

To: ODOT Staff, OTC Commissioners  
Cc: Director Matthew Garrett, Governor Kate Brown

Dear ODOT Staff and OTC Commissioners,

Roadway fatalities in Oregon have increased by 42% over the past two years, from 313 in 2013 to 445 in 2015. Pedestrian fatalities increased almost 50%, and 2016 is on pace to further exceed 2015's numbers. This trend is unacceptable and the draft Transportation Safety Action Plan (TSAP) must better acknowledge the urgency of this crisis. "Vision Zero" transportation reforms have a proven track record of reducing fatalities in the United States and abroad. Washington, Minnesota, and Utah recently adopted Vision Zero reforms and have seen a 40-48% reduction in traffic fatalities since the early 2000s. Unlike the draft TSAP, which focuses on education, behavior modification, and enforcement at the expense of roadway design, Vision Zero reforms emphasize increased traffic safety through roadway design. For example, the TSAP focuses on policy changes that "identify unsafe walking, biking, or driving behaviors," but does not adequately address the role that roadway design can play in discouraging unsafe driving behavior. Although we laud the TSAP goal of zero traffic deaths by 2035, we maintain that realization of this goal will require adoption of standard Vision Zero reforms.

Specifically, we call for the ODOT TSAP to place a far greater emphasis on roadway design that decreases vehicle speed. As the TSAP notes, approximately 37% of fatalities in Oregon are linked to high vehicle speed, making speed-reduction policies the low-hanging fruit of safety reforms. Speed limit reduction, traffic calming, and road diets all effectively reduce fatal crashes irrespective of road users' behavioral patterns. After New York City implemented a 25 mph default speed limit, the city experienced the lowest rate of pedestrian fatalities in its history. Many ODOT-managed roadways in the Portland area have become "high-crash corridors" (streets with exceptionally high rates of fatal collisions), largely because they were designed to facilitate motor vehicle throughput at the expense of safety. We strongly disagree with the TSAP goal to "Plan, design and construct facilities for desired operating speed" (Policy 2.3 – Strategy 2.3.2). Instead, we urge ODOT and the OTC to prioritize the safety of all road users above other goals and metrics in its design criteria. ODOT's current speed limit policy is a significant barrier to safety in that speed limit reduction requests from local governments are frequently rejected or delayed, even on high-priority roads in urban areas where legacy highways run adjacent to otherwise safe and livable residential neighborhoods and commercial districts.

We call on ODOT and the OTC to reform the process for speed limit requests so that they do not function as a barrier to safety. Specifically, we request that ODOT allow local governments to set speed limits in designated urban commercial and residential areas and to develop a mechanism that fasttracks safety-related speed limit change requests. In addition to streamlining the process for speed limit requests, the TSAP should outline clear design and infrastructure improvements that would be taken when a road fails to meet safety metrics. These could include provisions for automatic speed reductions and the implementation of traffic calming features, such as lane-width reduction, installation of new traffic signals, and speed cameras.

In summary, we call on ODOT to revise the TSAP so that it explicitly adopts Vision Zero principles, addresses the deficient process for speed limit reduction requests, and describes specific infrastructure improvements to be implemented when roadways fail to meet safety metrics.

Sincerely,

Soren Impey, BikeLoudPDX Board Member and Livable Streets Action Co-Founder

Jessica Engelman, BikeLoudPDX Co-Chair

Gerald Fittipaldi, Livable Streets Action Organizer

[BikeLoudPDX.org](http://BikeLoudPDX.org)

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