



## Adventure Cycling Association

June 1, 2015

Dear Director Tooley and Administrator Kailey,

It was good to see you in Cheyenne last month at the AASHTO meeting and we have appreciated Mr. Kailey communicating with Ginny Sullivan on our staff. I wanted to let you know that, as of last Thursday afternoon, we were in receipt of both Director Tooley's letter in response to the thousand-plus protests received by MDT from individuals across Montana and the world about planned rumble strip installations on Adventure Cycling's Northern Tier and TransAm routes, as well as the benefit/cost analyses for each project.

Because time is of the essence, and MDT is moving forward on these projects, we have rapidly but carefully reviewed and analyzed your responses. We remain greatly concerned by the disconnect between your analyses and your planned actions, and strongly urge MDT to postpone the installation of rumble strips on Vida North and South (UPN 8714) and Reynolds Pass-Quake Lake (UPN 8761).

In the first case (UPN 8714), it is unclear what improvement a shoulder-edge rumble strip will make in protecting motorists -- and it is absolutely clear that MDT, by installing such a rumble strip, will be forcing cyclists into a high-speed travel lane with truck and auto traffic. This violates the Federal Highway Administration's (FHWA's) rumble strip guidance and undercuts MDT's own Vision Zero initiative by putting cyclists into a dangerous situation for 21 miles. In making the decision to move forward with rumbles on this segment, has any member of MDT's rumble strip committee actually ridden a comparable 21-mile segment in a high speed travel lane with a rumble strip and minimal shoulder to their immediate right? We would also like to know why MDT cannot install four-foot shoulders along this segment in order to comply with FHWA's rumble strip guidance and provide a safe operating space for cyclists.

In the second case (UPN 8761), it is absolutely clear from the most recent decade of data on the road segment in question that rumble strips would likely make no appreciable difference in regard to MDT's Vision Zero objectives of preventing fatalities and incapacitating injuries. In fact, as your data show over the last ten years, there have been no fatalities or incapacitating injuries. While it is commendable that MDT is adding shoulder space, and we truly appreciate that, it is still less than the four feet that is recommended by FHWA before rumble strips should be installed.

Especially given that MDT is planning to proceed with rumble strips on UPN 8761, we have to ask: on what road will MDT not install rumble strips? If the data demonstrate that a roadway does not have a problem with roadway departure crashes causing fatalities or incapacitating injuries, why is it a given that rumbles must be installed? If rumbles are to be installed, why are the adjacent shoulders not a minimum of four feet?

As we have noted many times before, we strongly support the use of rumble strips as long as they are accompanied by adequate shoulder space (again, the FHWA calls for a minimum of four feet); the adequate shoulder space is both for cyclists to have reasonable operating space but also to give motorists adequate paved space and traction to recover once they go over the rumble strips. In the case of UPN 8714, it appears that the shoulder width after rumble installation will typically be zero to one-and-a-half feet -- meaning motorists will have minimal to no time to react once they cross over the rumbles.

### Adventure Cycling Association

*A member-supported nonprofit organization, inspiring and empowering people to travel by bicycle.*

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We do understand and share your concern about roadway departure crashes on Vida North and South, where there have been two crashes in the last ten years resulting in incapacitating injuries (but fortunately no fatalities). However, we would like to know in your analysis if there were any other factors involved in the injury result, including lack of seatbelt use, alcohol use, distracted driving, icy or slick road conditions, or wildlife crossings. Were such factors involved in the other non-injury crashes cited in the benefit/cost analysis?

These are our immediate concerns regarding the two rumble strip projects. We have broader concerns that still need to be addressed. In particular, MDT continues to approve rumble strip installations without a finished and publicly available statewide rumble strip policy, despite promising to develop and publish such a policy. When will this policy be completed and publicly available? Will there be an opportunity for the public to provide input on a final draft policy before it is finished? We also hope that MDT will create more timely and meaningful communication channels for cyclist and pedestrian input for roadway re-designs; this includes receiving crash and benefit-cost analyses for affected road segments *before* a final decision is made on whether or not to install rumble strips.

Finally, we would like to know how the economic costs of deterring bicyclists will be factored into the benefit/cost analysis. As we have learned over the last year, bicycle tourism already generates significant economic activity in Montana, and could generate even more, with the right infrastructure and promotion. Montana's roads and trails could be a long-term, low-cost tourism gold mine for our state, to the tune of \$377 million annually for multi-day bike tours alone. The primary hurdle, according to the University of Montana's Institute for Tourism and Recreation Research, is the quality of our rural roadways. If MDT continues to apply rumble strips in ways that deter cyclists from traveling to and through Montana, and with questionable analytical justification, the Treasure State will miss out on this gold mine. How does MDT take into account the potential for lost economic activity when rumble strips are installed that make it more dangerous for cyclists to use a roadway?

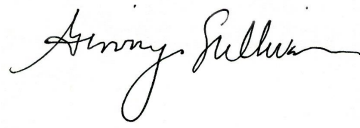
To conclude, we are grateful for the improvements that Director Tooley and MDT staff have made in planning for cycling and pedestrian improvement. We are also grateful for investments in trails and our cooperative work to create funding mechanisms to maintain this increasingly popular form of infrastructure. However, it is also important for cyclists -- as legitimate and valued users of Montana's transportation systems -- to enjoy safe and reasonable use of Montana's highways. With the application of rumble strips, especially in UPN 8714, MDT is failing to comply with the best practice rumble strip standard of the FHWA and signaling that cyclists do not deserve the safe and enjoyable use of important road segments, used by many thousands of cyclists over the last decade.

We will continue to work with Administrator Kailey on setting up a meeting as soon as possible to further discuss these issues but, given that construction season is upon us, we strongly urge MDT to uphold its commitment to Vision Zero by postponing the installation of rumble strips on Vida North and South (UPN 8714) and Reynolds Pass-Quake Lake (UPN 8761). We also urge MDT to complete and make publicly available its rumble strip policy before implementing any further rumble strips on Montana's roadways.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Kailey', written in a cursive style.

Jim Sayer  
Executive Director

A handwritten signature in black ink, reading "Ginny Sullivan". The signature is written in a cursive, flowing style with a long horizontal flourish at the end.

Ginny Sullivan  
Director of Travel Initiatives