Before the Montgomery County Council

Written Testimony of Lloyd Guerci

On the Draft Pedestrian Master Plan

August 9, 2023

Introduction and Summary

This comments on the draft Pedestrian Master Plan, which was the subject of a public hearing on July 25, 2023 (with the record remaining open until August 18). I have lived in the DMV for over 50 years and in Montgomery County, between Bethesda and Friendship Heights, for over 28 years and am retired. Most of my career was with the federal government, including over 15 years with the National Highway Traffic Safety Administration (NHTSA).

Traffic safety is very important. NHTSA posted a large graph on the wall on traffic safety deaths over time - a constant reminder of the toll involving vehicles and the importance of reducing fatalities. (Nothing here speaks for NHTSA and I did not work on pedestrian safety.)

First, the broad opening question(s) is not whether the County should address pedestrian safety – it should and must - but how should the plan approach this problem, including priorities, and what realistically can get done? The draft Pedestrian Master Plan, with safety in only its third objective behind comfort in its first objective, and a multitude of proposals may be viewed as an unrealistic, almost idealistic be-all that will never be funded even close to its entirety. Indeed, at the Council hearing on July 25, Kimblyn Persaud, of EPIC of MoCo, said the big red flag for me is knowing the funding is not there to bring the vision to fruition. At 58:29. With this in mind, the draft plan needs to be revised to make safety its number 1 priority, and overall to be within a reach of fiscal feasibility.

Second, the draft Master Pedestrian Plan does not adequately address the real problems faced withing about a mile of where I live.

Third, there are a number of other shortcomings with the draft plan, some of which I address.

These three points are discussed further below, following summaries of the underlying safety problems and notation of some well-known pedestrian safety measures.

The Underlying Safety Problems

Montgomery County had 541 motor vehicle crashes leading to bodily injuries and 48 traffic fatalities last year. In the first six months of 2023, 320 of our neighbors have been hit while walking or biking in our neighborhoods and nine have been tragically killed, as noted by Council President Glass.

These overall numbers are more than a sufficient basis as a call for action, but they are not particularly helpful in understanding the underlying events.

Viewed nationally, several years ago, NHTSA provided the following information:

Overview (by NHTSA)

In 2018 there were 6,283 pedestrians who died and approximately 75,000 were injured in traffic crashes in the United States (NCSA [NCSA is NHTSA's National Center for Statistics and Analysis], 2020). Pedestrians accounted for 17% of total traffic fatalities and 3% of total people injured. Since 2003 there has been a gradual rise in the proportion of total pedestrian fatalities. Of the pedestrian fatalities in 2018:

- 69% of pedestrians killed were males;
- 33% of pedestrians killed had Blood Alcohol Concentrations of .08 g/dL the or greater (It is illegal in all 50 states, the District of Columbia and Puerto Rico to drive with a BAC of .08 or higher, except in Utah where the BAC limit is .05)
- 81% of pedestrian fatalities occurred in urban areas;
- 74% of pedestrian fatalities occurred at non-intersection locations;
- 76% of pedestrians were killed in collisions that occurred when it was dark;
- The average age of a pedestrian killed was 48; injured was 39;
- Of all motor vehicle crash fatalities among adults, 21% of those 50-54, 21% of those 55-59, 22% of those 60-64, and 20% of those 65-69 were pedestrians. Adults 55-59 also had the highest number of pedestrian fatalities (608).
- The pedestrian fatality rate among children and teens (range of 0.29-1.08 fatalities per 100,000 population for ages 0-19) was lower than the pedestrian fatality rate for all adult age groups (range of 1.97-2.85 per 100,000 population).
- Child pedestrians 14 and younger accounted for 17% of the child motor vehicle fatalities and an estimated 11% of all pedestrians injured in traffic crashes;
- Of all the adults 65 and older killed in motor vehicle crashes, 18% were pedestrians, including 361 pedestrians 80 years and older; and
- The highest total pedestrian injury rates by age group were those 15 to 19 and 20 to 24 (31 and 32 per 100,000 population, respectively).

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NHTSA continued:

Countermeasures to improve pedestrian safety are listed in the table below. The table is intended to provide a rough estimate of each countermeasure's effectiveness, use, cost, and time required for implementation. Effectiveness is shown using a five-star rating system.

- Countermeasures that receive ★★★★ or ★★★★★ have been determined to be effective.
- Countermeasures that receive ★★★ are considered promising, and likely to be effective.
- Countermeasures that receive ☆ or ☆☆ have NOT been determined to be effective, either because there has been limited or no high-quality evidence (☆) or because effectiveness is still undetermined based on the available evidence (☆☆).

States, communities, and other organizations are encouraged to use ★★★, and especially ★★★★ or ★★★★★, countermeasures. They should use caution in

selecting ☆ or ☆☆ countermeasures, since conclusive evidence is not available to demonstrate the effectiveness of these countermeasures. If they decide to use a new or emerging countermeasure that has not yet been studied sufficiently to demonstrate that the countermeasure is effective, they are encouraged to have the countermeasure evaluated in connection with its use.

Further details about the symbols and terms used are included after the table. Effectiveness, cost, and time to implement can vary substantially from State to State and community to community. Costs for many countermeasures are difficult to measure, so the summary terms are very approximate.

1. Preschool-Age Children

Countermeasure	Effectiveness	Cost	Use	Time
1.1 Children's Safety Clubs	☆	Varies	Unknown	Unknown
1.2 Child Supervision	☆	$	Unknown	Short

2. School-Age Children

Countermeasure	Effectiveness	Cost	Use	Time
2.1 Elementary-Age Child Pedestrian Training	★★★	$	Unknown	Short
2.2 Safe Routes to School	★★★	$	High	Short
2.3 Walking School Buses	★★★	$	Low	Short
2.4 Child School Bus Training	☆☆	$	High	Short

3. Impaired Pedestrians

Countermeasure	Effectiveness	Cost	Use	Time
3.1 Communications and Outreach Addressing Impaired Pedestrians	☆☆	Varies	Low	Medium
3.2 "Sweeper" Patrols of Impaired Pedestrians	☆	$$	Low	Medium

4. All Pedestrians

Countermeasure	Effectiveness	Cost	Use	Time
4.1 Pedestrian Safety Zones	★★★★	$$$	Low	Medium
4.2 Reduce and Enforce Speed Limits	★★★	$	High	Varies
4.3 Conspicuity Enhancement	★★★	$	Low	Medium
4.4 Enforcement Strategies	★★★	$$	Low	Short
4.5 Driver Training	☆	$	Low	Medium
4.6 Pedestrian Gap Acceptance Training	☆	$$	Unknown	Medium
4.7 University Educational Campaign	☆	$	High	Medium

Effectiveness:

★★★★★	Demonstrated to be effective by several high-quality evaluations with consistent results
★★★★	Demonstrated to be effective in certain situations
★★★	Likely to be effective based on balance of evidence from high-quality evaluations or other sources
☆☆	Effectiveness still undetermined; different methods of implementing this countermeasure produce different results
☆	Limited or no high-quality evaluation evidence

Effectiveness is measured by reductions in crashes or injuries unless noted otherwise.

See individual countermeasure descriptions for information on effectiveness size and how effectiveness is measured.

Cost to implement:

$$$	Requires extensive new facilities, staff, equipment, or publicity, or makes heavy demands on current resources
$$	Requires some additional staff time, equipment, facilities, and/or publicity
$	Can be implemented with current staff, perhaps with training; limited costs for equipment or facilities

These estimates do not include the costs of enacting legislation or establishing policies.

Use:

High	More than two-thirds of the States, or a substantial majority of communities
Medium	One-third to two-thirds of States or communities
Low	Less than one-third of the States or communities
Unknown	Data not available

Time to implement:

Long	More than 1 year
Medium	More than 3 months but less than 1 year
Short	3 months or less

These estimates do not include the time required to enact legislation or establish policies.

Source: Countermeasures that Work Pedestrian Safety | NHTSA (2020)

Montgomery Planning's Predictive Safety Analysis (2022), which considered data from 2015 to 2019, included a breakout categorizing crashes. Predictive Safety Analysis Final Report (montgomeryplanning.org), Appendix D:

Pedestrian crashes

Pedestrian crashes 1779 crashes (100%) (some count more than once in the analysis))

Intersection 1,232 crashes (69%)

After dark 496 crashes (28%)

Vehicle going straight 629 crashes (35%)

Vehicle turning left 338 crashes (19%)

Vehicle turning right 192 crashes (11%)

Other 73 crashes (9%)

Segment 547 crashes (31%)

Vehicle going straight 418 crashes (23%)

Turns/other 129 crashes (7%)

(There is considerably more county data in the draft Pedestrian Master Plan.)

COMMENTS

I. The Draft Pedestrian Master Plan Needs to Be Revised with Priorities Based First on Safety and With a Recognition of Fiscal Realities

A. The Pedestrian Plan needs to be restructured with safety as the highest priority in words and in operation, and in recognition of other significant County priorities and fiscal realities

The draft Pedestrian Master Plan's vision - walking and rolling are safe, comfortable, convenient, and accessible for pedestrians of all ages and abilities - is defined by four goals: goal 1: increase walking rates and pedestrian satisfaction in the county; goal 2: create a comfortable, connected, convenient pedestrian network; goal 3: enhance pedestrian safety; goal 4: build an equitable and just pedestrian network. As stated in the draft plan, these goals are not listed in order of importance. rather, they are intended to show that the ultimate success of this plan will be reflected when they are met.

This needs to be restructured. The primary and first goal should be enhancing pedestrian safety, which may include infrastructure (e.g., construction and other physical changes), services (e.g., school crossing guards) and maintenance (e.g., repairing dangerous sidewalks). The other goals should be secondary.

The draft plan is a set-up for failure. The draft Pedestrian Master Plan may be viewed as an unrealistic, almost idealistic be-all that will never be funded even close to its entirety.

As a matter of good government, the Council needs to say what any pedestrian master plan it adopts is. It should be a plan that with a long but not wholly unrealistic reach is something that is doable and expected to be implemented. But the draft plan under consideration seems to be an unattainable, aspirational document that although containing a number of desirable elements is not likely to be implemented in any realistic fiscal environment.

Part of the concept of making promises and being true to them was implicitly raised by Councilmember Friedson at a budget hearing on May 8, 2023, as he spoke to the Little Falls Parkway. He said there were numerous parks projects in master plans that are yet to be realized and I think we should focus our resources on promises. May 8 a.m. session at 1:44.

The draft Pedestrian Master Plan before the Council, if adopted and viewed as a commitment, would inevitably lead to many broken promises because at least, of cost (see list of projects from the draft plan identified on the next two pages), the County's budgetary constraints and other high priorities such as affordable housing. As the County Council knows, the very recent County budget process left priority items unfunded; and it was recognized that next year's budget will be even tougher. The future is no better. There likely will *not* be very large sums of money for many pedestrian improvements. While buried in the draft plan is an admission that demand for investments in improved pedestrian facilities far exceeds the county's current resources dedicated to these projects (p. 131), throughout the plan are many programs (some of which are listed in the next two pages) and the words priority, prioritize and prioritized are used many, many times in the plan's discussion of them.

Let me return to our local master/sector plans. These involve a lot of resident and other input that considered the facts of specific areas. Under the County's Bicycle and Pedestrian Areas (BiPPA) funding program, prioritizing roadways and neighborhoods was undertaken based on the master plan schedule. In less than a half page, however, the draft Pedestrian Master Plan would toss all of this, and substitute a complicated approach in the Prioritization Methodology appendix. Draft Plan p. 131. That appendix is in a separate document, apart from the 289-page draft Pedestrian Master Plan. The normal County resident who does not have the time to read these lengthy documents, loses. They do not know that that realistic expectations based on past deliberations are to be summarily scuttled and they are in for a huge disillusionment. This elimination of projects will be a great loss to communities. Specifics on prioritization are addressed below.

If the Council proceeds to adopt a Pedestrian Master Plan that is similar to the draft under consideration, based on principles of candor in good government, it should add a preface such as: This contains possible concepts. We are not adopting all of them and implementation of many will depend on further deliberations and available funding.

B. List of some proposed taxes, new CIPs, Themes and Expenditures in the draft Pedestrian Master Plan

The draft Plan includes the following, among others, pertaining to taxes, funding, programs and construction:

F-1b: Implement a non-regressive tax to fund pedestrian and safety improvements.

B-7b: Create a new Capital Improvement Program (CIP) project to build, reconstruct, and resurface master-planned pedestrian shortcuts, Neighborhood Connector pedestrian/bike paths, and other pedestrian connections

B-7c: Create a new Capital Improvement Program (CIP) project to build pedestrian and bicycle connections to parkland.

Theme: build more sidewalks faster (p. 69)

Theme: build more walkable places (p. 79)

B-3c: Construct raised crossings across all driveways and at intersections between residential street types (Neighborhood Streets and Neighborhood Yield Streets) and higher classification streets through capital projects and as a requirement for private development.

B-4e: Create a grid of streets and alleys along transit corridors with block sizes based on the protected crossing spacing standards in the CSDG

B-4h: Provide public seating, restrooms, and other pedestrian amenities in Downtowns, Town Centers, and priority park locations and along Boulevards

B-6b: Reinvigorate the county's street tree planting program to greatly increase native canopy tree planting within the right-of-way, especially in areas like Equity Focus Areas with poor canopy coverage

B7a: Increase funding for the Annual Sidewalk Program and other related Capital Improvement Program efforts, including the Bus Stop Improvement capital funding program, to address missing, broken, or substandard sidewalks and other infrastructure. Additional funding is needed to address the large demand for sidewalk projects

B-7f: Offer monetary support to Homeowners Associations, Condominium Associations, and commercial properties for providing pedestrian connections through their property and reconfiguring existing parking lots to be more pedestrian friendly.

B-7g: Fund off-site pedestrian and bicycle access improvements to transit stations as part of the main capital project or through a parallel effort

B-9a: Increase funding for traffic calming countywide to encourage a more proactive traffic calming installation approach

P-1a: Install speed governors or intelligent speed control devices in county and public agency vehicles to ensure their drivers adhere to the speed limit

P-5b: Fund Walking School Buses to reduce the number of students being driven to school

P-5d: Develop and implement a countywide transportation demand management plan for schools addressing all school-related travel, including travel by students, parents, and staff members

P-6a: Implement the recommendations in the Access Management Study

P-8a: Increase the number of Automated Traffic Enforcement (ATE) locations

Expand the existing The Bicycle and Pedestrian Areas (BiPPA) funding program. pp. 131, 269.

MA-1a: Create a plan for proactively inspecting and repairing Montgomery County sidewalks and pathways equitably across the county and track implementation.

EA-1a: Prioritize the repair of brick sidewalks that have identified accessibility challenges. Require new or rehabilitated brick sidewalks to be constructed using non-slip materials and with patterns, spacing, and installation methods designed to minimize disturbance for wheeled vehicles: Increase in-person traffic enforcement activities

EA-1b: Saw cut sidewalk joints to minimize vibrations for pedestrians using mobility devices or pushing strollers.

EA-2a: Identify and relocate permanent vertical obstructions (like utility poles) that result in pedestrian clear zone widths that are not ADA compliant

EA-2b: Move existing utility boxes and traffic signal control cabinets out of the sidewalk into the street buffer or underground. Ensure that new utility boxes and traffic signal control cabinets are not installed in the sidewalk.

EA-5b: Provide subsidized orientation and mobility specialist and/or travel training sessions for those who may not be able to afford them

C. Priorities.

Adopt a Safety-First Approach

The draft plan's lengthy advancement of a large number of proposals is followed by a proposed prioritization mechanism (p. 131 et. seq.) which refers to a Prioritization Methodology appendix that is in a separate appendices document. This approach would apply to all new capital improvement program projects that address pedestrian and bicycle safety and connectivity challenges, as well as a potential tool to guide annual funding programs that provide new pedestrian and bicycle infrastructure, including new sidewalks, sidepaths, bikeways, median refuges, curb ramps, signalized intersections, traffic calming. This approach is not intended to influence the construction of maintenance projects. Draft plan p. 132. The draft plan recognizes that it should be reassessed as part of the Pedestrian Master Plan Biennial Monitoring Report. Ibid. It is unclear how a Council-approved plan could be modified by a biennial report.

As revealed in the Prioritization Methodology appendix, in total, there are 869 geographies included in the prioritization analysis: 55 Downtowns and Town Centers, 430 major road segments, 384 neighborhoods. The home-grown Prioritization Methodology includes not only pedestrian crashes, but pedestrian crossing comfort based on a Pedestrian Level of Comfort (PLOC, discussed below) with a metric of the sum of length of "undesirable" (PLOC 4) crossing segments divided by geographic area, bicycle measures, and others discussed below. The analysis uses several data sources, including Montgomery Planning's Predictive Safety Analysis and its Pedestrian Level of Comfort analysis. See Prioritization Methodology appendix pp. 2-4.

One of my most fundamental disagreements with the proposed plan is that safety is not given the proper prioritization as Number 1. And, as discussed in the following four paragraphs, this has real meaning.

As part of Montgomery County's Vision Zero goal, Montgomery Planning has been using a strategy to improve road safety for drivers, pedestrians and bicyclists called the Predictive Safety Analysis. As described by the Planning Department, this is a proactive data-driven approach that identifies future problem areas and works to prevent severe and fatal crashes before they happen. See, https://montgomeryplanning.org/planning/transportation/vision-zero/predictive-safety-analysis/; Predictive Safety Analysis Final Report (Oct. 2022) , https://montgomeryplanning.org/wp-content/uploads/2022/10/Predictive-Safety-Analysis-Final-Report-October-2022.pdf.

Montgomery Planning's website says this analysis "allows the county to prioritize where and how to most effectively invest in safety improvements through capital projects, development approvals, and master planning." The Predictive Safety Analysis - Montgomery Planning (website); Predictive Safety Analysis Final Report p. 3. I assume but cannot tell if it has been validated.

Montgomery Planning's Predictive Safety Analysis website has a link to "Top 200 Locations for Each Crash Type." For example, it has links to maps of Pedestrian Crashes along Segments and Pedestrian Crashes after Dark at Intersections : Predictive Safety Analysis - Top 200 Locations by Crash Type (arcgis.com). I urge you to look at these maps. These implicitly shows places to make improvements. Other areas could be added but with a lower weight. (And, in my opinion, this should not be applied to the exclusion of improving the sidewalks, sidepaths etc. that children use to go to school.)

In contrast, consider maps in the draft Pedestrian Master Plan, pp. 135, 137, 140, and 145 which identify the draft document's top four Bicycle and Pedestrian Areas (BiPPA) funding program tiers. BiPPA areas that are currently funded (more than 50% funded through construction in the six-year Capital Improvement Program (CIP)) are identified as Funded in Capital Budget) – are tier I in the draft plan. I agree with tier I. The remaining tiers were generated by the plan's Prioritization Methodology appendix. It appears that these do not substantially line up with the predictive safety analysis maps discussed above, which is very problematic.

Pedestrian Level of Comfort

In contrast to the serious safety issues that need to be addressed, the draft Pedestrian Master Plan addresses pedestrian areas that, it compassionately says, need a higher level of comfort. Three of the main problems with this are that comfort goes beyond safety, the broad goals for comfort are not effectuated by the prioritization methodology – a matter of some inconsistency, and a model in the plan produces results that without more, I cannot agree with. Further, and very generally, it is necessary to consider a form of opportunity cost. The County needs affordable housing, for example. In view of needs such as this, I do not see how largescale expenditures are likely to improve areas where the pedestrian comfort level is uncomfortable (# 3 on PLOC scale, below) (which would be nice in a perfect world with unlimited resources) beyond those where needed for safety.

First, what is the Pedestrian Level of Comfort or PLOC? Pedestrian Level of Comfort was developed by the Montgomery County Planning Department together with a private entity to quantify how comfortable people feel when they walk in certain traffic conditions. The PLOC analysis assigns a comfort level to pathways and crossings based on factors such as traffic speed, number of lanes, and whether there is a buffer between a pathway and the street. When a street receives a relatively poor score, under an aspect of the draft plan, it is a sign that a change is needed to make it a place where more people will feel comfortable walking. Pedestrian Level of Comfort (mcatlas.org) (short narrative and map); PLOC Methodology 3 (mcatlas.org). From what I could tell, PLOC is a home-grown concept that at this time does not appear to have wide acceptance. I did not see a validation and a demonstration that it really works well.

Second, as noted in the Pedestrian Level of Comfort Methodology document "'comfort' as a concept should be thought of differently from "safety." p. 1. While safety will always be the bedrock principle of the transportation system, this analysis is a tool to create a pedestrian environment in Montgomery County that is more than safe – one that is enjoyable and comfortable for people of all ages." Ibid, p. 1. The comfort level scale allows for a basic four-point ranking system, while half-points add further nuance when additional data are available to refine the evaluation. The comfort level scale is 1 = Very Comfortable; 1.5 = Comfortable; 2 = Somewhat Comfortable; 2.5 = Somewhat Uncomfortable; 3 = Uncomfortable; 3.5 = Very Uncomfortable; 4 = Undesirable. As an example, a crossing might be upgraded from a score of 3 to 2.5 if an additional safety or comfort treatment, such as lighting or a "No Turn on Red" sign, is present. In my view, a fundamental concern is at what level in the PLOC analysis would an area under consideration be characterized as a safety problem?

Third, as discussed below under prioritization methodology, if the net result of the pedestrian level of comfort analysis is "undesirable," the prospective area is an input into the Prioritization Methodology. But if it is more comfortable on the PLOC scale than undesirable, seemingly it is not an input. The net result would appear to be large areas of the County that are categorized as "uncomfortable" or "very uncomfortable" but below the level of "undesirable" under the PLOC

analysis, without the benefit of some other factor under the Prioritization Methodology, would go unaddressed. This suggests that the plan's sweeping vision of a county where walking (and rolling using a mobility device) is safer, more comfortable, more convenient and more accessible for pedestrians of all ages and abilities (draft plan p.1) is not supported by the plan's implementation. It does seem to be a bit closer to fiscal reality, however.

A Planning Department map shows areas that are not comfortable. Pedestrian Level of Comfort (mcatlas.org). There are vast areas of the County that are "uncomfortable" shown as orange. If readers of these comments look at the map and focus on communities they are familiar with, they will get a fact-based sense of the extraordinary breadth of designated discomfort under the draft plan. In the southern part of County Council District 1, not far from where I live, this includes, for example, large parts of numerous communities including Kenwood, Brookdale, Green Acres-Glen Cove, Springfield, Wood Acres, Sumner and Westmoreland Hills communities, which in the aggregate have thousands of homes. But the areas that are classified as "undesirable" on the map in red involve far smaller areas and, generally, are along major roads such as River Road. And, as discussed elsewhere, they too apparently do not have sufficient priority for counter measures under the Prioritization Methodology**.** *See* draft Pedestrian Master Plan, pp. 135, 137, 140, and 145.

Fourth, has the pedestrian level of comfort methodology model been validated?

Fifth, the model itself produces results that I question (without more information). The first example in the PLOC Methodology appendix, PLOC Methodology 3 (mcatlas.org), is outside a house in a non-urban area in or near Woodside Park at 1220 Noyes Drive, Silver Spring. There is no pathway, but in much of the county there are no sidewalks or other pathways, and it is an older road (I live on one with parking on one side) but this has no parking. This is PLOC- scored as uncomfortable. I do not see any significant discomfort. If there were a lot of traffic, I would have a different view. To conform to the plan's goals, what should be done here? What likely will ever be done?

The third example in the Methodology appendix is Maryland 119 in Gaithersburg, a non-urban area. It has a 5-foot buffer and 8-foot pathway, but no parking lane or separated bike lane (SBL), a 50-mph speed limit, and is in good condition. The PLOC methodology scores it at 3 – Uncomfortable. But strictly from a pedestrian comfort standpoint, what would be needed? Redesign and rebuilding of a highway to have a parking lane and/or bike lane? How does that substantially benefit pedestrians? This seems more than questionable.

The fifth example is 7431 Arlington Road, Bethesda. This is just north of the Bethesda Library and just south of the fenced ball field of Bethesda Elementary School. The area is urban but, in my view, is not as urban as some in our County. The sidewalk does not have a buffer, is a 5.5-foot pathway. Arlington Road does not have a parking lane or separated bike lane. The speed limit is reported at 30 mph, with the road in good condition but there is a utility pole obstruction near toward the entrance to the library parking lot. It is scored 4 – Undesirable. This example is very telling and demonstrates why the model is at most a screening tool. Site specific facts need to be considered. About 7 years ago, I was involved in the Bethesda Downtown Plan sector plan. There were considerations, before the Planning Board and/or Council, of reducing Arlington Road down from 4 lanes. That reduction was not adopted due to the large volume of traffic on Arlington Road, which if it were a 2-lane road, could not handle the traffic. Setting aside the four lanes of traffic, that leaves the lack of a buffer (for unknown reasons). There are many sidewalks in the county without buffers. What realistically can be done about that? The

foregoing does not include matters related to the proximity of the school, which might warrant pedestrian-oriented improvements. What should be done?

The Prioritization Methodology

The last straw is the proposed revision to the Bicycle and Pedestrian Priority Area (BiPPA) priority system. Through the Prioritization Methodology, the draft Pedestrian Master Plan would revise the county's BiPPA program framework. Draft plan, p. 131. As noted above, the draft Pedestrian Plan's Prioritization Methodology is in the separate appendix document. Pedestrian Master Plan Working Draft Appendicies (montgomeryplanningboard.org) For 889 geographies (55 Downtowns and Town Centers, 430 major road segments, and 384 neighborhoods (which ones are not expressly stated on the summary page), as step one, it includes (p. 3):

Factor	Weight
Pedestrian Activity	15
Bicycle Activity	9
Pedestrian Crashes	15
Bicycle Crashes	9
Pedestrian Pathway Comfort	9
Pedestrian Crossing Comfort	9
Bikeway Comfort	5
Bike Crossing Comfort	5
School Access	12
Transit Access	12
(This adds to 100)	

As step 2, equity would have a weight of 5.

There are significant problems with this homegrown methodology. First, this does not emphasize pedestrian safety satisfactorily. Pedestrian crashes are only 15 per cent of the total score. It seems to be driven more by pedestrian activity in urban areas plus multiple bicycle measures. For example, if there is an urban area with considerable pedestrian activity, a relatively large number of MCPS students who may walk to school and of households within one mile of a Metro Red Line station (set aside double counting for now) and an uncomfortable sidewalk or crossing, the area would have a high score. While that score could readily mean that the area should be analyzed by professionals for safety and any necessary countermeasures, it does not mean that it is not safe and warrants improvement. A separate review of school access would be wise. Second, comfort is secondary to safety as discussed above, and should therefore be secondary, with at least far less weight.

Third, the draft Pedestrian Master Plans goals are all about pedestrians: 1) Increase Walking Rates and Pedestrian Satisfaction 2) Create a Comfortable, Connected, Convenient Pedestrian Network 3) Enhance Pedestrian Safety 4) Build an Equitable and Just Pedestrian Network." draft plan p. 1. The Pedestrian Master Plan should be true to its goals. Pedestrian safety and to the extent advanced, the other goals, should not be diluted and shortchanged by bicycle comfort, which when all potential matters are tallied, might mean not addressing an intersection that is unsafe for pedestrians and adding something for bicycles. A fair way to go about this is to run a model without bicycle information and one with bicycles and in a hard look compare them.

Fourth, from what I could readily see, there is no validation of the model. Fifth, just as the Pedestrian Level of Comfort document had examples, there needs to be a presentation of fair and representative examples to see if the prioritization methodology works and meets public expectations. It needs to be reviewed and possibly recalibrated/revised. Sixth, ultimate decisions on individual projects (not sidewalk maintenance or individual crosswalk painting projects) need to be made by the Council, which can consider the facts, not just what a model generates.

II. Local Concerns are Not Addressed by the draft Pedestrian Master Plan

At the Council hearing on July 25, Kimblyn Persaud, of EPIC of MoCo, said the plan was not written from the perspective of a parent who might have to pick up a sick child from school then go to work. That speaks to real world practicality.

These comments will now address some real problems within about a mile of where I live, including by the Capital Crescent Trail.

Curb cuts

A year ago, while riding her bicycle in a bike lane, Sarah Langenkamp, was struck by a flatbed truck as the vehicle turned into a parking lot in the 5200 block of River Road near Little Falls Parkway, in Bethesda. Regardless of the lawsuit against the trucking company, the area near the curb used by bicycles and the sidewalk for pedestrians is problematic. There are many curb cuts, including for a garden center, bank, roofing supply business, McDonald's, gas stations 7-Eleven, storage facilities, laundromat, etc. in a short stretch of read. In the course of discussion on the Westbard Sector Plan about 7 years ago, one person said it was terrifying at times walking with a stroller on that segment of River Road. (Councilmember Friedson is very familiar with this area and can describe it.) This sort of problem is not limited to Council District 1; similar conditions exist elsewhere in the County including on Georgia Avenue.

Does the draft Pedestrian Master Plan specifically address curb cuts; answer: NO. A word search in the draft Pedestrian Master Plan for curb cut revealed in part: P-6: Address access management to reduce pedestrian/vehicle conflicts. On non-residential streets, sidewalk interruptions should be limited as driveways and other curb cuts create conflict points between motor vehicles and pedestrians. Implement the recommendations in the Access Management Study (2022).

One might assume, based on the foregoing, that practical solutions are to be found in the Access Management Study, but that is not the case. This is a study "to coordinate" regulation and design of access between roadways and land development to systematically improve the safety and efficiency of moving people and goods while reducing conflicts between all modes of transportation using and crossing the roadway, including cars, heavy vehicles, transit, bicycles, and pedestrians.

The Access Management Study (https://montgomeryplanning.org/wp-content/uploads/2023/05/Access-Management-Study-Report-072122_Final.pdf) provides INTERAGENCY RECOMMENDATIONS such as:

In order to implement an effective access management policy and address Vision Zero priorities, it is critical that shared policies be developed for the county's High Injury Network, which includes both state- and county-owned roadways. It goes on to recommend joint activities. What's more, it is unclear how the Pedestrian Master Plan's priority schemes would bring into fruition whatever might flow from the Access Management Study or what funding would follow.

On the surface, the draft Pedestrian Plan might seem to provide something by referring to the Access Management Study. But concrete solutions are lacking.

Metro station safe sidewalks

The closest Metrorail station to our residence is Friendship Heights, which my wife and I have used routinely to go to and from work. At the northwest corner of Wisconsin and Western Avenues are a bus terminal (Ride-on and Metrobus) and Metrorail access escalators, and above that the 2 Wisconsin Avenue office building. In this immediate area, the sidewalk along Wisconsin Avenue is brick. Some of the bricks were uneven, loose and out-of-place, causing my wife to fall and get hurt. There was no number to call to get the pavement fixed. The Metro station manager had no interest in the problem. The one thing Metro was practiced at was denying any responsibility.

While there no doubt is agreement that sidewalks near a Metrorail station need to be safe, and the draft plan says EA-1a Prioritize the repair of brick sidewalks that have identified accessibility challenge with brick sidewalks (p. 117), readily executable mechanisms to assure that brick sidewalks are safe and repaired are woefully lacking. It is intolerable that the entity responsible for maintenance and repair of the public sidewalk at a Metrorail stop is not readily identifiable with contact information, that there may not be clear responsibility of a particular entity or entities for the maintenance, and that there is no one readily identifiable in the County to actually ensure that the sidewalks in these critical areas are fixed and safe. Loose bricks in the area remain to this day.

Bicyclists on the Capital Crescent Trail

The Capital Crescent Trail, which is paved to a width of 10 feet, is popular and has many users. The trail is shared between cyclists, walkers and joggers with no one group being a "majority" user in the Bethesda area. Riders on high-speed electric scooter are emerging as users. The speed limit is 15 mph but when the trail is crowded, that is high. A small percentage of bicyclists go too fast and do not respect the rights of pedestrians. This has presented safety issues. (e.g., https://www.thewashcycle.com/2007/05/hostile_cyclist.html) and certainly presents significant comfort issues to pedestrians on the trail. Just as speed limits were lowered on some roads in light of Vision Zero concerns, when the trail is crowded, the speed on the trail needs to be adjusted. Bicyclists do not have priority. And there needs to be enforcement.

Road closures

The draft Pedestrian Master Plan barely touches on street closures, and in a very limited way. It refers to partial roadway closures immediately adjacent to schools during arrival and dismissal (P-5c, pp. 109-110). It also refers to Streeteries in the glossary as a dining concept to create additional restaurant seating outdoors, especially with the use of temporary street closures. p. 286. Overall, this is insufficient and too narrow.

Whenever a road closure is considered, the unintended consequences, including on pedestrians, need to be considered in depth. A relatively recent case in point was the Parks Department's closure of a major part of the Little Falls Parkway on weekends after the pandemic descended upon us. The Parkway is the major roadway for residents of a number of communities to the south of Bethesda to go to Bethesda. What happened? Motor vehicles took an alternate path (which is easy to do in the modern era with Waze) through the Kenwood community. But that community lacks sidewalks, so this presented a dangerous situation to pedestrians and bicyclists (including children). Ultimately, as Parks Director Michael Riley himself recognized, Parks had not considered unintended consequences of the Parkway's closure. The Parks Department reconsidered and Little Falls Parkway was reopened.

Pedestrian Crossing Signal on Wisconsin Avenue (Rte. 355) and Chevy Chase Boulevard

This signal was installed by the State Highway Administration (SHA) before the pandemic. The signal is high and does not have the multitude of red lights that, for example, exist on Willard Ave. at its intersection with The Hills Plaza (road). While our State legislative delegation was successful in prevailing upon SHA to reduce the speed limit on Wisconsin Avenue to 30 mph, the fact remains that the local view is that people are taking their lives into their own hands in relying on this signal to cross Wisconsin Avenue. There needs to be (better) standards for pedestrian crossing signal lights and their conspicuity.

Sidewalks in urban areas - widths and how they are measured, and what is going to be done about it.

As noted in the draft Pedestrian Plan, the county's Complete Streets Design Guide includes a six-foot default sidewalk width for all street types. p. 38 fn 14. But what is required and how is it measured? The description in the draft Pedestrian Master Plan lacks specifics, although the problems of obstructions in certain contexts are recognized. p. 119. The following example describes a sidewalk that in my view is problematic. It is on the western side of Wisconsin Avenue just north of Bradley Boulevard, with an address of 6800 Wisconsin Avenue. In that building, which is set back from Wisconsin Avenue, there is a Staples store. The store doors open to an elevated walkway parallel to Wisconsin Avenue that serves only the stores. From the walkway, there are steps down to the Wisconsin Avenue sidewalk. In that area are trees in tree boxes at the same elevation as the sidewalk and lamp posts. As a practical matter, at numerous locations, the sidewalk - from the steps to an obstruction such as a tree box or lamp post - is wide enough for only two people walking side-by-side or a person walking a dog on a leash. Yet in this narrow space, there are people passing both ways, dogs on long leashes or not, and people on bicycles. It is too narrow. What is the required width along the sidewalk, how is it measured, and what will be done if it is not met?

III. Other Concerns With the draft Pedestrian Master Plan

First, the County has an aging population. The only reference to the "elderly" is in "B-4h: Provide public seating, restrooms, and other pedestrian amenities in Downtowns, Town Centers, and priority park locations and along Boulevards. Enjoyable walking often requires more than just a sidewalk and a place to safely cross the street. For example, not having a place to rest along a walking route may reduce walking for the elderly." Moreover, in my view, this is a safety issue for the very old, particularly on hot days. While I do not agree with construction and maintenance of public bathrooms due to cost and likely conditions in and around such facilities,

seating has appeal. A very modest amount of separate (from safety) funds for seating that does not obstruct sidewalks might be entertained.

Second, while I generally agree that there are desirable aspects of increased walking, there are questions on the feasibility or likelihood of the draft plan's projections of increased walking. As may be recalled, in the context of resolution of the Thrive Montgomery 2050 there was supplemental RESJ work. A question raised was how can I carry my ladder on Metro? Similarly, a lot of people in the building trades cannot walk to work. Many people commute to Virginia, many school teachers live in the outer areas of the County or Frederick County, many retail and hospitality workers cannot afford to live near where they work. It is unlikely that these workers will walk to work more. As to schools, high school students generally have different sleep patterns from adults. These adolescents are also commonly sleep deprived. It is not uncommon for parents to car pool them to school in the morning in order to give them say an extra half hour of sleep, and I do not see this changing.

Third, it seems that the planners want a procrustean approach to school and other county construction so it complies with every word in the voluminous policies they have generated, regardless of the facts and complexities of the sites for buildings. The fact is that school construction often does not take place in idealized settings. Years ago, then County Executive Leggett was heard to complain about the cost of some school construction. The response was that school construction commonly does not occur on large open fields, schools have to be designed to fit onto available lots precluding at times standardized plans, and therefore construction is expensive. There are tradeoffs and at times a bit of unhappiness by some. This was apparent in the choice of a site for the Silver Creek Middle School in the Bethesda-Chevy Chase cluster within the last eight years. Even the County Council could not come to unanimous agreement on the site for the new middle school. There is a lot of public input and debate on school sites. No single sentence in a policy should control. The proposals in proposed plan B-4b go too far.

Respectfully submitted,

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