



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY

May 17, 2023

The Honorable Kathleen Hobbs
Governor, State of Arizona
Office of the Governor
1700 West Washington Street
Phoenix, Arizona 85007

Dear Governor Hobbs,

Advocates for Highway and Auto Safety (Advocates), an alliance of consumer, safety, law enforcement, medical and public health groups, and insurance companies and agents working to advance laws proven to prevent crashes, deaths and injuries on our roads and contain related costs, urges you to veto Senate Bill (SB) 1234. This legislation prohibits the use of automated enforcement (AE) systems, an effective technology to deter speeding and red light running throughout Arizona.

According to the National Highway Traffic Safety Administration (NHTSA), 1,311 people lost their lives on Arizona roads in 2022, a more than 11 percent increase over the same period in 2021.ⁱ Over the ten-year period, 2013 to 2022, traffic fatalities increased nearly 55 percent in the state (849 to 1,311 people killed). In addition to the physical and emotional burden, traffic crashes exact a financial toll. In 2019, the estimated cost of traffic crashes in Arizona surpassed \$5.9 billion, effectively imposing a \$817 “crash tax” on all Arizona residents.ⁱⁱ Clearly, traffic safety is a serious issue that urgently needs improvement rather than the dismantling of a proven traffic safety countermeasure.

Speeding is one of the most common causes of crashes and a contributing factor in 28 percent of all fatal crashes nationally in 2020.ⁱⁱⁱ Speeding is even more prevalent and destructive in Arizona; in 2020, 33 percent of all fatal crashes in the state were speeding related.^{iv} Excess speed is particularly dangerous for vulnerable road users (VRUs), including in work zones, which present challenging driving conditions and space restrictions that tend to limit traditional law enforcement. Motorists driving through a job site are subject to dangers as well; in four out of five work zone crashes, motorists and passengers are injured or killed.^v A 2020 review by the Congressional Research Service (CRS) found that speed camera programs are effective in reducing speeding and / or crashes near cameras.^{vi} According to the Insurance Institute for Highway Safety (IIHS) speed cameras alone resulted in a 19 percent reduction in the likelihood that a crash resulted in a fatal or incapacitating injury.^{vii} Repealing use of AE will nullify an essential tool, elevating risk for all road users.

In 2020, red light-running crashes caused an estimated 116,000 injuries and 928 deaths in the U.S.^{viii} Over half of these deaths were pedestrians, bicyclists, and people in other vehicles hit by red light runners. An IIHS study found that AE cameras reduced the fatal red light running crash rate of large cities by 21 percent and the rate of all types of fatal crashes at signalized intersections by 14 percent.^{ix} IIHS studies showed reductions in red light violation rates of about 40 percent after the introduction of red light cameras.^x One year after the start of a red light camera program in Arlington, Virginia, “violations occurring at least 1 second after the red light were 48 percent less likely, and the odds of a violation occurring at least 1.5 seconds into the red phase fell 86 percent.”^{xi} This result demonstrated the largest improvement during the period when the violation was most likely to result in a crash, when

opposing lane traffic had begun moving through the intersection. The data are clear – red light running cameras are successfully changing driver behavior and improving intersection safety.

Enforcement is essential to reducing red light running and speeding violations, but it is implausible for police officers to be at every intersection, or to always be present when a speeding or red light running violation occurs. Speed and red light cameras are an effective technology to augment traditional police enforcement to curb dangerous driving behaviors and save lives without adding traffic stops.

To encourage greater use of AE and affirm our organization’s support for the proven technology, Advocates jointly released the *Automated Enforcement Checklist* (Checklist) with AAA, IIHS, Governors Highway Safety Association (GHSA) and National Safety Council (NSC) in May 2021. A copy of the Checklist follows this letter.

On average, nearly four people were killed every day in 2022 as a result of crashes on roads in the state.^{xii} Advocates strongly urges you to veto SB 1234 and retain a proven technology that prevents crashes and saves lives.

Sincerely,



Catherine Chase
President

Encl: Automated Enforcement Checklist

ⁱ National Center for Statistics and Analysis. (2023, April). *Early estimate of motor vehicle traffic fatalities in 2022* (Crash•Stats Brief Statistical Summary. Report No. DOT HS 813 428). National Highway Traffic Safety Administration.

ⁱⁱ The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), National Highway Traffic Safety Administration (NHTSA), DOT HS 813 403, February 2023, available at: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403>

ⁱⁱⁱ Traffic Safety Facts 2020 Data: Speeding, NHTSA, DOT HS 813 320, June 2022, available at: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813320>

^{iv} Traffic Safety Facts 2020 Data: Speeding, NHTSA, DOT HS 813 320, June 2022, available at: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813320>

^v A Decade of Safety Success, NHTSA, March/April 2020 Available at: <https://highways.dot.gov/public-roads/marchapril-2010/decade-safety-success>

^{vi} Congressional Research Service, *Safety Impact of Speed and Red Light Cameras*, September 28, 2020.

^{vii} Hu, Wen / McCartt, Anne T., Effects of automated speed enforcement in Montgomery County, Maryland, on vehicle speeds, public opinion, and crashes, Traffic Injury Prevention 2016. Available here: <https://www.iihs.org/topics/bibliography/ref/2097>

^{viii} Red Light Running, Insurance Institute for Highway Safety (IIHS), available at: <https://www.iihs.org/topics/red-light-running>

^{ix} Red Light Running, Insurance Institute for Highway Safety (IIHS), available at: <https://www.iihs.org/topics/red-light-running>

^x Red Light Running, Insurance Institute for Highway Safety (IIHS), available at: <https://www.iihs.org/topics/red-light-running>

^{xi} Red Light Running, Insurance Institute for Highway Safety (IIHS), available at: <https://www.iihs.org/topics/red-light-running>

^{xii} NHTSA State Traffic Safety Information, Traffic Safety Performance Measures for Arizona 2012 - 2021. Available here: <https://cdan.nhtsa.gov/SASStoredProcess/guest>



AUTOMATED ENFORCEMENT PROGRAM CHECKLIST

For red light cameras and automated speed enforcement

Automated enforcement is an effective tool to make roads safer. Research shows that red light cameras reduce violations and injury crashes, especially the violent front-into-side crashes most associated with red light running. Speed cameras have been shown to reduce vehicle speeds, crashes, injuries and fatalities. Both types of programs should be designed, implemented and administered properly. Poorly run programs are less likely to be durable and may undermine support for automated enforcement generally.

Speed and red light camera programs augment traditional enforcement to improve traffic safety by deterring dangerous driving behaviors. Automated enforcement does not require traffic stops, and well-designed programs can improve safety for all road users in a neutral manner.

Successful programs are transparent and have a strong public information component. Communities should take into account racial and economic equity when making decisions about camera placement and fines. Automated enforcement programs should be data-driven and should prioritize safety, not revenue. In fact, communities should expect that revenue will decline over time as fewer drivers run red lights or violate speed limits.

This checklist assumes your community is already legally authorized to set up a program. It provides a minimum list of considerations to help you follow best practices. The goal is to operate a successful program that reduces crashes and prevents deaths and injuries while maintaining strong public support. Automated enforcement can be integrated into broader efforts to discourage unsafe driving that includes optimizing speed limits for safety and improving roadway design.



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FIRST STEPS

- Identify problem intersections and roadways.
 - Assess violation and crash data.
 - Conduct field observations.
 - Collect resident and roadway user input.
- Consider what role automated enforcement should play as part of a comprehensive traffic safety strategy.
- Make any engineering or signage changes needed to improve drivers' compliance with the law.
 - Ensure the road geometry conforms with guidelines from the American Association of State Highway and Transportation Officials, National Association of City Transportation Officials guidance or state road design manuals, as appropriate.
 - Remove sightline obstructions of signals and signage.

For red light cameras:

- Ensure that yellow light timing conforms to the Manual on Uniform Traffic Control Devices and Institute of Transportation Engineers guidelines.

For automated speed enforcement:

- Ensure the speed limit is appropriate and accounts for all road users. Follow guidance and use tools from the Federal Highway Administration, Institute of Transportation Engineers, and the National Association of City Transportation Officials.
 - Ensure the speed limit is appropriate for special conditions, such as work zones and school zones.
 - Assess whether engineering changes could be made to promote compliance with the speed limit.
 - Ensure adequate posting of speed limits.
- Establish an advisory committee comprised of stakeholders.
 - Consider including law enforcement, transportation department employees, victim advocates, equity and civil rights advocates, school officials, community residents, first responders, health officials and the courts.
 - Outline the committee's role. This may include developing guiding principles related to safety, equity, and transparency, as well as other aspects of the program.
 - Ensure committee meetings are open to the public and deliberations are transparent.
 - Meet with the media, including newspaper editorial boards, to build support and educate the public.



SECOND STEPS

- Make program design decisions, consulting with the advisory committee as appropriate.

Program design considerations

Target violations with the greatest safety consequences. For example, you might decide not to ticket for right-turn-on-red violations when pedestrians, bicyclists, and oncoming vehicles are not present or to limit violations in work zones to when workers are present, provided the road configuration has not also been altered for construction.

Establish a reasonable fine structure. Create options for indigent violators such as payment plans or other alternatives.

Establish a threshold that must be crossed before a vehicle is photographed for a violation of red light running or speeding (i.e., a period after a light turns red or a certain mph over the posted speed). The point is to target flagrant, rather than marginal, infractions.

Programs should include a process for evidence review by appropriately trained personnel to determine if a violation occurred and issue a citation if warranted.

Establish clear procedures for contesting an alleged violation. Consider options to contest online or by mail.

When possible, red light camera violations should be recorded in real time video, and videos of the offense should be made available to the vehicle owner for review via the Internet.

Fines in excess of program costs should be allocated to transportation safety programs.

- Use safety data gathered in the first steps to determine camera locations, ensuring that particular neighborhoods are neither overlooked nor overrepresented.
- Publicize the extent of the safety problem and the need for innovative solutions.
- Secure a vendor and establish payment based on the vendor's actual costs, not the number of citations.
- Publicize procedures for contesting an alleged violation.
- Create a website and social media plan to publicize program details, such as how to pay and dispute tickets. Establish a method for answering questions accurately and in a timely manner.
- Develop an emergency action plan for handling problems, such as system malfunctions.

IMPLEMENTATION

- Hold a kickoff event with advisory committee members. Introduce a well-developed and sustained public education campaign focused on improving safety by changing driver attitudes and behavior.
- Connect the program to overall roadway safety in the community and identify the goal of zero tickets resulting from changes in driver behaviors.
- Install prominent warning signs.
- Start with a probationary period during which only warnings are issued.
- Follow current guidance from the U.S. Department of Transportation for implementation and operation of automated enforcement devices.
- Allow for due process. Minimize the number of days between the violation and citation issuance.

LONG TERM

- Publicize changes, including new camera locations. Reinstate the probationary period before ticketing begins at new locations.
- Monitor program operation and publicize results. Undertake periodic reviews and ensure racial, economic and other equity issues and public concerns are addressed.
- Require regular field reviews. Verify monthly camera calibration and synchronization with signals.
- Require regular evaluations of the traffic safety benefits of the program by collecting crash and infraction data. Before-and-after comparisons must use control intersections and roadways. Include control intersections and roadways that are not subject to spillover effects.
- Regularly meet with the advisory committee and media to review program status and sustain public support.
- Continue to improve programs based on new and updated guidance and best practices and look for opportunities to expand automated enforcement use.
- Consider other changes, including roadway design improvements, in order to reduce opportunities for unsafe driving.