

April 17, 2020

Doug Rex  
Executive Director  
Denver Regional Council of Governments



Dear Doug,

We are writing on behalf of Bicycle Colorado and the Denver Streets Partnership (DSP) to share our comments on DRCOG's Regional Vision Zero Action Plan draft. Bicycle Colorado is a statewide bicycle advocacy organization working to ensure that riding a bike is always safe and convenient and DSP is a coalition of community organizations advocating for people-friendly streets in Denver. Before merging, both of our organizations sat on the Denver Vision Zero Action Plan Technical Advisory Committee and continue to participate in steering committees to advance Denver's goal of zero traffic fatalities and honor Vision Zero principles. Similar to your Metro Vision, we see streets and roadways as essential conduits that connect us to jobs, schools, services, and amenities and should enable everyone to participate in and benefit from Denver's growth, regardless of how we get around or age, income, and ability.

Bicycle Colorado and DSP are thrilled about the impact this Vision Zero Action Plan will have across the region by supporting communities in prioritizing people and safer roadways. We were also excited to learn that the plan will be used very soon after its launch to evaluate a new round of infrastructure projects. It is a great resource as it provides strong data and high injury network maps, a toolkit of countermeasures as well as area types to share information specific to each local government's conditions. All of these will expedite the process for local governments to prioritize traffic safety in their planning and projects. DRCOG's interest in supporting policies and a legislative agenda to advance traffic safety was also a highlight.

Bicycle Colorado and the DSP appreciated the opportunity to review and provide comments on an early draft of the plan, which we sent to DRCOG on March 7, and are pleased to see some of these comments reflected in the current draft. To further strengthen the plan, we reiterate several of our recommendations that were not addressed in the current draft:

- **Commitment to Vision Zero**

As a "Vision Zero" plan, it is important that this plan models the Vision Zero guiding principle of prioritizing roadway design over individual responsibility and enforcement. Given that crash reports and survey data tend to focus on behavioral issues, it is particularly important to explicitly call out how infrastructure can guide safe behaviors, and to provide concrete examples that help the reader understand this foundational concept. The emphasis on behavior takes away from the true spirit of Vision Zero and can lead people to place blame on each other, instead of analyzing the built environment and identifying systems-level solutions. And ultimately, local governments have more control over the design of their streets than they do over constituents' behaviors.

- **Urgency**

We feel the plan needs a stronger sense of urgency, that traffic deaths are an epidemic and governments and decision makers have the power (and responsibility) to change the direction of traffic safety through new systems. The plan includes a "call to action," but we feel that the plan should strike this tone throughout.

- **Equity and enforcement**

Equity and empathy are mentioned without much context or depth. Local governments and communities need to know why equity is important and examples of what this looks like or what strategies they can use, similar to the toolkit of countermeasures that is provided for design and operations. An “Equity Strategies” section was added toward the end of the plan, but DRCOG can demonstrate its commitment to equity by strengthening its language throughout the plan so as not to appear a siloed effort. Furthermore, focusing on enforcement as a primary strategy can exacerbate existing racial and social injustices and erode mutual feelings of trust and safety between our police officers and the communities they serve. The plan should highlight other interventions that should precede enforcement and suggest other roles law enforcement can play in building relationships with and educating the public. A specific example of where enforcement needs to be addressed very thoughtfully is in the context of HINs/disinvested communities. Finally, the many graphics in the plan that illustrate people are an opportunity to better represent and emphasize the diversity in gender, age and ability of residents in the region who share our roadways.

- **Vulnerable road users**

Vulnerable road user data is introduced in a number of places in a way that emphasizes “low” pedestrian and bicyclist numbers and crash rates. This detracts from the fundamental Vision Zero principle that even one fatality is too many and the main point should be that pedestrian and bicyclist injuries and fatalities are disproportionately high relative to their mode share. Metro Vision establishes goals for increasing non-SOV mode share and decreasing vehicle miles traveled, and the Regional Vision Zero Action Plan should recognize that achieving these goals will require increasing safety for modes other than driving.

- **Speeding**

We are glad the Vision Zero Principles section emphasizes the role of speed in crash severity and the importance of setting context sensitive speeds, and are pleased to see the addition of a section on “Speed Reduction Strategies.” Because the plan may not be read cover-to-cover, however, we reiterate our earlier recommendation that speed reduction should still be referenced within all area type sections, not just rural and limited-access highways. Furthermore, the countermeasures should include more details on how to mitigate unsafe speeds through street design, with enforcement as a secondary strategy.

- **Charts**

Some graphics and page formats could be improved for optimal readability.

We appreciate your team’s hard work and the extensive amount of community engagement, data analysis and thoughtful discussion that informed the development of the Regional Vision Zero Action Plan. Please do not hesitate to reach out if we can clarify any of our comments or recommendations and we would be happy to continue to be a resource as you incorporate feedback into the final plan before May 20.

Sincerely,

Pete Piccolo,  
Executive Director, Bicycle Colorado

Jill Locantore  
Executive Director, Denver Streets Partnership