

Attachment 3 – Summary of Written Comments Received and Changes Made

(Transportation Safety Action Plan 2021 Update Public Comment Record)

Public Comment Period: May 24, 2021 - July 9, 2021

#	Received	Representation	Contact /Source	Comment Summary	Key Themes	TSAP Team Response	Text Edit y/n	Text edit page
1	5/24/2021	Chris Bauman	Written comment	Please stop expanding highways. People need safety improvements in cities. Children and other vulnerable users traveling by more active modes other than personal vehicles need better conditions and safer routes. People who walk or use other wheeled devices to travel need to receive safer infrastructure improvements beyond what you have proposed. Incomplete roadways are never left how they are, so please do the same for bike routes and sidewalks in urban areas where people and vehicles mix too often. Urban areas should be built with the most vulnerable and exposed users in mind while reducing the violence that can be caused by people who are operating vehicles in safely or travel at too high speed	<ul style="list-style-type: none"> Prioritize bike and pedestrian safety over highway expansion. 	<p>Bicyclists and pedestrians (Vulnerable Users) are one of 4 primary emphasis areas in the 2021 TSAP. Bicyclist and pedestrian safety issues are addressed with the most Emphasis Area Actions of any category.</p> <p>While the detailed designs are not in the TSAP, ODOT's Blueprint for Urban Design addresses multimodal design that is context sensitive. The BLUEPRINT FOR URBAN DESIGN is referred in the Introduction and 3 separate Emphasis Area actions.</p>	n	
2	5/25/2021	Mark Wigg	Written comment	The state needs to require that autonomous vehicles have a higher priority for avoiding hitting pedestrians or cyclists that preserving the vehicle. If a child dashes into the street, the car should crash into other cars, walls, etc. to avoid hitting the child. A child will not survive an automobile hitting them. The occupants of the car will survive almost all crashes. The warning beeper for backing up in my car sounds if a car is behind me but not if a person is behind me. This is bad design.	<ul style="list-style-type: none"> Autonomous vehicles safety. 	Automated vehicle safety will be addressed primarily at the vehicle manufacturer and federal legislation level. Oregon safety professionals will monitor progress and develop state-specific policy accordingly.	n	
3	5/25/2021	Mark Wigg	Written comment	Are pedestrian and bicycle accidents counted in the total for traffic accidents? If they are included, ODOT is not suitably measuring these accidents because it lumps them with vehicles. Fatalities per 100million miles travels does not capture the death rate for peds and cyclists. We don't have 100million miles of travel by foot or bike in a year but we have multiple	<ul style="list-style-type: none"> Question about how bike and pedestrian crash data is included in traffic accident data. 	The current data set does not include statewide miles traveled by foot or bicycle. The TSAP uses the best information available, which right now is vehicle miles traveled.	n	

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				deaths. ODOT's focus on safety is very distorted by combining vehicle and bike-ped accidents.		Bicyclists and pedestrians (Vulnerable Users) are one of 4 primary emphasis areas in the 2021 TSAP. Bicyclist and pedestrian safety issues are addressed with the most Emphasis Area Actions of any category.		
4	6/1/2021	Susan Bechert	Written comment	<p>I live in a community on Feters Loop in Eugene that is home to many retired people. At the time I moved here, I chose it because it provided bike access downtown (which I then used) and had bus service every 15 minutes. I was close to retirement, and wanted affordable and accessible transportation in the future.</p> <p>Over time, service has been repeatedly reduced. Now, there is no bus service at all. Only abandoned bus stops.</p> <p>We are told to walk a distance to stops on 18th (steep incline and difficult for those of us with disabilities) or 11th. While I am the first to promote exercise, the truth is some of us are using walkers, or have breathing challenges which makes navigating this added distance difficult. I settled here because there was bus service a block from my dwelling. Now I must travel many blocks, over uneven sidewalks.</p> <p>When I fell and broke my leg, traveling by foot 3-4 blocks was out of the question, but my "disability" was considered temporary, so I could not access the alternative transportation offered to persons with difficulty reaching the bus routes. In other words, I was stuck. Now, many other residents are likewise potentially stuck, because the infirmities of age do not qualify them for special transportation services, but the time and agility necessary to navigate uphill or 4 blocks poses too much of a risk.</p> <p>Many low income and senior people along Oak Patch were dependent upon this bus line to get to work, medical appointments, and to access basic necessities. Students used it to get to school. As you know, many downtown employers discourage the use of cars as there is no parking available, and those of us who settled in a spot with bus transportation now find our transportation withheld.</p>	<ul style="list-style-type: none"> • Bike and pedestrian safety. • Concern about reduced transit access. 	ODOT shared this concern regarding transit access with Lane Transit District on June 7 th , 2021.	n	

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				When will the bus service at Feters Loop/15th Street and Oak Patch resume? We were told the discontinuation was due to the pandemic. Or have we lost our transportation altogether? If the latter, please reconsider.				
5	6/4/20121	Jay Higgins, City of Gresham	Written comment	<p>It's good to see ODOT doing proactive safety planning to make our roads safer and leading with a Zero Deaths approach.</p> <p>Page 36, "As shown in Figure 9, speeding is the most common behavioral issue associated with fatal and serious injury crashes in Oregon, followed by alcohol-involved drivers." But that's not what the figure shows... isn't alcohol/drugs the most common because it has the largest % of both, 68%? Maybe the labels are mixed up?</p> <p>Page 81, Figure 22 - the labels are the same.</p>	<ul style="list-style-type: none"> • General text edits. 	<p>Pg 36 and Figure 9: The text content is largely accurate. A change will be added in the TSAP to include alcohol and/or drug involvement.</p> <p>The draft Figure 9 information included an error and is updated with accurate data.</p> <p>Figure 22. The right-most caption has been changed to "Neither Alcohol Nor Other Drugs Involved"</p>	y	36, 81
6	6/5/2021	Sara Wright, Oregon Environmental Council	Written comment	<p>Thank you for the opportunity to comment on the Transportation Safety Action Plan. This document lays out the problem - people are dying and being injured on Oregon's roads - and the "vision" - nobody will die or be injured on Oregon's roads starting in 2035. It fails, however, to lay out any actions that will get us from the current state of affairs to the vision. Everything in this document is incremental and completely insufficient to make any meaningful change. The priority actions are primarily about education. This accepts the status quo of the system, and assumes that individual behavior change will make the difference, which it never has and never will.</p> <p>For example, we know that speed is associated with injury and death, and while this document addresses the relationship between driving over the speed limit and crashes, it ignores the relationship between actual speed and both crash incidence and severity. Reducing speed limits, automating enforcement, and changing the way roads are engineered would not only reduce traffic violence but also climate pollution and air toxics.</p>	<ul style="list-style-type: none"> • Redirect investments and prioritize the safe and convenient movement of people. • Plan is not sufficient to make meaningful change. • Engineering and design over personal responsibility. • Prioritize Right of Way for bike and pedestrian safety over cars. 	<p>Chapter 6 Emphasis Area (EA) Actions move in the direction of achieving the Vision of zero deaths by 2025.</p> <p>Engineering and design are highlighted in the Infrastructure EA and several EA Actions within the Vulnerable Users area.</p> <p>The TSAP addresses the relationship between speed and crash incidence and severity through the implementation of the Blueprint for Urban Design, referenced in Action #7. The Blueprint for Urban Design is heavily influenced by new research regarding speed and safety.</p>	n	

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				<p>This document should also address the way that right-of-way is allocated. Our right-of-ways should be designed around people, not vehicles. Provide safe, convenient space in the right-of-way for people walking, biking, and riding transit, and we will be able to dramatically increase safety while reducing other harmful outcomes of driving.</p> <p>This "Action Plan" fails to point the way to actual change. In order to achieve that, ODOT will need to significantly redirect investments and prioritize the safe and convenient movement of people, not vehicles. Without that shift, we will never reach the "vision" identified in this document.</p>		Bicyclists and pedestrians (Vulnerable Users) are one of 4 primary emphasis areas in the 2021 TSAP. Bicyclist and pedestrian safety issues are addressed with the most Emphasis Area Actions of any category.		
7	6/8/2011	Michael Holloran, Oregon State Police	Written comment	<p>As a State Trooper and a member of The Dalles Traffic Safety Commission it saddens me that reduced police presence during COVID 19 saw fatalities rise dramatically in 2020 and Oregon was no exception with fatalities well over 500.</p> <p>Already in 2021 the number of driving complaints is on the rise; most are cell phone and speed related. I have written more cell phone citations in 2021 than ever before and I have also set a record for the number of CMV citations to trucks going over 80 mph and the year is only half over.</p> <p>Unfortunately I see the future of Oregon's Fatalities going up not down. The number of mentally ill people, most of which are drug induced is sky-rocketing with Oregon essentially legalizing drugs. My patrol shift has become re-active rather than pro-active.</p> <p>Just last week I had one subject driving over 100 mph recklessly (under the influence) cutting in and out of traffic, whose horrific crash shut the freeway down for hours on a holiday weekend. We had three motorcycle fatalities in our area in the last two weeks and just a few days ago I had a 19 year old kid high on drugs dancing naked in the freeway playing a guitar while playing chicken with a log truck. He lost. Also this last week I contacted a man parked on the side of the road, tying up a baggie of methamphetamine. He was alone and not yet impaired, so I wrote him \$100 citation which if he takes an assessment he doesn't have to pay.</p>	<ul style="list-style-type: none"> • Lack of traffic safety enforcement and funding. • Increased unsafe driving behavior and drug use. • Poor legislation. • Insufficient traffic safety education. 	<p>Emphasis Area Risky Behaviors focuses on actions to address the concerns raised.</p> <p>The TSAP includes some elements regarding legislation, but the TSAP as a planning tool does not have legal authority nor is it a lobbying document.</p>	n	

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				<p>Currently our legislators are trying to pass laws that make it nearly impossible for Law Enforcement to stop equipment violations. It is as if no one has bothered to look at the number of DUII and DUI-CS arrests that come from equipment violation traffic stops.</p> <p>To make matters worse, our courts are not yet sending safety belt violators to our local classes. On line courses have little to no impact, participants are not even required to pay attention; they could be playing games or completely away from the computer. The number of people not wearing safety belts is up, but the number of people in class is down.</p> <p>Is highway traffic safety really a priority?</p>				
8	6/10/2021	Clay Veka, Portland Bureau of Transportation	Written comment	<p>I noticed a couple of technical errors in the draft plan that I meant to point out.</p> <ul style="list-style-type: none"> • P. 36. The text and the graphic mix percentages for Speeding and Alcohol/Drugs. The text says, “As shown in Figure 9, speeding is the most common behavioral issue associated with fatal and serious injury crashes in Oregon, followed by alcohol-involved drivers.” But the graphic shows Alcohol/Drugs as #1 and Speeding as #2. • P. 81 – Figure 22. The light teal description needs to be corrected. It says, “alcohol and/or other drug involved” but it’s supposed to be “NOT alcohol and/or other drug involved.” • P. 82 – Figure 23. These are the wrong numbers for fatalities and serious injuries. These are the exact same numbers from the DUII #s in Figure 21 above. And are much too high for unrestrained fatalities and serious injuries (fortunately) 	<ul style="list-style-type: none"> • General text edits 	<p>Pg 36 and Figure 9: The text content is largely accurate. A change will be added in the TSAP to include alcohol and/or drug involvement.</p> <p>The draft Figure 9 information included an error and is updated with accurate data.</p> <p>Figure 22. The right-most caption has been changed to “Neither Alcohol Nor Other Drugs Involved”</p> <p>Figure 23. Updated unrestrained to the correct values.</p>	y	36, 81, 82
9	6/12/2011	Rob Zako, Better Eugene-Springfield Transportation	Written comment	<p>I have a question about the draft Transportation Safety Action Plan. On page 48:</p> <p>The Economic Cost of Crashes While it is difficult to quantify the emotional costs of crashes, it is possible to estimate the purely financial impacts of lost lives, injuries, and property damage attributable to crashes involving motor vehicles.</p>	<ul style="list-style-type: none"> • Question about calculation methodologies. 	<p>The USDOT’s value of \$11.6 million is a national value based on a fatality.</p> <p>To tie the TSAP directly to Safety implementation in Oregon, ODOT takes a different approach to economic cost of crashes.</p>	n	

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				<p>Economists often use two approaches to quantify the costs of crashes: economic costs and comprehensive costs. Economic costs can generally be described as those costs which are measurable, while comprehensive costs include the economic costs as well as lost quality of life.</p> <p>Oregon reports human capital and comprehensive crash costs by crash type and severity are based on two methodologies: Highway Safety Manual (HSM) Appendix 4A and FHWA's <i>Crash Cost Estimates by Maximum Policy-Reported Injury Severity Within Selected Crash Geometrics</i>. Table 2 shows Oregon's comprehensive economic value for crashes based on highway type, urban/rural location, and severity outcome.</p> <p>How do these two methodologies align with USDOT's Departmental Guidance on Valuation of a Statistical Life in Economic Analysis, which estimates the value of a life at \$11.6 million in 2020?</p>		<p>For safety needs identification and project selection in the Oregon All Roads Transportation Safety (ARTS) program that distributed federal Highway Safety Improvement Program (HSIP) funds, ODOT uses a weighted average value of fatal and serious injury crashes so that a single fatal crash event is not overrepresented in project prioritization. This is why the \$1-2M values are used instead of the USDOT's \$11M.</p> <p>These values will be updated again during the next round of ARTS.</p>		
10	6/17/2021	Kiel Johnson, Go By Bike	Written comment	<p>Hello, my name is Kiel Johnson, I am the owner and founder of Go By Bike which provides bike valet services and consultation. For the past 9 years we have operated the bike valet under the aerial tram where we have parked over 500,000 bicycles. I applaud your efforts to eliminate traffic deaths in Oregon. To date 2,759 people in Oregon have died from Covid while on Oregon roads (most managed by ODOT) between 2009 and 2018 3,569 Oregonians have been killed.</p> <p>I was discouraged that the TSAP still places the highest priority for blame on those deaths on the users instead of the designers of the roads. Placing "Safety Culture" as the number one goal and "risky behavior" will not help us get to a zero traffic death future. These issues should be prioritized below infrastructure.</p> <p>Following the success of places like Utrecht in the Netherlands the TSAP should copy what they have done and call for the shrinking of all highway and arterial roads to three lanes or less. By reducing the number of lanes we make space for pedestrians and bikes and are able to slow down traffic to a none lethal speed.</p>	<ul style="list-style-type: none"> Value engineering and design over personal responsibility. Consider road diets to prioritize bike/ped improvements and increase safety. Reducing car speeds by innovating road design. Regulate car size for safety. 	<p>The Emphasis Areas are not provided in a priority order. Both Risky Behavior and Infrastructure are important aspects of roadway safety.</p> <p>Lane reconfiguration/reduction is an approved safety countermeasure. ODOT's Blueprint for Urban Design addresses many of the concerns by the commentor regarding arterials. While the detailed designs are not in the TSAP, the Blueprint for Urban Design is referred in the Introduction and 3 separate Emphasis Area actions.</p> <p>Vehicle details (such as size) tend to be handled at the federal level and outside the TSAP purvue. The TSAP will include the addition of vehicle size as a</p>	Y	91

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				<p>The report needs to focus more on reducing car speeds and allowing for innovative road designs (like curving roads) and smaller road space. ODOT needs to reevaluate it's criteria for lane widths. For example when PBOT installed a bicycle lane on N Rosa Parks ODOT made the city shrink the bike lane to allow for a wider car lane.</p> <p>The report also need to call for new law regulating the size of cars allowed to be purchased in Oregon. https://www.iihs.org/news/detail/new-study-suggests-todays-suvs-are-more-lethal-to-pedestrians-than-cars</p>		<p>contributing factor to pedestrian collisions in Chapter 6.</p> <p>Vehicle speed is identified more than 70 times in the TSAP, including an entire section in Chapter 6 (p. 83-85)</p>		
11	6/17/2021	Drew Williamson	Written comment	<p>I am writing today in response to the TSAP and solicitation of comments. I firmly believe that if ODOT wants to realize these goals (which I, and many in the community strongly support), then we need to get serious about reducing automobile throughput. There are many many studies that show how road design and excessive widths are the leading cause of high speeds, a top killer of both drivers, cyclists, and pedestrians alike. They contribute to an enduring hegemony of vehicle driving as the only legitimate way to get around. ODOT has thus far shown an unwillingness to reduce automobile throughput, even when faced with a once and a lifetime opportunity to rebuild a very dangerous street, Barbur Blvd, through a reduction in car lanes in conjunction with the SW Corridor project. Traffic counts be damned on Barbur, it could instead become a safe, welcoming and vibrant urban corridor. As a SW Portland resident, I wish this notion would be taken more seriously.</p> <p>There are other examples, of course we are all cognizant about what has happened on 82nd Avenue in Portland these last couple months. Deaths are the only thing that register, but there is no telling how many close calls have been missed in the tally. 82nd, among other roads, needs urgent safety upgrades and we ought to more seriously consider road diets. Traffic apocalypse is always predicted, though such results rarely materialize to any meaningful extent—the demand and travel patterns simply change around the new configuration and all users have a safer space for getting around. Until we make appropriately drastic changes to the way we think about the public right of way and how to allocate this space, we will not achieve Vision Zero.</p>	<ul style="list-style-type: none"> Consider road diets to prioritize bike and pedestrian improvements and increase safety. Reduce auto throughput on the widest non-interstate roads. 	<p>Multimodal transportation, in particular active modes, is a focus of the TSAP, and Road Diets are on the list of recommended countermeasures. For example, ODOT's Blueprint for Urban Design addresses many of the concerns by the commentor regarding arterials. While the detailed designs are not in the TSAP, the Blueprint for Urban Design is referred in the Introduction and 3 separate Emphasis Area actions.</p> <p>ODOT does recognize the safety implications of speed. It is addressed in the Blueprint for Urban Design. Other statewide mode and topic plans also specifically consider multimodal investments and safety implications related to speed.</p> <p>The TSAP includes actions that address speed management (Speed Action 2), as well as facility design to address safety issues related to speed (Speed Action 5).</p>	n	

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				I fully believe that in this vein, ODOT should formally adopt a stance that focuses on intentionally reducing auto throughput on the widest non-interstate roads across our state. Thank you for reading these comments.		ODOT is collecting a list of considerations for future updates and implementation, and we will add this item to the parking lot		
12	7/7/2021	Paula Leslie, Oregon BikePAC	Written comment	<p>TSAP BikePAC revisions</p> <p>As stakeholders in the TSAP, BikePAC has taken the opportunity to offer suggestions and edits to minimize bias in this document.</p> <p>We feel strongly that there is potential for more equality among road users, in regard to the unique needs of motorcycle riders, as our stakeholders work to reduce serious injuries and fatalities on Oregon’s roads and highways. Here are our focus areas.</p> <ul style="list-style-type: none"> • Motorcycle crash scene management • Increase reckless, careless, and distracted driver accountability • improving public safety training and data sharing for motorcycle crash scene management • Awareness of the unique safety needs of power two wheel vehicles, in regard to traction and visibility. • The need for more Autonomous vehicle safety data, before the infiltration onto Oregon’s roads. <p>P. 14</p> <p>The TSAP also serves as Oregon’s long-range safety topic plan, an element of the Oregon Transportation Plan (OTP), and parallel to other mode and topic plans like the Oregon Motorcycle Safety plan, Bicycle and Pedestrian Plan and Oregon Freight Plan.</p> <p>P. 20</p> <p>PUBLIC TRANSPORTATION DIVISION</p> <p>The Public Transportation Division is a stakeholder in the TSAP as it supports safety initiatives relevant to rail, multimodal, and active transportation. This division includes the Motorcycle safety program, Bicycle and Pedestrian Program that has established goals that set forth to reduce crashes involving people walking, Power Two wheel vehicle riding, PTWV, and biking, eliminate crashes that result in injuries and deaths, and promote PTWV, bicycle riding, walking and to improve</p>	<ul style="list-style-type: none"> • Motorcycle crash scene management. • Motorcycle safety related to vehicles. • Improving public safety training and data sharing for motorcycle crash scene management. • Motorcycle unique traction and visibility needs. • The need for more Autonomous Vehicle safety data. • Text edits related to motorcycles. 	<p>While the Motorcycle Safety Plan should be considered, it is not a statewide mode or topic plan as it is not officially part of the OTP. Mode and topic plans refine and apply OTP policy to specific modes or topics and guide state, regional, and local investment decisions for the parts of the transportation system that they address.</p> <p>https://www.oregon.gov/odot/planning/pages/plans.aspx</p> <p>Motorcyclist representatives were involved in our stakeholder workshops and the Governor’s Advisory Committee on Motorcycle Safety received TSAP updates and opportunity to provide input.</p> <p>Pg 60: Added the recommended inclusion of motorcyclists in this section.</p> <p>Chapter 5 (Strategy)</p> <p>Recommendations: The 2021 TSAP focused update was not scoped to update this chapter except under very specific circumstances. The next TSAP update anticipated for 2026 will include a review of all the TSAP chapters.</p>	y	60, 101, 103, 117

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				<p>health and safety. The Program works towards these goals by supporting implementation of the Oregon motorcycle , Bicycle, and Pedestrian Plan and the TSAP, developing walking, Motorcycle, PTWV riding and bicycling safety and education materials, funding projects that improve conditions for Riding PTWVs, walking and biking, and providing planning and design guidance for PTWV,pedestrian and bicycle projects. OTHER STATE AGENCIES</p> <p>Page 25 ORS 802.320. Motorcycle safety program. The Department, with advice from the OTSC, is to plan for and conduct training for motorcycle safety. The Department does this in consultation with local groups. (The Governor’s Advisory Committee on Motorcycle Safety provides a conduit for local consultation). This program is allowed to raise funds to provide programs???</p> <p>P27 MULTIDISCIPLINARY APPROACH. Technical staff from ODOT were consulted in the development of the plan, including Motorcycle, pedestrian and bicycle, motor carrier, freight, traffic operations, traffic engineering, construction, and maintenance experts. ODOT, local agencies, law enforcement, public health, and regional planning organizations were also consulted to address the 4 Es (engineering, emergency response, law enforcement, and education) and provide input on Emphasis Area actions in two stakeholder workshops.</p> <p>COMPETING PRIORITIES IN URBAN AREAS In urban areas there is a high mix of modes of travel, speed of travel and trip purpose. Trucks move freight 4,3, 2 wheel vehicles, bicycles and transit move people to work, recreation, and shopping. There is inherent conflict and risk in this mix of modes, trip purposes, and speed of travel. Implementing a range of transportation solutions in urban areas is necessary to meet transportation goals, such as safety, mobility, reliability, or improved air quality. Planners and engineers need to draw on the best available evidence to implement a data-driven approach to funding projects which reduce the frequency and severity of crashes.</p> <p>p 28 Oregon has designated the Oregon Transportation Plan, the adopted</p>		<p>p. 88 and 89. This definition of vehicle includes all. To single out passenger vehicles and motorcycles would require also adding trucks, buses, and other types separately.</p> <p>p. 97 This statement already exists as Enforcement Emphasis Action Action 2.</p> <p>p. 101 Added reference to reckless and distracted driving language to the Enforcement paragraph.</p> <p>p.102 TSAP will not add to this list, as these are "such as" clause, not a full list.</p> <p>Data Action 1. The intent of this one is specifically for bicyclists and pedestrians only.</p> <p>Training and Education Action 3. Added motorcyclists to this item.</p> <p>p. 117. Added "reckless, careless" to this item.</p>		

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				<p>mode and topic plans (Aviation, Motorcycle, Bicycle and Pedestrian P 53 Connected and Automated Vehicles Are Expected To:</p> <ul style="list-style-type: none"> • Reduce likelihood of crashes. • Take time before all vehicles have the technologies. • Require public investment, policies, and programs in urban and rural areas. • Initially benefit higher income residents. • PROVIDE MORE SAFETY DATA <p>P54 SAFETY ANALYTICS The use of analytical tools and processes offers a more immediate application of technology to transportation safety. The increasing quality and quantity of safety-related data (e.g., crash, roadway inventory, and volume) is enabling new insights into the causes of crashes and possible measures to reduce their occurrence or severity. Methods for collecting safety data specific to other modes such as Motorcycles, MOPEDS, bicycles and pedestrians are emerging and will expand capability to assess opportunities and risks and identify solutions for Vulnerable road users . Advances in statistical modeling</p> <p>P 55 Shifting Transportation and Lifestyles</p> <ul style="list-style-type: none"> • More people are choosing urban lifestyles. <ul style="list-style-type: none"> • Urban areas are becoming more dense. • More people are choosing non-auto travel • More people are riding motorcycles and mopeds (PTWVs) • Transit is one of the safest modes of travel. • Managed speeds can significantly reduce the severity of crashes <p>P56 Less is known about the relationship of the level of MOTORCYCLING walking and bicycling to safety outcomes for these modes or for the broader public. A ‘safety in numbers’ theory has been proposed, suggesting that higher levels of MOTORCYCLING, walking, and bicycling result in lower</p>				

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				<p>crash rates involving these modes.</p> <p>While data consistent with this theory has been presented from several countries, a consensus on this question has not been reached. It is possible that one or both of these factors played a role in reducing the crash rate, but it cannot be determined without a more rigorous study. Nonetheless, the evidence suggests that at the very least, higher levels of MOTORCYCLING? bicycling and walking do not result in a dramatic increase in crashes</p> <p>p 60 Inspiring a strong safety culture among the public (individual drivers, passengers, MOTORCYCLISTS, bicyclists and pedestrians) can be implemented in a number of ways. Good public information and education on the rules of the road and changes in regulations; broadly available and up-to-date AUTOMOBILE AND MOTORCYCLE training; clear communication of the benefits of transportation law enforcement in changing social norms to expect slower speeds; respect and responsibility for other users; and community engagement in transportation safety plans and programs; can all contribute to higher awareness of how individual choices influence the safety of all system users.</p> <p>p 61 Strategy 1.3.1 – Collaborate with state, regional, tribal, county and city transportation and safety agencies, and other stakeholders, to identify unsafe walking, biking, motorecycling, or driving behaviors that could be addressed through legislation. Identify and pursue legislation to modify these behaviors</p> <p>p 62 Strategy 2.1.2 – Identify and implement new methods for crash, roadway, and exposure (e.g., 4, 3, and 2 wheel Power Vehicles, PTWV, pedestrian, and bicycle volume) data collection, sharing, and storage.</p> <p>Strategy 2.1.4 – Review state crash report forms to ensure appropriate data is collected and extraneous data is eliminated. Provide training and education to state and local enforcement agencies on crash scene management, related law changes, and resulting form(s).</p>				

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				<p>p. 65 Strategy 3.1.2 – Support a high-visibility enforcement program increasing traffic, VULNERABLE ROAD USERS, INCLUDING MOTORCYCLE, bicycle, and pedestrian law enforcement capabilities (priority and funding). Strategy 3.1.5 – Conduct education and outreach to law enforcement to increase understanding and enforcement of traffic, commercial vehicle, MOTORCYCLE, pedestrian, and bicycle laws</p> <p>P 66 Strategy 3.4.1 – Enhance perceptions of MOTORCYCLING, bicycling, walking, and transit safety and security by identifying and implementing appropriate facility design, lighting, and</p> <p>P 87 Intersections An intersection is a point at which two or more roads intersect. Most intersections are primarily designed for passenger vehicles, freight, and buses, and at a secondary level for pedestrians and bicyclists, while motorcycles have historically been left out of these considerations. An inherent concern at intersections is that they create conflict points among multiple road users, which can be exacerbated by surface and visibility issues, differences in vehicle size and travel speed as well as the complexity of the intersection design. Intersection crashes in Oregon are defined as incidents that occur at a signalized or unsignalized intersection in an urban or rural environment.</p> <p>P. 88 5. Improve the visibility of passenger vehicles, motorcycles, pedestrians and bicycles along corridors and at intersections with lighting and unobstructed sightlines.</p> <p>p. 89 Roadway Departure When operating a passenger vehicle or motorcycle, an event may require the driver or rider to swerve suddenly to avoid another car or object, or an unsafe speed could affect control of the car, and especially a motorcycle. These situations impact a driver’s or rider’s ability to stay on the road, possibly resulting in a crash. These concerns are escalated for PTWVs. Roadway departure crashes are defined as non-intersection crashes which</p>				

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				<p>occur after a vehicle crosses an edge line or a center line, or otherwise leaves the traveled way. Figure 29 ROADWAY DEPARTURE FATALITIES AND SERIOUS INJURIES BY YEAR 0 2014 2015 2016 2017 2018 144 138 207 170 146 344 414 358 373 445 F</p> <p>p. 89 Let's put some motorcycle road departure stats in here? Problem Identification Between 2014 and 2018 approximately 41 percent of all fatal and serious injury crashes in Oregon included a roadway departure, contributing to 1,330 fatalities and 3,336 serious injuries. About 68 percent of these crashes were in a rural environment. Many risky behavior-related crashes involve the vehicle leaving the lane or entire roadway. For example, road and lane departure accounts for 68 percent of speed-related fatal and serious injury crashes and 60 percent of impaired driving fatal and serious injury crashes.</p> <p>p. 97 Motorcyclist Actions 1. Provide information to increase awareness among motorcycle drivers that most motorcyclist-involved crashes involve speed, impairment, and roadway departure. 2. Provide education and enforcement focused on impaired motorcycle riding and its impact on all road users. 3. Increase awareness of motorcycles among the general public through education and outreach. 4. Adopt and implement road surface maintenance practices across jurisdictions that reduce hazards for people operating motorcycles. 5. Modify Oregon's helmet definition to match federal regulations. 6. Provide education and enforcement focused on driver accountability for distracted, reckless, and careless driving.</p> <p>p. 98 Enforcement Law enforcement officials prevent crashes through traffic details, special mobilization campaigns such as Click It or Ticket, saturation patrols, and checkpoints. These different approaches enable officers to prosecute safety offenses, such as impaired driving, distracted driving, careless, and reckless driving, but also keep all road users safe at the same time. They also respond to crashes to collect information for crash reports, which detail the specifics of the crash, person(s), and vehicle(s) involved in the incident. This information later helps transportation and safety</p>				

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				<p>stakeholders make informed decisions about safety solutions. Fully staffed and funded law enforcement agencies can direct their efforts towards strategic enforcement and data collection.</p> <p>P.102 Enforcement Law enforcement officials prevent crashes through traffic details, special mobilization campaigns such as Click It or Ticket, saturation patrols, and checkpoints. These different approaches enable officers to prosecute safety offenses, such as impaired, careless, reckless, and distracted driving, but also keep all road users safe at the same time. They also respond to crashes to collect information for crash reports, which detail the specifics of the crash, person(s), and vehicle(s) involved in the incident. This information later helps transportation and safety stakeholders make informed decisions about safety solutions. Fully staffed and funded law enforcement agencies can direct their efforts towards strategic enforcement and data collection.</p> <p>Data Actions 1. Analyze existing safety-related data and collect and analyze new data sources to evaluate motorcycle, pedestrian and bicycle safety risk factors on all public roads.</p> <p>Training and Education Actions 1. Implement education, training, or examinations to ensure all licensed drivers understand current traffic laws. 2. Conduct training on traffic safety laws for law enforcement officers, attorneys, and judges to improve consistent and unbiased enforcement and adjudication processes. 3. Continuously improve the education system for new motorcycle riders and drivers, including Driver's and Motorcycle rider's Education cost and access barriers. Evaluate requiring driver and Rider training for new operators. 4. Provide education and other countermeasures to improve work zone safety for workers and the traveling public. 5. Develop training for local agency and consultant engineers and planners in transportation safety basics (e.g., safety investigations, road safety assessments, speed zoning, data analysis).</p> <p>p.117 ment and EMS to identify strategic education and marketing campaigns. ENFORCEMENT AGENCIES • Collaborate with tribal, county, city, MPO,</p>				

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				and state partners to advance safety culture within organizations and with the public. • Collaborate with tribal, county, city, MPO, and state partners to develop strategic enforcement or education campaigns to address critical behaviors identified in the TSAP. • Educate the public and tribal, county, city, state, and MPO partners about critical and emerging issues which could be addressed through the planning and programming processes. • Identify and deploy best practices related to reckless, careless, impaired, and distracted driving education and enforcement. • Identify and deploy best practices related to crash data collection, compilation, and transfer.				
13	7/7/2021	Doug Parrow	Written comment	<p>After having reviewed the draft plan, I have to say that I am disappointed. Rather than offering an effective path toward Vision Zero, the draft appears to be little more than a rehashing of the same tired old Goals, Policies, and Strategies that have utterly failed to stem the increasing casualties of our transportation system, particularly among pedestrians and bicyclists. Under the current plan, Oregon has failed to meet the safety targets that were established. We need action now. Not 146 more pages of platitudes and measures that have proven to be ineffective.</p> <p>We desperately need the implementation of new measures to increase safety on our transportation systems. I suggest that the OTSC incorporate the following measures into the plan:</p> <ol style="list-style-type: none"> 1. Revise traffic engineering protocols to design all urban streets in a manner that will ensure that traffic speeds are lowered to no more than 35 mph through the use of the range of proven traffic calming devices. Historically, ODOT has done just the opposite by widening lanes and increasing sight distances in the name of safety. 2. Eliminate all slip lanes. While slip lanes are remarkable effective in allowing motor vehicles to navigate intersections without slowing down, they are extremely hazardous for pedestrians and are challenging for bicyclists to cross. 3. Construct more signalized crosswalks that are placed closer together. (ODOT always seems to have plenty of money to add lanes to roads that are 	<ul style="list-style-type: none"> • Prioritize traffic calming measures in design and protocols. • Eliminate slip lanes for increase bike and pedestrian safety. • Prioritize pedestrian facilities and increase clustered crosswalks. • Create legislation that shifts legal responsibility from bikes and pedestrians to drivers. • Prioritize bike and pedestrian needs over vehicles. • Consider “Dangerous by Design” by the National Complete Streets Coalition and Smart Growth America. 	<p>ODOT’s Blueprint for Urban Design addresses many of the concerns by the commentor regarding design and a new approach to setting context-sensitive speed limits using the latest research. While the Blueprint for Urban Design elements are not detailed the TSAP, the Blueprint for Urban Design is referred in the Introduction and 3 separate Emphasis Area actions.</p> <p>New designs and retrofits are considered in the Blueprint for Urban Design.</p> <ol style="list-style-type: none"> 3. Pedestrian actions are addressed in the TSAP, and signalized crossings are in the toolbox. 4. Raised crosswalks are an available treatment in some areas. 5. At-fault laws are out of the scope of the TSAP document. 	n	

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				<p>marginally congested. It is past time to redirect that money to real, effective safety measures.)</p> <p>4. Initiate programs to raise crosswalks to curb level. (Given that pedestrians have the right-of-way in crosswalks, why do they have to step down onto the street, rather than having the motor vehicles drive up to the level of the sidewalk.) In addition, incorporate other traffic calming devices into all street designs.</p> <p>5. Shift the legal responsibilities for crashes from pedestrians and bicyclists to motorists by establishing an assumption that crashes are the fault of the motorist, unless they show otherwise. This is the case in many European countries, but here motorists who kill pedestrians and bicyclists are rarely prosecuted.</p> <p>6. Develop road planning protocols that consider the extent to which motor vehicle traffic will obstruct and hinder pedestrian and bicyclist traffic, rather than the other way around. Currently, road planners design roads to accommodate motor vehicles traveling at speeds well in excess of the speed limit and then figure out how to cheaply shoehorn pedestrians and bicyclists into the plan with little regard to their convenience or safety.</p> <p>I urge you to carefully review “Dangerous by Design” by the National Complete Streets Coalition and Smart Growth America and to overhaul the draft Traffic Safety Plan to ensure that the numbers of fatalities and injuries on our streets and road actually start to go down and to create a realistic possibility that the OTSC will, in the future, no longer need to begin each meeting with a moment of silence in memory of those who have lost their lives on our roads.</p>		<p>6. The Blueprint for Urban Design addresses this issue and begins to provide alternatives.</p> <p>7. The TSAP editors are familiar with Dangerous by Design. Agree that the 2021 TSAP is an incremental step, and that more should be done in the future to continue evolving the plan and implementation actions to improve safety.</p>		
14	7/7/2021	Central Lane Metropolitan Planning Organization Policy Board	Written comment	<p>Oregon Department of Transportation Safety Office: The Metropolitan Planning Committee (MPC) serves as the Central Lane Metropolitan Organization Policy Board. The Central Lane MPO works in cooperation with MPC, local government, state and federal agencies and the public to improve transportation in the Central Lane County region.</p>	<ul style="list-style-type: none"> • Report out on 2016 TSAP performance targets. • Highlight differences in 2016 and 2021 TSAP. 	<p>A review of the 2016 TSAP would be useful to evaluate implementation and results; however, the project team determined to not add it to the 2021 TSAP. Determining what “worked</p>	n	

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				<p>As the Oregon Department of Transportation (ODOT) asks for the public to review and comment on the Draft 2021 Transportation Safety Action Plan, MPC would like ODOT to consider the following regional recommendations:</p> <ul style="list-style-type: none"> • Identify and provide lessons learned from 2016 TSAP <ul style="list-style-type: none"> o Which strategies and actions from the 2016 TSAP worked effectively and should be further prioritized and invested in? Provide an overview of successfully implemented actions from the previous plan. o Which strategies and actions were not effective and should be dropped? o Provide an explanation of the 2016 TSAP results to address why the safety outcomes are not improving. • Highlight differences between the Draft 2021 TSAP and the 2016 TSAP <ul style="list-style-type: none"> o Provide an appendix that highlights the differences from the 2016 TSAP and how the new changes will address the increase in fatal and severe injuries in Oregon. • Address funding concerns <ul style="list-style-type: none"> o To meet stated safety goals, ODOT should include a funding and implementation assessment in the TSAP to illustrate the overall needs and potential sources of funding. o Given that many safety programs are funded through Federal programs that have limited flexibility, ODOT should direct more state funds to programs that would impact the issues uniquely facing Oregon. • Recommend major overhaul for the 2026 TSAP <ul style="list-style-type: none"> o ODOT recognizes all the trends are going in the wrong directions but continues to use a similar safety action plan. • More emphasis on equity consideration <ul style="list-style-type: none"> o The plan identifies equity in transportation safety as a key area of focus, however the reliance and emphasis on enforcement is more notable throughout the plan. Consider further adjustments and possible integration of engagement to reach ODOT equity goals. 	<ul style="list-style-type: none"> • Recommend major overhaul for the 2026 TSAP. • Prioritize racial equity over enforcement. • Add impacts from COVID-19 restrictions. • Automated enforcement. 	<p>effectively” is complex and confounded by a high number of factors.</p> <p>The Introduction provides a summary of TSAP history, and a review of the 2016 TSAP compared to 2021 could reveal the differences. Do not concur with one-to-one comparison as added value to this TSAP update.</p> <p>Funding: TSAP is not an ODOT plan, it is a statewide plan, and investments decisions are made beyond the scope of this planning-level document.</p> <p>It is anticipated the the 2026 TSAP will include substantial changes.</p> <p>The project team coordinated with ODOT’s new Office of Social Equity to identify the most important places to address this in the 2021 TSAP. Implementation, starting this fall, will continue those efforts. Further, Law Enforcement continues to be a proven safety countermeasure, though we concur with the commenter that racial inequity in law enforcement must be addressed as part of the work.</p> <p>COVID-19 is mentioned in the Introduction as a contributor, but the reality is we are still in the middle of pandemic response, so the effects of COVID will not be known by the time of 2021 TSAP publication.</p>		

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				<ul style="list-style-type: none"> Impact of COVID-19 <ul style="list-style-type: none"> o Include a section on the anticipated/observed impacts of Covid-19 on transportation safety in Oregon. Automated enforcement <ul style="list-style-type: none"> o Recommend that ODOT take the lead in expansion of automated enforcement statewide. 		Expanded use of automated enforcement provides value and is included in the TSAP Introduction and as an Emphasis Area action.		
15	7/8/2021	Daniel Peterson	Written comment	<ul style="list-style-type: none"> Why are there not proposed or existing agency performance measures for the assets that have the most positive influence over safety performance measures: signals, striping, signing and illumination/lighting? Replacing assets/maintenance doesn't in and of itself qualify for HSIP funding. Is there an implementation plan of the Transportation Safety Action Plan anticipated/in the works to help Oregon/ODOT implement the recommendations in the draft? It seems likely that nothing will change without developing an implementation plan with assigned tasks and responsibilities. ODOT has known since 2019 that Oregon has not been meeting our Federal Safety performance measures yet no changes at the DOT have been made to provide more transportation safety, safety engineering or local technical assistance program (LTAP) positions to support ODOT regions and local agencies to try and meet these goals again. However, Climate and Equity offices were created in the meantime with new positions for new Agency performance measures? At the very least, wouldn't adding four E experts/representatives to the LTAP help meet the Agency's Equity performance measures AND Federal Safety performance measures? If this action by ODOT is not proof enough of a need for a transportation safety and engineering representative at the agency leadership table, I don't know what is. ODOT does not appear to recognize Safety Engineering as a valued and individual engineering discipline like other DOT's have/do: 	<ul style="list-style-type: none"> Performance measures for existing assets. Need for an implementation plan. Need for a transportation safety and engineering representative at the agency leadership table. Prioritize Safety Engineering as a valued and individual engineering discipline. Prioritize transportation/traffic safety in each of the existing STIP or statewide maintenance programs. Require drivers training courses to receive a driver's 	<p>The project team will consider incorporating these suggestions into the upcoming TSAP Implementation Plan activities beginning Fall 2021.</p> <p>Operations and maintenance of safety assets is an ongoing need that is not federally-funded.</p> <p>The project team is scoping an initial TSAP Implementation Plan White Paper to guide ODOT and other safety stakeholders toward implementing the actions in the TSAP.</p> <p>TSAP is not an ODOT plan, but will share this comment with ODOT leadership.</p> <p>OTSC Role and Influence: TSAP is not an ODOT plan, but will share this comment with ODOT leadership.</p> <p>STIP: TSAP is not an ODOT plan, but will share this comment with ODOT leadership. This is another item to consider for the Implementation Plan.</p>	n	

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				<ul style="list-style-type: none"> ○ No standalone traffic safety engineering positions in the Regions (the person who does it wears multiple traffic engineering hats) ○ No traffic safety engineering representation on the agency leadership team ○ Traffic safety engineering isn't listed as an engineering discipline in the Statewide Project Delivery Branch guidance/resources ○ OTSC doesn't consistently have a representative/expert for each and every one of the 4 E's (including traffic safety engineering) <ul style="list-style-type: none"> ● Why doesn't the OTSC have the same level of influence over projects and project development as the Mobility Advisory Committee or OTC? For example, if the MAC can influence and prevent the installation of a roundabout, an FHWA proven safety engineering countermeasure, so why doesn't OTSC have equal influence over ODOT projects? I also think it's interesting that the evaluation period for the not met safety performance measures includes the period of time when the MAC had instigated a roundabout moratorium at ODOT. ● Contrary to popular belief and statements given at previous OTC meetings, transportation/traffic safety is not ingrained in each of the existing STIP programs. The only program outside of the Highway Safety Improvement Program that considers crash history, risk and inclusion of proven safety countermeasures in the entirety of their program project prioritization and development is the new Pedestrian-Bike Strategic Program. Especially if a STIP program has their own, non-safety, performance measures they are trying to meet within a limited amount of funding. If we aren't reevaluating or reforming individual program performance measures to match the anticipated available program funding or holding those programs partially responsible for our Federal safety performance measures, those programs do not have any incentive to add additional, non-required, 	license for revenue opportunity.	<p>Maintenance: TSAP is not an ODOT plan, but we will share this comment with ODOT leadership.</p> <p>7. Driver Education: Continued driver education and training is included in the TSAP, include discussion and actions on p. 103.</p>		

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				<p>proven safety elements to their projects. And the included proven safety elements are at a bare minimum and what is only federally required.</p> <ul style="list-style-type: none"> • Transportation/traffic safety is also not ingrained into the larger statewide Maintenance program. For example, they do not have traffic safety performance measures (this does not include employee safety) and are not held at all responsible for the existing traffic safety performance measures which they do have influence over even if it's not known or acknowledged. Statewide Maintenance also does not have tools available to help Regions consistently (within the Region and between Regions) prioritize their workload for the features that are proven to affect traffic safety the most if not properly maintained (for example, striping/legends/signing over mowing). • We should require drivers training courses to receive a driver's license in Oregon like east coast states already do. It is a potential source of revenue in addition to building up safer drivers and improving driving behaviors on all Oregon roads. 				
16	7/8/2021	Tyler Deke, Bend Metropolitan Planning Organization	Written comment	<p>Thank you for providing an opportunity to comment on the draft 2021 Transportation Safety Action Plan. Below are my comments.</p> <p>Does the ODOT TSAP link to local TSAP documents? If so, that relationship should be discussed (pp 21-22).</p> <p>The statewide crash trends (p 32) continue to show a disproportionately large percentage of fatal and serious injuries in rural areas. A combination of action items from multiple emphasis areas will be necessary to reduce crashes in rural areas. We encourage you to look for opportunities to identify opportunities for synergy among the actions to help reduce rural crashes.</p> <p>The proportion of serious and fatal crashes is almost evenly split between ODOT and local roads (pp 32-33). If available, it would be helpful to include total VMT by road ownership category. This information could further help identify how and where to address crash issues.</p>	<ul style="list-style-type: none"> • Clarify how the state TSAP relates to local TSAPs • Prioritize preventing fatal and serious injury crashes in rural areas. • Include total VMT by road ownership category in crash data. • Prioritize providing safe transportation options in low income neighborhoods 	<p>There is not an official direct link between the State TSAP and local TSAP-type documents, though many local TSAPs use the structure of the State TSAP as their starting point.</p> <p>Rural safety is an issue and there is an opportunity to combine actions to address crashes in these areas.</p> <p>The TSAP balances providing data analysis details, while maintaining readability for a wide audience. Additional information is available by contacting ODOT directly, and the 'ODOT 2020 Statewide Congestion</p>	y	95

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				<p>Table 1 (p 34) identifies unlicensed drivers involved in a significant proportion of fatal and serious injury crashes. Was any consideration given to identifying specific actions to address this issue?</p> <p>I applaud the inclusion of equity (p 51) in the plan. As noted in the plan, pedestrian crashes are more common in low-income neighborhoods. Providing safe transportation options in low income neighborhoods and for low income populations should be emphasized during project funding.</p> <p>The discussion on safety analytics (p 54) is appreciated. As noted in the plan, better data and analytics will help us deliver better solutions. I strongly support the goal of Improving Safety Culture (pp 60-61). A large percentage of crashes are behavior related and cannot be easily addressed through infrastructure changes. Improving safety culture will require involvement from everyone engaged in transportation safety.</p> <p>Law enforcement is included in goal 3 (pp 65-66). I believe the total number of state police officers has remained nearly constant over the past 20-30 years. Since the year 2000, Oregon's population has increased by nearly 24% and VMT has increased significantly on some of our rural highways. Was there any consideration to request increased state policing levels? Inadequate state police levels impact response times to crashes, especially in rural areas. This also impacts enforcement of speeding and aggressive driving.</p> <p>Under Policy 4.1, I would like to see a more explicit consideration of planning and designing for technology changes. While there may be additional upfront costs to include infrastructure (e.g. conduit), those costs are far cheaper than retrofitting infrastructure in the future.</p> <p>In the goals section, I would like to see a strategy of funding development of local transportation safety action plans. The benefits of local safety plans are many and can help inform local funding decisions and applications for state funding.</p> <p>The Oregon Road Departure Safety Implementation Plan is over 10 years old. Is there a need to update that plan? If so, it should be identified as an action under the Roadway Departure Actions section (p 90).</p>	<p>during project funding.</p> <ul style="list-style-type: none"> • Increase law enforcement to keep up with population growth. • Explicit consideration of planning and designing for technology changes. • Develop local transportation plans. • Address road departure crashes. • Bicycle funding question. • Specific text questions. 	<p>Overview" includes information about VMT.</p> <p>Unlicensed Drivers is a difficult issue to address with specific actions. The upcoming TSAP Implementation Plan may include this topic in more detail.</p> <p>Pedestrian safety is an issue in low income neighborhoods and is addressed in Vulnerable Users Pedestrian Actions.</p> <p>Increased funding for law enforcement is mentioned on p. 101 as an Emphasis Area action.</p> <p>Concur with the commentator's sentiment, the</p> <p>The TSAP provides a light touch on this topic, and there is potential for the 2026 TSAP to include more information about new technologies, including connected and automated vehicles.</p> <p>The Implementation Plan will include further discussion of local TSAP development; agree that these are useful to local agencies. The Oregon Roadway Departure Safety Plan was updated in 2017 and being used to identify treatment locations.</p> <p>There are several specific infrastructure treatments for roadway departure that</p>		

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				<p>Road departure crashes account for the largest share of fatal and serious injury crashes. Are there additional action items (p 90) that could help address these types of crashes?</p> <p>Bicyclist Action number 8 (p 95) is to fund a youth bicycle safety program. This type of training already occurs to some extent through the Safe Routes to Schools (SRTS) program. Should this action be modified to reference the SRTS work already underway and to recommend additional funding through that program?</p>		<p>can be addressed and implemented through ARTS and other programs.</p> <p>Bike Action 8. Updated thr action to include “Implement and promote increased funding for the bicycle safety training in the Safe Routes to School program.”</p>		
17	7/8/2021	Safe Lane Transportation Coalition	Written comment	<p>Executive Summary: Moving Forward Section – What are the ramifications referenced for not achieving the safety targets? How do these compare to failing with state of good repair pavement condition performance measures? How is the state prioritizing lives vs. pavement conditions?</p> <p>The 2022 targets (2015-2019 crash years) are unambitious, but it also doesn’t make sense to adjust them since that data is already in the past and we can’t take action to change what has already occurred. This is another reason to emphasize the data system improvement needs.</p> <p>Introduction: Title page “A Strategic Highway Safety Plan (SHSP) is a statewide, data-driven, coordinated safety plan that provides a comprehensive framework for reducing highway fatalities and serious injuries on all public roads.” – Remove “highway.” Should be oriented towards the entire transportation system, not just highways or even just all public roads. We don’t want passenger rail derailing, we don’t want fatalities and injuries on multi-use paths, etc.</p> <p>Local, Regional, and Tribal Entities (pg 21) – Safe Communities Programs referenced – It would be helpful to have a list of Safe Communities Programs across the state as a resource to those wanting to collaborate with other programs or start their own if one does not exist in their community. This could also be a</p>	<ul style="list-style-type: none"> • Emphasize data system improvement needs. • De-emphasize “highways” when discussing the SHSP. • Include list of Safe Communities Programs. • We are failing as a state with regards to safety. • Support and encourage transit ridership. • Use “cannabis” instead of “marijuana” throughout document. • Specific recommendations for Driving Impaired Actions. 	<p>Targets: Details are available here. https://safety.fhwa.dot.gov/hsip/spm. In general the ramifications related to funding flexibility and reporting requirements.</p> <p>2022 Targets: As inferred, the timeliness of the current Oregon crash data system results in some complications with target-setting. The team made a decision with the information available.</p> <p>Introduction: Removed “highway” from the Introduction title page.</p> <p>Safe Communities: Added a link to the list of Traffic Committees. https://oregonimpact.org/Traffic_Safety_Committees</p> <p>p55: The 2021 TSAP avoids detailed discussion of COVID-19 since we are still in the middle of pandemic response, and much remains unknown.</p>	y	13, 81, 83, 85

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				<p>resource on the website instead that gets updated more frequently than the plan updates and could include contact info? Maybe integrate into the statewide safety data portal?</p> <p>Transportaion Safety Trends: We are failing as a state. We need to change our approach because it is not working.</p> <p>Safety Challenges and Opportunities: Shifting Transportation and Lifestyles (pg 55) – Transit is one of the safest modes of travel – Include something about the importance of supporting and encouraging transit ridership, especially emerging from Covid-19? Interplay with public health concerns and misperceptions of Covid exposure on public transit could drastically impact safety, climate, and equity goals.</p> <p>Impaired Driving Actions: Introduction – Define what impaired driving is in the first sentence – move the last sentence to the beginning. Substitute the word “cannabis” in for “marijuana” throughout the document.</p> <p>Impaired Driving Action 1 – A barrier is sustainable funding for education - usually short term funding instead of long term. How much would it cost to fund different levels of programming to address this at a statewide level?</p> <p>Impaired Driving Action 3 – Instead of the term marijuana, use the term cannabis. Have more diverse locations for DRE trainings - a mobile training that travels throughout the State. Having to travel for trainings is a time constraint.</p> <p>Impaired Driving Action 4 – The overtime model is a huge burden and inaccessible to police departments that have 0-3 traffic officers. Recommend re-visiting with a focus on the enforcement effort and include considerations for racial profiling and implicit bias training.</p>	<ul style="list-style-type: none"> Consider reallocating Occupant Protection Actions funds. Specific recommendations, questions and edits to Speeding Actions, Distracted Driving Actions, Intersection Actions section, Roadway Departure Actions, Aging Road Users Actions, Improved Systems Actions, Performance Measures and Targets, Implementation and Evaluation sections. Emphasize roundabouts. 	<p>Impaired Driving pg 81: Replaced “marijuana” with “cannabis” throughout.</p> <p>Impaired Actions 1-8 Comments: The TSAP will address these detailed comments in the Implementation Plan process and with the Impaired Driving Emphasis Area team.</p> <p>Recommended Action pg 81: Added a new Impaired Driving enforcement-related action to match the Speeding action. <i>9. Conduct unbiased enforcement to reduce impaired driving crashes.</i></p> <p>TSAP project team will bring the other recommendation regarding low-cost transportation to the Emphasis Area team during implementation for consideration.</p> <p>Occupant Protection: It’s been stated that maintaining high seat belt use is important and requires investment.</p> <p>Speeding pg 83: Updated the description from “vehicle traveling too fast...” to “driver traveling too fast...”</p> <p>Pg 83 Clarified language in paragraph 1, which now reads: “...trending downward from 2016 to 2018. In 2019, law enforcement issued...”</p>		

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				<p>Impaired Driving Action 5 – Recommend 0.00 - if you are under the influence, you should not be the one driving.</p> <p>Impaired Driving Action 7 – This could be more specific – reference what laws/programs/increasing community outreach for substance abuse and repeat offenders and what strengthens means. Should DUII diversion programs be required all across the State? How much would it cost to fund such a program?</p> <p>Impaired Driving Action 8 – Streamline? Same as #7. Too open ended and needs to be more specific.</p> <p>Recommended Impaired Driving Action – Add an action specifically for bias or equity like the Speeding Actions.</p> <p>Recommended Impaired Driving Action - State financial support for providing free and reduced priced transportation options on key holidays. State financial restrictions on fees imposed during periods with increased risk of DUII violations.</p> <p>Occupant Protection Actions: Should some of these resources be reallocated to other areas we’re doing worse? Oregon seems to do quite well in this area.</p> <p>Speeding Actions: Speeding Introduction – This intro makes it sound like speeding is not a problem. Change language to people-focused, specifically, “defined as a vehicle traveling too fast...” -> the driver was driving too fast. Second paragraph – for self-reporting surveys, people may downplay how fast they actually drive. How much weight is given to this public opinion survey? Lane County data shows that drivers speed. Should report on the number of people killed and injured from speed related crashes. Need to be more clear about the data they are pulling from – it begins in 2016, but when does it</p>		<p>The TSAP is only using State-provided crash data through 2018.</p> <p>Figure 26: Concur with commentor about likely underrepresentation, but without data to back up the assumption do not concur with adding that to the TSAP.</p> <p>Speed Actions pg 85 1: Updated to match DUII language 3: Will share with implementation team, but this word affirms current efforts. 4: Revised to include “Track and assess changes to operating speed, crash rates, fatalities, and serious injuries on roads where posted speed limits were changed.” 5: ODOT is quite flexible and addresses much of this need. 6: The addition of Equity-related language was carefully chosen with input from ODOT Office of Equity. Additional modifications may occur during implementation and in the next update.</p> <p>Distracted Actions: The Transportation Safety Division provides guidance on the details of campaigns, which change over time to address current needs.</p>		

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				<p>end? Need to include data to 2020 or be more clear that this is just 2014-2018/19. Need to be consistent with the data – what is the value of the “In Federal FY19” sentence? Overall, this narrative is not true for Lane County. Like the DUII sheet, this introduction should be consistent and call out, “speeding crashes are defined if speeding is marked on the crash report or not”</p> <p>Figure 26 – This graph just shows if local police department flagged speeding as a contributing factor. It feels broad. This may also be under reported. Include acknowledgement that this data under represents the contributing factors.</p> <p>Speeding Action 1 – People focused language - reference the 1st action in DUII document. Should be more detailed like this one.</p> <p>Speeding Action 3 – Change “continue” to “increase”. Last sentence is phrased weird -> “Implementation must address equity concerns”. Include automated enforcement removes the human bias.</p> <p>Speeding Action 4 – Include locations for where speed limits are going to be lowered. Include pre and post speed measurements to show what the impact is.</p> <p>Speeding Action 5 – To implement Action 5, ODOT needs to pave the way by adding, “Identify and eliminate regulations that prevent implementation of safe speeds.” For example, “the right to experiment” bypasses MUTCD and allows flexibility to test new speed reduction tools.</p> <p>Speeding Action 6 – Rephrase to “implement programs and trainings to reduce bias in enforcement.” Make it sound like improving/reducing bias.</p> <p>Distracted Driving Actions: Impaired Driving Action 5 - Expand and add specific campaigns instead of the generic "don't drive distracted" campaigns. Focus on the cognitive or manual piece in a specific area. Emphasize that driving is a privilege.</p>		<p>Intersection Actions: It was decided to focus on getting the projects in the ground for this emphasis area.</p> <p>Roundabouts: Concur they are a proven safety countermeasure, and are included in the Intersection Safety Implementation Plan. Generally speaking, specific treatments are not discussed in the TSAP but left to the specific implementation efforts.</p> <p>Roadway Departure: Similarly, Oregon’s Roadway Departure Implementation Plan dives into the detailed treatments.</p> <p>Aging Road Users: The topic of re-testing and removal of licenses has been deemed generally unacceptable socially/politically.</p> <p>Improved Systems: Plans are in place to make improvements. Implications will include making safety-related decisions based on more recent crash data.</p> <p>Performance Measures/Targets: Evaluation of projects and treatments is specifically called out in the Emphasis Area Vulnerable Users Pedestrian Action 3 and Bicyclist Action 3.</p> <p>Legislation: Several laws are being addressed by safety stakeholders, but</p>		

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				<p>Recommended Distracted Driving Action – What about partnering with private sector (cell phone software companies, such as the phones now requiring users to say “I’m not driving” to use phone while in motion)? Other more direct strategies like this?</p> <p>Intersection Actions: Recommended Intersection Action - Bring back previous action “Implement education and training related to new types of infrastructure (e.g., signal heads, safety edge, crosswalks, bike lanes, or roundabouts) and related”</p> <p>Infrastructure Actions: Infrastructure Introduction – It seems as if roundabouts should be emphasized more, given the percentage of fatal and severe injury crashes occurring at intersections. The word “roundabout” only appears in the plan once. They are a proven, effective tool to address fatal and severe injury crashes at intersections, plus have emission reduction benefits.</p> <p>Recommended Infrastructure Action - Roundabouts and their safety benefits to all users should be included. What about addressing challenges with being able to fund roundabouts through ARTS program? Establish a roundabout first policy?</p> <p>Roadway Departure Actions: Roadway Departure Introduction - What impact, if any, has the implementation of more cable barriers, rumble strips, and safety edges had so far? How effective is this and is it a strategy we should be doubling down on?</p> <p>Aging Road Users Actions: Recommended Aging Road User Action - Add action to increase frequency of renewing driver’s license, including in-car driving portion of test?</p> <p>Improved Systems Actions: Improved System Introduction - Glad to see this section call for shorter data timelines since that has been a big challenge for years. What will this actually look like? What can we expect for new timelines and by when will the improvements be in place?</p>		<p>the TSAP is not, itself, a legislation-focused document.</p>		

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				<p>Performance Measures and Targets: What do we know about what has worked and not worked from previous safety investments over the last 5-10 years? How has this informed this TSAP update and recommendations?</p> <p>Implementation and Evaluation: What actions should be recommended that would need legislative changes? For instance, what would it take to change the driver’s license requirements related to age, # of passengers allowed in car with young drivers (could’ve saved lives in Eugene within the last couple of years), etc.?</p>				
18	7/9/2021	Michael O-Casey, Oregon Action Team on Unregulated Migration	Written comment	<p>Thank you for your consideration of the following recommendations developed by the Oregon Action Team on Ungulate Migration (OAT). These comments and recommendations are meant to provide local stakeholder input to help guide ODOT as they finalize updates to the Oregon Transportation Safety Action Plan (TSAP).</p> <p>OAT is a coalition focused on “improving ungulate habitat connectivity, ecosystem structure and function, and human/wildlife safety, including addressing barriers to migration and advancing measures to restore degraded and fragmented habitat.” The Team engages in education and outreach, advocacy for policy and plan development and revisions, identification and coordination for project implementation, and support in identification and leverage of funding sources.</p> <p>Reducing wildlife-vehicle collisions on Oregon’s highways is a core focus of our group. We believe reducing barriers to ungulates through creative solutions, such as building wildlife crossings, will ensure our big game populations, so vital to our economy and way of life, continue to thrive. As stated in the draft TSAP, the goal of the document is to ‘eliminate deaths and life changing injuries by 2035’. This is an excellent goal that will improve the safety of all Oregonians. However, we are concerned that this goal cannot be met without addressing the need to improve the safety of our highways related to wildlife-vehicle collisions (WVCs). As members of OAT read through the draft TSAP report, we were disappointed to see that</p>	<ul style="list-style-type: none"> Address the need to improve the safety of our highways related to wildlife-vehicle collisions in the TSAP. 	<p>The TSAP is primarily focused on those crash types that, when addressed, will have a significant impact on the frequency of fatalities and serious injuries statewide.</p> <p>Like wildlife-vehicle collisions, several other crash types – while important – are not an emphasis in the TSAP. Examples include collisions occurring in work zones and at rail-highway grade crossings.</p>	n	

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				<p>there was no mention of WVCs anywhere within the report and we recommend that ODOT staff update the report to acknowledge the safety hazards ungulates pose to Oregonians on our highways and to incorporate some opportunities for action and solutions into the report. As one example of a location to incorporate opportunities to reduce WVC's on our highways, we recommend that Wildlife Crossings be included under the 'improving infrastructure' section of the report.</p> <p>According to ODOT, an average of 7,000 WVCs occurs annually on Oregon's ODOT maintained roads. These collisions cause 2 fatalities and over 700 injuries on average each year and result in \$44 million in damaged property costs. A safety report that does not address the hazards from wildlife vehicle collisions will not be able to achieve the goal of 0 fatalities by 2035.</p> <p>Thank you for your work on the next revision to the TSAP and for your consideration of our above recommendations. OAT greatly appreciates our working relationship with ODOT, and we look forward to our continued engagement with the agency to reduce barriers to migration within the state. Please do not hesitate to contact us with any questions and/or with ways in which we can help.</p>				
19	7/9/2021	John Mercier, The Confederated Tribes of the Grand Ronde	Written comment	<p>Thank you for contacting the Confederated Tribes of Grand Ronde and inviting the Tribe to review and comment on the Oregon Transportation Safety Action Plan (TSAP). The letter sent from ODOT to the Tribe is attached. My name is John Mercier, and I work for Tribe's Public Works and Tribal Transportation Program. I reviewed the TSAP. Unfortunately, I was not able to thoroughly review the plan, and I will do my best to provide thoughtful comments.</p> <p>Overall, the plan is well-written and has valuable information. I especially liked Chapter 4, Safety Challenges and Opportunities. The plan does a good job covering technology which is an ever evolving and growing contributor to safety opportunities, but at the same time creating challenges with hand-held devices. Especially, thank you for covering connected and automated vehicles. The reader will learn important information from the plan about those technologies.</p>	<ul style="list-style-type: none"> The TSAP adequately meets objectives. The plan lacks GIS data and how it relates to local communities. 	The TSAP is purposely an overview of safety issues without specifics regarding location. However, intent is to implement the TSAP locally by using the information in this plan to support safety work in each community, including Grand Ronde.	n	

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				<p>The only criticism, and it is only minor, that I could offer about the plan, is that it lacks GIS data. In Chapter 3, Transportation Safety Trends, the plan does well with providing information that Principal Arterials see the most crashes. A map accompanying the information that show Oregon, with highways that designate their functional classifications would be helpful. In a general sense, any reader of a product in the planning realm, will always want to know how the plan relates to the reader's community. Of course, any level of detail for an individual community would not be practical in the TSAP, but some GIS presentation could still be help to the readers, as they interpret the extensive data provided in the plan.</p> <p>In conclusion, as I look at the objectives contained in the attached letter:</p> <ul style="list-style-type: none"> • Integrated updated crash data; • Identified emerging safety trends and challenges since the adoption of the 2016 TSAP; • Evaluated the progress towards achieving the elimination of fatalities and serious injuries on Oregon's transportation system; • Identified solutions and actions to address system needs for all modes, travelers and roadway users. <p>The May 2021 version Oregon Transportation Safety Action Plan accomplishes those objectives.</p> <p>This is a very limited review and comment about the Oregon Transportation Safety Action Plan. Please be aware that I will keep the plan close by, and continue my review. I also want to use the plan to see how we can work together to improve transportation safety in Grand Ronde, and in the state of Oregon.</p>				
20	7/9/2021	Rebecca Sanders	Written comment	<p>Great job on the TSAP -- it is well-written and sets important goals and strategies for ODOT's and Oregon's future. I have one question/comment for your consideration.</p> <p>I see that you have developed high-level targets for system performance, and I understand the selection of performance targets based on an s-curve, but I</p>	<ul style="list-style-type: none"> • Plan is not sufficient to make meaningful change – bolder action is needed, particularly with 	<p>Target Setting: Concur with the commentor's sentiment, and the stakeholder team had detailed discussions that match these thoughts. In the end, safety leadership decided on the current S-curve approach for the</p>	n	

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				<p>am concerned about the relatively minor movement of the needle that shooting for a handful of fewer fatalities (out of hundreds) will get us. If our goal is a system of zero fatalities, we are banking on major fatality reductions down the line that absolutely depend on bold action today. Realistically, those bold actions should yield results faster than the s-curve suggests, but I understand being conservative. However, because the targets are up for annual review that could allow adjustment of future targets based on recent performance, I'm concerned that there will not be enough accountability with relatively small goals in the near term (DOT history in the U.S. unfortunately does not indicate a trend toward bold, life-saving action, particularly for vulnerable users).</p> <p>What metrics exist to allow ODOT and the public to monitor ODOT's progress toward achieving the more specific goals upon which the ultimate targets depend? Each strategy should ultimately have some metric to measure its effectiveness. This may be particularly important for strategies dealing with education and culture change, the efficacy of which have been historically harder to measure accurately, but the more specific metrics are also important for other areas. I see that there is a section on reporting in, e.g., the HSIP, but it is not clear to me how specific that performance evaluation will be. It would be great to see more specific metrics for each strategy and action. Additionally, a way to monitor those metrics, such as a public-facing dashboard, would be ideal. I appreciate that that is a lot of work -- and I hope Oregonians' lives will be considered worthwhile to provide that kind of public legibility and more specific accountability.</p>	<p>respect to vulnerable users.</p> <ul style="list-style-type: none"> • Need for accountability and performance metrics that are monitorable by the public. 	<p>2021 TSAP, and in allowing annual updates opened the door for additional discussion in 2022 and beyond regarding more aggressive targets.</p> <p>Measuring Effectiveness. An Implementation Plan will be developed upon completion of the TSAP to measure the Chapter 6 Emphasis Area actions, identify a responsible champion, and establish reporting requirements. A public-facing dashboard has been discussed as a possibility.</p>		
21	7/9/2021	Jon Henrichsen, Multnomah County	Written comment	<p>Thank you for the opportunity to provide comments on the ODOT TSAP. The Multnomah County transportation division and health department care deeply about the health and safety of people using the public right of way. The ability to travel safely throughout the county, the state, and the region is something that we all agree is critical. The TSAP provides many goals toward that end. Below are some suggestions we have to make the document more valuable as well as specific actions that we think ODOT should take.</p> <p>Culture Change We agree with the aspiration of culture change. But rather than focusing on an effort to “transform public attitudes”, the most important piece of culture</p>	<ul style="list-style-type: none"> • Prioritize changing the culture within ODOT and other agencies rather than individual actions. • Prioritize safe systems design. • Cross reference data to mitigate skewed analysis. 	<p>Culture Change. Culture change in public agencies transportation agencies is vital. This is stated on p. 7: “Transform organizational transportation safety culture among employees and agency partners...”</p> <p>Target Setting: A group of safety stakeholders was convened for two workshops during the TSAP to discuss several target setting options, and that</p>	y	35, 36, 37, 81, 89

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				<p>change should be within ODOT and other transportation agencies. Emphasizing the protection of the most vulnerable users in design decisions should be paramount, as is consistent with a safe systems approach. The TSAP is intended to apply universally to all public roads in Oregon, but it falls short of the culture of safety already established in agencies in the Metro Region. While achieving “zero traffic fatalities by 2035” is mentioned in several parts of the document, it is not fully engaged as a goal given that the fatal injury target has gone up since the last TSAP was published. Increasing the target for fatal injuries creates an off paradox within the TSAP, wherein the long term goal is to decrease deaths but the near term target is for increased deaths. This increase in the target is extremely concerning and is out of sync with local goals.</p> <p>We recognize that local jurisdictions such as Multnomah County have a role to play in changing culture and reducing traffic fatalities. Funding Multnomah County’s safe routes to school program is one way that ODOT directly supports this culture change. Continuing to provide this type of funding to local jurisdictions is one that ODOT can continue to promote this culture change.</p> <p>Data presentation may skew results, may influence the mitigation strategies</p> <p>The data shows that roadway departures are the most common attribute of serious and fatal injuries. It would be helpful to see the data for roadway departure cross referenced with speeding and impaired driving (alcohol and other drugs, alcohol only) because the mitigation might be different for these causes. Additionally it would be valuable to see the data cross referenced with pedestrian and bicyclist and urban vs rural areas. The reason for this is that roadway departure in urban areas will have different features and consequences in urban or rural areas. For instance a recent roadway departure in east Multnomah County resulted in a child pedestrian fatality. Mitigation for roadway departures in urban areas may include slowing speeds, increasing visual friction and barriers. Whereas mitigation in rural areas may not include all of these. It appears that ODOT has this data and could use it to conduct more detailed analysis of crash causes. This type of analysis could provide ODOT and local jurisdictions with greater opportunity to find the right solutions to reduce crashes.</p>	<ul style="list-style-type: none"> • Prioritize racial equity. • Set targets that reflect a commitment to vision zero. • Text edits. 	<p>group decided on this approach to use the most recent information to set future targets. The approach also includes annual updates, which will allow for additional discussion in 2022 and beyond regarding more aggressive targets.</p> <p>Data Presentation: We have balanced providing data analysis details with also making the TSAP readable and approachable to a wide audience. This does sometimes result in an incomplete picture of complex collision types like roadway departure. Concur with the reader that studying this crash type in more detail could lead to different recommended solutions in urban vs rural areas. We encourage the County to work with their ODOT partners for safety data analysis support.</p> <p>Equity: The team coordinated with ODOT’s new Office of Equity to identify the most important places to address this in the 2021 TSAP. Implementation, starting this fall, will continue those efforts.</p> <p>Target Setting: During the TSAP update a group of safety stakeholders was convened for two workshops to discuss several target setting options, and that group decided on this approach to use the most recent information to set future targets. The approach also includes annual updates, which will</p>		

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				<p>Equity The TSAP notes that the problem of increasing traffic deaths is disproportionately impacting BIPOC populations and lower income neighborhoods. The Multnomah County Health Department confirmed this in the 2021 report, finding that the death rate from traffic crashes among the County’s Black population is nearly twice the rate experienced by non-Hispanic white residents. As research from ODOT and Oregon Walks demonstrates, this is especially true of pedestrian deaths. Among the causes cited in TSAP are disproportionate use of walking and transit, and inadequacies in the built environment. We share the concern about these proximate causes, but also acknowledge that white supremacy is the underlying cause. Generations of systemic racism have constrained opportunity for BIPOC Oregonians across the state, resulting in education, jobs, and housing options that disproportionately expose these groups to a range of health hazards including traffic crash risk. The TSAP sets a goal of implementing “unbiased” solutions, which implies the unacceptably low standard of not actively harming one group over another. As a state we should hold ourselves to a higher standard of correcting historical wrongs, implementing safety interventions that create a just transportation system in the context of a legacy of underinvestment in BIPOC communities. Multnomah County’s value of leading with race is applicable to the TSAP; if we resolve disparities by race and ethnicity, it is highly likely that we will also resolve inequities based on income, age, ability, and other markers of marginalization.</p> <p>Set targets that reflect a commitment to vision zero The plan clearly indicates that zero traffic deaths is a desired outcome. The “vision of zero deaths by 2035” is stated several times in various parts of the document. However it doesn’t set ambitious targets that will force the culture shift toward this goal. The targets set in the plan that ODOT is willing to accept more traffic fatalities per year than they were willing to accept in 2016.</p> <p>A few other housekeeping items of note:</p> <ol style="list-style-type: none"> 1. Figure 8 page 35 of the action plan is unclear. It references proportion but lists as percent. It says that the highest proportion of serious and fatal are Young drivers but the table looks like it shows 		<p>allow for additional discussion in 2022 and beyond regarding more aggressive targets.</p> <p>Figure 8 pg 35, Figure 9 pg 36, and Figure 10 pg 37: Errors - mixing totals and proportions have been corrected.</p> <p>Pg 35 Additionally, Aging drivers (65+) have surpassed young drivers, so we will also update that content.</p> <p>Figure 22 pg 81. Error in the legend color coding has been corrected. The light color is NEITHER alcohol nor drugs identified by the officer.</p> <p>Figure 29 pg 89: Corrected the Roadway Departure figure, it was inadvertently representing the Speed-involved Figure 25</p>		

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				<p>older drivers. Also the categories are not all mutually exclusive so it's not clearly indicating how crashes compare by age or mode. Is 15% the percent of fatal crashes vs non fatal for that age group? Or for all crashes?</p> <p>2. Figure 22 on page 81 is unclear. Both colors on the pie chart are labeled the same.</p> <p>3. Figure 25 and Figure 29 show the same number of serious and fatal crashes in the same year categories. Is this correct? Is the data conveying the exact same info (as in – all roadway departures are speed related?) Or is it a coincidence? Or an error?</p> <p>Again, we appreciate ODOT's efforts to improve safety on all public roads in Oregon. ODOT's focus on safety in project funding and programs like All Roads Transportation Safety (ARTS) and Safe Routes to School (SRTS) have benefited Multnomah County and its residents.</p>				
22	7/12/2021	Ryan Webb, The Confederated Tribes of the Grand Ronde	Written comment	<p>1. Page 9, Table ES.3 – Would be good to see what the baseline, target and actual statistics were for the 2016 TSAP, see how ODOT did against those figures.</p> <p>2. Page 31, Figure 3 – Can this data also be spilt up to show fatalities per VMT for both urban and rural areas?</p> <p>3. Page 38, Figure 11 – Can this data also be spilt up to show fatalities and crashes for both urban and rural areas?</p> <p>4. Page 53 – How will the advancement of CAV help reduce crashes in the future? Is there any reporting mechanism to report near misses instead of crashes as a result of CAV technology.</p> <p>5. This is no recap of 2016 TSAP, how did the visions, goals, policies and strategies in that plan measure up? What were the actual results against the targets in the 2016 TSAP? There is no recap of prior plans and how they fared, need that data to make sure the measures in this plan can work.</p>	<ul style="list-style-type: none"> • Data clarification. • Text edits. 	<p>In general the TSAP update team chose not to provide historical information like this. However, it is available from FHWA here: https://www.fhwa.dot.gov/tpm/reporting/state/safety.cfm?state=Oregon</p> <p>We have balanced providing data analysis details with also making the TSAP readable and approachable to a wide audience. Crash rate by VMT split by urban and rural is a particular detail we'd chosen not to add, but ODOT could work with you to discuss crash rates in your area.</p> <p>Similar answer as #2, though this is information we could consider in the future.</p>	n	

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						<p>There are a few answers to this. CAV will have technology to prevent collisions by reacting faster and better than human drivers; this occurs now. And yes, CAV will theoretically be able to report individual “near miss events” to help safety analysts identify “high-conflict” collision locations and types to support proactive safety risk identification.</p> <p>Implementation results from 2016 are important to justify future investments, but the data from these efforts is inconsistent. For the 2021 TSAP we are developing an Implementation Plan and tracking mechanisms to measure activities and progress toward output measures.</p>		
23	7/14/2021	Patrick Allen, Oregon Health Authority	Written Comment	<p>Oregon Transportation Safety Committee: On behalf of the Oregon Health Authority (OHA), I thank the Oregon Transportation Safety Committee (OTSC) and the Oregon Department of Transportation (ODOT) for the opportunity to respond to the 2021 draft of the Transportation Safety Action Plan (TSAP).</p> <p>OHA’s 10-year goal is to eliminate health inequities by 2030. OHA uses the following definition of health equity: Oregon will have established a health system that creates health equity when all people can reach their full health potential and well-being and are not disadvantaged by their race, ethnicity, language, disability, age, gender, gender identity, sexual orientation, social class, intersections among these communities or identities, or other socially determined circumstances.</p> <p>Achieving health equity requires the ongoing collaboration of all regions and sectors of the state, including tribal governments to address:</p>	<ul style="list-style-type: none"> • Social Equity • Impaired Driving (alcohol) 	<p>Equity: The TSAP is careful to state "unbiased enforcement" as a stated goal throughout, including in Emphasis Area actions.</p> <p>Impaired Driving pg 81: TSAP will add a policy-focused action regarding alcohol sales and distribution, with the OHA recommendations as examples.</p> <p>“Promote policies to reduce alcohol over-consumption, including sales tax, limited service hours/days, accountability for overserving. Increase</p>	y	81

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				<ul style="list-style-type: none"> The equitable distribution or redistributing of resources and power; and Recognizing, reconciling and rectifying historical and contemporary injustices. <p>OHA’s work includes injury prevention, behavioral health services and chronic disease prevention. Therefore, OHA has an interest in seeing that ODOT and the OTSC are successful in their goals, particularly regarding reducing road fatalities related to alcohol and substance use.</p> <p>OHA applauds the TSAP for demonstrating the threat of impaired driving with such clear and complete data. As pointed out in Table 1, alcohol is a major contributor to fatal and serious crashes on our roads and highways. Data demonstrate that alcohol, even in comparison to other drugs, represents the majority contributor to health consequences across a host of ailments, including injuries. OHA appreciates you for centering equity in the TSAP. Both of our agencies have dedicated ourselves to this cause and, as reflected in Goal Area 5, we have much to gain by working together, especially for communities of color and Tribal communities.</p> <p>In the spirit of that collaboration, OHA offers a few suggestions for areas we feel are underrepresented in the current draft of the TSAP.</p> <p>As a result of OHA’s own strategic planning efforts, we have found enforcement and education activities alone are insufficient to affect the large social outcome of reducing alcohol misuse and its consequences, such as road fatalities. Efforts to inform the public and enforcement actions will be ineffective if at the same time alcohol becomes easier to get, at more places, more times of the day, in more ways, for less money. Oregon hasn’t raised the tax on alcohol since 1980, meaning when adjusted for inflation, alcohol is cheaper year over year. There are now more alcohol retail outlets in the state than 10 years ago and the three-tier model of alcohol regulation has been more limited over time.</p>		<p>support of related mental health and addiction services.”</p>		

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				<p>OHA also has concerns that an enforcement-heavy strategy to combat alcohol and drug- related crashes will contribute to disproportionate confrontations between communities of color and law enforcement. Furthermore, the volume of individual-level enforcement needed to counter the shifting policy landscape may not be practical in the current Blueprint for Urban Design or political environment.</p> <p>With these dynamics in mind, OHA suggests the following modifications to the TSAP:</p> <ul style="list-style-type: none"> • Add an alcohol tax to the policy priorities for reducing alcohol-related road fatalities; • Add a policy strategy directed at changing or maintaining strong alcohol retail laws, such as limiting hours and days of service, reducing alcohol outlet density, and making it easier to hold businesses accountable for their role in overserving patrons; • Broaden the individual-focused communication campaigns beyond drinking and driving campaigns to include community messages to reduce overall binge drinking; • Shift enforcement to businesses that over-serve patrons; and • Call out strategies to strengthen community access and diversion programs to increase the use of mental health and addiction services. <p>OHA stands ready to partner with ODOT and OTSC in pursuing our joint mission of Oregon’s roadways and improve the lives of the people in Oregon.</p>				