



WalkBoston

September 27, 2006

Secretary Robert Golledge
Executive Office of Environmental Affairs, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on Generic Environment Impact Report (GEIR) for the Snow and Ice Control Program of the Massachusetts Highway Department
EOEA # 11202

Dear Mr. Golledge:

WalkBoston appreciates the opportunity to comment on the GEIR for the Snow and Ice Control Program of the Massachusetts Highway Department. We are commenting because of concern about the pedestrian issues associated with this program.

The GEIR covers many of the steps that the MHD has taken to deal with the impacts of its application of chemicals on roadways. It discusses in detail the impacts that these materials have on pavement and the relative degree of effectiveness that the materials exhibit when removing snow and ice. It describes procedures that snow plowers (whether state employees or service-providers hired by the state) must follow, along with ways that the state will oversee the operations associated with snow plowing. In several of these discussions within the GEIR, the MHD comes tantalizingly close to describing potential impacts on pedestrian movement, yet there is no explicit acknowledgement that pedestrians have a stake in the way the state removes ice and snow from roadways and to the relationship between roadway and sidewalk snow and ice clearance.

The impact of roadway snow and ice clearance on pedestrians.

Pedestrians are clearly affected by the removal of snow from roadways and sidewalks and the effects of inadequate clearance that results in unsafe conditions for walking. After a snowfall in Massachusetts, it is possible to view city or town streets where the roadways are well plowed, but the sidewalks are impassable. Common public services such as postal deliveries or meals on wheels can be disrupted. Commuters and school children find their routes blocked. Uncleared sidewalks parallel to snow mounds can force pedestrians onto the street where pedestrian-automobile crashes are far more likely to occur. Even where sidewalks are cleared, pedestrian access at intersections is frequently blocked by roadway-related snow mounds that impede safe walking through the intersection.

The simple activity of walking is dramatically altered by the presence of snow. Snow mounds present a physical challenge to pedestrians, and walkers who are trying to cross mounds of snow to get to a safe walking route may have their attention diverted away from oncoming traffic. Intersections clogged with snow or snowmelt can challenge pedestrians trying to cross, again causing temporary diversion of attention from oncoming traffic. Drivers may not be able to see pedestrians forced onto roadways.

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Sidewalks are found along state roadways throughout the Commonwealth, and some roads that were originally constructed without sidewalks now have them as a result of the continuing urbanization and suburbanization of the state. Adding sidewalks is likely to continue as communities become increasingly aware of the need to provide pedestrian access to workplaces, schools, shopping and recreation.

The importance of providing safe pedestrian access in all seasons cannot be taken lightly. It is a matter of public safety, adequate transportation, social justice (many of our citizens who are pedestrian and transit-dependent are lower income or elderly), and economic well-being (we discourage elders and the disabled from staying in Massachusetts if they feel isolated and home-bound by wintry conditions).

The GEIR states: “It is the policy of MassHighway not to perform snow removal functions on sidewalk areas abutting state highways or bridges.” (Appendix B, Chapter 5 of MHD’s Maintenance Manual, Section 5.3.8)

This policy does not seem to conform to the MHD Project Development and Design Guide, 2006 edition, which states: “MassHighway, in its role as steward of our roadways, must consider a broad range of factors in maintaining (emphasis added) or improving this system, including:

- Safety for all users
- Functionality – the need for access and mobility
- Accessibility for people with disabilities...
- Input and participation from local constituents ...”

The manual quotes state law: “Chapter 87 of the Acts of 1996 requires MassHighway to ‘make all reasonable provisions for the accommodation of bicycle and pedestrian traffic...’” (Section 1.2.1, p. 1-3) The manual continues with this Guiding Principle: “Multimodal consideration – to ensure that the safety and mobility of all users of the transportation system (pedestrians, bicyclists and drivers) are considered equally through all phases of a project so that even the most vulnerable (e.g., children and the elderly) can feel and be safe within the public right of way....” Section 1.2 Guiding Principles of the Guidebook, detailed in Section 1.2.1, p. 1-3.

The public right of way frequently includes sidewalks on one or both sides of the roadway, and these sidewalks are needed to “ensure the safety and mobility of all users of the transportation system.” If snow and ice are not to be removed from sidewalks, as stated in this GEIR, this places the GEIR at odds with current state policy.

WalkBoston believes that the GEIR should be modified to show the methods by which the state will ensure removal of snow and ice from all parts of the transportation system that are within the rights of way of its roadways. MHD might do the work on its own, through hired agents, or by means of agreements with local communities or private abutters. The GEIR also fails to cover methods for accomplishing a full-scale removal of snow and ice from all routes through its rights of way, and fails to cover potential additional environmental impacts that may accrue from a more comprehensive approach to snow and ice removal. The environmental impacts of snow removal for pedestrians have not generally been closely examined.

The GEIR should address the issues noted below.

Safety for both drivers and pedestrians. The state has determined that highway safety and vehicle mobility are high priority reasons for snow and ice removal. Clearing only the road is insufficient as a method for providing safety. Pedestrians crossing roadways or walking within the roadway constitute significant dangers for both drivers and themselves. The extent to which pedestrians use roadway pavements for walking is greatly expanded when sidewalks are left uncleared or when roadside snow mounds force people to clamber over them to cross streets. Many miles of MHD roadways are paralleled by sidewalks and are thus critical components of the pedestrian (and transit) transportation networks.

Development of a protocol for determining who will be responsible for sidewalk snow clearance on MHD roadways. Sidewalk clearance responsibilities may well fall to several different parties including MHD, local municipalities, other state or local agencies, or private abutters. In order to “ensure the safety and mobility of all users of the transportation system,” this responsibility must be assigned, managed and enforced throughout the state. As the owner and operator of this transportation network, MHD should assume the job of leading the effort to determine how and by whom the sidewalks will be cleared.

The right of way as a basis for snow and ice removal. Municipalities throughout Massachusetts remove snow and ice from local roadways and establish methods for removing snow and ice from sidewalks. Yet the state does not take on the same responsibility for its roadways. Thus, local jurisdictions must provide for snow and ice removal from sidewalks along state roadways without substantial state assistance. Without coordination between the state and the municipalities, several issues emerge:

1. Intersections. The maintenance of a safe pedestrian passageway is critical at street crossings. The crossings are often blocked by snow plowing procedures that simply pile up snow evenly along the road, covering sidewalks, handicapped ramps and street corners, forcing pedestrians to walk in the roadways. According to the MHD plowing standards, the state or its plowing agents clear important intersections for roadway traffic. No mention is made of attention to crosswalks or for sidewalk access into the crosswalks. The responsibilities of the state and its agents in clearing intersections – including pedestrian access through the intersection – should be spelled out, as has been stated in 2-lane Plowing Standard 1, GEIR Attachment 7, that states that “Truck #3 is also responsible for clearing important intersections.” This assignment of responsibility is significant, and should be augmented by detailing the actions to be taken to provide for pedestrians at intersections and should be extended to all Plowing Standards. Attention to this issue can help municipalities cope with comprehensive snow removal for sidewalks.
2. Roadway use by walkers. When the state or its agents clear roadways of snow, safe pedestrian passage must be maintained. If the roadway is temporarily used as a substitute sidewalk because sidewalks have not been cleared pedestrian and vehicular safety is compromised. Snow removal frequently results in substantial mounds of snow paralleling the state highway that, in many cases, block the sidewalks and driveways connected to the roadway. Snow mounding as a method of disposal may exacerbate the problem of clearing sidewalks because of the sheer volume of the snow plowed onto the sidewalks.
3. Planning. Streets can be designed to make plowing easier. Sidewalks might be placed at a distance from the roadway that is sufficient to accommodate snow plowed from the street.

Snow fences could be located to control snow buildup on pedestrian facilities and help reduce removal costs. Pedestrian safety islands should be designed to remain snow-free after plowing operations. The state should establish guidelines for improved design.

4. Research. The GEIR contains documentation of lane-miles plowed under state responsibility. Perhaps research is necessary to document pedestrian miles on sidewalks along state highways and to show how state snow plowing policies affect pedestrians and how those policies need to be amended or supplemented. In addition to providing a plan for ensuring the clearance of sidewalks, it would be useful to know what financial and technical assistance the state might provide for communities and pedestrians during snowy conditions along state roads through a variety of funding sources such as CMAQ, safety funds or hazard elimination funds.

Coordination of local and state efforts. The method by which state and local coordination takes place is described briefly in Section 2.5 of the GEIR, with subtopics of technology transfer and complaints. Some other issues that should be addressed are:

1. Division of responsibilities. As noted above, MHD must determine sidewalk snow-clearing responsibilities and how state, local and private entities will divide the work. A detailed plan for coordination is essential to determine precisely how the responsibilities will be divided, especially at locations where different responsibilities will abut or overlap. For example, at intersections where there are sidewalk connections into intersections, pedestrian crossings through intersections, and sidewalks along the roadways and across driveways. It is important for the MHD to include information about pedestrian issues for inclusion in the plow route schedule each fall, as specified in GEIR Appendix B, Chapter 5 of the MHD Maintenance Manual, Section 5.5.3, and for information to be disseminated by the Traffic Operations Center (Section 5.3.4), MHD Districts (Section 5.3.5), and shared (Section 5.1.4).
2. Sidewalk snow removal procedures. Written procedures can help clarify how snow is to be removed from sidewalks along state roads by agents other than the MHD. The state, municipalities or other state agencies can establish priority sidewalks that must be maintained for walkers right from the start of a snow emergency. One model has been prepared by the DCR, which works with the MHD to clear certain of its roadways. The state clears curb-to-curb, and the DCR clears the sidewalks according to a predetermined priority rating assigned to each sidewalk. Some communities (e.g. Concord) clear snow from sidewalks along state roads according to a plan that has been developed in conjunction with the school department to facilitate safe access to schools. Priorities may need to be established for sidewalks leading to schools, transit, hospitals and clinics, business concentrations, and public services such as police and fire stations, as well as based on the density of pedestrian use.
3. Bartering. A bartering process described in the GEIR (Section 2.5.3, p. 29) is an informal method of coordinating operations, with the state taking on some municipal responsibilities. This method of coordination could be used to establish procedures for local communities. Coordination might be embedded in written agreements between the state and the cities and towns that define responsibilities for the details of snow removal.
4. Information sharing. The state should make every effort to share information from its Road Weather Information System (RWIS) so that local communities could further coordinate snow removal and deicing of roadways and sidewalks in their communities.
5. Communication with the public. The public should be informed of policy decisions concerning snow removal on sidewalks, streets and at intersections, so that individuals can plan routes to work or school or for other purposes. One method is to place information delineating

responsibilities on the Internet or on printed material that can be widely distributed. A good example of delineating agency responsibilities for snow removal is laid out in the Department of Conservation and Recreation's website at www.mass.gov/dcr/winterstormplan.htm. By laying out snow removal intentions, it may be possible to avert tragedies involving pedestrians walking in roadways.

Thank you for the opportunity to comment on this GEIR. Please feel free to contact us for clarification or additional comments. We would be very pleased to work with MHD on this important issue.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner

Cc: Louisa Paiewonsky, Commissioner of the MHD
Steve Burrington, Commissioner of the DCR