

The National Capital Area Chapter (NCAC) of the American Council of the Blind of Maryland (ACBM) is writing here to submit our comments regarding our recommendation that the County should eliminate all so-called “floating bus stops” (also called Floating Bus Islands) from local bus routes throughout the County. As a not-for-profit organization which focuses on support and advocacy on behalf of people who are blind or have low vision, our members reside primarily in Montgomery County, and travel throughout the DC/MD/VA (DMV) region.

Since we first discovered the existence of these bus stops, we have found their configuration to be confusing, and worse, unsafe for blind pedestrians and bus riders. Ever since the re-designed bus stops first appeared, unannounced, and without seeking input from or providing notice to the community of blind and otherwise disabled County residents, NCAC members have interacted with county leaders and administrators, including Montgomery County Director of Transportation, Christopher Conklin, and Montgomery County Executive Director, Marc Elrich, as well as with several traffic engineers responsible for installing the floating bus islands and creating the bicycle lanes that also function as pedestrian crosswalks. Our members have also worked regularly with county transit employees to test the bus stops for safety and accessibility, as they were installed at various locations throughout Montgomery County. Although County leaders and administrators and traffic engineers seemed to listen attentively to our concerns and interacted with many of our members with the stated goals of solving problems and lessening our anxiety, the problems we described, from the very beginning, still persist today, and we continue to find bus stops with floating islands and pedestrian crossings where bicyclists whiz by, taking little notice of waiting pedestrians, in a seemingly uninterrupted stream, to be exceedingly dangerous for blind and low vision pedestrians.

The bottom line is this: The floating island bus stops are unsafe for blind and visually impaired pedestrians and bus riders and should be eliminated.

First, it is impossible to predict which bus stops will float, across from the sidewalk curb, and which will be positioned, familiarly, curbside. While people who have normal or normally corrected vision can see, before they reach a floating bus stop, that it is coming up and, understanding its configuration before they reach it, can figure out how to navigate the sidewalk and cross the bike lane safely, blind pedestrians and bus riders have no reliable or predictable way to even know where a floating bus stop might appear en route, and since exact configurations of the floating island bus stops can – and do – vary from one location to another, blind people cannot plan, in advance, how to navigate one of these bus stops safely.

Tactile strips are sometimes installed to indicate to pedestrians that they are entering or exiting a bus stop and to indicate the path of travel across a bike lane, with a goal of tactually assisting blind pedestrians (under foot) with orientation, but the warning strips are often more confusing than helpful, especially when we are walking through unfamiliar settings where the reason for the appearance of a tactile warning strip might

not be immediately apparent, and also because the floating island bus stops vary considerably in configuration from one location to another.

Some of our members who have used public Metrobuses and Ride-On buses for many years consider these new floating island bus stops to be so dangerous that they have stopped riding buses altogether. Now they rely on ParaTransit (i.e., MetroAccess) for traveling throughout the county, at an average per-ride cost to the transit agency, according to WMATA's estimate, of \$95.00.

Forced reliance on ParaTransit negatively impacts our ability to plan trips, to expect to arrive at our destinations on time, and to generally enjoy the experience of traveling independently.

If you survey our members who have attempted to use the floating bus stops, you will find that, universally, their experience has been that most bicyclists do not yield to pedestrians. It is nearly impossible to hear a bicycle coming. And bicyclists seldom willingly stop for pedestrians, one reason being that it apparently feels unsafe to many bike riders, to interrupt the smooth flow of bicycle traffic on a dedicated bike lane to stop for unexpected obstacles (including pedestrians!)

Lights have been installed in some locations, to alert bicyclists of an upcoming pedestrian crossing, but the lights may be very hard to see during daylight hours, and, even when there are lights installed to alert bicyclists of the pedestrian crossing ahead, our members have not detected any differences in the likelihood that bicyclists will stop to allow them to cross, or any discernible reduction in the length of time they have had to wait. .

The crosswalks, which are often painted in unconventional ways, can be confusing to our guide dogs. Some of us have found that our guide dogs refuse to guide us across the unstriped crosswalk, altogether.

Some crosswalks are four feet wide to accommodate one lane of bike traffic, others accommodate two lanes where bikes are traveling in both directions, meaning that our crossing is eight feet wide. There's no way to predict how many lanes we will need to cross or to plan when to initiate a crossing or to reliably estimate how long it will take us to get across.

We want to point out that as residents of Montgomery County, we pay taxes, and that tax revenue funds the Metrobus and the Ride-On transit systems. However, now that many bus stops have become floating islands and buses may not stop at curbs anymore, those transit systems are inaccessible for people who are blind and have low vision, and we cannot safely use the transit systems that we pay for with our tax dollars.

Under grant funding provided by the National Academies of Science, Engineering and Medicine for a U. S. Department of Transportation-sponsored two-year study entitled "Floating Bus Stops and People with Visual Disabilities," the Transportation Research

Board (TRB) is investigating the safety of floating bus stops for people who are blind and have low vision. The study is currently at its mid-point with results and final recommendations expected a year from now.

[See: apps.trb.org/cmsfeed/TRBNetProjectDisplay.asp?ProjectID=5438]

Beezy Bentsen, a Certified Orientation and Mobility Specialist (COMS), who is a universally acknowledged expert in the field of pedestrian safety for people who are blind, and a principal investigator for this research study, was asked for her preliminary assessment regarding the safety of floating bus stops for people who are blind and have low vision. Ms. Bentsen summarizes her extreme concern regarding the threat that floating bus stops represent to the safety of blind and low vision pedestrians, as follows:

“Until there’s a solution that can be confirmed, buses should pull up to the curb.”

We appreciate her willingness to share her concern for our safety with respect to floating island bus stops, and agree completely with her assessment and the solution she proposes.

Unequivocally, we urge the County to eliminate these dangerous floating bus stops, and to reinstitute the practice of requiring buses to stop at the curb every time they are picking up or discharging passengers.

Thank you for allowing us to comment on this issue that is urgently important to our members and every blind or low vision pedestrian who travels on sidewalks and across streets in Montgomery County.

Sincerely,
President and Board of the National Capital Area Chapter,
American Council of the Blind of Maryland

Penny Reeder, President;
Patrick Sheehan, Vice President;
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Joyce Feinberg, Board Member