

Connecticut DOT's Preliminary Safety NPRM Comments to AASHTO

Updated 3/31/2014

Connecticut DOT (CTDOT) has formed internal subject matter working groups to respond to each performance management related NPRM and help coordinate the target setting process in Connecticut for MAP-21 performance measures. Members of the safety working group include representation from the Highway Safety Office (HSO), Traffic and Safety Engineering Office, Work Zone Safety Office, Crash Data and CDIP Units and the Office of Strategic Planning and Projects. The safety working group is chaired by the Director of Policy and Planning.

The CTDOT safety working group met to discuss and formulate these comments late last week.

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POLICIES CONSIDERED BY USDOT FOR NPRM:

FHWA REQUEST 1:

The FHWA considered these principles in this NPRM and encourages comments on the extent to which the approach to performance measures set forth in this NPRM supports the principles discussed above.

CTDOT has no comment regarding principles at this time.

PERFORMANCE MEASURES TO REPORT:

FHWA REQUEST 2a:

The DOT requests comments on how the Department could address separate non-motorized performance measures.

CTDOT recommends that USDOT, AASHTO and GHSA address the development of separate non-motorized performance measures as a national coordinated process with the states.

Vehicle Miles Traveled (VMT) should not play a role in determining rates of non-motorized fatalities and serious injuries on public roadways. VMT is not a good indicator of bike and pedestrian utilization of the network.

FHWA REQUEST 2b:

The DOT requests input on the extent to which States and MPOs currently collect and report non-motorized data (fatality, serious injury, miles traveled) and the reliability and accuracy of such data, and how States and MPOs consider such data in their safety programs and in selecting investments.

Crashes:

In Connecticut, bike and pedestrian accident data is reported if a motor vehicle is involved and a police officer writes up the accident and submits a report. Near misses and non-roadway incidents are not included in the data. Although non-motorized fatalities that occur on roadways are reported with high accuracy, non-motorized serious injuries are not. However, some agencies may collect non-motorist accidents (i.e. bike on bike, bike on tree, or bike on pedestrian, etc) on the new MMUCC 4 PR1 form.

The ability for Connecticut to establish a baseline of reliable rates for non-motorized fatalities and serious injuries is limited due to lack of data for statewide bicycle and pedestrian miles traveled.

Volumes:

CTDOT does not currently conduct any systemic data collection for non-motorized users, however when turning movement counts are required we request that bikes and peds are also counted. The Department recently acquired video intersection counters which have the ability to be used for bike ped but this will not be a priority function of the equipment. Additionally, the Capitol Region MPO (CRCOG) participates in the annual National Bicycle and Pedestrian Documentation Project, but this data is limited to select sights and the CTDOT has no oversight and doesn't participate in this effort. The City of New Haven has some point in time data for non-motorized users documented in their parking study.

The current lack of data represents one of the Departments greatest challenges to the Bike and Ped program, because of its impacts on our ability to prioritize, find funding, and improve safety systematically.

The number 1 data need is base volumes of cyclist and pedestrians.

Based on our current fiscal/person power constraints, CTDOT has a limited ability to perform turning movement counts specifically for bike and ped. Additional means of getting necessary data include: Major Traffic Generators should be required to submit bike and ped counts at all turning movement count locations. An additional avenue would be to use research funding for automatic counters to be installed on all major

river crossings where bike and pedestrian traffic is channelized into a separated path (interstate bridges mostly), and to fund several mobile counting units.

Facilities:

The CTDOT does not currently collect bike lane miles data. There are few existing bike lane miles on state routes and there is no reporting mechanism/requirement set up for local municipalities to report this information to CTDOT. However of all the uncollected data this might be the easiest to collect. This data could be included annually with submissions for the TIP for example.

Multi-use trails miles data quality is limited.

CTDOT finds it challenging to collect local and private bike facility data, but this could be included in the bike map update.

Sidewalk network data is pretty unobtainable. Some towns may have up to date networks in GIS, but we don't have that information at the state level.

FHWA REQUEST 3a:

Stakeholders are encouraged to comment on whether a 3-, 4- or 5-year rolling average should be required for the HSIP performance measures.

The CTDOT Highway Safety Office (HSO) currently reports goals to NHTSA using a 3 year moving average. However, as a Department, CTDOT has agreed to start using a 5 year moving average. CTDOT supports the use of 5 year moving averages for both the HSIP performance measures and NHTSA performance measures. A 5 year moving average is preferable to allow for fluctuations in crash data. The use of moving averages to set goals places less of a burden on the State to effect significant change over shorter periods of time.

The term "rolling average" should be replaced with the more traditional "moving average" and defined as the sum of the value of the current year and the values of a predefined number of previous years divided by the number of years involved.

FHWA REQUEST 3b:

Stakeholders are also encouraged to comment on whether the use of moving averages is appropriate to predict future metrics.

The use of moving averages to set targets places less of a burden on the State to effect significant change over shorter periods of time. States should have the flexibility to use absolute numbers if they are proven stable enough to use by testing the R value of the trend line. If the R-value is low and data determined to be stable, States should be able to set goals using absolute numbers.

DEFINING SERIOUS INJURIES:

FHWA REQUESST 4:

The FHWA solicits comment on whether some other injury classification and coding system would be more appropriate.

CTDOT supports USDOT's recommendation for all State DOTs to be able to link to hospital records by 2020.

However, this safety measures NPRM relies too heavily on the availability of hospital injury data without having a backup system in place that can be made better with additional training of police officers.

CTDOT recommends that police officers still attempt (even in 2020) to collect serious injury data in the field through better data collection protocols at the scene. This would complement serious injury data coming from hospitals which while possibly more accurate could also be dated. In addition, unless States are capturing EMS run numbers on the crash report, States would need to use the same standards for probabilistic linkage and imputation analysis to determine serious injury counts.

In Connecticut, hospital records belong to the State hospital association and will need to be forwarded to the Department of Health under a data sharing agreement for linkage purposes. Under a previous CODES grant, linkage between crash and medical outcome data has been attained in Connecticut.

TARGET SETTING PROCESS:

FHWA REQUEST 5:

The current time lag (time period between the end of the calendar year in which the data were collected to the date the data is available in the national system for the final FARS and HPMS data) is approximately 24 months. The DOT seeks comments on whether this time lag is an issue, any impacts it may have on a State DOT's ability to establish targets, and any suggestions that can help address this issue.

Reliance on final FARS data is problematic given the extended delays in receiving the final FARS file. The 24 month lag in final FARS data presents an immense challenge for the Highway Safety planning process both in determining targets and measuring progress. One of the biggest concerns for the CTDOT is target setting.

CTDOT suggests States be allowed to use early FARS numbers entered into the system or certify their own fatality reporting systems for use as planning tools in the setting of performance targets. Preliminary FARS and HPMS data will suffice in most cases. It is important for states to get credit for progress made. It is also important for states to be establishing their safety targets using the same standardized process and data sets as other states.

CTDOT encourages the expansion of Fast FARS to match with the performance measures that states are required to set targets for.

CTDOT recommends the creation of a national FARS conference to address the data lag issues with FARS.

REPORTING PROCESS:

FHWA REQUEST 6:

Many differences in target setting boundaries could exist that would require State DOTs and MPOs to coordinate on quantifiable targets between them using the proposed target setting requirements in this section. As part of the coordination process, State DOTs and MPOs are encouraged to consider how the data will be reported. The FHWA is seeking comment on alternative approaches that could be considered to effectively implement the coordination requirements of MAP-21 (e.g., 23 U.S.C. 134(h)(2)(B)(i)(I) and 23 U.S.C. 150(d)(2) considering the need for coordination required under 23 U.S.C. 134(h)(2)(B)(i)(II) and 23 U.S.C. 135(d)(2)(B)(i)(II).)

The safety target setting coordination required in MAP-21 between states and other stakeholders may best be achieved through the development of the SHSP. Applicable for Connecticut, another coordination suggestion could be via the LTAP Center at UCONN.

DETERMINING SIGNIFICANT PROGRESS:

FHWA REQUEST 7:

Stakeholders are encouraged to comment on the appropriateness of the trend line methodology proposed for the significant progress analysis.

The trend line methodology sounds reasonable. Highway Safety goals are already based off trend line analysis.

Under NHTSA/GHSA guidance States can project goals out to any number of years. This should be made standard under the NPRM. The impact of performance goal assessments on setting goals should be analyzed. States will set goals very close to trend line projections to achieve "success" rather than basing goals on projected countermeasure effectiveness.

FHWA REQUEST 8:

The FHWA seeks comment on whether the underlying methodology of the prediction interval is appropriate.

The prediction line methodology sounds reasonable. However, gaming the prediction intervals could become a problem to avoid the consequences of excessive intervention into program countermeasure selection from the outside. States not attaining their goals should be able to provide other underlying data to show that progress is being made (e.g. in specific areas of the State, observation or reported behavior measures).

FHWA REQUEST 9:

The FHWA seeks comment on whether 50 percent is the appropriate threshold for determining if a State has overall achieved or made significant progress toward achieving its performance targets.

The 50% threshold appears reasonable but should be able to be adjusted if weak incremental goals are being too easily achieved or if too many States have set aggressive goals that cannot be attained.