



MID-OHIO REGIONAL
MORPC
PLANNING COMMISSION

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To Whom It May Concern:

The Mid-Ohio Regional Planning Commission (MORPC) writes to express its support – and concern – regarding the proposed rule NHTSA-2023-0020, which would enact a rating system to convey pedestrian safety information to automobile consumers. We applaud the National Highway Traffic Safety Administration for prioritizing pedestrian safety and encouraging consideration of this information in consumer decisions. However, we would urge the Administration to go further and integrate this information into the five-star safety rating system.

MORPC is a regional planning organization and regional council representing more than 80 local governments and partner organizations across 15 Central Ohio counties. Our communities span urban, suburban, and rural areas, comprising a broad cross-section of Ohioans. In addition to serving as both a Metropolitan Planning Organization (MPO) and Regional Transportation Planning Organization (RTPO) and advocating on behalf of our members, we also provide a variety of programs and services related to transportation, land use, data, sustainability, and economic and community development.

In Central Ohio, recent years have seen an alarming uptick in traffic fatalities, both for drivers and pedestrians. As we noticed during the peaks of the COVID-19 pandemic, speeds increased and crashes became both more common and severe. Simultaneously, vehicles sold in the United States continue to grow larger and heavier, and feature higher, more blunt front ends. Resulting reductions in visibility combined with increasing speeds have had fatal results.

Attached to this comment are maps demonstrating the scope and geographic diversity of this problem across our region. Between 2017 and 2021, 187 pedestrians were killed and 594 were suspected to be seriously injured. Pedestrian deaths more than doubled here between 2013 and 2021, and now make up 17 percent of all fatalities on Central Ohio roadways. Bicyclist deaths increased by 50 percent in the same period.

We can and must do more to address this growing crisis. As we at the local level continue to pursue policies and engineering practices to slow traffic and promote safe road use, we urge the NHTSA to use every tool at your disposal to protect pedestrians and vulnerable road users. Providing complete and easily digestible information to motorists at the point of purchase is a good start, and we hope that you will further integrate this information into the five-star safety rating system and promulgate further rules to enhance vehicle safety in every aspect.

Thank you for considering our comments, and please do not hesitate to contact me with any questions.

Sincerely,

Joseph Garrity

Senior Director of Government Affairs and Community Relations
Mid-Ohio Regional Planning Commission

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