

May 15, 2024

Administrator William Pines
State Highway Administration
Maryland Department of Transportation
707 N. Calvert Street
Baltimore, MD 21202

Dear Administrator Pines:

Prince George's County and Montgomery County are reaching out to you regarding the Maryland Department of Transportation's (MDOT) Context Design Zone designations. When it launched in 2020, the Context Driven program promised to be a game changer in how MDOT plans, designs, and operates the state highway system. It established a framework for creating multimodal, complete streets that put people first. This approach recognized that different land use contexts require different methods to ensure public safety, economic vitality, and environmental sustainability. We applaud the state for its objectives behind the context-sensitive approach and encourage it to also be data-driven to apply the appropriate countermeasures based on where the SHA severity data shows needs are the greatest. Therefore, it is critical to work with local jurisdictions to revise the guidelines to advance the program's implementation further based on crash history and an approach that uses context to create a seamless transportation network regardless of who maintains a given section. In doing so, it will be critical to align the contexts with local master plan visions. At the end of the day, it is essential to incorporate safety measures that not only meet the needs of today, and targeted to where challenges are most acute today, but are also aspirational to meet the growing vision of our communities.

We respectfully request that MDOT revise its Context Driven guidelines and Context Zone designations in collaboration with local jurisdictions to advance economic development and Vision Zero goals, per the 2023 Moore-Miller Transition Report.¹ We request the following changes to the program:

1. Incorporate local master plan visions, not just existing conditions, into MDOT's Context Zone designations.

MDOT's Context Zone designations largely reflect existing land use conditions and do not reflect local master plans, which seek to transform Suburban Activity Centers into Urban Centers and Suburban areas into Traditional Town Centers. In Montgomery County, the Context Driven program appropriately recognizes Bethesda, Friendship Heights, Rockville, Silver Spring, and Wheaton as Urban Cores, but no Urban Cores are designated in Prince George's County, where according to their General Plan has 3 downtowns and 5 Regional Transit Centers. Additional areas that are envisioned by master plans to be Urban Cores, but instead are designated as Suburban Activity Centers by Context Driven, include the Hyattsville Crossing, New Carrollton, Suitland, Capitol Heights, Addison Road-Seat Pleasant, and Naylor

¹ The Moore-Miller Transition Report (page 121-122) states: "Revise SHA Context Driven guidelines, which offer planning and design resources to practitioners centered on establishing safe and effective transportation, to incorporate Vision Zero goals, and make 25 mph the maximum speed limit for urban centers...Establish policy that requires complete streets and Vision Zero implementation for state-funded transportation investments."

Road Metro Station Areas in Prince George's County and White Oak in Montgomery County.² Additionally, Burtonsville and Shady Grove in Montgomery County are envisioned to be Traditional Town Centers but are designated by Context Driven as Suburban areas. Unless MDOT revises Context Zone designations to reflect local long-term master plan visions, state policy may inhibit or prevent implementation of local planning efforts that call for more urban transportation solutions. A community that does not have safe, multimodal streets will not compete well with neighboring communities to attract new commercial and residential development.³ This threatens the state's economic competitiveness.

2. Create a biennial process by which localities can nominate areas for Context Zone designations based on approved master plans, changes in existing conditions, and/or approved development.

Local jurisdictions throughout Maryland are seeking to transform auto-oriented communities into thriving, multimodal communities, and master plans are regularly updated. To reflect changing local visions, MDOT should establish a biennial process in which local jurisdictions can nominate areas for Context Zone modifications.

3. Develop a Transit Corridor Context Zone.

While the Context Driven program effectively identifies a variety of different types of "centers," an additional context zone should be considered for the segments located in between these centers that experience high volumes of transit ridership, and therefore require more pedestrian and bicycle-friendly approaches. In Montgomery County, transit corridors such as Georgia Avenue (MD 97), Veirs Mill Road (MD 586), and University Boulevard (MD 193) account for 10% of fatalities and severe injuries but only 1.3% of roadway miles. In Prince George's County, 22% of all fatalities in the County occur on just 10 roads, including University Boulevard (MD 193), Kenilworth Avenue (MD 201), and Saint Barnabas Road (MD 414)⁴ and based on state data, 19 of the top 20 one-mile segments with the highest severity rates are on State Roads. The Southern Maryland Rapid Transit corridor should also be considered for this type of designation. More frequent protected crossings and lower target speeds, as well as continuous, corridor-length sidewalks and bikeways, are needed on these roads to eliminate transportation-related fatalities and severe injuries.

4. Establish 25 MPH Maximum Speed Limits and Design Speeds in Urban Cores and Centers.

Pedestrians experience an elevated crash risk in Urban Cores and Centers and therefore, a maximum 25 mph posted speed limit must be established in these Context Zones. Posted speed limits do not on their own make streets safer, but a 25-mph speed limit should be part of an overall street design to achieve a 25-mph operating speed. Some lower-volume streets in these context areas may also justify 20-mph speed limits. In Montgomery County Urban Centers, pedestrians are 25 times more likely to be involved in a crash after dark at intersections and seven times more likely to be involved in a segment crash with a

² Prince George's County's General Plan, Plan 2035, designates Prince George's Plaza (Hyattsville Crossing) and New Carrollton as two of the County's three Downtowns, designates Suitland as a Regional Transit District, and the Capitol Heights, Addison Road-Seat Pleasant, and Naylor Road Metro Station Areas as Local Transit Centers.

³ It should be noted that, as of 2022, the Prince George's County Zoning Ordinance requires developers in designated Plan 2035 Centers to construct or reconstruct streets to the County's Urban Street Design Standards; these standards include bicycle and pedestrian accommodations and 25 mph design speeds that may conflict with SHA's suburban context zones.

⁴ Vision Zero Prince George's: Crash Data, Prince George's County Department of Public Works and Transportation, 2021, <https://visionzero-princegeorges.hub.arcgis.com/pages/crash-data>.

vehicle going straight than in other areas of the county.⁵ Reducing the maximum posted speed limit in these areas will save lives. Where prevailing speeds are substantively higher than these posted speeds, we encourage investments in traffic calming to reduce travel speeds.

5. Establish Maximum Protected Crossing Spacing Targets for Context Zones.

The provisions of frequent, protected crossings,⁶ consistent with land use character, is a key determinant in eliminating transportation-related fatalities and severe injuries. Montgomery County's Complete Streets Design Guide established *Maximum Spacing for Protected Crossing* targets for each street type. Downtown Boulevards and Downtown Streets, which experience the highest levels of activity, target a maximum protected crossing spacing of 400 feet, whereas Suburban Boulevards target a protected crossing spacing of 1,300 feet. MDOT should establish a similar target for the maximum space between protected crossings for each Context Zone, as well as for the requested Transit Corridor Context Zone.

6. Align the context and countermeasures with the locations with the highest fatality and crash rates.

In order to shift the trend of roadway crashes and fatalities, particularly for the most vulnerable populations, a data driven approach that focusses efforts towards communities of greatest need is an essential element of the safety paradigm. Safety is an equity issue and should be treated as such and factored in accordingly.

We appreciate your partnership and look forward to working with you to advance our common goals. If you have any questions about these recommendations, please feel free to reach out to David Anspacher at Montgomery Planning (david.anspacher@montgomeryplanning.org) or Brandon (Scott) Rowe at Prince George's Planning (brandon.rowe@ppd.mncppc.org).

Thank you for your consideration,



Lakisha Hull
Director
Prince George's County Planning Department



Jason K. Sartori
Director
Montgomery County Planning Department



Michael D. Johnson
Director
Prince George's County Department of Public Works and Transportation



Christopher Conklin (May 29, 2024 10:28 EDT)

Christopher Conklin
Director
Montgomery County Department of Transportation

⁵ Predictive Safety Analysis Final Report, Montgomery County Planning Department, October 2022. See: <https://montgomeryplanning.org/wp-content/uploads/2022/10/Predictive-Safety-Analysis-Final-Report-October-2022.pdf>.

⁶ Montgomery County defines protected crossings as specific traffic control devices that improve the safety and comfort of pedestrians and bicyclists crossing streets by reducing or eliminating conflicts, as well as increasing stopping and yielding for pedestrians and bicyclists, using measures such as traffic signals (full signals with pedestrian signals), pedestrian hybrid (HAWK) beacons, all-way stop control, or grade-separated crossings.