

# PSRC Regional Safety Action Plan Errata and Edits - 4/8/25

Response ID#	Commenter ID	Comment	Response Class	Recommended Plan Changes
5	Apex Driving School-Montlake Terrace	<p>"I have been working on this issue of 'individual decision making' for years, trying to get the state to properly address.</p> <p>Safety Starts with Behavior Roadway safety issues like speeding and distracted driving are heavily dependent on the individual making decisions that affect other people. We need to find a way to grow our safety culture regionally.</p> <p>However, the individual's decision making is based upon their personal knowledge, and we as a state just take that for granted." As just one example of many, "reckless driving". Here is the homework for 'Reckless Driving'. - I emailed to some of the representatives on the state legislative transportation committee. Washington Traffic Safety Education Required Curriculum Standards – to be published by DOL in March 2025 "C. Explain Washington State laws, consequences, and best practices concerning rules of the road1. Reckless driving Class 9.0 - To comply with Washington traffic laws and regulations, you must be able to: "instructors will provide lessons that ensure students are able to I am trying to get DOL to write more substantial requirements in driver education for driving schools to teach, instead of just relying upon expectations the driving school will look up the laws and teach from them. "I wrote this in just a few hours;</p>	Board Review	Add the following language after the last paragraph on p. 78: "PSRC will continue to emphasize safety throughout all aspects of regional planning processes, from the overall system goal as identified in VISION 2050, to the long-range planning and investments identified in the Regional Transportation Plan, and through the more detailed project evaluation criteria that are used to award PSRC's federal transportation dollars to specific near-term transportation investments. PSRC's work program will not only periodically reassess safety conditions, but will build on the strategies and information contained in the RSAP to expand strategies, countermeasures, and information to help proactively eliminate deaths and serious injuries on the region's roadways. At PSRC board direction, this could include future work programs including research, convenings and workshops."
20	City of Bellevue	<p>Bellevue encourages PSRC to incorporate the established high injury network (HIN) corridors of member agencies into the RSAP. The draft RSAP acknowledges (page 3) that: "There are 86 jurisdictions within the central Puget Sound region, many of which have their own transportation safety-related priorities, policies, and plans. The RSAP acts as an umbrella for these related priorities, policies, and plans, and is a resource to help local jurisdictions with a baseline of tools and strategies for understanding the current transportation safety issues existing today and potential solutions into the future." Appendix D of the RSAP provides a local jurisdiction policy inventory; however, there is no documentation of established local HIN corridors. To better account for local area safety priorities, the RSAP should incorporate in its mapping of regional HIN corridors (pages 17-25) a section on locally established HIN corridors. Including this recommendation in the RSAP will account for the efforts of the many member agencies in the region that have expended resources developing local area knowledge and HIN designations that informs their road safety planning, demonstration, and implementation activities. For example, the City of Bellevue conducts road safety assessments on each of its HIN corridors to identify safety issues and prioritize improvements for implementation.</p>	Board Review	Add the following language after the paragraph on p.17: "High Injury Network (HIN) analyses can be conducted at the state, regional, and local levels, each focusing on identifying areas with high crash rates to prioritize safety interventions. Regional analyses examine crash data across multiple jurisdictions to inform regional-level safety planning on regional facilities, developing regional safety strategies, and promoting collaboration among jurisdictions. Equally important, state and local HIN analyses identify specific locations with high crash rates based on their own tailored methodologies and facilities. State, regional, and local HIN analyses, where available, should inform PSRC's safety planning and implementation."
24	City of Kent	<p>Impairment as a contributing factor appears to be increasing in each of the four counties over the study time period in the State of Safety in the Region report. According to data reported by the Washington Traffic Safety Commission, impairment involvement in fatal crashes in King County, as an example, increased from 59% (2014-2018) to 65% over the same time period (2019 to 2023, WTSC dashboard as of May 2024). The increase is even more stark locally in Kent: 51% (2014-2018), to 71% (2019 to 2023). However, the State of Safety report notes impairment as related to only 22-24% of fatal crashes, regionally. We believe impairment is being severely underreported in the WSDOT crash data.</p>	Board Review	Add the following language after the fourth paragraph on page 15 preceding Table 2-1: "Both impairment and distraction rank among the top 5 factors contributing to crashes in the central Puget Sound region. Due to the nature of the way this data is collected, it may be underreported as a contributing factor. In particular, delays in completing toxicology reports may result in an underreporting of impairment in the latest available safety data. This should be considered when assessing appropriate policies and projects in high crash locations. In addition, several of these factors can combine to contribute to a single crash, such as impairment, speeding, and distraction. Strategies to address speeding may also address impairment or other contributing factors."

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25	City of Kent	We found impairment underreporting in our own data. Kent uses the same WSDOT data as other agencies for our safety analysis. We found out that the WSDOT crash data is not updated when the results of toxicology tests are completed. Testing can take more than one year. WSDOT data is only updated if responding law enforcement agency amends the crash report when the toxicology results are received. The WSTC crash data for fatalities is updated with data directly from the WSP Toxicology Lab and is therefore more representative. It appears that WSDOT does not receive the toxicology results to update their data.	Board Review	Add the following language after the fourth paragraph on page 15 preceding Table 2-1: "Both impairment and distraction rank among the top 5 factors contributing to crashes in the central Puget Sound region. Due to the nature of the way this data is collected, it may be underreported as a contributing factor. In particular, delays in completing toxicology reports may result in an underreporting of impairment in the latest available safety data. This should be considered when assessing appropriate policies and projects in high crash locations. In addition, several of these factors can combine to contribute to a single crash, such as impairment, speeding, and distraction. Strategies to address speeding may also address impairment or other contributing factors."
26	City of Kent	The City of Kent encourages PSRC to highlight this discrepancy and note that impairment is likely a much higher contributing factor than the existing data suggest.	Board Review	
27	City of Kent	The plan needs to highlight that impairment data for serious injuries is not required to be collected, so reporting is underrepresented in the plan. We share interest in proposed solutions. Kent encourages PSRC to expand durable solutions that reduce impacts from impairment including education and enforcement. A number of solutions appear focused on speeds. Reducing speed on regional links should also be noted in the context of tradeoffs, as reducing speeds for, say, a community's sole arterial also reduces the access to jobs and opportunity for those using the arterial whether by car or transit. Any prioritization of improvements should take tradeoffs such as these into account.	Board Review	
31	City of Kirkland	Greetings. These comments are from the City of Kirkland which have been coordinated with staff and City Council:  1. The High Injury Network does not include speed, volume or number of lanes. Due to this, if the HIN ends up being included in future funding criteria, local HIN's or Vision Zero plans should be included as of equal value as local analysis often includes a richer look at this that does include these factors.	Board Review	Add the following language after the paragraph on p.17: "High Injury Network (HIN) analyses can be conducted at the state, regional, and local levels, each focusing on identifying areas with high crash rates to prioritize safety interventions. Regional analyses examine crash data across multiple jurisdictions to inform regional-level safety planning on regional facilities, developing regional safety strategies, and promoting collaboration among jurisdictions. Equally important, state and local HIN analyses identify specific locations with high crash rates based on their own tailored methodologies and facilities. State, regional, and local HIN analyses, where available, should inform PSRC's safety planning and implementation."
35	City of Redmond	3. Page 78-Suggestion related to this statement: Once adopted, PSRC's boards will provide direction on how the RSAP and the HIN will further inform PSRC's future project selection processes. Please acknowledge and factor in local priorities as articulated in local safety action plan, including local HIN/HRNs in future project selection processes. It would make sense that regionally-identified HIN may score higher, but points or other consideration should be given to locally-identified safety priorities and HIN/HRNs.	Board Review	After the second paragraph on p. 78, add: "Staff propose to incorporate state, regional and local HINs and safety planning into both PSRC's project selection processes and the project consistency review for the Regional Transportation Plan."

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41	City of Seattle, Department of Transportation	Alignment between the RSAP and local Safety Action Plans is essential to streamline strategies and efforts to address safety issues across the region, while preserving flexibility for PSRC member agencies to utilize countermeasures that directly address safety needs at a local level. SDOT recommends strengthening recognition of local safety action plans, networks, and policies across PSRC's 86 member jurisdictions. Local jurisdictions continuously monitor safety priorities by tracking collisions, developing systemic analyses to plan both responsive and proactive safety measures, and engaging communities on neighborhood-level safety needs. While the RSAP provides a useful tool for understanding crashes regionally and can fill gaps where local jurisdictions have not developed transportation safety plans, the plan does not capture the broader context of safety included in many local safety plans. Appendix D could be considered a start in this direction, however SDOT encourages PSRC to go beyond a review of policies and countermeasures by also considering the autonomy that local plans bring to the regional framework. Given the importance of recognizing local plans, SDOT also encourages PSRC to clarify if and how they intend to defer to local safety action plans when local data differs from regional data, specifically as it relates to project selection and High Injury Networks (HIN).	Board Review	See proposed changes in responses 20, 33, and 35.
60	City of Tacoma	Specify if and how PSRC intends to acknowledge and defer to local plans when local data differs from regional data, particularly in project selection.	Board Review	
62	City of Tacoma	The PSRC Regional Safety Action Plan should serve as a regional framework for addressing equity at a broad scale while continuing to recognize the unique characteristics of each city's High Injury Network, High-Risk Network, and locally identified safety priorities. Cities like Tacoma have a deep understanding of their specific safety challenges and needs, making it critical that PSRC respects and integrates these existing local plans. For example, Tacoma's Vision Zero Action Plan goes beyond a High-Injury Network by incorporating a High-Risk Network to better address safety concerns. We appreciate the statement on page 77 that regional strategies should complement local safety initiatives. This allows for a more effective and targeted approach to reducing traffic-related injuries and fatalities.	Board Review	
116	King County - Regional Public Health	4. Address impairment discrepancies. According to data reported by the Washington Traffic Safety Commission, impairment involvement in fatal crashes in King County, for example, increased from 59% (2014-2018) to 65% over the same period of time (2019 to 2023). However, the State of Safety report notes impairment related to only 22-24% of fatal crashes. While the data dashboards provided by WTSC do not account for serious injury crashes, the fatal crash impairment data is derived from toxicology reports. In contrast, WSDOT crash data does not include all toxicology reporting. We suggest acknowledging this data reporting/limitation in the plan. Impaired driving is the leading cause of traffic fatalities and injuries in King County. It is concerning to underrepresent the actual impairment involved in fatal and serious injury crashes; if the impairment is discounted, then solution highlights may represent a missed opportunity to affect cause compared to others under the Safe System Approach.	Board Review	Add the following language after the fourth paragraph on page 15 preceding Table 2-1: "Both impairment and distraction rank among the top 5 factors contributing to crashes in the central Puget Sound region. Due to the nature of the way this data is collected, it may be underreported as a contributing factor. In particular, delays in completing toxicology reports may result in an underreporting of impairment in the latest available safety data. This should be considered when assessing appropriate policies and projects in high crash locations. In addition, several of these factors can combine to contribute to a single crash, such as impairment, speeding, and distraction. Strategies to address speeding may also address impairment or other contributing factors."
117	King County - Regional Public Health	5. Integrate local and municipal data. The RSAP acts as an umbrella for local priorities, policies, and plans and is a resource to help local jurisdictions with a baseline of tools and strategies for understanding the current transportation safety issues today and potential solutions in the future. Appendix D of the RSAP provides a local jurisdiction policy inventory; however, there is no documentation of established local HIN corridors. To better account for local area safety priorities, the RSAP should incorporate a section on locally established HIN corridors in its mapping of regional HIN corridors.	Board Review	

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125	King County Department of Local Services	5. The role of asset management agencies is not clearly described. The plan should highlight that the HIN and high collision locations are useful to provide a high-level regional perspective, but that each asset-management agency may use alternate data, methodology, and engineering judgment to identify and prioritize locations for improvements. Further, it should be noted that some of the identified locations may already have been addressed since the crash occurred.	Board Review	Add the following language after the paragraph on p.17: "High Injury Network (HIN) analyses can be conducted at the state, regional, and local levels, each focusing on identifying areas with high crash rates to prioritize safety interventions. Regional analyses examine crash data across multiple jurisdictions to inform regional-level safety planning on regional facilities, developing regional safety strategies, and promoting collaboration among jurisdictions. Equally important, state and local HIN analyses identify specific locations with high crash rates based on their own tailored methodologies and facilities. State, regional, and local HIN analyses, where available, should inform PSRC's safety planning and implementation."
129	King County Department of Local Services	9. PSRC should make recommendations to its boards on how the RSAP and HIN should inform future project selection to ensure that safety is a key element of funding decisions but that inclusion on the HIN does not displace local-level assessments of safety, appropriate countermeasures, or other sources of accepted standards. Other sources of standards should be listed in the plan itself.	Board Review	After the second paragraph on p. 78, add: "Staff propose to incorporate state, regional and local HINs and safety planning into both PSRC's project selection processes and the project consistency review for the Regional Transportation Plan."
159	Port of Everett	As you are aware, Washington state, and particularly Snohomish County, is a leader in international commerce, regional trade, and freight transport. The Port of Everett is the third largest container port in the state, and exports on average \$21 billion worth of cargo. This cargo comes and goes through the Port via marine vessels, truck and trailer, and rail, and includes heavy hauls, over-dimensional cargoes, and more. This economic portfolio diversifies and enriches the local economy. Success in trade and manufacturing requires the need for transportation and land use planners to be aware of local and regionally recognized distinct freight corridors that allow for the transport of cargo safely, efficiently, and without conflict with pedestrian uses.	Board Review	
160	Port of Everett	The Port urges PSRC to recognize this important need for the Plan and ensure that designated freight corridors are recognized and maintained for their unique and regionally significant purpose. Any improvements for pedestrian, bicycle, and vehicular traffic should be made with consideration of designated freight corridors in mind. If improvements for alternative forms of transportation are proposed for established freight corridors, they should be planned to accommodate freight traffic, not impact it. If these improvements must occur on designated freight corridors, safety should be paramount, and these improvements should provide distinct physical barriers to separate pedestrians and bicyclists from freight traffic.	Board Review	
161	Port of Everett	Ideally, bicycle routes would not be located at all on designated freight corridors but instead be routed on lower impact side streets.	Board Review	

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162	Port of Everett	The Port recognizes that safety improvements for alternative forms of transportation are a benefit to the greater good, but emphasizes the need to not allow those improvements to take place at the expense of maintaining safe and vital freight corridors.	Board Review	Add the following language after the last paragraph in the introduction to Safety Strategies on p. 43: "Lastly, consideration of local context and the core purpose and function of roadways will be paramount in determining which countermeasures may be appropriate for a given corridor. For example, designated freight corridors have unique heavy-duty transportation needs with few alternative routes. The application of certain strategies may not be suitable in these locations, for example those that may hamper the movement of freight and/or result in conflicting uses of the facility. Local jurisdictions and agencies must make this determination."
164	Port of Seattle, The Northwest Seaport Alliance   Port of Tacoma	However, we have one concern: the RSAP does not provide unique strategies the MICs, where strategies should be tailored recognizing the industrial land uses and higher percentages of trucks than on roads in Urban Centers or Urban Villages. While the RSAP acknowledges land use as the foundation shaping our transportation system, this plan specifically and deliberately defines freight and rail as "outside the scope" of the current plan. Page 16 recognizes that "motorcycles and heavy vehicles (e.g. trucks and tractor-trailers) had more severe outcomes for people involved ... However, they represent a small proportion of total traffic-related deaths and serious injuries." The pie charts in Figure 2-3 show heavy vehicles involvement is 8-9% of the deaths by vehicle type. We believe this proportion warrants specific strategies and tools for truck (and rail crossings) treatments in the RSAP. In order for its safety solutions to be effective, as well as support the transportation system, this plan should include additional solutions for all the region's land use typologies when recommending street improvements. If the RSAP does not address safety around heavy trucks, this could diminish both opportunities for transportation safety grants in industrial areas and reduce visibility in future regional policy development.	Board Review	
165	Port of Seattle, The Northwest Seaport Alliance   Port of Tacoma	Arterials in industrial areas need to be designed to accommodate the higher proportion of heavy trucks (and rail crossings). Safety projects on these roads will need to suit realistic design vehicles and acknowledge that increased truck congestion will result in negative economic and environmental impacts. We recommend the following changes to better address this gap:  -Incorporate land use into the strategy tables by indicating what strategies are more compatible with improving safety while maintaining efficiency on roads with a significant truck share. -Acknowledgement that some roads are essential to freight and industry. On these roads, the priority may need to be on removing the conflict between modes by prioritizing alternate routes or separated pathways. This is consistent with the safe system approach as removal of a conflict between modes is a Tier One approach under FHWA's Safe System Roadway Design Hierarchy. -Add a section in the body report discussing the unique safety considerations of large and heavy commercial vehicles. These include driver's blind spots that are larger than on passenger vehicles, as well as trucks' larger turning radii, requiring using multiple lanes on some urban streets. Unique counter measures include truck aprons, maintaining sufficient lane widths, driveway-crossing treatments to raise awareness of truck access, etc. -Recognize that light rail extensions through the MICs will increase potential for conflict between industrial and non-industrial users, at the same time as the demand for housing results for increased pressure to add residential uses in the vicinity of industrial areas and along roads that are major truck streets.	Board Review	
181	Snohomish County	What are appropriate details that local agencies can add to tailor the PSRC's HIN methodology to include enough detail while maintaining regionwide consistency? Here are some key aspects of Snohomish County's approach for PSRC consideration:  o Our methodology has identified both an urban and rural HIN. We think this will help us account for volume differences on roads that may otherwise be filtered out of the HIN.	Board Review	
182	Snohomish County	o We have included all crashes in the HIN, with a weighting factor for serious and fatal injuries. We believe this captures a level of risk that is detailed enough for the county.	Board Review	

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186	Snohomish County	The equity analysis identifies a number of trends and focus areas. o How will PSRC incorporate the lessons learned from the equity analysis. Local agencies are required to develop a prioritization framework for our Road Safety Plan and we are looking for guidance on how this can be incorporated in a regionwide consistent manner.	Board Review	Add the following language after the last paragraph on p. 78: "PSRC will continue to emphasize safety throughout all aspects of regional planning processes, from the overall system goal as identified in VISION 2050, to the long-range planning and investments identified in the Regional Transportation Plan, and through the more detailed project evaluation criteria that are used to award PSRC's federal transportation dollars to specific near-term transportation investments. PSRC's work program will not only periodically reassess safety conditions, but will build on the strategies and information contained in the RSAP to expand strategies, countermeasures, and information to help proactively eliminate deaths and serious injuries on the region's roadways. At PSRC board direction, this could include future work programs including research, convenings and workshops."
3	A	There is some good information in the draft plan and draft summary. Most of the treatments are labeled "safer" instead of "safe", which the correct way to describe safety improvements. However, there are still a couple of places in both documents that still identify "safe" when describing pedestrian crossing treatments. The strategies and treatments described in the plans can make crossings "safer", but they do not necessarily make them safe. Please consider revising the body of the text in both documents to reflect my suggestions.	Technical Correction	On p. 49, edit the language to read "Countermeasures include...safer crossing treatments..." On p. 53, edit the language to read "...provide bicyclists with a safer..."
15	City of Auburn	Page 18 – Map shows E Main Street, east of R Street SE as being on the Arterial HIN. However, Main Street is not an arterial at this location. Please remove.	Technical Correction	Modify the third sentence on page 12 to read: "It consists of interstates, state highways, principal arterials, minor arterials of regional significance (e.g. that serve transit), <u>and in some cases other local roadways that connect these facilities.</u> "
16	City of Auburn	Page 18 – Please provide details of how Main Street was designated as a HIN. This was not identified as a HIN (called Safety Emphasis Corridor) in Auburn's plan.	Technical Correction	Modify the third sentence on page 12 to read: "It consists of interstates, state highways, principal arterials, minor arterials of regional significance (e.g. that serve transit), <u>and in some cases other local roadways that connect these facilities.</u> "
19	City of Auburn	Multiple Pages (51,56, 70) – The text notes that automated enforcement cameras can be deployed in ways that perpetuate historical inequities. Can you please elaborate on this? What inequities have cameras created in the past and how can deployment of them avoid this?	Technical Correction	Insert footnote or citation on p. 51: "Making Speed Safety Cameras Effective & Fair: From Planning to Action. Vision Zero Network. <a href="https://visionzeronetwork.org/promoting-equity-in-speed-safety-camera-programs-from-planning-to-action">https://visionzeronetwork.org/promoting-equity-in-speed-safety-camera-programs-from-planning-to-action</a> . Accessed 4/2/25"
28	City of Kent	Speed or speeding is referenced 148 times in the plan. Impaired or impairment references number less than 20 and ranks below excessive speed as a contributing crash factor. The plan notes that impairment and speed are correlated. Consider that solutions for one may also be applied to the other for mitigation.	Technical Correction	The change suggested in response to comment #24 will address this issue.

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29	City of Kent	Map detail comments: The map on page 18 has errors. i. SR 99 in Federal Way, Kent, Des Moines, and SeaTac is a managed access state highway. It is not limited access ii. SR 516 in Kent from 30th Ave S (west of I-5) to the Union Pacific rail crossing (east of SR 167) is a limited access state highway operated by WSDOT. It is not managed access and not operated by Kent. iii. The map shows and extension of S 196th St extending from 84th Ave S across SR 167 and connecting to S 192nd St east of SR 167. This road does not exist. The map on page 22 also has an error. The map shows and extension of S 196th St extending from 84th Ave S across SR 167 and connecting to S 192nd St east of SR 167. This road does not exist.	Technical Correction	PSRC will review the HIN for miscoding and make necessary corrections.
32	City of Kirkland	2. One edit is needed to Kirkland's summary in appendix table. This shows a 'No' for Kirkland having a Safety section in our Transportation Strategic Plan which is not true. We've had safety as part of our plan since 2015 including a Vision Zero goal carried forward from our 2015 plan into our newly adopted Transportation Strategic Plan.	Technical Correction	The reference in the Appendix D table D-2 will be corrected.
33	City of Redmond	The City of Redmond is greatly appreciative of the work that has gone into the Regional Safety Action Plan (RSAP) and the useful strategies therein to address our region's traffic safety challenges. Redmond staff have reviewed the Regional Safety Action Plan and would like to submit the following comments. Comments 1 – 3 are of particular interest to the City of Redmond given that it has developed its own Safer Streets Action Plan, which includes both a High Injury and High Risk Network that are responsive to the contextual safety issues of Redmond.  1. Page 3 – please consider adding the red text to this sentence: However, the Regional Safety Action Plan is not the only plan addressing safety in the region. There are 86 jurisdictions within the central Puget Sound region, many of which have their own transportation safety-related priorities, policies, <u>High Injury or High Risk Networks</u> , and plans. The RSAP acts as an umbrella for these related priorities, policies, <u>networks</u> , and plans, and is a resource to help local jurisdictions with a baseline of tools and strategies for understanding the current transportation safety issues existing today and potential solutions into the future. <u>Conversely, local plans, policies, and priorities, including High Injury or High Risk Networks, may go beyond what is presented in the RSAP in addressing locally-specific risk factors, contexts, and emphasis areas.</u>	Technical Correction	Add the suggested language on p.3: "However, the Regional Safety Action Plan is not the only plan addressing safety in the region. There are 86 jurisdictions within the central Puget Sound region, many of which have their own transportation safety-related priorities, policies, <u>High Injury or High Risk Networks</u> , and plans. The RSAP acts as an umbrella for these related priorities, policies, <u>networks</u> , and plans, and is a resource to help local jurisdictions with a baseline of tools and strategies for understanding the current transportation safety issues existing today and potential solutions into the future. <u>Conversely, local plans, policies, and priorities, including High Injury or High Risk Networks, may go beyond what is presented in the RSAP in addressing locally-specific risk factors, contexts, and emphasis areas.</u> "
34	City of Redmond	2. Page 17 – please consider adding the red text to this sentence: The HIN helps communities and partners identify areas where they may want to prioritize safety investments. Many local jurisdictions have developed their own HIN (or HRNs), which tend to have many more segments and intersections due to the use of different parameters and crash risk factors derived from a more local analysis of crash data.	Technical Correction	The suggested language in response to comment #31 addresses this issue.
44	City of Seattle, Department of Transportation	Crash Analysis by Location (pg. 17) PSRC's HIN utilizes an 85th percentile score region-wide for deaths and serious injuries on roadways and for vulnerable road users. SDOT requests PSRC clarify their reasoning behind utilizing a threshold of 85th percent. As an alternative, PSRC should consider expanding the score to capture additional density of crashes along corridors across the region. The HIN has a minimum segment length of 0.6 miles, and a minimum threshold of 2 deaths or serious injuries. However, in areas with a dense street network, corridors as short as 0.25 miles are worth including in a HIN to highlight crash-prone street segments and intersections. Seattle's updated HIN includes street segments 0.25 miles and longer, which are prioritized based on the total number of crashes (excluding sideswipe, parking, and rear-end crashes) and the total number of injury-causing crashes. Currently, PSRC's identified "High Crash Locations" account for only serious injury and fatal spot locations. We recommend broadening the definition to consider all crash types that are most likely to cause injury (excluding less severe crashes such as sideswipe, parking, and rear-end crashes). This will help identify recurring patterns that could result in future injuries, serious injuries, or fatalities.	Technical Correction	The 85th percentile was chosen to identify the places where there are the greatest concentration of incidents in order to prioritize where to focus projects and interventions.  Add the following language before the last sentence in of the High Injury Network description on p. 17: "Given the extent of the regional roadway network, a shorter minimum segment is not appropriate for regional analysis. Shorter roadway segment lengths used for local analyses may identify additional roadways that do not meet the regional threshold. High Injury Networks developed by local jurisdictions for more detailed application may want to select shorter roadway lengths to understand conditions with more dense street networks."
55	City of Tacoma	Align the Plan/its information with the recently completed Washington Target Zero Plan by incorporating Safer Land Use into the Safe System Approach.	Technical Correction	To better align with the Washington State Strategic Highway Safety Plan 2024, PSRC will add a "Land Use" wedge to the Safe System Approach graphic on p. 6.

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61	City of Tacoma	Additionally, we have questions about the methodology used to create the Pedestrian and Bicycle High Injury Network map (page 24). Specifically, while N. 26th Street is identified, Portland Avenue—a principal arterial with twice the number of pedestrian and bicycle crashes—is not. We would appreciate further discussion on these discrepancies so the PSRC plan effectively identifies and supports Tacoma’s safety needs or a commitment that local Vision Zero Plans will be recognized as an equal (or greater) factor during project selection when data and equity considerations are met.	Technical Correction	PSRC will review the HIN for miscoding and make necessary corrections.
104	King County	<p>1. Page 32:</p> <p>a. Frequent transit stations are defined as clusters of stations that have at least four transit trips per hour.</p> <p>i. Define “clusters of stations”. Seems to suggest a collection of points but is referring to an area. Is a “frequent station” only identified if it is in proximity to multiple “frequent stations” (i.e. cluster). How are the “frequent transit station areas” drawn – are they a 1/4 walking distance, geographic buffer, etc.?</p> <p>ii. Please provide more clarification on the how frequent transit stations are defined.</p> <p>b. From 2016 to 2023, there were roughly 106 people walking or biking in frequent transit station areas per square mile that suffered a serious injury or fatality as compared to less than three overall in the region’s urban areas.</p> <p>i. The usage of “per square mile” usage hard to follow, though important for comparison. Consider providing clear terminology that is conveys the message.</p> <p>c. Clarify what is meant by “In areas near frequent transit station areas”.</p> <p>i. “In areas near frequent transit stations” or “In frequent transit station areas”</p> <p>d. Clarify text the text that states “roughly 15 people walking or biking died per square mile, in comparison to the much lower ratio of one person every two square miles that died in a crash in the region’s urban areas (excluding frequent transit station areas)”.</p> <p>i. This language suggest: People walking or biking in frequent transit areas experienced a deadly crash at a rate nearly 30 times greater than people walking or biking in the region’s urban areas outside of frequent transit areas.</p>	Technical Correction	Edit the Frequent Transit Stations description on p. 32 to read: <u>“Frequent transit station are defined as <u>an area with</u> clusters of stations within 100 meters of each other that <u>each</u> have at least four transit trips per hour. These locations account for 14 percent of pedestrian and bicycle deaths or serious injuries. From 2016 to 2023, <u>roughly 106 people walking or biking in these areas suffered a serious injury or fatality per square mile compared to less than three per square mile in the overall urban area. People walking or biking in frequent transit areas experienced a deadly crash at a rate nearly 30 times greater than people walking or biking in the region’s urban areas outside of frequent transit station areas, shown in Table 2-6.”</u></u>
118	King County - Regional Public Health	6. Strengthen the description of the role of agencies with direct jurisdiction over the roadway. The report does not clearly convey that jurisdictions may use more localized data, analytical methodology, and site-specific engineering judgment to assess road networks.	Technical Correction	Add the following language at the end of the Plan Purpose section on p. 3: “While PSRC develops strategies and guidance and can establish regional priorities, it is the responsibility of local transportation agencies to develop, implement, and operate safety projects and programs.”
124	King County Department of Local Services	4. The PSRC, its role, and its levers of change are not clearly described. The plan needs a section that explicitly describes who the PSRC is, what it does, and how it can and can’t affect traffic safety. The bulk of the document describes what asset management agencies could do, but does not identify what PSRC could or will do. For example, the regionally significant network is described as the “PSRC network” as shorthand for the regionally significant road network, which gives the misleading impression that PSRC owns any assets or exerts any direct control over the road network.	Technical Correction	Add the following language at the end of p. 3: “While PSRC develops strategies and guidance and can establish regional priorities, it is the responsibility of local transportation agencies to develop, implement, and operate safety projects and programs.”
204	Y	My main concern is the pedestrian countermeasure in table 4-2 which simply states “High-Visibility Crosswalks”. I think this language could give the false impression that installing crosswalk markings inherently improves safety outcomes. The representation of this countermeasure in the table does not provide enough context to represent the intent of the associated study, which compares high-visibility markings to transverse lines. Instead of the current language, I recommend alternative language such as Replace Transverse Crosswalks with High Visibility Crosswalks, or Use High Visibility Style Markings When Marking Crosswalks, which would more accurately depict the intent. While the context in the section that follows does seem to hint at the idea that this countermeasure is a comparison between marking styles, it doesn't say so outright and I'd be concerned about the message being misconstrued (as I've seen happen in claims I've served as an expert witness on).	Technical Correction	Edit the description of “High-Visibility Crosswalks” on p. 47 to read: “High-visibility crosswalk markings can be more easily seen by drivers than traditional parallel markings, and can be more effective in preventing crashes and injuries.” In addition, add the following language to the introductions to the plan’s summary tables 4-2 through 4-6 (pp. 45; 52; 57; 63; 67): “Local context and conditions will be critical in determining which countermeasures may be appropriate for a given roadway or location.”
205	Z	Please adopt the Washington State 2024 Strategic Highway Safety Plan’s Safe Systems Approach framework, which also incorporates ‘Safer Land Use’.	Technical Correction	To better align with the Washington State Strategic Highway Safety Plan 2024, PSRC will add a “Land Use” wedge to the Safe System Approach graphic on p. 6.