by 2035.	Establishing cost estimates for this plan is more complicated than ODOT's other plans because it is not primarily funded with transportation dollars and is implemented by many organizations that are not transportation providers.	Consider whether next version plan could include more about identifying costs for implementation
9	7/18/16 7/19/16	Email Letter	Joseph Elliot	P. 6-10	Chapter 6, Emphasis Areas and the whole plan generally	Eliminate term "Motorcyclist" from plan to reduce ambiguity; in most cases, motorcycle can be used appropriately	Because "Motorcyclist" is accepted as a general term for the driver, passenger and/or occupant, it will continue to be used where appropriate. Staff has scanned the plan for related terms to be sure the proper term is used in each occurrence.	Plan was scanned for the use of "motorcyclist" and the term was changed where appropriate.
10	6/21/2016	Email	Tegan Enloe, City of Hillsboro	N/A	Clarification / Detail, Emphasis Areas and Actions	In reading the proposed emphasis areas and actions, my impression is that the actions are too vague to be effective. For example, under Table 6.7 and Roadway Departure Actions, the first Action is to "Design and implement treatments addressing risk factors associated with roadway departure crashes". My questions are, what are these risk factors and what are the recommended treatments? As the action stands now this doesn't tell me what I should be doing to fix my roadways. It just identifies that risk factors exist and I should come up with things to address them. Another example is Table 6.10 under Bicyclist Actions; it says to "Adopt and implement road surface maintenance practices across jurisdictions that reduce hazards for people riding bicycles". It would help me more if I knew which treatments were the ones that reduce these hazards so I can use those and not the ones that don't help.	This distinction was the subject of detailed and ongoing discussion over the course of developing the plan. A statewide transportation safety plan needs to be translatable to varying circumstances including available resources, specific types of safety problems, and changing conditions. A list of specific applications would narrow the opportunities for creative solutions. The PAC and the Transportation Safety Division reached consensus on the more general approach taken in this draft plan.	No change

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11	8/1/2016	Email	Nick Fortey, Federal Highway Administration	N/A	Collaboration and Communication	The Plan evidences a comprehensive approach to transportation safety and the attendant policies cover the broad range of actors and actions necessary to success. As you are aware, while we have no approval action on the plan per se, we do approve the process used in developing the plan. We find that the effort to date has been inclusive and broad, although we offer recommendations for increased engagement. We offer these comments as part of our technical review of the plan content; they are provided as suggestions for consideration:	Affirms process used in developing the plan is consistent with FHWA regulations.	No change
12	8/1/2016	Email	Nick Fortey, FHWA	begins p. 50	Crash Costs	Page 4-2 notes "Consistent with the 2011 Transportation Safety Action Plan (TSAP), crash costs developed by the National Safety Council (NSC) are used in this chapter to estimate the statewide economic cost of crashes. Understanding the economic cost of crashes will help Oregon's policy-makers and the public compare the scale of the traffic safety problem to other societal concerns." While the report references the two chief means to assess crash costs the report hews to the economic crash costs model and does not provide, for the purpose of a robust policy discourse, the willingness to pay argument. Inclusion of the willingness to pay methodology would seem to align with the focus of the plan on changing the approach to crashes as articulated on page 4-1: "Crashes and resulting injuries have historically been considered by many as an inevitable consequence of mobility. However, currently this idea is being challenged as countries, states, and cities across the world seek to change culture and eliminate traffic fatalities entirely. The idea may be difficult to grasp initially, but when people are asked how many traffic fatalities are acceptable for their friends and family, the universal response is: 'zero'."	The recommended addition to the plan would add some additional depth to the consideration of the economic costs of crashes.	Consider "willingness to pay" analysis for future updates to the plan
13	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	N/A	Crash Data	We would point out that crash data needs to be available with enough specificity as to cause and mode that dangerous roadway, conditions, or situations can be investigated and addressed, regardless of injury or property damage, for all roadways, for this is how dangerous situations are discovered.	Crash data can be queried for many of the questions raised in this comment. More complete and accessible data is one of the objectives of this plan as seen in the Infrastructure Goal and the Improved Systems Emphasis Area.	No change
14	7/29/2016	Email	Peter Russell, Deschutes County	p. 77, Figure 6.1	Data	5. Crash data always needs to be understood in context. It would be useful if the TSAP were to add a summary of the state's population and vehicle miles traveled (VMT) in a graph or two. Similarly, shown by rate for fatal and serious crashes per 100 million VMT per year would be helpful rather than just absolute numbers in Figures 3.1 and 3.2.	If reliable information is available to support this suggestion, it could increase understanding of the crash data discussion.	Add additional information to the extent practicable; consider adding to scope for next update if not done now.

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15	7/29/2016	Email	Peter Russell, Deschutes County	p. 38	Data	6. As a complement to #5 and Figure 3.4, a graph showing either the centerline mileage or lane mileage for the state for the various functional classifications would be illuminating as would the average annual daily traffic (AADT) for each type of facility. Think of this as more of a "nice to have" graph(s) rather than necessary.	This is outside of the scope of this update project.	Consider adding to scope for next update
16	7/29/2016	Email	Peter Russell, Deschutes County	p. 53	Data	7. The text at 4-4 on motor-related deaths is somewhat misleading. The text states injuries are the third-leading cause of death in Oregon with motor vehicle crashes being the fourth-leading (cause) of death in that broad category. Statistically true, but why not just give the number of annual deaths in Oregon, then provide the numbers of motor-vehicle deaths as a percentage of the death total?	Will review paragraph and consider edits to clarify	Add additional information to the extent practicable
17	7/25/2016	Email	Michael Goff	N/A	Economic Impacts	Third, the TSAP should recognize the risk of accidents as an external cost of transportation and price it accordingly. The State of Oregon, counties, and municipalities should further explore options for pricing transportation risk, including but not limited to gasoline taxes, congestion pricing, and VMT charges. In summary, I greatly appreciate ODOT's effort to develop a roadmap to eliminate deaths and life-changing injuries in Oregon's transportation system. I urge ODOT to draft a comprehensive TSAP which emphasizes infrastructure investment, land use planning, and pricing as indispensable tools in making our state a safe place to travel.	This reviewer is unaware of any precedent for public "pricing of risk." The insurance industry is one of many external partners in transportation safety, but the plan does not establish policy for private sector enterprises.	Consider including insurance industry stakeholders in next plan update.
18	8/1/2016	Email	Evan Manvel, DLCD	p. 107	Education	Table 6.17 talks about driver education. Focusing drivers education on understanding laws might be less valuable than focusing it on the reasons for those laws. For example, exceeding speed limits is a social norm in our society, and is engineered into existing road designs. Focusing license tests on the reasons for laws and key dangers, such as the question the DMV has on the most frequent type of crash involving motorcycles, might boost conformity to safer driving. People tend to ignore rules they see no use for.	"Understanding laws" is the objective. Providing contextual information to create a complete message will often contain "why" information.	No change

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19	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 61	Education	Strategies 1.1.1 and 1.1.2 on page 5-2 should include in-school education for youth, and more information in the Drivers' Manual and the license test.	Two Strategies address outreach to schools: Strategy 2.4.2 – Work with school districts, . . . and local education interest groups to evaluate and implement best practices for safety in school zones. Strategy 5.3.2 Work with educators in the State's public school system . . . to improve awareness and understanding of transportation laws, roles, and responsibilities through programs such as Safe Routes to School. The drivers manual is updated periodically to reflect changes in the law; "Implement education, training or examinations to ensure licensed drivers understand current traffic laws." is a tier 1 Action under Training and Education. The strategies and actions are written broadly to include a broad range of possible measures.	No change
20	8/1/2016	Email	Gerald Fittipaldi	Page 8-3, Table 8.1 -	Education	Current text: Lead public education to change safety culture for all users of the transportation system. Revised text: Lead public education to improve safety culture for users of the transportation system, with an emphasis on motorists.	An improved safety culture requires everyone to be equally attentive and responsible	No change
21	7/29/2016	Email	Peter Russell, Deschutes County	Ch. 6, begins p. 76	Emphasis Areas	3. The Emphasis Areas (EA) are all treated equally. Yet, in times of scarce resources it would seem more appropriate to identify at the very least EAs which are high, medium, and low priority. If every EA is a priority, then no EA is a priority. I recognize the difficulty of rank ordering all the EAs, but again there should be some sense of scale and importance or where scarce dollars could provide the most return.	The Emphasis Areas are intended to be implemented over the next five years. The Actions are tiered to identify which have higher priority if resources are not able to cover all of them. The notion of prioritizing actions was discussed at length; because there are so many points of view on what is most important it was difficult to do. The PAC relied on public input to establish the two tiers.	No change
22	7/29/2016	Email	Peter Russell, Deschutes County	Ch. 6, begins p. 76	Emphasis Areas	4. Related to #3, the data would indicate Bicycles are inappropriately included as an EA. Look at the TSAP's own Figure 6.1 "Crash Types Ranked by Crash Frequency and Severity, 2009-2013." Bicycle crashes occupy the lower left-hand corner due to the low number and low severity. In fact the only two groups below Bicycles are Commercial Vehicles and Inattentive Drivers, neither of which is an EA. Bicycles seems to be included as an EA more for aspirational reasons than actual data. In a time of scarce financial resources, the emphasis on Bicycles could be better spent on modes or categories with more documented safety problems.	While crash data serves as the primary data source for the development of the TSAP, input from committees, stakeholders, and the public also were considered during the planning process. Existing policies (e.g. other plans), high levels of public interest (bicycle safety) and increasing casualties (e.g. increasing pedestrian fatalities) are a few of the reasons why some issues generated actions despite low crash volumes. Note that the bicycles actions are typically early stage efforts like getting to better data and identifying best practices for safe multi-modal design.	No change

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23	8/1/2016	Email	Lake McTighe, METRO		Emphasis Areas	The method and approach to identifying the Emphasis Areas is very well done. Metro supports the areas identified.	Affirms plan approach for identifying Emphasis Areas	No change
24	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 77, 78	Emphasis Areas, Improved System	Pages 6-1 and 6-2 regarding the Improved Systems Emphasis Area concerning training and education and incorporation safety into everyday job responsibilities is one of the important statements that will lead to success or failure of this plan. This needs to be a priority action immediately after plan adoption.	Affirms plan language	No change
25	8/1/2016	Email	Evan Manvel, DLCD	N/A	Enforcement	Calling for additional use of speed-activated feedback signs (reducing speeds an average of 6 mph) and automated enforcement.	Increasing enforcement and information efforts is consistent with the plan	No change
26	8/1/2016	Email	Gerald Fittipaldi	Page 5-7, Policy 3.1, Strategy 3.1.2	Enforcement	Current text: Support a high-visibility enforcement program (i.e., Share the Road) increasing traffic, bicycle and pedestrian law enforcement capabilities (priority and funding). Revised: Please clarify the meaning of the above text. Specifically, what is meant by a "high-visibility enforcement program?"	"High visibility enforcement" means that law enforcement personnel or electronic enforcement tools are visible to drivers so more people are aware that enforcement is being done and in some cases is ongoing 24-7.	Have added definition
27	8/1/2016	Email	Lake McTighe, METRO		Equity	Equity, vulnerability and higher crash-risk in areas of disadvantaged populations: Metro appreciates language in the plan addressing socio economic equity specifically. However, the plan could go further in addressing socio-demographic equity. Several policies and strategies address geographic equity, but none seem to directly address the impacts of high crash areas in low-income and historically disadvantaged communities.	Equity was an underlying theme in the plan development process, but the smallest geographic unit considered was ODOT Regions. The equity work done by Metro in considering transportation safety is an excellent approach for closer analysis of equity issues, but was not in the scope of this plan update	Consider geographic analysis of crash data compared to under-served and minority populations for a future update of the plan.
28	8/1/2016	Email	Lake McTighe, METRO		Equity	Review Emphasis Area Actions involving enforcement with a racial equity lens: Metro has been involved in and tracking the development of Portland's Vision Zero Action Plan. During that process, community members and members of the plan's task force have raised concerns about increasing enforcement without addressing disproportionate impacts to communities of color. The action on page 6-26 to "Equitably enforce and prosecute traffic safety offenses for all modes" is promising, but would benefit from more explanation. Also, consider adding reference to HB2002.	The PAC discussed equity issues in several stages of plan development and decided that enforcement was one area where equity was particularly important. HB 2002 is concerned with law enforcement agencies adopting policies prohibiting profiling of protected classes and puts that responsibility on those agencies. The Action cited is consistent in spirit with that law, but is focused on traffic enforcement including inequities that may occur based on location or the age and appearance of a vehicle, etc., so is related to but not just about profiling of protected classes.	No change. Consider a deeper consideration of equity issues in future updates.
29	8/1/2016	Email	Evan Manvel, DLCD	p. 11	Executive Summary	The first sentence in the Executive Summary should have an "and" instead of an "or," as we want to eliminate both deaths and serious injuries on our transportation system.	Change has been made to draft	Minor edit made

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30	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 15	Executive Summary	Page ES-5 speaks to the critical need to engage a very wide variety of people towards the vision. This will be the challenge of the plan. Page 1-2 (copied below) correctly delineates what it will take to achieve the vision. This is a very monumental list of tasks, but each is necessary if the vision is to be truly approached.	Affirms Plan approach with reservations about how well such a complicated effort can be achieved.	No change
31	7/29/2016	Email	Peter Russell, Deschutes County	N/A	General comment	I have reviewed the May 2016 draft of the Oregon Transportation Safety Action Plan (TSAP) and provide the following comments for your consideration. The document has a wealth of data and is obviously is a product of much work. The authors should be commended for the clarity of the text and the crisp graphics. The comparison and contrast of the five ODOT regions to the statewide trends is also very informative. There are many positives to the draft TSAP, but there also several places where it could be improved. These are presented in descending order of priority. Again the draft TSAP is a very impressive body of work which provides an excellent overview of the major safety challenges facing Oregonians as they move about the state. If you have any questions or wish to discuss any of my comments, please feel free to contact me. Thanks again for all of the hard work and the production of what overall is a fine document.	Affirms the plan overall	No change
32	7/25/2016	Email	Michael Goff	N/A	General Comment	The draft TSAP is correct to highlight the importance of engineering, law enforcement, emergency response, and education. Oregon needs to do more to prevent drunk, reckless, and distracted driving; to improve emergency response; and to invest in safety-enhancing infrastructure. However, it must be recognized that driving is an inherently unsafe activity, and as long as Oregon relies on the personal automobile as the primary mode of transportation, the goal of zero fatalities and life-changing injuries will be unattainable. In short, ODOT must recognize that a move away from reliance on personal automobiles and long commutes is an essential component of transportation safety.	Correspondent would like to see a focus on mode share as a part of the TSAP. "Intermodal ODOT" and many planning efforts by the state and ODOT are planning for and investing in increased travel options in all areas of the state and are rightly the vehicles for accomplishing this goal. Increasing mode options is outside of the scope of this plan.	No change
33	8/1/2016	Email	Lake McTighe, METRO	begins p. 150	Glossary	Proposed additions: Equity (socio economic and geographic), Work Zone, Unendorsed Travelers, Vision Zero, Towards Zero Deaths, Vulnerable Users, Operating Speeds, Design Speed, Posted Speed.	Outside of "work zone," "vision zero" and the three categories of facility speed, these are not defined terms in transportation safety and have to be read in context.	Add glossary terms as available

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34	7/18/16 7/19/16	Email Letter	Joseph Elliot	pp. 151 & 155	Glossary (motorcycle related terms)	"Motorcyclist" includes Motorcycle Driver, Motorcycle Driver, and Motorcycle Occupant can refer to either. Add these definitions, consistent with NHTSA definitions to Glossary and use in plan to clearly distinguish these different categories of motorcyclists. The term "Inattentional Driving" is suggested as a term that can help drivers understand the importance of paying conscious attention at all time (supported by research).	The draft Glossary contained no definitions related to motorcycles and the correspondent provided definitions consistent with NHTSA definitions. Inattentional Blindness is a concept that can help to build understanding of why drivers often don't consciously see hazards, even when they are following good driving practices.	Add motorcycle related definitions consistent with NHTSA definitions to Glossary and a definition for Inattentional Blindness.
35	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-6, Table 6.1	Impaired Driving Actions	Adopt National Transportation Safety Board recommendation to reduce Blood Alcohol Content limit to 0.05. Comment: This action is consistent with research indicating that impairment begins at BAC levels below 0.08, the current legal limit for most people driving. Portland's crash data shows that 56% of our traffic deaths involve impairment—usually due to alcohol.	Affirms draft language and Impaired Driving Action.	No change
36	8/1/2016	Email	Lake McTighe, METRO	begins p. 126	Implementation	It is great that there is an Implementation Chapter. It would be beneficial to make Table 8.1 as exhaustive as possible, and to remove the word Example from the title. The plan refers to implementation throughout, in the goals, policies, strategies and actions, but it is not always clear how the elements will be implemented or who will take the lead. The Implementation chapter would benefit from more detail, especially on the role of the state and ODOT.	Without any suggestions of what might be added to the list it is difficult to respond to this comment and create a more exhaustive plan. The word "Example" is used to recognize that the list is neither exhaustive nor limiting. After plan adoption, additional work will be done to inform implementation.	Consider comment in scoping the Implementation work to follow and/or for future updates.
37	8/1/2016	Email	Nick Fortey, FHWA	p. 2-7	Implementation	Page 2-7 of the TSAP states "As a Topic Plan that is part of the Oregon Transportation Plan, The TSAP Implements the OTP safety goals and informs safety goals of new and updated plans. Going forward, the TSAP will be an important resource for transportation safety direction as state, regional, Tribal, county, and city plans are updated or new plans are developed. These plans should be consistent with the TSAP with respect to safety to effectively link to TSD and other resources for safety planning and improvements." While the role of policy and modal plans in relation to the Oregon Transportation Plan is one of State discretion, we would encourage a more holistic discussion of plan integration and coordination given the importance of the TSAP in setting overall safety priorities and the supposition that the TSAP should serve as the sine qua non directive for safety investments and coordinated efforts for safety planning. This should include a comprehensive discussion of involvement by multidisciplinary actors, including MPOs, tribal governments, and local governments.	Agreed	Consider follow-up on this comment in the Implementation Plan to follow adoption of the plan.

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38	8/1/2016	Email	Evan Manvel, DLCD	N/A	Infrastructure	Engineering is central to safety. As noted in the TSAP, countries that have been much more successful cutting traffic deaths take it as a given that humans will make mistakes, and design systems to lessen the impacts of those human mistakes. Education and enforcement have their place, but the physical system people use has a very large impact on how fast people travel in the first place and how likely crashes are to happen. In Chapter 4, the TSAP notes, "unless we design our roads for the speeds that are appropriate within the land use and geographic contexts and the types of users expected, crashes will continue as before." Engineering lower speeds would boost safety. The TSAP notes, in several places (Strategy 2.3.2, Strategy 2.4.1, and Table 6.3 Action), the need to use road design to set speeds. Yet I cannot discern a clear commitment to a central strategy so many other countries have used with success: lowering speeds, through both road design and changes in law.	A core principle of Vision Zero is that well engineered roads can prevent small user errors from becoming tragedies. That does not mean that engineering is the only factor in improving transportation safety. Engineering for lower speeds can affect driver behavior, but does not eliminate all driver decisions to speed.	No change
39	8/1/2016	Email	Evan Manvel, DLCD	N/A	Infrastructure	Addressing traffic lane widths and lane markings, which can cut speeding.	This is part of designing for intended speeds.	No change
40	8/1/2016	Email	Evan Manvel, DLCD	p. 65	Infrastructure	Strategy 2.3.8 mentions access management as a key safety countermeasure. The Plan does not call out FHWA's other proven safety countermeasures that are particularly key to people walking, biking, and taking transit: road diets, medians, and roundabouts. Specifically highlighting these as an additional strategy, instead of just saying "best practices" or "apply proven countermeasures" (Strategy 6.1.3) would be helpful to communities looking to boost walking and biking.	The strategy was intentionally written broadly to allow creative solutions and changes in engineering practices. It is not meant to be prescriptive.	No change
41	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 50	Infrastructure	We are encouraged by the statement on page 4.1 addressing the need for road design to reflect the surroundings and the expected users. We would add that this is true for all roads, in both dense urban, rural, and highway situations. As part of that effort, there needs to be a more realistic way to slow traffic and provide alternatives to 85th percentile used to set speed limits. Agencies must seek out user groups or users when planning or designing projects to increase the knowledge of safety improvement needs. We would note that risk or perceived risk, including risk from moving motor vehicles, dissuades people from walking and cycling.	Speed was a key item for discussion in the development of this plan. In Chapter 3 where the lion's share of the data analysis is found it is very clear that reducing speeds is understood as a central part of reducing fatalities and serious injuries. The "perception of safety" concern is discussed further in the Response on line 43.	No change

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42	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 62	Infrastructure	We are also pleased with the statement on page 5-3 that "Transportation infrastructure should be planned, designed, built, operated, and maintained to provide the safest feasible environment for all transportation users." Each of those actions can have a dramatic impact on our safety and each is an important part of moving forward. There is, however, a statement on page 5-5 that is rather confusing and may contradict other elements of the plan. Strategy 2.3.2 states: "Plan, design and construct facilities for desired operating speed." Depending upon what is meant by the "desired operating speed" and if there is such a speed for each mode and how each interacts, this strategy appears to be in conflict with the statement reference earlier regarding road design reflecting the surroundings and expected users and the "safety-first" approach.	The difference between the strategies is not contradictory. The first acknowledges that there are many modes and types of system users that need to be kept safe. The second recognizes that design affects speed.	No change
43	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	begins p. 62	Infrastructure	Goal 2 policies: How do these relate to current operations, programs, and funding, and what changes are needed to carry out these policies via current efforts vs. needing new funding or programs? Is there any evaluation for current facilities to examine their safety particularly for "other" modes and recommendations for corrections that would enhance safety, but be less than ideal? That is, with current funding, what small or relatively inexpensive changes could be made to increase safety on a roadway? Page 5-14, Policy 6.1. states: "Allocate infrastructure safety funds strategically considering all modes, to maximize total safety benefits." This policy, or a similar policy, needs to address all roadway infrastructure funds, not just safety funds, if we are serious about zero deaths or serious injuries.	Assessment of safety issues on state facilities is ongoing at ODOT. One program, SPIS (Safety Priority Index System), identifies corridors with worse than average crash histories and prioritizes funding for improvement in the worst locations. Documented safety issues are factors in prioritizing projects. The plan is meant to add weight to existing consideration of safety for all project funds going forward. "Infrastructure safety funds" are just one pot of money that can be used for safety improvements. The Policy is addressing strategic investment of infrastructure safety funds because that budget is within the authority of this plan.	No change
44	8/1/2016	Email	Nick Fortey, FHWA		Infrastructure	Policy 2.2 calls to "Continually improve and implement design and analysis techniques for safety-related decision-making in transportation planning, programming, design, construction, operations and maintenance for all modes." We would encourage the Plan to clearly articulate the presumed desire to include safety as a primary outcome for all investments, not solely investments made with safety funds.	The Goal 6-Strategic Investments background information recognizes that safety should be a part of the decision process for any investment in transportation infrastructure. While there is some emphasis on "safety funding" there is also clear direction to identify other funding opportunities for safety improvements. The PAC may want to consider whether the descriptor "safety" should be used in references to funding in all instances in the plan.	Consider whether "funding" should be limited to "safety funding" in all instances in the plan.

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45	8/1/2016	Email	Nick Fortey, FHWA		Infrastructure	Policy 2.1 calls to "Continually improve safety data collection, management, and distribution for data-driven decision-making for infrastructure planning and, development and operations activities, across all divisions at ODOT, and with partner agencies and stakeholders." We would encourage the policy to specifically cite the intent to improve the timeliness and accuracy of crash data reporting	The recommended addition is consistent with the current language of the whole plan. The introduction to the Data Actions (p. 6-27) lists the characteristics of data that are intended from the Actions, including accuracy. "Timeliness" of data availability was a topic of discussion in several public meetings and in the PAC and is the objective of ongoing work at ODOT.	No change
46	8/1/2016	Email	Nick Fortey, FHWA		Infrastructure	Strategy 2.3.2 calls to "Plan, design and construct facilities for desired operating speed." We would encourage the plan to structure an approach that considers design and operating speeds and the context of the roadway and roadside environment to focus on critical roadway segments.	The "desired operating speed" would be determined within local context and with consideration of safety needs and other objectives such as functional classification.	No change
47	8/1/2016	Email	Gerald Fittipaldi	Page 5-5, Policy 2.3, Strategy 2.3.2	Infrastructure	- Current text: Plan, design and construct facilities for desired operating speed. Revised text: Plan, design and construct facilities for safe operating speed. Such speeds will enhance the safety for all road users, including vulnerable road users.	The "desired operating speed" is a safe design speed for the facility which may be a high speed highway, a low speed pedestrian mall or anything in between.	No change
48	8/1/2016	Email	Soren Impey	N/A	Infrastructure	Unlike the draft TSAP, which focuses on education, behavior modification, and enforcement at the expense of roadway design, Vision Zero reforms emphasize increased traffic safety through roadway design. For example, the TSAP focuses on policy changes that "identify unsafe walking, biking, or driving behaviors," but does not adequately address the role that roadway design can play in discouraging unsafe driving behavior. Although we laud the TSAP goal of zero traffic deaths by 2035, we maintain that realization of this goal will require adoption of standard Vision Zero reforms.	As discussed in several comments above, Vision Zero is a more wholistic approach to transportation safety than the traditional approach of primarily engineered solutions. Personal responsibility, education, enforcement and emergency response are also important parts of successful Vision Zero programs.	No change

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49	8/1/2016	Email	Soren Impey	N/A	Infrastructure	Specifically, we call for the ODOT TSAP to place a far greater emphasis on roadway design that decreases vehicle speed. As the TSAP notes, approximately 37% of fatalities in Oregon are linked to high vehicle speed, making speed-reduction policies the low-hanging fruit of safety reforms. Speed limit reduction, traffic calming, and road diets all effectively reduce fatal crashes irrespective of road users' behavioral patterns. After New York City implemented a 25 mph default speed limit, the city experienced the lowest rate of pedestrian fatalities in its history. Many ODOT-managed roadways in the Portland area have become "high-crash corridors" (streets with exceptionally high rates of fatal collisions), largely because they were designed to facilitate motor vehicle throughput at the expense of safety. We strongly disagree with the TSAP goal to "Plan, design and construct facilities for desired operating speed" (Policy 2.3 – Strategy 2.3.2). Instead, we urge ODOT and the OTC to prioritize the safety of all road users above other goals and metrics in its design criteria. ODOT's current speed limit policy is a significant barrier to safety in that speed limit reduction requests from local governments are frequently rejected or delayed, even on high-priority roads in urban areas where legacy highways run adjacent to otherwise safe and livable residential neighborhoods and commercial districts.	As discussed above in several responses, design is an important part of the solution to speeding, but not the only one. The safety of all users is the objective.	No change
50	8/1/2016	Email	Soren Impey	N/A	Infrastructure	The TSAP should outline clear design and infrastructure improvements that would be taken when a road fails to meet safety metrics. These could include provisions for automatic speed reductions and the implementation of traffic calming features, such as lane-width reduction, installation of new traffic signals, and speed cameras.	The plan is not prescriptive by design. Safety improvements are inherently site- and context specific. As discussed in other Responses above and below, setting speeds is not within the authority of this plan	No change
51	7/28/2016	Email	Bob Cortright	p. 5-5	Infrastructure	3. Expand Strategy 2.3.2 to include resurfacing or retrofitting: Strategy 2.3.2 - Plan, design, and construct and retrofit facilities for desired operating speed. Comment: The overall policy that this strategy implements directs that we "operate and maintain" the system to "eliminate fatalities and serious injuries for all modes." As written none of the recommended strategies address either operation or maintenance. As noted above, retrofitting arterials and collectors that pass through communities is a key opportunity to improve safety for vulnerable users.	"Construct" includes retrofitting, but the addition is not in conflict with the intent of the strategy. While none of the strategies names specific operations and maintenance measures, those types of measures are not precluded from actions such as applying best practices or identifying solutions. There are also maintenance related Actions in Ch. 6. The lack of a specific strategy does not invalidate the policy.	Can add "retrofit" to Strategy 2.3.2

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52	7/21/2016	Oral and Written Testimony in OTC TSAP Public Hearing	Gerald Fittipaldi, Livable Streets Action	N/A	Infrastructure, importance relative to other priorities	<p>Within the TSAP we are glad to see the State's intent to "plan, design and construct facilities for desired operating speed." However, this goal is mixed in with numerous other strategies which all seem to be given equal importance. While culture, education, and enforcement are pieces of the pie, they should not be emphasized as strongly as the need to design safer streets. We need to start placing safety ahead of level of service and motorist convenience.</p> <p>Countries that have had the most success in achieving drastic reductions in roadway fatalities all place primary responsibility for traffic safety upon the designers of the road system. Sweden, where the Vision Zero concept originated, acknowledges that humans are prone to making mistakes. Rather than focusing on changing behavior, Sweden has decided to design streets so those mistakes aren't fatal. The TSAP sends the message that pedestrians, bicyclists, and motorists all share equal responsibility for street safety. I disagree with this. As operators of 4,000 pound high-speed pieces of machinery, motorists have a much greater responsibility than people on foot or those riding 30 pound bicycles.</p>	<p>It is a widely held belief of the citizens and decision makers who participated in the plan development and review processes for this plan that human behavior is a very important variable in transportation safety. Anecdotal evidence of near misses with distracted drivers, pedestrians failing to look up to see cross traffic and bicyclists who run stop signs and lights were very common in all face-to-face meetings around the state. The plan is based on an effort to balance all of the aspects of improving safety, but human behavior is, by consensus, Goal 1. As a side note, individual responsibility is in fact a core principle of Vision Zero in Europe and around the U.S. The traditional approach was to put the main focus on design, engineering and construction. Shifting the focus from that view to a more holistic approach is an important aspect of the Vision Zero approach and gives everyone an opportunity, and a responsibility, to make a difference.</p>	No change
53	7/21/2016	Oral and Written Testimony in OTC TSAP Public Hearing	Gerald Fittipaldi, Livable Streets Action	N/A	Infrastructure, Plan Priorities	Livable Streets Action is interested in participating in the process for achieving safe streets through effective funding mechanisms.	Financial decisions for individual projects are outside the scope of this project. Those decisions generally are initiated by local government and prioritized within the sub-regions by Area Commissions on Transportation and/or the MPOs. Citizen participation is a part of construction project decision making at the local, regional and statewide level.	No change
54	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-14, Table 6.6	Intersection Actions	Implement access management on high-volume roads and/or around complex intersections to reduce crashes. Comment: Minimizing driveways and other access management strategies are relatively inexpensive and improve safety for all road users. We believe that access management offers untapped potential to make streets safer, and we are interested in partnering with ODOT to leverage these tools more effectively.	Affirms draft language	No change

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55	8/1/2016 Email		Ovid Boyd		Intersections, Bikes and Pedestrians	This weekend a tragedy occurred, a 25 year old woman was killed while riding down one of the streets of our state. I am writing you because I believe it is our fault. Our fault as Oregonians I mean. We allow roads to operate in a way that is unsafe, that literally kills people. We cannot continue to do so. A road that kills is not an ok. Not at all. It needs to be made safe. For roads, we must immediately reduce speeds and close lanes. Few people are killed when traffic is slow. We must slow it. ODOT must reduce speeds on 82nd street to 25 mph and on Flavel to 20 mph tomorrow. You must remove a car lane from 82nd street and from Flavel tomorrow. These are emergency responses that we undertaking until permanent improvements can be made. Thank you for ensuring that today is the last day that people are unnecessarily killed	ODOT maintains 82nd Avenue while Flavel is a city street. ODOT has a series of improvement projects in the works for 82nd, running from Columbia Boulevard in the north, south to Johnson Creek Boulevard. This web site: www.82ndAveProjects.org , will provide some details. Once complete, the projects should significantly improve safety for all users. Note that site specific improvements are outside of the scope of the TSAP.	No change
56	7/25/2016 Email		Michael Goff	N/A	Land Use Planning	The second area, which is inseparably linked to transportation planning, is land use planning. Land use decisions directly impact the number of vehicle miles travelled, which in turn impacts transportation safety, and land use decisions also open or close possibilities for various transportation options. For example, when a municipality adopts density restrictions, the result is additional sprawl, leading to increased travel and an increase in serious accidents. Conversely, when a municipality invests in transit-oriented development, the result is a shift from personal automobiles to public transit, which reduces accidents. As with transportation planning, public agencies engaged in land use planning should estimate the transportation safety impact of land use decisions and take them into account.	The Transportation Safety Plan may be implemented through measures that affect land use, but the plan does not make any specific land use decisions. This is beyond the scope of the current plan	Future plans may consider adding more emphasis on incorporating safety into transportation System Plans. If that is the case, then LCDC / DLCD would be a stakeholder needing a place at the table.
57	7/29/2016 Email		Peter Russell, Deschutes County	p. 99	Motorcycles	13. For Motorcyclists on 6-20, I'd flip Tier 1 and Tier 2; more than any other road users, motorcyclists are in charge of their own safety (as I know as a rider of almost 17 years) and it would be better to address the riding community on a range of topics as in the proposed Tier 2	Recommended for PAC consideration	Suggest PAC discussion of this for possible minor change to action or new action
58	8/2/2016 Email		Gena Castaldi	N/A	Operations	I ask you to immediately reduce the speed limits on 82nd and on Flavel to 25 mph, and to remove one car lane from 82nd in the surrounding blocks until a permanent safe reengineering can be made. I ask you to make this standard procedure after all accidents as part of your Transportation Safety Action Plan. Do not let more people die. High speeds and car lanes should never be a bigger priority than human lives.	Speed was a key item for discussion in the development of this plan. In Chapter 3 where the lion's share of the data analysis is found it is very clear that reducing speeds is understood as a central part of reducing fatalities and serious injuries. However, this plan cannot by itself change the way speeds are set which is controlled by state statute.	No change

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59	7/28/2016	Email	Bob Cortright	6-18,	Pedestrian and Bicycle Actions	5. Expand the list of Pedestrian and Bicycle Actions to include retrofitting arterial and collector streets to improve pedestrian and bicycle safety when roads are resurfaced. Table 6.8 and 6.10 add new actions: Action: Update policies and programs for road resurfacing in urban areas to include implementation of low-cost measures to improve pedestrian/bicycle safety including narrowing travel lanes, adding or widening bicycle lanes, adding pedestrian crossing islands and crosswalks.	The first 2 Pedestrian Actions include retrofitting as one of many options for implementation. The first Bicycling Action includes retrofitting as one of many options for implementation. The broad Action statements are intended to be inclusive of many possible actions to meet the intent, considering resource and local context issues among other considerations.	No change
60	7/28/2016	Email	Bob Cortright		Pedestrian and Bicycle Safety	2. Revise the Emphasis Areas for "Infrastructure" and /or the "Vulnerable Users" to address retrofitting arterials and collectors in urban areas to improve safety for pedestrians and cyclists. The "actions" called for in the Infrastructure and/or the Vulnerable Users Emphasis Areas on page 6-1 should be expanded to include: "updating policies and programs to retrofit arterials and collectors in communities to include cost-effective measures to improve safety for walking and cycling as part of or in combination with roadway resurfacing projects." Also, add an "Infrastructure Subarea" for "- Urban Arterials and Collectors" Comment: As noted above, arterial and collector roads in built up areas of Oregon communities are a significant safety problem area: high speeds and lack of facilities combine to make these roadways unsafe for vulnerable users. The majority of bike and pedestrian injuries and fatalities occur on these roadways. Road repaving and resurfacing is a critical opportunity to implement low-cost improvements to make these roads safer for walking and cycling.	All of these issues and actions were the subject of much discussion in the plan development process and are addressed in the plan, though not framed in quite the same way as the recommended changes here. The discussion on page 6-1 does include "retrofitting" facilities as a focus. Tables 6-5 and 6-6 include several actions related to intersection improvements, including low cost improvements, that do not limit those actions to "construction" projects only. Actions related to speed pertain to all roads including urban arterials. And vulnerable user actions, general and related to pedestrians, also address infrastructure improvements to promote safety.	No change
61	8/1/2016	Email	Lake McTighe, METRO	begins p. 111	Performance Measures	Performance measures and targets: Metro is currently updating the Regional Transportation Safety Plan, including performance measures and targets, and will be working with ODOT to coordinate setting targets for federal performance measures as required in MAP-21. The S-curve trend is a pragmatic approach to setting targets for the performance measures, and Metro is currently evaluating using the same approach to set MPO targets. The performance measures section would benefit from tracking fatalities and severe injuries by population in addition to VMT. It would be helpful to include the goals (targets) from the Oregon Traffic Safety Performance Plan, and explain the relationships of those goals (targets) to the TSAP Performance Targets, and overall relationship to achieving zero deaths and severe injuries by 2035.	ODOT does a lot of tracking of results of safety activities, and reporting on performance measures, particularly as related to the Transportation Safety Division Annual Plan and the HSIP Performance Plan. Those performance measures are actively in play and the TSAP does not change them. To avoid repetition and potential inconsistencies if one of the plans is affected by changes in federal law, only the five measure specific to Strategic Highway Safety Plans were included in the TSAP.	No change

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62	8/1/2016	Email	Nick Fortey, FHWA		Performance Measures	The Plan includes several safety performance measures. We would encourage benchmarking road safety performance, to encourage best practice and track progress over time, different geographies, and the myriad actors involved in a multidisciplinary safety campaign.	This is done and has been done in TSD for years, particularly as regards TSD's annual plans and report and the HSIP Performance Plan, so setting new baselines/benchmarks does not seem necessary.	No change
63	7/19/2016	Email	Joe Marek, Clackamas County	N/A	Public Health, generally	While Public Health was mentioned in the document, I didn't see much in the way of efforts of tying in public health to the goal of reducing F&SI crashes. I think about 1) the health consequences of crashes and 2) the consequences of health as a contributing factor to crashes. For example, a local community program of Tai-Chi or yoga for an elderly citizen may help keep them mobile, flexible and maintain good reflex action to help them be a safer driver. A person with multiple health issues taking a number of medications may not be as alert or have good reflexes and that extra 0.5 seconds of response time could result in a child getting hit in a crosswalk. There, of course, are many examples that I think warrant inclusion in this important document that will guide the State for the next several years.	The relationship of transportation safety and public health is an emerging issue for the OTSC and ODOT, and ongoing efforts in data sharing and supporting emergency response are having results at this time. Goal 3: Safe and Healthy Communities also acknowledges the links between safe travel and health. The next logical steps, as described in this comment, are beyond the scope of the current TSAP update.	In the next update of the plan: Consider ways in which health initiatives may have secondary effects of improving transportation system users' ability to navigate the system safely.
64	8/1/2016	Email	Lake McTighe, METRO		Risky Behaviors	Targeting high risk behaviors: Metro appreciates that Risky Behaviors are included as an Emphasis Area, especially those that focus on DUII, speed and setting speeds appropriate to land use, context and users.	Affirms plan language	No change
65	8/1/2016	Email	Gerald Fittipaldi		Risky Behaviors	Page 3-7, Behavioral Issues- Current text: More than 90 percent of all crashes involved human error. Revised text: More than 90 percent of all crashes involved human error. Therefore, ODOT will emphasize roadway design that encourages slow vehicle speeds so that any errors are not fatal.	The suggested change is out of context	No change

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66	8/1/2016	Email	Gerald Fittipaldi		Risky Behaviors	Page 4-1, Human Impact of Crashes, final paragraph- Current text: As long as transportation users engage in risky behaviors such as driving under the influence of alcohol or drugs, speeding, not wearing seat belts, texting while driving or walking and biking, wearing dark clothing at night, and not using reflectors or lights, fatalities and injuries will continue to occur on our transportation network. Furthermore, unless we design our roads for the speeds that are appropriate within the land use and geographic contexts and the types of users expected, crashes will also continue as before. Revised text: By designing our roads for speeds that are appropriate within the land use and geographic contexts and the types of users expected, we will significantly cut down on the severity of crashes, thus lowering traffic fatalities. We have had success in increasing seatbelt use and reducing drunk driving through education campaigns. We will seek to follow best practices to combat emerging issues such as texting while driving. We will encourage bicyclists to use lights for night-time riding through programs such as light giveaways. § Delete: “walking and biking, wearing dark clothing at night, and not using reflectors or lights.”	The paragraph is about risky behaviors. The recommended change is out of context	No change
67	7/29/2016	Email	Peter Russell, Deschutes County	p. 67	Safe, Livable Communities	11. For Policy 3.4, how does the TSAP propose to measure “the perception of safety”? What is the metric for perceived safety? And what if the perception is a facility is unsafe but data does not support the perception, how will that disconnect be resolved?	The "perception of safety" is a value for safe and healthy communities proponents as well as bike and pedestrian interests in the context of encouraging use of non-motorized transportation. It is, however, a challenge for the transportation safety community because being aware of risks is important for supporting safe decision making. That is why it is included only in the long-range, safe and livable communities section.	No change

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68	7/29/2016	Email	Peter Russell, Deschutes County	Goal 1, p. 61-62	Safety Culture	2. The plan calls for development of a Safety Culture that will permeate those who plan, design, build, and maintain the transportation system as well as those who use all modes of the transportation system. Yet, the plan does not provide any evidence that does not happen now. The planners and engineers I have worked with have all considered safety in their daily activities; indeed, road authorities and local jurisdictions have adopted design and operational standards which are based on safety. Similarly, planning departments' development codes also incorporate elements of safety in clear zone standards, access management standards, and similar items. Finally, I really do not know of any bicyclist, bus rider, driver, motorcyclist, pedestrian, truck driver who intentionally sets off with a "tally ho, time to be unsafe!"	The plan does not assume there is no current safety culture, just that the numbers suggest strongly that it needs to be improved and shared more widely. While transportation safety has traditionally been an engineering exercise, personal responsibility is clearly part of any thorough or long-range solution. Many people drive responsibly, drive defensively or otherwise practice a healthy safety culture. Many also choose to speed, text while driving, drive impaired or distracted. A stronger safety culture can help to change that.	No change
69	8/1/2016	Email	Nick Fortey, FHWA		Safety Culture	The plan makes a strong case for embracing a safety culture approach. In that a safety culture approach that includes the full transportation system and the interaction among components and actors is both a complex and atypical approach, we would urge a more robust discussion on establishing and maintaining a safety culture.	As this new Goal is addressed, additional detail may be forthcoming. Implementation planning will include looking for examples of effective approaches in other states and internationally to the extent practical	No change
70	8/1/2016	Email	Gerald Fittipaldi		Safety Culture	Page ES-3, Safety Culture and Page 5-2, Goal - Current text: Transform public attitudes to recognize all transportation system users have responsibility for other people's safety in addition to their own safety while using the transportation system. Revised text: Transform public attitudes to recognize that motorists have a paramount responsibility in operating their vehicles in a safe manner. Since small acts of carelessness by motorists directly put the lives of vulnerable roads users at risk, public attitudes should recognize that motorists have a greater responsibility than vulnerable traffic.	Personal responsibility applies to everyone equally	No change
71	8/1/2016	Email	Gerald Fittipaldi		Safety Culture	Page 4-1, Human Impact of Crashes- Current text: Everyone is responsible for ensuring their own safety, and responsible to protect the lives of others through responsible decision-making. Revised text: Our education campaigns will focus on encouraging safe decision making by motorists, as errors made by motorists often lead to the deaths of other innocent road users.	The public input on risky behaviors identified all system users as culpable for making bad decisions that jeopardized their own or other system users' safety. Personal responsibility applies to everyone equally	No change

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72	7/21/2016	Oral Testimony in OTC Public Comments	Dan Kaufman, Livable Street Action, Salmonberry Corridor, Safer Powell Blvd. and Business Owner	N/A	Safety on ODOT Corridors	(paraphrased from meeting notes) As a parent of students at Cleveland High School on Powell Blvd., it is not apparent that ODOT puts safety first on Powell Blvd. There have been several fatalities near the school over the years, and the principal estimates one traffic related hospitalization of a student or other person associated with the school every semester. Why is reducing fatality and serious injury numbers not important to ODOT?	No one can dismiss the concerns of parents about the safety of their children and the safety of all transportation system users is important. A Safety Project is currently under development to increase safety for pedestrians, bicyclists, transit users and motorists on a busy section of Southeast Powell Boulevard (US26) between Southeast 20th and Southeast 34th Avenues. Note that site-specific projects are outside of the scope of the TSAP.	No Change
73		Oral Testimony in OTC Public Comments	Dan Kaufman, Livable Street Action, Salmonberry Corridor, Safer Powell Blvd. and Business Owner	N/A	Safety on ODOT Corridors	The statewide 42% increase in fatalities is not the result of comparable increases in vehicle miles travelled.	After many years of effectively reducing transportation fatalities Oregon did experience a significant increase in fatalities in 2014 and 2015 that is only partially explained by increased VMT. Comparable increases occurred in most U.S. states and the cause is not entirely clear. Theories include increased distraction by smart phone use and an increase in aggressive driving, among other things. The plan supports improved data collection and analysis to continue to improve our understanding of the causes of this change and how to address them constructively.	No change
74	8/1/2016	Email	Evan Manvel, Department of Land Conservation and Development	N/A	Speed	Speed is central to safety. Speed is a key factor in transportation safety. It's a matter of psychology and physics. Longer distances travelled during perception and reaction time means more crashes and more severe crashes. The top crash risk factors (lane/road departure, aggressive driving, intersection crashes, speed-related crashes, alcohol-and/or-drug related crashes, and unrestrained occupant crashes) are interrelated with speed. ODOT's plans to increase rumble strips, improve curve speed signage, and cut impaired and distracted driving are smart steps in addressing some of these issues; addressing speed head-on could supplement those efforts.	Comment is consistent with the consensus of the PAC. For further discussion of how speed is addressed in the plan see above responses.	No change

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75	8/1/2016	Email	Evan Manvel, DLCD	N/A	Speed	The TSAP – and follow-up work – should include a clear, central focus on reducing speeds on existing roads. While Table 6.3 is a start, additional actions could include: 1) Streamlining and improving the speed limit reduction process. 2) Empowering localities to set speed limits on roads in their jurisdiction. The World Health Organization calls out a best practice of ensuring localities have the power to control speed limits. “It is important that local authorities not only have the legal authority to reduce national limits, but also to manage local speeds according to particular road situations and in conjunction with other traffic calming or speed management policies.” Oregon has not implemented this best practice. 3) • Being clear on how using safety as its top priority will impact ODOT policies regarding traffic throughput and speeds. It is unclear how ODOT’s other policies and priorities may be impacted by efforts to make safety the top priority.	The plan Actions sets out the first steps for changing how speeds are set.	No change
76	8/1/2016	Email	Evan Manvel, DLCD	N/A	Speed	Setting up a Speed Task Force to oversee progress (or Governor’s Advisory Committee, such as those on DUII and Motorcycle Safety).	This could be part of implementing a study of and creation of legislative concept for changing the way speeds are set, but is outside of the authority for this plan.	No change
77	8/1/2016	Email	Evan Manvel, DLCD	N/A	Speed	Calling for a maximum urban speed limit of 30 mph on most streets. The World Health Organization notes a best practice of setting maximum urban speeds at 50 kph. “Although the definition of urban may vary between countries, given that these areas usually involve a high concentration of pedestrians and cyclists, speeds above 50 km/h would be unsafe.” While 97 countries have done this, Oregon has not.	The plan Actions sets out the first steps for changing how speeds are set.	No change
78	8/1/2016	Email	Lake McTighe, METRO		Speed	Speed reduction: review language in the plan around “speeding” and look for ways to address “speed” as a factor in severe crashes, especially for pedestrians (not just speeding). Add “Speed Kills” graphic, such as the one in the Oregon Bicycle and Pedestrian Plan, to the Vulnerable Users Emphasis Area. The graphic is an effective tool for informing people about the relationship of speed, sight distance and survival rates of vulnerable road users.	Speed has been considered at length and integrated throughout the plan. The Bike and Pedestrian Plan is the appropriate place for the graphic cited.	No change
79	8/1/2016	Email	Soren Impey	N/A	Speed	We call on ODOT and the OTC to reform the process for speed limit requests so that they do not function as a barrier to safety. Specifically, we request that ODOT allow local governments to set speed limits in designated urban commercial and residential areas and to developed a mechanism that fast-tracks safety-related speed limit change requests.	The plan includes the first steps required to begin a complex policy and legislative process for potentially modifying how speeds are set.	No change

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80	8/1/2016	Email	Gerald Fittipaldi		Speed and General Comment	I have read through the Draft Transportation Safety Action Plan. Thank you for taking the time to put it together. Below are my suggestions for revisions to specific parts of the document. I applaud ODOT for striving to eliminate roadway fatalities. To meet this goal we need to drastically change how we design roads to achieve lower motorist speeds.	Affirms intent of plan	No change
81	7/21/2016	Oral Testimony At OTC TSAP Public Hearing	Soren Impey, Bike Loud PDX	N/A	Speed, generally	(paraphrased from meeting notes) Would prioritize reducing speed and designing roads to eliminate fatalities and serious injuries. New York City adopted Vision Zero and had the lowest number of pedestrian fatalities in its history in the first year after adopting the plan. States with Vision Zero plans have significantly reduced bike and pedestrian fatalities. Speed reduction is the key. Most of the fatalities in the Portland area are on ODOT high speed corridors. There is a perception that the state is institutionally resistant to reducing speeds. If we are serious about safety we have to reduce speeds.	State jurisdiction corridors in densely populated areas present unique issues. Often they were established long before current urban densities or heightened interest in alternate modes existed. ODOT has transferred jurisdiction of many such roads that primarily served local and regional needs to the cities, but state highways established to meet inter-city transportation needs are more difficult to adapt to the effects of urbanization. ODOT is currently developing Safety Projects for urban highways such as Powell Blvd and 82nd Ave. to improve safety, and otherwise implement best practices for urban arterials. Note that site-specific projects are outside of the scope of the TSAP.	No change

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82	7/28/2016	Email	Ovid Boyd	N/A	Speed, Infrastructure	<p>As you know, our friends, family members, community members, the people of Oregon, are dying on our street. We had a child killed in a crosswalk from the school district I work at just a few months ago. This is not something that should ever happen. I want to see a few specific changes: 1) Make it easy to reduce speed limit. Crashes at low speeds are livable, at high speeds they are not. Speed reductions should be immediate and easy. 2) Set a max 20mph speed limit in Metro areas (except on the interstates). People don't die at those speeds, and speed limit should never cause deaths. 3) When a crash occurs, an immediate response should be instituted automatically. Speeds should be reduced that day in the area. Road lanes should be repainted within a month to be narrower. The assumption should be that the road is unsafe, and needs to be immediately made safe. In cases when a car hit a person or bike, cars should be immediately blocked and banned from the street until infrastructure improvement can be made. We need to take immediate actions to stop our community members, families and friends from dying. Please restructure the Transportation Safety Action Plan so that zero death is tolerated. That means assuming things are too dangerous, preventing high speeds, and banning automobile traffic if it can't be done safely.</p>	<p>The issue of setting speeds was one of the most discussed elements of the TSAP. The speed issue is important to most of the people who participated in development of this plan. It is to some extent an infrastructure issue and good design of infrastructure makes a difference. But speeding is largely a matter of drivers engaging in risky behavior. Roadways are generally designed for their intended speeds. Speeding drivers often test the limits of the infrastructure. With a transportation system that serves local, regional, statewide and national transport needs, roads built to accommodate a variety of speeds will continue to be part of the system. On the other hand, the plan recognizes that there are routes where low speeds may be appropriate and that local governments have an interest in how speeds are established in their neighborhoods. Changing the way speeds are set requires legislative action to change state law which is why the plan cannot establish a new way to set speeds.</p>	No change

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83	7/28/2016	Email	Bob Cortright, retired transportation planner	N/A	Speeding	(w/ edits to shorten) Revise and expand the plan's discussion about speeding as a problem, especially for vulnerable users on urban arterial and collectors. The plan needs to connect the dots on the importance of reducing speeds to improve safety. While the plan endorses "Vision Zero" it fails to convey national and international research and experience that shows (the value of) reducing traffic speeds to achieve this goal. In particular, speeding on arterial and collector streets in built up areas is a key safety problem that deserves more attention in the plan. It's well-established that prevailing speeds on these roads are above the posted speed limit. This means in lots of Oregon communities people drive too fast on roads that have inadequate facilities for walking and cycling. The plan's analysis about the extent of speeding as a problem appears limited to a reciting a misleading survey: that implies that people don't speed much and that speeding is not a widespread problem. Much more reliable information is available and makes a compelling case that speeding is a widespread and significant safety problem. In 2012, the National Highway Traffic Safety Administration (NHTSA) compiled national data on vehicle traffic speeds on major and minor arterials. NHTSA found that more than 30% of vehicles are exceeding the speed limit by at least 5 mph, and 13-15% are traveling more than 10 mph above the speed limit.	Speed was a key item for discussion in the development of this plan. In Chapter 3 where the lion's share of the data analysis is found it is very clear that reducing speeds is understood as a central part of reducing fatalities and serious injuries. The Oregon survey cited indicates that most people (+/- 75%) report that they do not exceed posted speeds regularly. The NHTSA finding cited is that +/- 30% do regularly speed. Similar conclusions. And the use of the Oregon survey in the discussion is meant to show that even with a significant percentage of drivers reporting that they don't speed, speed is still a significant contributor to serious crashes. It is incorrect to say that the plan as written neglects speed as a significant problem. The five-year action plan includes all seven Actions for addressing speed as Tier 1 Actions, including design and construction, working toward setting speeds in context with land use and local conditions (requires statutory changes), educating drivers and more.	Edit discussion on page 6-9 to add additional explanation of the relationship of the self-reported poll and the rate of speed related crashes and the impacts of speed on serious crashes.
84	7/28/2016	Email	Bob Cortright	6-10	Speeding	4. Table 6.3 Speeding Actions: Add an Action: Implement low-cost systemic safety measures to achieve desired operating speeds when roadways are resurfaced. Co-Benefits: Pedestrians, Bicyclists, Older Road Users, public transit. Comment: This would mirror language in Table 6.7 which calls for implementation of low cost actions to address roadway departure crashes.	This Action: "Focus facility design and redesign to achieve operating speeds consistent with safety goals, context, users and land use." covers the recommended Action except for the "low cost solutions" element. Low cost measures are called out in Tier 1 Actions for both intersections and roadway departures which appears to cover the intent of this recommendation.	No change
85	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-10, Table 6.3	Speeding Actions	Modify laws to allow more effective automated enforcement of traffic laws. Comment: While Portland is already expanding automated enforcement, we are pleased that ODOT is working to help other communities pursue this option, which is proven to support safe driving behavior. In Portland, 47% of deadly crashes are caused in part by people driving at unsafe speeds, a behavior that automated enforcement helps to prevent.	Affirms draft language	No change

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86	7/19/16 7/20/16	Email Letter	Margi Bradway, Portland Bureau of Transportation	p. 6-10, Table 6.3 & p. 6-13, Table 6.5	Speeding, and Infrastructure Actions	(3 actions): 1) Continue work between ODOT, cities, and counties to consider and revise, as appropriate, regulations and programs for establishing speed limits to achieve safety goals, improve balance among multimodal interests, and support community objectives. 2) Focus facility design and redesign to achieve operating speeds consistent with safety goals, context, users and land use. 3) Implement design treatments to achieve appropriate speeds and manage sight distance consistent with context, users, and community goals. Suggestion: Call for reducing speeds to levels that prevent deaths and life-changing injuries. Research indicates that limiting speeds to 25 miles per hour or lower prevents most deadly and life-changing crashes, and should be the standard for local roads when safety is the goal. Limiting speeds to 25 miles per hour or lower is especially important on roadways that do not physically separate people driving from people walking and biking. AND Please consider specifying that "safety goals" and "appropriate speeds" refer to eliminating deaths and life-changing injuries, which is consistent with the TSAP's overall objective.	This topic was discussed at length by the PAC. The plan uses broad language to state these Actions because state law limits opportunities to change the way posted speed is determined. Research of the implications of existing law and an understanding of what types of changes would achieve the intent of the Action have to precede any request for an amendment to statute.	No change
87	7/21/2016	Oral Testimony in OTC Public Comments	Soren Impey, Bike Loud PDX and other efforts	N/A	Strategic Investments	(paraphrased from meeting notes) Over the last two years there has been a 40% increase in traffic fatalities which is unacceptable. ODOT has given us a Vision Zero plan and now needs to commit to implementation. Put safety first by identifying adequate funding to get it done. With current funding patterns it will take twenty years to complete a safe bike and pedestrian network. ODOT needs to fund implementation of the new Bicycle and Pedestrian Plan. This is an ongoing crisis! The transportation system needs to be safer for all modes. And implementation needs to be equitable and meet environmental justice standards.	The TSAP is a prerequisite for funding for many safety-specific programs but is not the only source of funds for safety improvements. ODOT's Highway Safety Improvement Plan identifies strategic investments in safety projects and the State Transportation Improvement Program funds many projects that improve safety conditions. The Bicycle and Pedestrian Plan does include information on how it will be implemented and funded and is separate from the TSAP.	No change

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88	7/25/2016	Email	Michael Goff	N/A	Strategic Investments	There are three major areas in which the draft TSAP could expand the scope of available actions in ways that would significantly reduce accidents. The first is in transportation planning. From the perspective of transportation safety, the State of Oregon, counties, and municipalities overinvest in road system at the expense of rail, public transportation, and active transportation. In making transportation investment decisions, such as new highway construction, all public agencies should estimate the cost or benefit in terms of safety and take those estimates into account.	The comment overlaps investment for transportation safety (which is within the scope of this plan and is addressed most directly in the long-range plan, Goal 6: Strategic Investment) and investing in making the system more multi-modal, which is outside the scope of the plan. ODOT's modal plans and Transportation Options Plan are the vehicles for planning for increased mode share. Prioritization of state construction projects does include consideration of costs and benefits and methods for including analysis of safety costs and benefits is an evolving discipline that ODOT is implementing. Adding additional specifics on these matters to this plan is, however, out of scope.	No change
89	7/29/2016	Email	Peter Russell, Deschutes County	p. 56	Technology	8. Minor quibble the pullout quote on 4-7 for Advantages and Disadvantages of Technology only lists disadvantages.	Duly Noted	Review and Clarify
90	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	N/A	Technology	Automation and/or self-driving vehicles, while offering a degree of safety for some users, must not be risky for other roadway users. More work on this topic will be needed as the technology develops.	Discussed in some detail in the Response on Line 22, above.	No change
91	7/25/2016	Email	Michael Goff	N/A	Technology: Connected & Autonomous Vehicles	The draft TSAP is also correct to highlight the potential of connected and automated vehicles to greatly reduce accidents, and Oregon should take all reasonable actions to accelerate the deployment of these technologies. However, the development and deployment of connected and automated vehicles to 2035 is highly uncertain, and therefore also cannot be relied upon to eliminate accidents.	The role of ODOT at this time is to stay abreast of both technical and policy advances related to autonomous and connected vehicles so that when they begin to be present within our transportation system, and as they take over a significant percentage of vehicles, the state will be prepared to deal with them effectively. The plan does not propose that that transition will happen quickly or that the transition to advanced technology vehicles will solve our safety problems alone or in the near term.	No change
92	7/29/2016	Email	Peter Russell, Deschutes County	p. 62	Terminology	9. Minor quibble on 5-3, Strategy 1.1.2 does the term "bikers" mean bicyclists or motorcyclists? I'd advocate changing biker to the appropriate term.	Term has been changed to "bicyclist"	Done
93	7/29/2016	Email	Peter Russell, Deschutes County	Example on p. 65	Terminology	10. Minor quibble on 5-5, Strategy 2.23 is "disbenefits" even an actual word? How about drawbacks, disadvantages, negative outcomes, or something similar.	"Disbenefit" is a word meaning anything disadvantageous, or a drawback.	No change

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94	8/1/2016	Email	Lake McTighe, METRO		Urban / Rural differences	Distinguishing between urban and rural needs: Metro appreciates language in the plan acknowledging that urban and rural areas need different strategies and solutions. Metro also acknowledges that "Crashes in urban areas tend to have less severe outcomes due to lower speeds and access to medical services." This point was made several times in reference to urban areas, however, in the Metro region pedestrian fatalities are rising and the region still suffers from an unconscionably high number of severe crashes. The plan's de-emphasis of severe crashes in urban areas is especially problematic for vulnerable users.	The broad statement about overall crash severity in urban areas is not intended to be dismissive of the dangers to vulnerable users.	No change
95	6/21/2016	Email	Nic Oliver	p. 60	Vision Statement	This is an unrealistic goal. It is a shame that so many believe that a zero fatalities rate can ever be achieved in reality. The goal is a utopian dream and not based in reality as unforeseen incidents will always arise that are no-one's fault. To top it off, you added to no deaths a statement including life changing injuries. Virtually any accident/crash changes a person's life to some degree and therefore this goal is not only unrealistic but also unattainable. Please review this policy and make changes that are not only realistic but sustainable goals for the future.	The distinction between a "Vision" and a "Goal" are important here. We "envision" no deaths and have set goals to move towards zero deaths. A vision statement is aspirational - something we would like to see and are committed to work towards. Goals are more specific about what needs to happen to achieve the vision. The vision statement is a consensus product of the PAC and has broad support around the state.	No change
96	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	p. 11	Vision Statement	The plan vision is appropriate and provides a clear direction for the plan and for our transportation system. We fully support the adoption of the Vision Zero policy, but would note that the plan should also look at reducing the frequency and severity of ALL injuries, particularly as any other injuries can have a dramatic effect on users' perceived safety and their choice of mode and their activities. A good example here in Roseburg is a friend's mother who will not walk across a street which has a traffic signal, to go to the medical center.	Fatal and serious injury crashes are the targets of the plan because that is the frame of analysis of federal transportation safety programs and that is the data that is captured for safety planning.	No change
97	8/1/2016	Email	Lake McTighe, METRO Transportation Planning	p. 60	Vision Statement	Vision: It is great to see a strong vision statement supporting a target of zero deaths and serious injuries by 2035.	Affirms Vision Statement	No Change
98	8/1/2016	Email	Lake McTighe, METRO		Vulnerable Users	Metro appreciates that Vulnerable Users are included as an Emphasis Area. For cross reference, consider adding actions that address infrastructure specifically for vulnerable users to the Infrastructure Emphasis Area, emphasizing separation from traffic. Highlight separation for vulnerable users.	The plan approach is intentionally not prescriptive. Separated facilities are desirable but not feasible in many settings and may not be fundable with federal funds, so are not specified. Safety focused funding sometimes supplements other construction funds to add or upgrade safety improvements.	No change. Consider more information about safety options for vulnerable users in future updates.

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99	8/1/2016	Email	Nick Fortey, FHWA		Vulnerable Users - Older Users	Page 6-23 notes that "While older drivers are a concern now in Oregon, crash numbers could increase dramatically over the next decade as the U.S. population ages." We would strongly encourage that this approach to forecasting future safety concerns more fully permeate the plan so as to muster an effective proactive approach.	The "older drivers and pedestrians" elements of the plan reflect a new FHWA requirement for SHSPs. Our data doesn't tease out causal conclusions but clearly shows worse physical outcomes for older travelers. There is current research and testing of modified signage, etc. that is addressing how older travelers can be better protected. In this plan, we are essentially setting a baseline that will be used to assess trends in future plans.	No change. Consider more information of safe options for older system users in future updates.
100	7/29/2016	Email	Peter Russell, Deschutes County	p. 77	Vulnerable Users EA: Older Users	12. Older Road Users are vulnerable, but not for the reasons listed at 6-1. The vulnerabilities listed at 6-1 are reduced physical skills; the actual vulnerabilities of older road users are physical frailty and how that manifests itself in a crash.	The current language speaks to changes due to aging that may result in crashes. Draft language has been added to note the reasons why injuries tend to be more severe.	Minor edits made
101	8/1/2016	Email	Dick Dolganos, Bike Walk Roseburg	N/A	Vulnerable Users, Older Drivers	The rate of crashes involving older drivers speaks to the need for more alternatives to individual motor vehicles that allow elderly folks to get around their communities safely.	Crashes involving older drivers are not necessarily caused by the older driver, but injuries may be more severe due to the physical effects of aging. Providing transportation options is outside of the scope of this plan.	No change
102	8/1/2016	Email	Gerald Fittipaldi	Page 6-17,	Pedestrians	Pedestrians - Current text: Pedestrian fatalities and serious injuries can be caused by inattentive drivers or inattentive pedestrians. Revised text: Pedestrian fatalities and serious injuries are often caused by inattentive drivers. Drivers should always be on the lookout for the unexpected. For example, small children may be crossing a street, or people may be wearing dark clothing, even at night. The driver is responsible for not hitting any vulnerable road users.	Personal responsibility applies to everyone equally	No change
103	8/1/2016	Email	Gerald Fittipaldi	Page 6-21,	Bicycles	Bicyclists - Current text: Bicyclist fatalities and serious injuries can be caused by inattentive drivers or inattentive bicyclists. Revised text: Bicyclist fatalities and serious injuries are often caused by inattentive drivers. Drivers should always be on the lookout for the unexpected. For example, small children may be crossing a street. While ODOT will be aiming to increase the percentage of bicyclists that use lights at night, bicyclists may be wearing dark clothing. The driver is responsible for not hitting any vulnerable road users.	Personal responsibility applies to everyone equally	No change