Montgomery County ATEU response for the GOCA Speed Camera Taskforce Recommendations

Thank you for the opportunity to review the Greater Olney Civic Association (GOCA) Traffic Cameras Task Force Report (the "Report"). Although this letter is not intended to provide a comprehensive response to the Report's methodology, analysis, and conclusions, several points merit particular attention.

First, the Safe Speed program was developed to address the threat to public safety posed by endemic, excessive speeding in our County. Olney is no exception, and the data set forth in the Report reinforces that indisputable fact. Indeed, individual residents of Olney have been vocal in requesting more aggressive speed enforcement, including automated speed enforcement, because they are concerned about pedestrian, cyclist and motor vehicle safety. Thus, the Safe Speed program serves a beneficial public safety objective that the residents of Olney themselves have requested.

Second, to the extent the Report suggests that the problem in Olney is not speeding, but rather artificially low speed limits, the Report lacks context. It was the Olney business community that requested lower speed limits well before the Safe Speed program came to fruition, and that request was prescient given the dramatic increase in vehicular, pedestrian and cyclist density that Olney has experienced. We recognize the recommendation to increase speed limits for what it is: a backdoor effort to remove speed cameras by pushing roads on which they are located past statutory thresholds. That would be bad safety and public policy, and it would reverse a beneficial trend toward reduction of collisions. The speed limits currently established for roads in Olney (and elsewhere in the County) were set by traffic engineering professionals based on objective metrics, and there is no public safety rationale to increase them.

Third, the Report's findings with respect to transparency in decision-making are flawed. Speed camera locations are selected by the MCPD Traffic Division based solely on law enforcement and public safety data and objectives. To enhance the process, the Traffic Division (like other MCPD directorates) consults an informal advisory board comprised of residents who bring varied perspectives to the table, but who lack personal agendas to either expand or contract the speed camera program. Their participation is unique among similar programs in Maryland, and it helpfully informs the Traffic Division's judgment. However, the deliberative process surrounding the selection of speed camera locations – like the processes for determining where and when other law enforcement operations will be conducted – is not public, nor should it be. Requiring that such law enforcement decisions be made in public and with the participation of *political appointees*, as the Report recommends, would introduce political influence into the process, and we firmly believe that politics should not guide law enforcement strategies. (One need look only to Baltimore City to observe the perils that attend a program guided by political leadership, rather than law enforcement professionals.) To the extent GOCA believes the Safe Speed program is not administered properly, the answer is not to appoint more committees or hire additional County personnel; rather, the answer is to convey those concerns to the County Executive and the Chief of Police, as GOCA has done here.

Fourth, the Report's findings with respect to a supposed lack of data transparency also lack context. The County publishes speed camera data on a quarterly basis, and the Management and Budget Division (not the Traffic Division, which administers the Safe Speed program) publishes financial data for both the speed camera program and the red-light camera program on the Traffic Division website. Revenue data is reported on a County-wide basis, and not by camera or location, because the programs' objectives are safety, not revenue. We believe reporting revenue by location would foster an inaccurate perception that camera locations are determined based on their ability to generate revenue. Moreover, it is a matter of both practical and contractual necessity that the data generated by the Safe Speed program be maintained by the vendor. The County simply does not have the financial or human resources to perform the specialized data analysis that the Report seeks, and expanding the workforce to manipulate that data is a solution in search of a problem. In time, it is conceivable that MCPD could develop a monthly web-based report that identifies passes and citations, but doing so in a manner that would be readily digestible to laypersons, and hiring staff to respond to resulting resident inquiries, would impose burdens that we submit is unwarranted.

Finally, left unstated by the Report is the fact that Montgomery County's Safe Speed program is a model – both locally and nationally. It is the only such program in Maryland that has been evaluated by the assuredly independent IIHS, which soon will release its *second* evaluation of Safe Speed.

We recognize that there is a vocal segment of the community that opposes automated speed enforcement even though it is an effective and efficient mechanism for reducing speeds on our roads and improving public safety. Respectfully, we submit that the answer is not to neuter the Safe Speed program, but to obey the speed limits.