

From: Abby Swaine, Advocacy Representative, Greater Boston Chapter of United Spinal Association

To: David Mohler, Chair, Boston Region Metropolitan Planning Organization

Tegin Teich, Executive Director, Central Transportation Planning Staff

Cc: Kate White, Public Outreach Coordinator, Boston MPO

Róisín Foley, MPO Staff

Re: Comments on Work Program: Improving Pedestrian Variables in The Travel Demand Model

My name is Abby Swaine, and I represent the Greater Boston Chapter of United Spinal Association. Our Chapter is one of 53 in the United Spinal nationwide network, and our 1800 members are individuals with spinal cord injury and disease, and their families. We are pleased to comment on this work program proposed by CTPS from the perspective of paraplegics, tetraplegics and others who use wheelchairs, young and old.

Fundamentally, we encourage CTPS and the MPO to explicitly mention users of wheelchairs and other assistive mobility devices as pedestrians in describing “pedestrian environmental variable (PEV).” This would encourage improved consideration of wheelchair use in level of service and sidewalk infrastructure variables, as well as integration of the perspective of the wheelchair user in the new PEV metrics this study proposes to establish.

As examples of the potential practical application of this perspective:

- “Transit stations within walking... range and with good facilities” can be more stringent for those in wheelchairs, e.g. manageable distances; sidewalks of firm smooth texture, mild slope and adequate width, free from obstructions; compliant curb ramps in good condition; pedestrian refuges and lane divider cuts of adequate geometry for crossing conditions, including wait times; and so forth.
- Many of our members would like to use the standard fixed-route transit system, rather than driving or using the RIDE, if getting to and from stations and stops along the sidewalk and crosswalk network were more accessible and pleasant. Shelters at stops and stations are important for those who cannot easily use umbrellas.
- A crucial test of the usability of the pedestrian and transit network is how it is maintained under snowy and wet conditions. Curb cuts that are not cleared and sidewalks where the shoveled area is narrower than three feet are insurmountable for wheelchair users. No pedestrian should have to climb over a snowbank to reach the bus at a stop, and no wheelchair user can. Therefore, the degree to which the responsible party-- MBTA or municipality—ensures that snow is cleared dependably in the areas being assessed is an important variable.
- Pedestrian paths are only of use to those in wheelchairs if they are paved and without stairs. Cycling paths and lanes are an important amenity for paralyzed users of recumbent hand cycles, but only if they are wide, feature large turning radii, and not very steeply sloped.

We applaud CTPS’s effort, and I would be glad to provide assistance. Please contact me at abby.swaine@gmail.com. Thank you!