

SUMMARY OF COMMENTS ON THE MORPC COMPLETE STREETS POLICY AND CHECKLIST, MARCH 2010

[C = Comment & R = Response]

This list of comments only summarizes comments received since the final draft was issued in March. Comments were received from: ODOT, ODNR, Franklin and Delaware Counties, Cities of Columbus, Dublin, Gahanna, Pickerington, and Upper Arlington, OSU, Consider Biking, 3 consultants, and 4 residents.

Comments on the Complete Streets Policy

General Comments

- C: The cost of implementing this policy needs to be addressed. Based upon past experience, 10% to 15% is probably a reasonable estimate. This includes the direct construction costs along with impacts to utilities and right-of-way.
- R: We realize that providing more accommodation may increase project costs significantly, but again, we don't think that this policy should include an automatic cost increase percentage as an exemption. Just as one example, a project like the I-70/71 split would never have to consider pedestrian and bicycle accommodations, even though the accommodations are vital to the city and its neighborhoods. Please also keep in mind that of the cost increases, MORPC would continue to cover 80%. MORPC will work on an exemption guidance document over the next year. But also remember that that when considering Complete Streets, it is important to not only focus on short-term construction costs but on long-term costs arising from health issues, lack of economic competitiveness, and lack of mobility options, among many other things.
- C: Bicycle riders should have to be licensed, should have to carry a driver's license while operating a bicycle, and should be cited for not following the rules of the road. This would help improve the negative view many drivers have towards those bicyclists that act irresponsibly.
- R: Yes, enforcement will be an important part of the toolkit, with regard to motorists, pedestrians, bicyclists, and all other users. It should be noted here that motorists also often fail to obey the rules of the road with respect to bicyclists and pedestrians (e.g. failure to yield). So education and enforcement efforts should target motorists as well as bicyclists and pedestrians.
- C: Street trees should be considered in the policy. Leaving space for canopy trees is an important part of urban planning, and trees should be part of the entire planning process. A city forester should be included in the planning process to make sure complete streets are truly great streets.
- R: These points and other points regarding street trees will be addressed in the toolkit.
- C: Will the checklist be used to weight and score projects?
- R: No, the checklist is only used to provide additional information for MORPC staff to help them better understand how a project complies to the policy. Section A of the checklist is only informational and shows selected questions that are part of the regular MORPC-attributable funding process.

Definition

- C: The definition should read: "Roadways should be designed to safely and comfortably accommodate all users *in a sensible or practical manner.*"
- R: We have considered this, but feel that the flexibility/context-sensitivity of the policy is addressed at other places of the policy and checklist.

Policy Statement

- C: In the sentence that begins "MORPC will seek incorporation of the Complete Streets concept and policy into the development of **all** transportation infrastructures within the region at all phases of their development..." consider eliminating the word "all."
- R: We have considered this comment, but Complete Streets is a comprehensive concept and we want the policy to apply to all transportation infrastructure project.
- C: Does the Complete Streets policy apply to interstate projects?
- R: Most will be exempt, but we will not provide a blanket exemption. A good example is I-670 on the east side of Columbus, which has a Multi-Use Path (MUP) alongside it in the same right of way.

- C: The additional verbiage on sustainability, affordable housing, etc. dilutes the primary message. The policy could be a little more concise.
- R: We have condensed the background information and deleted the sections related to MORPC's strategic plan.

Applicability

- C: Are guardrails included in the Complete Streets concept and in the federal funding allocated through MORPC?
- R: Yes, MORPC can pay for maintenance items, and guardrail would be eligible.
- C: Any projects that use federal funding that do not comply with the MORPC Complete Streets policy should be removed from the MORPC TIP (Transportation Improvement Plan).
- R: This is an issue that can be revisited during the one-year evaluation.
- C: The Complete Streets policy should be extended to projects using Ohio Public Works Commission funds. OPWC has agreed to incorporate Complete Streets standards into their project selection criteria.
- R: OPWC District 3 funds are not controlled or approved by MORPC. We have worked with them and they currently include recommendations in their policy but not requirements. OPWC maintains that bicycle and ped facilities are not part of the eligible infrastructure included in the legislation.

Review Process and Appeal Process

- C: Explain the three-stage review process. Also explain that MORPC's intent is to make the roads as reasonably accommodating to all users as possible, and that this goal will be achieved through a process.
- R: We have significantly changed the language in the policy to better explain the review and appeals process.
- C: There will likely be differences of opinion between MORPC staff and projects sponsors on what, or what degree, pedestrian, bicycle, or transit facilities need to be incorporated into a given project. This places a lot of importance on the appeals process. There needs to be more discussion in the policy to indicate the types of issues or the magnitude of costs that would be deemed acceptable for an exemption.
- R: We have significantly changed the language in the policy to better explain the review and appeals process. We will also develop exemption guidance throughout the next year to help with the exception process.
- C: The review process should be made clearer, especially in terms of who makes the compliance determination, what it's based on, and whether it's a "yes or no" determination or a negotiated agreement.
- R: We have significantly changed the language in the policy to better explain the review and appeals process.
- C: The appeals process should indicate that there are 5 voting members and one non-voting support staff, similar to a Board of Zoning Appeals. The policy also lacks any description as to how the appeal will be processed.
- R: We have significantly changed the language in the policy to better explain the review and appeals process.

Requirements

- C: Who determines the "most appropriate design standards and procedures" mentioned in the "Requirements" section?
- R: We have added clarification to the Requirements section.
- C: The appropriateness of extending a project boundary to include a "pinch point" (e.g. a bridge) will be dependent upon the purpose and need of the project.
- R: We agree that this is the case.
- C: Regarding extending a project boundary to include a "pinch point," please provide more information on what constitutes a "compelling reason." Is funding reason enough or must there be other factors as well?
- R: Funding might be a compelling reason, but it depends on the individual situation. We will develop exemption guidance and also work with project sponsors.
- C: Requiring that a project provides connectivity to a certain destination (e.g. a school or church) may lead to an encroachment upon private property. Also, must projects demonstrate that a connection will be made?
- R: We added clarifying language to the section.

C: The project sponsor is required to work with the local transit agency, but not all areas are covered by transit.
R: We have added additional language to the section. But also keep in mind that considering the rate of population growth, it is likely that more areas will be covered by transit in the future. The expansion of transit is desirable because it offers more mobility options.

C: What does involving the transit agency entail?

R: Involving the transit agency means to provide the local transit authority the opportunity to review your plans and comment on how it meets their needs. We have added clarifying language to this section.

C: The “utility/telecommunications infrastructure” bullet point may need to be carried over to the checklist.

R: Yes, it is already included in section B, item F.

C: Does a bicycle rack count as “secure bicycle parking”?

R: Yes. More information on best practices for bicycle racks and other bicycle parking will be provided in the toolkit.

C: The statement “Every project shall ensure that the provision of accommodations for one mode does not hinder another” should be clarified.

R: We have reworded the sentence to hopefully make it clearer.

C: Add examples for the 4th bullet point (relating to the systems approach). This point is unclear.

R: We have reworded the sentence.

Section 5: Recommendations

C: Add a recommendation that streets should include street trees and landscape components, with careful analysis of tree/site/design considerations.

R: We have added the recommendation. More detailed information on street trees and landscaping will be provided as part of the toolkit.

C: More information on the traffic calming recommendations would be helpful.

R: Yes, this information will be part of the toolkit.

Comments on the Complete Streets Checklist

General Comments

C: The introductory section of the checklist should also explain the purpose of the toolkit, and should explain MORPC staff’s role in the use of the checklist.

R: Yes, we will add more information and clarify this.

C: The Federal Funding Committee has essentially agreed to a “2-step” application process, in which the first step is a “screening” application to provide a recommendation to applicants that have a project with little or no chance of receiving funding. All what seems necessary initially is an acknowledgment that the project intends to comply with the Complete Streets Policy; the lengthy checklist information should wait for the full application.

R: We have significantly changed the language in the policy to better explain the review and appeals process. It was never our intention to add a lot of additional burden or duplicate efforts. The introduction to Section A of the checklist clearly states that this section is not in addition to the funding application process but that Section A just highlights the questions that project sponsors will be asked as part of MORPC’s funding application. The 2-step funding application process is not being replaced.

C: There are items in the checklist that will most likely duplicate information requested in the funding application. The appropriate MORPC staff should sort this issue out.

R: There will not be any duplication. See response above.

Section A. Project Description and Scope.

C: ADA transition plans should be added to the list of plans to which a project might relate (item K).

R: They have been added.

C: Is there a way to forecast pedestrian and bicycle volume? This could be very difficult and, depending on methodology, could produce widely varying numbers for comparable projects.

R: There are crude methods for estimation, but it is a discipline that needs more work. We have removed the item from Section B for now, but hope that project sponsors will conduct pre- and post-counts of pedestrian and bicycle traffic so we can develop better forecasting methods.

C: Item C: Are the truck percentages also expected to be able to be pulled from ODOT's or MORPC's web site?

R: As with any funding application, truck percentages can be requested from MORPC or provided from other sources such as ODOT.

C: Item D: Given the amount of safety and crash data required as part of the checklist, the idea of noting a "perceived" safety issue is extremely subjective.

R: That is true, but we still feel that it is important to get an idea of perceived safety issues, as they may result in less people walking or biking. Building proper facilities could address this issue.

C: Item E: Every land use is a "generator." Are there any minimum thresholds that are to be considered as part of the checklist?

R: No, there is no minimum. This item has been included to help MORPC staff better understand the project area.

C: Item F: There is no mention of "Environmental Justice" in the goals of the Complete Streets movement. The goals do not align with the three MORPC priorities stated in the document. Is this terminology derived from federal policy or executive directives? The proposed checklist item should be reworded to address how the project will provide access to ALL users, not just for environmental justice targets. As a checklist item, the question seems to address travel origins, but does not adequately address destinations where certain users are seeking employment. If this element is carried forward, what data will be available through MORPC and how will the question be weighted?

R: This is part of MORPC's application/scoring process. Environmental justice is federal policy and stems from an executive order. Information is available from the Census. Upon request, MORPC will help you derive this information from the Census.

C: Item J: This question will be difficult to answer because of funding issues.

R: The intent of the question is to ensure a systems approach was taken and that appropriate connections are made.

Section B. Project Design

C: In paragraph 2, the language should be made clearer.

R: We have reworded the paragraph to provide clarification.

C: Item B: What if there is no interest in transit in a particular location – whether by the municipality or by COTA? How will that be factored into the process?

R: Transit accommodations to the extent needed will be handled in consultation with the local transit authority, by providing the local transit authority the opportunity to review your plans and comment on how it meets their needs. Keep in mind that considering population growth, it is likely that more areas will be covered by transit in the future. The expansion of transit is desirable because it offers more mobility options.

C: Items C and D: These items will start to add to the cost and timeline for projects. How detailed a study is needed for off-street parking? Is this requirement for every project, even where it doesn't make sense to conduct it?

R: Language has been added to state that engineering judgment should be used whether or not it's necessary.

C: Under G (traffic calming elements), add a checklist line for street trees. Street trees are very different design elements than hanging flower baskets or other landscape features.

R: We added some wording.

C: Does the last question under item G (“If you are not providing any pedestrian, bicycle, or transit facilities, please explain why”) provide too much leeway for project sponsors to avoid providing these facilities?
R: This provides the applicant the opportunity to explain their rationale for leaving accommodation of these users out of the project. It provides a starting point for MORPC staff to discuss the situation with the sponsor.

C: Under Item G, bus pads should be added under “Transit Facilities.”
R: It has been added.

C: Item G: Under Traffic Calming Elements, reductions in speed limits must be based on the Ohio Revised Code or a speed study approved by the State of Ohio.
R: Language was added to the document to reflect the comment.

C: Item H: As a policy for creating Complete Streets, what is the relevance of ITS?
R: Transit signal priority or electronic message signs to explain bus waiting signs are just some examples. We have added examples to the item.

Section C. Construction

C: Some projects will necessitate cutting access for certain periods of time. This does not appear to be considered by the policy. A question should be added that asks for an explanation as to why access may be cut.
R: A sentence was added to the section.

Section D. Maintenance and Operation

C: Under item A, does the question about who will be responsible for maintenance include winter maintenance?
The recent snows that blocked sidewalks for weeks really highlighted the need to emphasize maintenance of sidewalks, bicycle paths, etc.

R: All types of maintenance issues will be discussed in the Complete Streets Toolkit.

C: Item B: Consider adding details or examples, such as cycle length, delay and level of service. Also clarify the conditions being evaluated, such as opening day and peak hour traffic. Are there comparable conditions for projects that do not include a signal?

R: We have added language to include these examples.

C: Item C: Consider adding coordination within the project jurisdiction. Also clarify which traffic the timings are established for: vehicular or bike?

R: We adjusted some wording. More details will be addressed in the toolkit.

Section E. General Recommendations

C: This section is already stated in the Recommendations portion of the Policy and is covered comprehensively by the checklist.

R: We thought it would be helpful to state it again.

C: Can federal funds be used for street furniture?

R: Yes, MORPC’s Transportation Enhancement funds can pay for these items.

C: Add something to this section regarding pedestrian access to transit stops.

R: We have added language to it.

C: Attention should be paid to improved loop detectors and other signal actuation devices to sense bicycles. A significant number often don’t sense the presence of a bicycle, forcing the bicyclist to cross on a “red.”

R: Loop detectors and actuation devices are included in the checklist (Section B, item G) as “bicycle detectors” and “pedestrian detectors.” More information will be provided as part of the toolkit.

C: Add language encouraging that street trees be included in designs.

R: Detailed discussion on importance of street trees will be part of the toolkit.

Section F. Recommended Public Input Practice

C: Change the introductory paragraph of this section to read: “The public input process should be commensurate with the scope and complexity of the project and should meet NEPA requirements. This may include public meetings, stakeholder meetings, direct mailings, a project website, or other suitable methods.”

R: We significantly changed the entire public involvement section.

Section G. Stakeholders

C: It is important to engage stakeholders from outside the project footprint. The A.P.E. (Area of Potential Effect) should be expanded to include generators that would potentially affect walking, biking, or transit routes within the project footprint.

R: Yes, that’s true.

C: If intended as part of the checklist, a question should be provided that would allow for a description of the particular stakeholders that are to be sought out as part of the input process.

R: We have added a question on this in section B.

Appendix 1. Selected Complete Streets Design Information

Notes explaining the development of these cross-sections

C: Are there Ohio standards that differ from the federal AASHTO pedestrian facilities guide?

R: No, not that we are aware of.

C: Under the second bullet in this section, change “type of landscaping desired” to “type of landscaping and street tree canopy desired.”

R: Yes, language has been added.

C: The definition and use of the term “minimum cross sections” should be consistent.

R: We agree.

C: It has recently been brought to our attention that bicycles are allowed on freeway interstates or highways when there is a physical barrier between the two. Can this be verified and considered as part of the policy?

R: Yes. A good example is I-670 on the east side of Columbus, which has a parallel Multi-Use Path (MUP) within the same right of way.

Notes related to Transit, Sidewalk, and Other Items

C: A minimum 5 foot clear width for sidewalks is recommended in the AASHTO guide to designing pedestrian facilities. While we also support wider sidewalks, the legal clear width per ADA standards is four feet.

R: This is correct. The 2004 “AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities” (p. 58) says the absolute minimum is 4 feet, but recommends a minimum of 5 feet. It further explains that if four feet sidewalks are used, passing spaces of at least five feet in width should be provided at reasonable intervals. This allows wheelchair users to pass one another or turn around.

C: Can you cite a source to support the value statement that indicates lost vehicular capacity may facilitate greater safety and use of other modes?

R: No. We have deleted this statement from the appendix, but will investigate it as part of the toolkit.

C: Under “Notes related to Transit, Sidewalk, and Other Items,” the bullet point that states that suburban or urban cross-section examples should be used as guidelines in areas that are currently rural but are predicted to become urban or suburban with the next 20-30 years implies a reliance on developers that is unsettling. Urban/suburban cross sections should not be used for guidance.

R: This does not imply reliance on developers. Increased residential density and new commercial development are merely examples. Many different factors, including community plans, availability of utilities, and transportation demand modeling, are used to predict whether an area will remain rural or will become suburban or urban.

C: When considering a road diet via the reduction of travel lanes, parking studies may also be required.
R: Agreed.

C: Change the bullet point about narrowing lane widths to read: "Narrowing lane widths should be considered where deemed appropriate by a traffic safety investigation, on low speed and/or lower traffic volume streets. Lanes that are overly wide encourage higher speeds by motor vehicles."
R: We have added language.

C: We agree that the vertical environment provided by trees has a traffic calming effect as well as provides a level of comfort to the pedestrian. However, 7 feet is not needed for some types of trees and may be difficult to obtain when competing for right-of-way in urban environments.
R: More explanation on proper street tree design will be added. The toolkit will also include more details on this topic.

C: Change the bullet point on landscape features to read: "Landscape features such as street trees should be considered where appropriate. Studies have found that this can visually narrow the roadway, which helps to discourage excessive speeds by motor vehicles. When planting trees in urban or suburban settings, ensure the lawn width is at least 7 feet to minimize damage to sidewalk/pavement by tree roots. Trees should not be placed within the clear zone on higher speed streets or highways." Also expand upon street trees to emphasize that site design details, root volume requirements, overhead spatial needs, and tree selection/planting are critical factors that will effect tree health and safety, surrounding infrastructure (including the surface of the sidewalk), and motorists, cyclists, and pedestrians.
R: We have added language to reflect the comment.

C: Reductions in speed limits must be based on the Ohio Revised Code or a speed study approved by the State.
R: Language has been added.

C: Regarding design speeds, who decides to design for over posted speed limit?
R: Conventionally, design speed been encouraged to be as high as is practical. This has generally been done provide higher safety for motorists.

C: The final bullet point talks about Federal Aid Primary roads? Are those the same as National Highway System (NHS) connectors.
R: Yes, we have clarified the language.

C: Lane width should be per the appropriate ODOT standard L&D Manual.
R: Yes, all our example cross sections were created using AASHTO and ODOT L&D Manual standards.

Notes related to Bicycle Facilities

C: Where is the citation for the "Bikes May Use Full Lane" signage in the 2009 MUTCD?
R: The 2009 MUTCD can be downloaded at http://mutcd.fhwa.dot.gov/pdfs/2009/pdf_index.htm and the section on "Bicycles May Use Full Lane" signage is on p. 794 (see below). The entire section verbatim is below. The sign is illustrated on p.793 in Figure 9B-2.

Section 9B.06 Bicycles May Use Full Lane Sign (R4-11)

Option:

- 01 The Bicycles May Use Full Lane (R4-11) sign (see Figure 9B-2) may be used on roadways where no bicycle lanes or adjacent shoulders usable by bicyclists are present and where travel lanes are too narrow for bicyclists and motor vehicles to operate side by side.
- 02 The Bicycles May Use Full Lane sign may be used in locations where it is important to inform road users that bicyclists might occupy the travel lane.
- 03 Section 9C.07 describes a Shared Lane Marking that may be used in addition to or instead of the Bicycles May Use Full Lane sign to inform road users that bicyclists might occupy the travel lane.

Support:

- 04 The Uniform Vehicle Code (UVC) defines a "substandard width lane" as a "lane that is too narrow for a bicycle and a vehicle to travel safely side by side within the same lane."

- C: While an eligible sign per the MUTCD, we do not support the use of “Bicycles May Use Full Lane” as it is in conflict with Ohio Revised Code 4511.55, which requires riding as near to the right side as practical.
- R: We support the use of this sign, and it is already in use in some locations in Ohio (for example, in the village of Yellow Springs). Furthermore, this sign is not in conflict with Ohio Revised Code 4511.55. The Code (<http://codes.ohio.gov/orc/4511.55>) states that bicyclists should “ride as near to the right side of the roadway as practicable.” The section clearly states that it “does not require a person operating a bicycle to ride at the edge of the roadway when it is unreasonable or unsafe to do so.” The code then cites examples of when it may be unreasonable or unsafe to ride at the edge of the roadway, including “if the lane is too narrow for the bicycle and an overtaking vehicle to travel safely side by side within the lane.” This situation—when the lane is too narrow for safe side-by-side operation—is specifically cited by the MUTCD (see above, section 9B.06, bullet 01) as one of the instances where the “Bicycles May Use Full Lane” sign is appropriate.
- C: Is there a per-mile number for “frequent” curb cuts in relation to bicycle lanes? The statement that bike lanes should not be installed where there are frequent curb cuts is questionable.
- R: “Frequent curb cuts” is left to engineering judgment. We have altered this text to indicate that bicycle lanes can be installed. Different bicycle facilities will be discussed as part of the toolkit.
- C: What bike facility would be appropriate for an area with frequent curb cuts and driveways?
- R: As Complete Streets is context-sensitive, it is difficult to provide one answer. Design of bicycle facilities depends on a variety of factors. It is critical that sound engineering judgment be used, taking into account factors like: number of lanes, travel patterns, target speed of vehicular traffic, intersection treatments, etc. We do not want to prescribe that in all cases where speeds are less than 35 mph sharrows should be installed, but not bike lanes. We will provide more information in the toolkit.
- C: Define the area in which a sharrow would be placed when a bike lane is used.
- R: The reference to sharrows for that bullet was deleted. More information will be part of the toolkit.

On-Street Parking Considerations

- C: 5 feet seems like a very large door zone that does not appear to match other portions of the policy.
- R: We feel that 5 feet is appropriate, providing safe use of the parking area and the bike lane. It remains a recommendation by MORPC staff, but is not a requirement based on federal or state standards.
- C: Requirement to marking and the type of marking for parking should be considered on a case-by-case basis as it becomes an added maintenance expense.
- R: We will address this in the toolkit.
- C: Given the tight competition for limited right-of-way in urban areas, a door zone buffer, while desirable, may not be practical.
- R: At this point, it remains a recommendation.

Notes on Sources for Design Standards

Urban and Suburban Lane Widths

- C: The new Highway Safety Manual states that there is no difference in safety between 10, 11 and 12 foot lanes on arterial roadways.
- R: We have not yet read the Manual, but will discuss this issue further as part of the toolkit.
- C: Add a reference to ODOT’s L&D Manual.
- R: A reference has been added.
- C: You cite a study that says 10 ft lanes are fine, but then go on to quote ODOT that 11 ft lanes are the minimum. This appears contradictory.
- R: The point of this section is that lane widths may be reduced in certain circumstances. The context of the situation must be considered to determine the minimum acceptable lane widths. The citations were provided as examples of this premise.

Bike Lanes and MUPs in areas with Frequent Curb Cuts or Driveways:

- C: Since safety concerns are heightened at intersections, consider including discussion or examples on how to address bike lanes and shared lanes at intersection areas.
R: We will address this in the toolkit.

Bike Lane Widths:

- C: Please verify the bike lane width. Should it be 5 feet when seamless with a gutter and 4 feet of pavement with lip and gutter pan?
R: MORPC's recommendation is that if there are 5 feet of usable space (meaning that the longitudinal joint between the gutter pan and pavement surface is smooth), 4 feet would be acceptable. More information on AASHTO's recommendation was added to this section.

The "Bike Lanes and Curb and Gutter" section has been combined with the "Bike Lane Widths" section.

Cross-sections

Overall MORPC comment: A new, condensed cross section version is being proposed as part of Appendix 1. However, our answers below are made in regard to the original version.

- C: An 8-foot paved shoulder on a rural section is too costly. A 4-foot shoulder (with an additional 4-foot graded, grass section) is a more economical and provides adequate safety to the low volume of bicycle and pedestrian traffic expected on a typical "rural" roadway.
R: We will change to 4-foot shoulders and provide references to documents that could support more width, depending on character of road and volume of road.
- C: The wider paved (impervious) roadway sections shown generate greater storm water runoff and thus have a negative effect with respect to environmental concerns. This needs to be considered when deciding on the final typical sections.
R: We will have more detailed information on practices regarding sustainability in the toolkit.
- C: The ditch width is a function of a number of variables. Showing a narrower ditch to stay within the existing ROW width oversimplifies the issue. A wider roadway section would typically prompt the need for a wider/deeper ditch.
R: As we've noted in many other places, the cross sections are merely examples. The examples are not intended to be prescriptive or to preclude other types of design. They are intended as flexible examples of how roads may be designed. Actual road design will vary depending on the individual context.
- C: The ditch, sidewalk, MUP, etc. should not extend right up to the ROW limit. Any work requires at least a couple of additional feet of work space which would require temporary ROW during construction. Property owners are only paid 50% of the property value for temporary r/w, but that can still add up to a significant cost.
R: The cross sections are merely examples, but we may make some changes to the cross sections.
- C: Can examples for bridge design be included in the cross-sections?
R: We will provide more detailed examples as part of the toolkit.
- C: Why do the two-way left-turn lane examples maintain a 12-foot lane for the TWLTL, while the through lanes are reduced to 11-feet?
R: They were included for safety reasons.
- C: How should intersections be treated?
R: This will be addressed in the toolkit.
- C: Will there be any guidance for the development of bike boulevards in the final document?
R: Bike boulevards will be addressed in the toolkit.
- C: Why do the sidewalk widths vary if the document recommends five feet?
R: The reason to show larger sidewalk widths was merely to show that one can provide more.

C: Assumed land uses do not include commercial typologies.

R: Land use will be discussed as part of the toolkit.

C: Example 1: Is there a moderate typical section that falls somewhere between the minimum and ideal accommodations?

R: Yes, we only selected a few examples.

C: Example 1: Why would you build a rural five lane road that has an ADT of less than 1,500?

R: We have removed that example.

C: Example 3: Please provide the source or citation to support that narrowing lanes to 11 feet will curb speeding.

R: We have referred to citations at the beginning of Appendix 1.

C: Examples 4 and 9: Under Minimum Accommodations, bullet 3, the shared lane marking would be placed near the center of the outside travel lane if a five foot door zone is used. This may send a confusing message to motorists, possibly interpreting the markings as a bike lane.

R: We have clarified the use of sharrows in the section "On street Parking Considerations." The use of sharrows will be explained in more detail in toolkit.

C: Example 6: Please clarify where the 7-foot bike lane comes from. It is not addressed in any prior discussions or the standards. Please clarify which signs should be used under the second example in bullet 4.

R: We will delete this example.

C: Example 7: Under bullet 4, define the pavement marking that should be used for the door zone.

R: This will be included in the toolkit.

Below are additional comments we received since the revisions have been made (updated March 29, 2010):

C: If operations is not included in the list of applicable projects, where would one categorize the series of Columbus CTSS projects?

R: We consider the installation of the new systems as construction, but we will change the 1st sentence of the Applicability section to state: "This Complete Streets Policy applies to all projects, including involving the new construction, reconstruction, rehabilitation, repair, maintenance, or planning of roadways, trails and other transportation facilities that will use federal funds allocated through MORPC?"

C: The current federal funding evaluation process awards points for bike and pedestrian accommodations. Will there be a CS score assigned to projects as part of the decision of MORPC to commit funds? It is not clear how the CS review and checklist will be used to select projects for MORPC attributable federal aid.

R: Yes, the funding evaluation process will continue to give points for bike and ped accommodations if they weren't provided previously. In addition, extra points are given if a facility is along a transit route. Furthermore, the funding application will now have a checkbox that will state something like: "The project will comply with the MORPC Complete Streets policy." Please keep in mind that the primary reason for the checklist is to be used to help applicants and MORPC staff ensure the project is developed in a manner that is as consistent as possible with the CS philosophy.

C: Once the CS review is applied to the design process, are there MORPC staff resources to review potentially 3 stages of design for every federal aid project? The design review process also needs more detail so that realistic design schedules can be developed and tracked. How much review time should the city and consultant account for in the schedule so that an achievable project duration is agreed to?

R: MORPC plans to make staff available throughout the development of projects using MORPC attributable federal funds. It is our hope that as the project advances through the development process, the need for MORPC staff time will decline. Since this will be a new process for applicants and MORPC staff and the complexity of projects will differ, it will be necessary to "play it by ear." It is MORPC's goal to avoid undue delays to project development. Furthermore, it is up to the project sponsor to set reasonable comment deadlines and MORPC staff will need to adhere to them.

- C: Will the review and evaluation process focus on whether or not CS features are included and/or the specific design of the features?
- R: The review process will focus on making sure that the project is being built with all users in mind and to provide safe accommodations for all users. Focus will be on whether appropriate CS features are included, but there will be some review of the specific design as well.
- C: In the Requirements section, without design exceptions, how friendly are ODOT L&D Manual standards to CS? Perhaps notifying project sponsors that design exceptions may be needed to achieve CS will assist in building reliable project schedules.
- R: While we don't think the ODOT L&D Manual embraces CS, it isn't necessarily unfriendly to it. According to ODOT, it is very similar to AASHTO standards. However, we hope the process ODOT is undertaking will result in changes to accommodate CS better and exceed some of the recommended minimums. Your point about the need to expect to request design exceptions is well taken.
- C: If our city forester supports the installation of trees in a tree lawn of less than 7 feet or in sidewalk tree grates, will our project be less likely to be funded? Same for a door zone less than 5 feet in width.
- R: As you can read in the citations piece of the Appendix 1, the 7 foot lawn and 5 foot door zones are recommendations from MORPC. So if AASHTO or other standards say that a lower minimum is acceptable, we cannot require more, just recommend. The process as envisioned is one of negotiation. At the time funding is awarded, the specifics of the projects are not known. These will be worked out during development.
- C: We still object to the lowering of design speed to match posted speed in all cases. Section 104.2 of the ODOT L&D manual describes the selection of minimum and desirable design speeds. Depending on the scope of project and recognizing that all streets will not have the need for the same level of multi-modality and completeness, it would be very appropriate to select a design speed five miles per hour greater than the posted speed. For instance, when resurfacing a roadway and CS will be of a retrofit nature, design and posted could be the same. However, when designing a new roadway or expanding an existing roadway in a rural area where the need for a complete street is justifiably less, design speed must be greater than posted speed for driver safety.
- R: Again, MORPC recommends that certain roads be designed so that the design speed matches the posted speed, but we agree that other roads need to be designed above posted speed to ensure safety. That is where the context-sensitivity of projects comes into play.
- C: Section A, item G still needs to account for a two-way-left-turn-lane. Existence or number of transit stops may also be of value to know.
- R: We will add a line that includes *Existing Two-Way-Center-Left-Turn-Lane? _Y/N_ Proposed Two-Way-Center-Left-Turn-Lane? _Y/N_*. Transit routes and stops are accounted for in item D.
- C: The policy should contain exemptions for rural roads.
- R: We don't feel comfortable providing blanket exemptions for rural roads. We feel that each project should be looked at from a case by case basis, and we hope that we can clarify the type of sufficient accommodation for each project during the review process. Also, please keep in mind that we will be developing exemption guidance and that we are reviewing this policy after one year.
- C: Under the Requirements Section in policy, the third bullet on item 5 only deals with bus stops along existing routes. Would like to see it reworded to include potential bus routes.
- R: We will add the word "future" to item 5.
- C: "Trails" are included in this language. Does a jurisdiction that is planning to construct or modify a bike trail or MUP need to adhere to the policy?
- R: The policy's intent is to accommodate all users in the corridor, and if some users are not allowed on a particular roadway (e.g. freeway or trail), it should be clear that one doesn't have to plan for them. Context-sensitivity will be required with all projects.
- C: Please clarify: If a sidewalk runs across the frontage of a restaurant and no pedestrian access exists between the sidewalk and front door other than the driveway, will the project provide that connection?
- R: No, the project provides the opportunity for the land owner to provide the connection. The land owner would have to provide the actual connection from the sidewalk to his front door.

C: It is not likely to have a 4/5 lane road with ADT less than 2000. Probably should delete from this sample.

R: The intent was not to suggest that a 4/5 lane road is needed for ADT less than 2000, but to show that other lane and shoulder widths are called for with lower volume roads. We will delete the reference in question as it is repeated in the 2-lane example immediately following.