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Christopher Conklin, P.E.
Director
Montgomery County Department of
Transportation
101 Monroe Street, 10th Floor
Rockville MD 20850

Michael Johnson, P.E.
Director
Prince George's County Department of
Public Works and Transportation
9400 Peppercorn Place, Suite 300
Largo MD 20774

Ms. Lakisha Hull
Director
Prince George's County Planning Department
The Maryland-National Capital Park and
Planning Commission
1616 McCormick Drive
Largo MD 20774

Mr. Jason Sartori
Director
Montgomery County Planning Department
The Maryland-National Capital Park and
Planning Commission
2425 Reddie Drive, 14th Floor
Wheaton MD 20902

Dear Mr. Conklin, Ms. Hull, Mr. Johnson, and Mr. Sartori:

Thank you for contacting the State Highway Administration (SHA) regarding Montgomery and Prince George's counties' desire to see SHA's Context Driven initiative continue to evolve. SHA's team looks forward to continuing to work with you to ensure Context Driven serves Montgomery and Prince George's counties and all of Maryland.

Context Driven is at the core of SHA's organizational pivot toward a safer and more context-sensitive approach to design in furtherance of the State's goal to reach Vision Zero. Since the publication of Context Driven: Access & Mobility for All Users 1.0 in 2020, SHA practitioners are directed to incorporate an ever-growing suite of context-sensitive vulnerable user-focused countermeasures in the design of mid- and long-term capital projects and short-term operational improvements. With respect to mid- and long-term projects, SHA's practitioners also are directed that contexts are not prescriptive and that it is critical to consider future planned conditions. In less than four years, SHA already has delivered over 600 Context Driven improvements across Maryland.

Beyond SHA's own Context Driven initiative, the Maryland Department of Transportation (MDOT) is doing its part to promote and encourage the development and deployment of complete streets. In May 2024, MDOT published its revised Complete Streets Policy with which Context Driven aligns. By formalizing a deliberate approach to planning, designing, and constructing streets that are safer for all users, MDOT's Complete Streets Policy is pledging to deliver on our agencies' collective commitment to a culture of safety and to making Vision Zero a reality. The revised policy requires that MDOT modal administrations, including SHA and the Maryland Transit Administration (MTA), update numerous policies, procedures, manuals, guidelines, and best practices to align with the revised policy. Crucially, the revised policy also requires MDOT modal administration projects comply with Context Driven: Access & Mobility for All Users 1.0.

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SHA does not view Context Driven as a static initiative but rather envisions Context Driven will evolve with the state of the practice. As resources allow, SHA foresees periodically revising the contexts. SHA welcomes a conversation with Montgomery and Prince George's counties and other stakeholders to determine the best manner in which to do so. For example, SHA appreciated the opportunity to collaborate on MCDOT's draft/planned *Inclusive Streets: Framework for Lane Repurposing*, and we look forward to continued discussions and collaborations in refining approaches to contexts and countermeasures. Revising contexts could include an approach as basic as retaining the original methodology and contexts but redrawing boundaries based on updated data inputs, an approach as complex as adding additional contexts and/or basing boundaries on new and/or different data inputs, or an intermediate approach. To preface that conversation, please find in the following pages SHA's initial thoughts as to the six questions posed in your letter. We look forward to a collaborative process that ensures Context Driven will continue to hone our agencies' approaches to both context-sensitive design and the safety of our systems' most vulnerable users.

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

SHA anticipates that revisions to Context Driven and the associated contexts will incorporate local planning visions in some manner. As Maryland's 131 local planning authorities approach land use planning and roadway design from a wide range of perspectives, ensuring local planning visions can be incorporated in Context Driven in a consistent manner presents challenges. SHA will work with you, your peer agencies, and stakeholders throughout Maryland to ensure a revised, suitable, and consistent approach to context designation is incorporated into the next iteration of Context Driven. Ensuring consistency will require:

- *reconciling local planning authorities' varied approaches to planning and data analysis;*
- *providing consistent context mapping, as local comprehensive planning documents are not updated on any consistent schedule; and,*
- *ensuring the deployment of Context Driven countermeasures is done at the appropriate juncture, balancing the need to support local jurisdictions' visions for future growth while also recognizing the need to ensure safety during the transitional period before contexts are updated.*

Please understand that SHA's existing Context Driven framework for identifying transportation needs and appropriate improvements purposefully does not preclude consideration of future land use. SHA's practitioners are directed to construe contexts as a baseline condition. Through mandated NEPA analyses undertaken during project development, future land use, growth, traffic generators, and resulting traffic patterns across all modes are incorporated into SHA's decision-making. How best to formalize existing practices should be part of our discussion when revising Context Driven.

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

SHA is amenable to incorporating an "interim" update process by which local governments might submit proposed context designation alterations, which SHA then would evaluate against an agreed-

upon framework between Context Driven revisions. A key point of discussion would be the permitted frequency for proposed alterations. As project development typically takes place over a multiyear period, it may be appropriate to place a moratorium on alterations to a specific area during an associated project development process. Repeated frequent context alterations in the name of getting it “just right” could unnecessarily prolong delivery of necessary safety improvements.

As discussed above, SHA currently is updating and improving several existing design manuals to ensure alignment with MDOT’s revised Complete Streets Policy. Updates to some design manuals, e.g., SHA’s Guidelines for Traffic Impact Reports/Studies, will necessitate SHA engage stakeholders. Updating policies, procedures, manuals, guidelines, and best practices to align with the revised policy and to ensure delivery of complete streets is SHA’s current priority. Revising Context Driven will follow.

3. Develop a transit corridor context

A transit corridor context may align well with MDOT, MTA, and SHA goals to provide more multimodal options throughout Maryland, as captured in MDOT’s revised Complete Streets Policy. This context also may provide a means by which to better support MDOT’s renewed focus and investments in transit-oriented development. The revised Complete Streets Policy also authorizes the use of MTA’s Bus Stop Design Guide as a complement to SHA’s Context Driven across Maryland, building additional transit-focused engineering countermeasures into SHA’s projects across Maryland where the context makes it appropriate to do so.

SHA’s existing contexts are based, in part, on access-to-transit and socioeconomic data incorporated into MDOT’s Short Trip Opportunity Area designations that indicate a higher likelihood to use transit, so it will be important to ensure that future context designations do not duplicate data inputs and unduly “bias” resulting context designations. It also will be important to consider whether a transit corridor constitutes a unique context or whether it mimics a zoning overlay in practice and whether an overlay type designation fits within the spirit of Context Driven. SHA also must exercise caution when considering adding contexts as excessive tailoring of contexts could erode consistency in a statewide approach.

4. Establish 25 mph maximum speed limits and design speeds in urban core and urban center contexts

SHA already has lowered many urban core and urban center speed limits to 25 mph and is amenable to continued discussion about where is it most appropriate to do so. While context certainly plays a role in establishing speed limits, Context Driven, itself, may not be the appropriate document in which to establish such policies or guidance. Speed limits should continue to balance safety and operations and be set such that the community is willing to comply. When possible, speed limits also should be complemented with engineering countermeasures to physically communicate to motorists appropriate driving behavior. It may be appropriate to establish target speed limits for individual contexts toward which agencies can work as associated engineering countermeasures are implemented to reinforce safe driving and as SHA and local jurisdictions collaborate to develop a unified approach to regional speed limits.

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It also will be crucial to ensure broad cross-jurisdictional agreement on speed policies as well as whether it is appropriate to mandate or only recommend maximum speed limits. Without agreement, disparate application of speed limits poses concerns including:

- *the challenge posed to all users'—motorists', bicyclists', pedestrians'—expectations when similar roadways have different speed limits in different jurisdictions;*
- *motorists rerouting via local roads with higher speed limits whether because of navigation apps or on their own volition, shifting safety concerns from a major arterial route to a local community route not designed to handle such volumes or speed; and,*
- *as speed limits are reduced, conflict may arise between communities and speeding motorists, leading to potential reversal or restriction of speed camera enforcement laws, especially if speed limit reductions are implemented wholesale in advance of appropriate complementary traffic calming measures.*

5. Establish maximum protected crossing spacing targets for contexts

As part of a future Context Driven revision, SHA will evaluate how to incorporate crossing intervals most appropriately into its design guidance. While intervals could be keyed to specific contexts, every project and setting remains unique. As such, SHA could consider establishing targets with the understanding that ensuring the safety of users along specific roadways and at specific locations may merit more or less frequent crossing spacing, to be determined as part of project development and based on an analysis of the local transportation network and proximate origins and destinations. Exceptions to target spacing mandates must be made available to ensure that funded projects remain practicable and deliverable.

6. Align contexts and countermeasures with the highest fatality and crash rates

Since the 2020 publication of Context Driven and the establishment of the current contexts, SHA has published additional planning products including the Pedestrian Safety Action Plan (PSAP) and the Vulnerable Road User (VRU) Assessment. These two documents employ robust data sets to identify SHA roadways most prone to safety-related incidents, especially incidents that adversely affect vulnerable users. These assessments also incorporate measures to ensure improvements are deployed equitably statewide.

Building on the publication of Context Driven, SHA created the Context Driven Toolkit, providing a mechanism to analyze and adopt additional countermeasures that then can be deployed as improvements in various contexts. These PSAP and VRU assessments help SHA direct funding toward those corridors most likely to benefit from investment. As part of project development in these corridors, SHA practitioners are applying Context Driven Toolkit countermeasures that align with the specific contexts in which these corridors are located.

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SHA is committed to working with local jurisdictions during a future Context Driven update, following the ongoing process to align existing policies, procedures, manuals, guidelines, and best practices with MDOT's revised Complete Streets Policy. While the timing of that Context Driven update remains to be determined, SHA believes it is crucial to continue this conversation in the interim. So that our agencies can begin this conversation and begin to more fully understand each other's concerns, Mr. Matt Baker, SHA Deputy Chief Engineer for Planning, Engineering, and Real Estate, will be reaching out in the coming weeks to schedule a meeting with you and/or your staffs.

Thank you again for contacting SHA. If you have additional questions or concerns, please contact Mr. Baker at 410-545-0410 or mbaker4@mdot.maryland.gov. Mr. Baker will be happy to assist you.

Sincerely,



William Pines, P.E.
Administrator

cc: Mr. David Anspacher, Acting Chief, Countywide Planning and Policy Division, Montgomery County Planning Department
Ms. Haley Peckett, Deputy Director, Transportation Policy, Montgomery County Department of Transportation
Scott Rowe, AICP, Master Planner, Master Plans and Studies, Prince George's County Planning Department
Mr. Vic Weissberg, Special Assistant to the Director/Major Projects Manager, Prince George's County Department of Public Works and Transportation
Mr. Matt Baker, Deputy Chief Engineer for Planning, Engineering, and Real Estate, SHA
Mr. Joseph Moges, Senior Safety Officer, SHA
Mr. Joe McAndrew, Assistant Secretary for Project Development and Delivery, MDOT
Ms. Kandese Holford, Director, Active Transportation and Micromobility, MDOT

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bcc: Mr. Geoff Anderson, Chief, Planning, Programming, and Delivery, MDOT
Mr. Jeff Davis, P.E., AICP, Deputy Director, Office of Highway Development (OHD), SHA
Mr. Nate Evans, Assistant Chief, Regional and Intermodal Planning Division (RIPD), SHA
Mr. Erich Florence, Deputy District Engineer, District 3, SHA
Mr. Andre Futrell, Chief Operations Officer, SHA
Ms. Elizabeth Gordon, Assistant Deputy Administrator for Planning and Programming, MTA
Mr. Derek Gunn, P.E., District Engineer, District 3, SHA
Mr. Deron Lovaas, Chief, Environment and Sustainable Transportation, MDOT
Mr. Eric Marabello, P.E., Director, OHD, SHA
Ms. Sushmita Mitra, P.E., Deputy Chief Engineer for Program Delivery and Construction, SHA
Mr. Ray Moravec, P.E., Director, Office of Planning and Preliminary Engineering, SHA
Mr. Drew Morrison, Senior Policy Advisor, MDOT
Ms. Molly Porter, Statewide Bicycle and Pedestrian Coordinator, RIPD, SHA
Mr. David Rodgers, Regional Planner, RIPD, SHA
Ms. Sutapa Samanta, P.E., Chief Engineer, SHA
Mr. David Schlie, Regional Planner, RIPD, SHA
Ms. Kate Sylvester, Deputy Administrator/Chief Program Delivery Officer, MTA
Mr. Darrell Smith, Director, Statewide Project Development, MTA
Ms. Kari Snyder, Regional Planner, Office of Planning and Capital Programming, MDOT
Ms. Teri Soos, P.E., Deputy Chief Operations Officer, SHA
Mr. Cedric Ward, P.E., Director, Office of Traffic and Safety, SHA
Ms. Nicole Wojciechowski, Chief of Staff, SHA