



CITY OF SOMERVILLE, MASSACHUSETTS
DEPARTMENT OF TRAFFIC & PARKING
DOROTHY A. KELLY GAY
MAYOR

WILLIAM F. LYONS JR., P.E.
DIRECTOR

October 22, 2002

Office of Technical and Informational Services
Architectural and Transportation Barriers Compliance Board
1331 F Street NW, Suite 1000
Washington, DC 20004-1111

RE: Architectural and Transportation Barriers Compliance Board
36 CFR Parts 1190 and 1191, Docket No. 02-1, RIN 3014-AA26
Proposed Rulemaking - Guidelines on Accessible Rights-of-Way

Dear Sir or Ma'am:

The City of Somerville Department of Traffic & Parking has had an opportunity to review the above referenced proposed rulemaking. We are writing to offer our comments regarding this very significant proposal. We hope our comments are helpful to the Board in its deliberations.

We have attempted to organize our thoughts to follow the order of the proposed rules. In some cases, our comments overlap and we have made an effort to cross reference to related issues. Our comments are as follows.

§ 1102.2.2 Alterations

The word "alterations" in the context of changing traffic regulations (and corresponding signage) is very ambiguous. If the Traffic Commission of the City of Somerville introduces a change in timed parking, or a parking restriction or prohibition, in a certain area, will this change constitute an alteration? Since these regulations are unenforceable without the requisite signage, does a change in traffic signs constitute an alteration? We request that the Board address these issue clearly in the regulation.

§ 1102.5.2 Post-Mounted Objects

The wording of this section is very confusing. The language could result in a conflict that we believe may be unintended. We request clarification of this language.

Our concern with this language revolves around a frequent application of signage in our City. Several years ago, parking meters were removed from some of our business districts. The meters were replaced by parking regulation signs specifying a two-hour parking limit. The signs were mounted to the meter posts in lieu of the now absent meters and oriented to face the street.

We do not believe our current application of parking signs on meter posts presents an obstacle to handicapped persons. We have never had a complaint to that effect. However, the language of this section could prohibit this application in the future. We request clarification of this issue.

§ 1102.7.2 Informational Signs and Warning Signs

This proposed regulation will require all informational and warning signs intended for use by pedestrians to comply with § 703.5 of the ADAAG. We do not have the staff or time resources to review this regulation in the light of the current proposal. In addition, we do not have the staff resources to deconflict the relevant provisions of the ADAAG and the *MUTCD*.

However, our interpretation of the *Manual on Uniform Traffic Control Devices (MUTCD)* includes the point of view that the *MUTCD* applies to all signs in the public way which are intended to control all modes of traffic (vehicles, pedestrians, bicycles, transit, etc.). This applies to all signs intended to inform and warn all modes of travel, including pedestrians. We draw this inference from the following language quoted from the *MUTCD*:

“Traffic Control Devices: all signs, signals, markings, and other devices used to regulate, warn, or guide traffic placed on, over, or adjacent to a street, highway, pedestrian facility, or bikeway by authority of a public agency having jurisdiction.” (Emphasis added)

MUTCD, § 1A.13, Definitions of Words and Phrases in this Manual, Standard: Paragraph 83.

“Traffic: pedestrians, bicyclists, ridden or herded animals, vehicles, streetcars, and other conveyances either singularly or together while using any highway for purposes of travel” (Emphasis added)

MUTCD, § 1A.13, Definitions of Words and Phrases in this Manual, Standard: Paragraph 85.

Accordingly, we are very concerned about the potential for conflict between differing federal regulations, to wit 23 CFR Part 655 (into which the *MUTCD* is incorporated by reference) and this regulation, which is proposed to be incorporated into the ADAAG. We believe that great caution must be exercised to avoid potential, perceived, or actual conflicts where there is significant possibility of error and where liabilities in tort or statute by civil action can be created. We urge the Board to coordinate thoroughly and diligently with the National Committee on Uniform Traffic Control Devices (NCUTCD) and the Federal Highway Administration (FHWA) to avoid undesirable outcomes of this sort.

§ 1102.14 On-Street Parking

This proposed regulation would require at least one accessible on-street parking space per block face where on-street parking is provided. The regulation makes no distinction between on-street parking in residential districts versus business districts. This distinction is important for reasons described below.

By way of background, the City of Somerville is one of the densest cities on the east coast of the United States, if not the entire United States. The City's corporate limits encompass an area of 4.12 square miles. Within this very small geographic area, there are in excess of 80,000 residents. In addition, there are more than 55,000 vehicles registered to owners residing in the City.

To compound our density problem, our City blocks were laid out in large part during the mid-1600s. The street grids originated as range ways between agricultural growing fields. The block sizes are very compact and the street widths themselves are often less than 30 feet in total layout width. The result is that there are only approximately 14,200 legal on-street parking spaces.

Moreover, in order to achieve a density of approximately 19,000 people per square mile, most of the individual properties are very densely used. Most are multifamily dwellings on lots less than 10,000 square feet. It is very typical of there to be no off-street parking provided in many of our residential lots.

With very few off-street parking spaces and a finite supply of on-street parking spaces, one can well imagine that parking supply is at a premium. A significant portion of this Department is dedicated to managing this very valuable on-street parking supply. In fact, our parking control officers issue approximately 200,000 tickets per year in our attempts to manage this commodity.

The reason all of this information is relevant is because the regulations treat all communities with a one-size-fits-all approach to parking supply for handicapped persons. Somerville, an extremely dense community with very short block sizes, is required to apply the same standards as a residential subdivision road in wide-open Iowa or a commercial district in modern urban settings in Arizona with quarter mile blocks. This approach is patently unfair and will result in a tremendous disproportional impact on cities like Somerville.

This approach also ignores very successful local solutions to this problem. For instance, the City of Somerville has a petition program for the placement of handicapped parking spaces in residential neighborhoods (copies of materials related to our program are attached). This program allows for residents who can verify their disability to have a handicapped parking space installed in front of the resident's home (or as close as possible). The City limits the program to no more than 10 percent of the spaces in a 1000-meter area and the space is open to anyone who displays a license plate or placard bearing the requisite identifying symbol. This program is hugely popular and we receive very few complaints regarding the standards.

With regard to commercial districts, the regulations are extremely onerous for older, built communities such as Somerville. This City, where the roadway network was developed as early as 1636, has very short block sizes and a very tight parking supply in the commercial districts. Some of our block sizes are a mere 150 feet in length. By contrast, a newly developed municipality in the Midwest or the Southwest will likely have a block size of a quarter of a mile with the same level of commercial activity (or even more commercial activity!). It is unfair to saddle a community like Somerville with the same supply requirements.

Another issue is that it may not be technically feasible to provide anything more than one handicapped space on a block face. We have multiple very short blocks with on-street parking provided. After deductions for fire hydrants and parking prohibitions for safety reasons, there may be only one parking space on this entire block face. In these cases, the only space would be a handicapped space because there are no reasonable exceptions to this rule. This rule would be unreasonable and would harm efforts to attain compliance from patrons and businesses owners.

For example, the Commonwealth of Massachusetts prohibits parking on all roads within twenty (20) feet of an intersection by statute. The Commonwealth also prohibits parking within ten (10) feet of a hydrant by statute. The City of Somerville also has multiple bus routes and the bus stops are no less than sixty (60) feet in length. Given a short block face of 150 feet, after deducting the requirements of the above limitations on our parking supply, there is only 30 feet available for legal parking. This provides space for one legal parking space, which under these regulations would be required to be a handicapped parking space.

We strongly suggest that the Board reconsider their current approach to this issue. We offer the following pointed recommendations in this regard.

- Differentiate between on-street parking in residential neighborhoods and commercial districts;
- Allow local jurisdictions the flexibility to develop programs that are tailored to local conditions;
- In the alternative, develop a more reasonable formula for allocating spaces in residential areas;
- Adopt a demand based approach which requires jurisdictions to respond to demands which can be managed in light of available supply (as we have done in Somerville);
- Look at handicapped parking supply as a reasonable percentage of total parking supply;
- Establish a minimum block size of 250 feet to which this regulation would apply.

§ 1103.3 Clear Width

This proposed regulation would mandate a minimum clear width of four feet for all pedestrian access routes. These regulations are onerous where sidewalks are five feet in width (or less). Where sidewalks are very narrow (five feet in width), it is very difficult to comply with competing mandates while at the same time avoiding subsurface utilities such as electrical or telephone conduit, sewer mains and services, water mains and services, and drain lines. This situation is particularly acute in aging, built environments such as can be found in Massachusetts.

I have authored an article on this subject, which is attached for your consideration. Without repeating the text of the article here, I would like to embellish on a few of the points I made. These points are critical to understanding the limitations and costs implied by these proposed regulations.

Optimally, where sidewalks are very narrow, the placement of traffic signal equipment; other traffic control devices such as signs, parking meters; and street appurtenances should be at the back of the sidewalk. However, sometimes this is impractical or impossible due to conflicts with major utilities (e.g., a 48 inch drain line) or with building faces and/or business access and egress points. The resulting conflicts make compliance with the proposed regulations impossible. The Board should take these cases into consideration when promulgating these regulations.

We recommend that the Board consider regulations more in line with the Commonwealth of Massachusetts' regulations on this subject. The Commonwealth of Massachusetts' Architectural Access Board (AAB) requires 3 feet clear path of travel on sidewalks. The text of their regulation reads as follows:

“WIDTH

The width of walkways shall not be less than 48 inches (48” = 1219mm), excluding curb stones. An unobstructed path of travel shall be provided which is at least 36 inches (36” = 914mm) clear, excluding curb stones.”

Architectural Access Board Regulations, 521 CMR 87, §22.2

However, if the Board decides to require a clear width as proposed, we recommend that waivers be automatically provided for sidewalks five feet wide or less to permit a 3 foot clear width.

§ 1104.3.7 Clear Space

This proposed regulation would require a four-foot by four-foot landing at the bottom of each handicapped ramp that is entirely within the crosswalk. The Commonwealth of Massachusetts Architectural Access Board (AAB) has rewritten its regulations to reflect a similar requirement. One of the unintended results has been that intersections with large curve radii (to accommodate trucks) are in conflict with the provisions of the MUTCD, specifically:

*“If used, stop and yield lines should be placed 1.2 m (4 ft) in advance of and parallel to the nearest crosswalk line, except at roundabouts as provided for in Section 3B.24. In the absence of a marked crosswalk, the stop line or yield line should be placed at the desired stopping or yielding point, **but should be placed no more than 9 m (30 ft) nor less than 1.2 m (4 ft) from the nearest edge of the intersecting traveled way.”(Emphasis Added)***

MUTCD, § 3B.16, Stop and Yield Lines, Guidance, p. 3B-34.

For intersections with large curb radii, the placement of the crosswalk to comply with this requirement will result in the stop line being more than thirty feet from the intersecting way. This has been a frequent and difficult burden during the local process of designing roadways. Again, it is our view that this section will result in a conflict (albeit an implied conflict) between two federal regulations and should be reviewed in that light.

§ 1105.2.1 Width

This proposed regulation would make the minimum width of all crosswalks 96 inches (8 feet) in direct conflict with the *MUTCD*, § 3B.17, which makes the minimum 72 inches (6 feet). Our crosswalk width standard is 10 feet, but some of our crosswalks are less than that width for a variety of reasons. We again emphasize that intentional conflicts between governing bodies should be avoided and a compromise should be reached before publication of this regulation. The width arrived at by the NCUTCD was selected for a purpose and that purpose should be explored before a contradicting standard is adopted.

§ 1105.3 Pedestrian Signal Phase Timing

This proposed regulation would require that the minimum clearance interval for pedestrian phases at traffic signals be calculated on a walk speed of 3 feet per second, in direct conflict with the *MUTCD*, § 4E.09, which requires that the pedestrian clearance phase be calculated based on a walk speed of 4 feet per second. In addition, this section will require that the calculated walk time be based on the distance a pedestrian must travel to go down a handicapped ramp, entirely across an intersection, and up the opposing handicapped ramp. This, too, conflicts with the *MUTCD*, which reads:

“The pedestrian clearance time should be sufficient to allow a pedestrian crossing in the crosswalk who left the curb or shoulder during the WALKING PERSON (symbolizing WALK) signal indication to travel at a normal walking speed of 1.2 m (4 ft) per second, to at least the center of the farthest traveled lane or to a median of sufficient width for pedestrians to wait.”

MUTCD, § 4E.09, Pedestrian Intervals and Signal Phases, Standard p.4E-12.

We again emphasize that intentional conflicts between governing bodies should be avoided and a compromise should be reached before publication of this regulation. The walking speed and travel distance adopted by the NCUTCD were selected for a purpose and that purpose should be explored before a contradicting standard is adopted.

Further, this regulation takes no account of another competing federal interest - traffic congestion and related air quality. As with all matters relating to traffic flow, there are always many competing interests as well as constituencies advocating for one interest to outweigh the others. It is always a matter of balancing interests on the part of local and state jurisdictions that results in local decisions.

In this case, the needs of the disabled community must be balanced against other competing priorities such as traffic congestion and air quality. The federal Clean Air Act amendments (and resulting Air Quality Conformance requirements for urban non-attainment areas) impose a responsibility on state and local operating jurisdictions to manage congestion and reduce traffic delays where feasible. In short, we are required to reduce vehicle delays in order to improve air quality.

This proposed regulation will result in increased delays. The increased length of the pedestrian clearance interval will cause impacts to traffic congestion and reduce air quality. The question for the Board to consider is not whether or not this regulation has merit in its objective. The question is “should the increased pedestrian clearance interval time be universally applied, or should local jurisdictions apply engineering judgment towards balancing these competing interests.”

The *MUTCD* wisely leaves this balancing effort up to the local jurisdictions. The language is as follows:

“Where pedestrians who walk slower than normal, or pedestrians who use wheelchairs, routinely use the crosswalk, a walking speed of less than 1.2 m (4 ft) per second should be considered in determining the pedestrian clearance time.”

MUTCD, § 4E.09, Pedestrian Intervals and Signal Phases, Standard p.4E-12.

We agree that an operating jurisdiction should consider such factors as the elderly and the disabled in making decisions to increase pedestrian clearance times. However, what if the normal population at a local intersection does not include these population groups? Should not the local jurisdiction be required to use their engineering judgment and their knowledge of local conditions to balance competing priorities? Again, this one-size-fits-all approach ignores many other factors that cannot be equally applied in all jurisdictions in the United States.

Further, for jurisdictions with a large number of traffic signals, these changes would result in literally thousands of seconds of delay on a daily basis. In areas of Air Quality Non-Attainment, the result could seriously jeopardize compliance with federally mandated air quality standards. The point is that these regulations do not allow for flexibility on the part of local agencies to determine the true needs of the constituents they serve.

Lastly, we would be remiss if we did not at least anecdotally discuss the affect of increased delay on motorist behavior. Increased delay certainly contributes to the phenomenon of “road rage.” When a motorist watches a traffic signal provide signal timing well in excess of the needs of the pedestrians while still causing all traffic to continue to stop, this promotes irrational and dangerous behavior that jeopardizes the safety and well being of all road users, disabled and otherwise. This aspect of the affects of the regulation cannot be dismissed.

The proper remedy for the poor exercise of judgment in cases where local jurisdictions use inappropriate assumptions is an action in tort. The legislating of such issues from Somerville, Massachusetts to San Diego, California does not take into account widely different local conditions. In addition, this approach does not strike a balance with other competing national priorities and regulations, such as the *MUTCD* and the Clean Air Act.

§ 1105.6 Roundabouts

This proposed regulation would require that every roundabout that includes pedestrian crossings include barriers where pedestrian crossing is not encouraged and pedestrian signals to cross the crosswalks. This approach is anathema to the whole purpose of roundabouts. First, roundabouts are intended to improve vehicular traffic flow without traffic signals. Second, roundabouts are generally used to improve the aesthetic quality of an intersection and slow vehicle speeds (e.g., traffic calming). These regulations would undermine both of these goals.

The requirement to include barriers does not make any sense to us. There are an unlimited number of locations along every roadway where pedestrian crossings are either prohibited or discouraged. We do not (and could not reasonably) provide barriers along these areas to prohibit accidental entry into the street. Likewise, with roundabouts, the curbing provides adequate vertical relief and warning to pedestrians that they would be leaving the sidewalk and entering the street. We do not feel that adding barriers to these roadway edges would serve any legitimate purpose and would dramatically increase the cost of construction for roundabouts.

Moreover, the requirement to signalize pedestrian crossings at roundabouts is equally troubling. The Commonwealth of Massachusetts requires that vehicles stop for all pedestrian in crosswalks at unsignalized intersections. This statutory provision is actually more protective than traffic signals in many cases. In any case, the requirement to include pedestrian traffic signals at every roundabout where a crosswalk is painted regardless of demand is unnecessary and onerous.

In point of fact, this requirement raises another direct conflict with the *MUTCD*. The *MUTCD* specifies thresholds to be observed when considering whether a traffic signal is warranted or not. The relevant text from the *MUTCD* describing these thresholds is provided below.

“Standard:

The need for a traffic control signal at an intersection or mid-block crossing shall be considered if an engineering study finds that both of the following criteria are met:

A. The pedestrian volume crossing the major street at an intersection or midblock location during an average day is 100 or more for each of any 4 hours or 190 or more during any 1 hour, and

B. There are fewer than 60 gaps per hour in the traffic stream of adequate length to allow pedestrians to cross during the same period when the pedestrian volume criterion is satisfied. Where there is a divided street having a median of sufficient width for pedestrians to wait, the requirement applies separately to each direction of vehicular traffic.

The Pedestrian Volume signal warrant shall not be applied at locations where the distance to the nearest traffic control signal along the major street is less than 90 m (300 ft), unless the proposed traffic control signal will not restrict the progressive movement of traffic.

If a traffic control signal is justified by both this signal warrant and a traffic engineering study, the traffic control signal shall be equipped with pedestrian signal heads conforming to requirements set forth in Chapter 4E.”

MUTCD, § 4C.05, Warrant 4, Pedestrian Volume, Standard p.4C-8.

Experience shows that providing traffic signals where they are not warranted results in reduced compliance with valid signal installations by violating motorists' expectations with regard to potential conflicts. Where motorists do not expect routine conflicts at traffic signals, they routinely violate or disregard the intended traffic controls. This regulation would result in increased danger for the entire pedestrian population, including the disabled population, contrary to its purpose.

Lastly, the requirement to include traffic signals for all crosswalks at roundabouts dilutes their very purpose of roundabouts, as the Board seems to understand. We are at a loss to understand why this would be the approach the Board would take. In light of other possible remedies (such as the Commonwealth of Massachusetts' YIELD TO PEDESTRIAN IN CROSSWALK requirements), we believe that adopting of this regulation would be disastrous.

If the Board adopts this regulation, there could be numerous unintended consequences that would result in poor public policy decisions. For instance, instead of bearing the burden to install traffic signals at a new roundabout, an agency may elect to not construct a roundabout at all. Worse even, the agency may elect to construct the roundabout but not provide crosswalks to avoid the signalization issue. As a practitioner, I feel obliged to say that I would weigh carefully these options before recommending roundabouts in the future due to the potential tort liability issues associated with the MUTCD and other research that militate against this practice.

Ultimately, it would be a sad day if this regulation essentially stopped short a national movement to improve traffic flow through the installation of roundabouts. The positive benefits provided by roundabouts and encouraged by other agencies in the federal government could be diluted to the point of roundabouts no longer being a viable option. Indeed, if every roundabout was required to have a pedestrian signal, I daresay this would be the case.

§ 1105.7 Turn Lanes at Intersections

This proposed regulation would require a pedestrian signal at all right and left turn slip lanes where a crosswalk is provided. We agree with this approach at signalized intersections. However, the regulation would seem to require that this provision apply where the intersection including the slip lanes is not itself signalized.

We find the language troubling because it would apply to signalized and unsignalized intersections alike. If this provision were to apply to unsignalized intersections, these regulations would again be in direct conflict with the signalization warrants of the *MUTCD* (see above discussion on roundabouts). We strongly urge the Board to consider language making this section only applicable where the intersection is signalized.

§ 1106.2.1 Location

This proposed regulation would require that all pedestrian signal devices be located 2.5 feet from the curb line. This regulation is also in potential conflict with the *MUTCD*, which specifies that all appurtenances will be at least two feet from the curb face. The relevant text is provided below.

Signal heads mounted at less than 4.6 meters (15 feet) from the bottom of the housing and any related attachments at the side of a roadway with curbs shall have a horizontal clearance of not less than 0.6 m (2 ft) from the face of a vertical curb. If there is no curb, signal heads shall have a horizontal clearance of not less than 0.6 m (2 ft) from the edge of a shoulder. (Emphasis added).

MUTCD, § 4D.17, Visibility, Shielding, and Positioning of Signal Faces, Standard p.4D-32.

While this regulation is not in direct conflict with the provisions of the *MUTCD*, it creates a problem that the *MUTCD* minimum is intended to address. Please see our discussion above regarding the proposed clear width requirements (§ 1103.3 Clear Width). When conflicts arise with utilities and business entrances, a jurisdiction may have no choice but to place signal faces much closer to the curb than these regulations (and even the *MUTCD*) permit. The Board should take these cases into consideration when promulgating these regulations.

§ 1109.6 Signs

This proposed regulation would impose a national standard for signing parking spaces designated for use by handicapped persons. This regulation is in conflict with the Commonwealth of Massachusetts statutory requirements for the sign design (so is the *MUTCD*). This observation is provided for your reference only.

The Commonwealth of Massachusetts requires that the signs be:

*“...above grade blue signs with white lettering against a blue background and shall bear the words ‘HANDICAPPED PARKING: SPECIAL PLATE REQUIRED
UNAUTHORIZED VEHICLES MAY BE REMOVED AT OWNER’S EXPENSE’”*

M.G.L. c. 40, § 22A

These statutory requirements apply to handicapped parking spaces on private property and in the public right of way.

§ 1111.3 Location

This proposed regulation would require all alternate circulation paths to be on the same side of the street as the disrupted pedestrian access route. What happens if a very narrow sidewalk (e.g., five feet wide) must be closed for a variety of reasons for a reasonable period of time? Perhaps the sidewalk is being replaced, or a building is being constructed and the construction extends into the right of way (including the traveled way).

Under the circumstances described above, it is our practice to close the sidewalk and detour all pedestrians to the other side of the street. These detours provide as good a pedestrian access route as possible under the circumstances. However, the proposed regulations make no allowances for these circumstances. We recommend that the Board take these circumstances into consideration in the final regulations.

Summary

There is an apparent effort on the part of the Board to regulate the use of traffic control devices in a way that conflicts with the *MUTCD*. We find it troubling that there would be two very conflicting federal regulations in this area. In some cases, the regulations proposed by the Board explicitly conflict with the *MUTCD*. In other cases, the regulations implicitly conflict or could potentially conflict with the *MUTCD* under certain circumstances.

Since the *MUTCD* is the definitive regulation regarding the placement, design, and use of traffic control devices from an industry perspective, we would continue to look to the *MUTCD* in making policy and engineering decisions. In that light, we strongly recommend that the Board consult the National Committee on Uniform Traffic Control Devices (NCUTCD) to avoid or minimize conflicts between these regulations and the *MUTCD*. If the Board is merely unsatisfied with the results of the recently revised *MUTCD*, we feel that these regulations are not the forum to effect a change in the regulations contained therein. These proposed regulations would only promote discord between two communities, which have the public's interest at heart. These regulations would also cause confusion on the part of practitioners as to which set of rules to obey.

In addition, we implore that the Board to take into consideration the widely disparate conditions in various parts of our great nation. The built environment of Massachusetts, whose infrastructure dates back to the mid-1600s, is vastly different than the environment still being constructed in the midwest, in the southwest, and in the deep south. Many of our public rights of way are 30 feet or less in width; many of our block faces are very short; and many of our sidewalks are five feet in width or less, with no room to be widened due to the need to accommodate the already substandard travel lanes. These regulations would impose unattainable standards with enormous societal, cultural, and economic costs.

Further, we believe that the ultimate costs of these regulations have been significantly underestimated. Local jurisdictions such as Somerville will be significantly impacted by these regulations. With more than 14,000 on-street parking spaces, these regulations will impose significant costs that will represent a real and very tangible barrier to the construction of improvements in the City.

Finally, we suggest that the Board provide as much local latitude and control as possible. Competing interests such as clean air requirements and aesthetic considerations that benefit all constituents require local jurisdictions to weigh these issues when making decisions for the public good. The maximum degree of local autonomy possible should be considered when making rules that conflict, if not literally then with the intent, of other federal rules and regulations.

Thank you for the opportunity to comment of this proposed rulemaking. Should you have any questions regarding this letter, please do not hesitate to contact me at (617) 625-6600, extension 7900.

Sincerely,

A handwritten signature in blue ink that reads "William F. Lyons Jr." with a stylized flourish at the end.

William F. Lyons Jr., P.E., P.T.O.E., A.I.C.P.
Director

- c: Honorable Dorothy A. Kelly Gay, Mayor
- Honorable Edward M. Kennedy, United States Senator
- Honorable John Kerry, United States Senator
- Honorable Michael Capuano, United States Representative in Congress
- Charles F. Sterling III, P.E., State Traffic Engineer
- Shenandoah Titus, J.D., Somerville Commission on Disabilities
- Lisa Mead, Esq., Somerville City Solicitor
- David P. Dow, Somerville Commissioner of Public Works & Chair of Traffic Commission
- Steve Post, Executive Director, Somerville Office of Housing & Community Development
- Jeff Levine, A.I.C.P., Director of Transportation & Long Range Planning, OHCD
- Christine Wrigley, Director of Commercial Development, OHCD
- Elaine Lecesse, Somerville Parking Clerk
- Todd M. Blake, E.I.T., City Traffic Engineer
- Scott Windley, Office of Technical and Informational Services, ATBCB
- Thomas Brahms, Executive Director, Institute of Transportation Engineers