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To: Senator Roger Victory
Senator Stephanie Chang
Committee Clerk Heather Dorbeck

The Detroit Greenways Coalition proposes the below change to Senate Bill 61 to incorporate best practices when evaluating speed limits. An engineering study performed by the Michigan Department of Transportation that considers factors beyond current vehicle operating speeds would create safer streets and communities. This is an approach recently recommended by the National Transportation Safety Board (NTSB).

Therefore, we recommend the following changes to the legislative language:

THE DEPARTMENT OF ~~STATE POLICE~~ **TRANSPORTATION** SHALL PERFORM A ~~SPEED~~ **AN ENGINEERING** STUDY ON A RANDOM SAMPLE OF LOCAL STREETS SET UNDER THIS SUBDIVISION. NO LATER THAN JANUARY 1, 2023, THE DEPARTMENT OF ~~STATE POLICE~~ **TRANSPORTATION** SHALL SUBMIT A REPORT ON THE ~~SPEED~~ **ENGINEERING** STUDY REQUIRED UNDER THIS SUBDIVISION TO THE SENATE MAJORITY LEADER, THE SPEAKER OF THE HOUSE OF REPRESENTATIVES, AND THE GOVERNOR.

A speed study of local roads by the Michigan State Police would most likely overlook other speed limit factors as specified by the Michigan Manual on Uniform Traffic Control Devices:

- A. Road characteristics, shoulder condition, grade, alignment, and sight distance;
- B. The pace;
- C. Roadside development and environment;
- D. Parking practices and pedestrian activity; and
- E. Reported crash experience for at least a 12-month period.

Also, it is not best practices to merely use vehicle operating speeds to set speed limits, especially in residential areas where there is a higher concentration of vulnerable users such as youth, seniors, pedestrians, and bicyclists. This is acknowledged in the 2017 NTSB study *Reducing Speeding-Related Crashes Involving Passenger Vehicles* which recommends an engineering study requiring these factors as well.

“NTSB recommends... the factors currently listed as optional for all engineering studies are required, require that an expert system such as USLIMITS2 be used as a validation tool, and remove the guidance that speed limits in speed zones should be within 5 mph of the 85th percentile speed.”

Please contact us if there are any questions or clarifications we can address.

Sincerely:

Executive Director

Our **Vision** is a strong, healthy, vibrant City of Detroit and surrounding region where a seamless network of greenways, green spaces, blue ways and complete streets is an integral part of people's active lifestyle including day-to-day transportation and recreation.