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August 31, 2020

To: House Transportation Committee
State Representative Bradley Slagh

Re: HB 4733 -- Speed limits

While recognizing the good intentions of HB 4733, we oppose this bill as written as it does not follow nationally recommended best practices and removes existing optional safety considerations.

Safety for bicyclists and pedestrians is a major concern for our organization. Vehicle speed is the major factor in whether a bicyclist or pedestrian will survive when hit by a motor vehicle. Speed limits are recognized as an effective tool for reducing vehicle speeds.^{1 2}

Best practices per the National Traffic Safety Board (NTSB)³ and the National Committee on Uniform Traffic Control Devices (NCUTCD)⁴ are to set speed limits based on engineering studies that consider:

- Speed distribution of free-flowing vehicles (such as current 85th percentile, the pace, and review of past speed studies)
- Reported crash experience for at least a 12-month period relative to similar roadways.
- Road characteristics (such as lane widths, curb/shoulder condition, grade, alignment, median type, and sight distance).
- Road context (such as roadside development and environment including number of driveways and land use, functional classification, parking practices, presence of sidewalks/bicycle facilities).
- Road Users (such as pedestrian activity, bicycle activity)

The current [Michigan Manual on Uniform Traffic Control Devices](#) includes *optional* speed limit guidance based on similar safety considerations. This legislation removes these optional considerations on all state and county roads while limiting their use on city and village roads.

If enacted, we believe this would be a step backwards for Michigan road safety and would not follow national best practices for setting speed limits. We would strongly support legislation that follows the recommendations put forth by the NTSB.

Sincerely:

A handwritten signature in black ink that reads "Todd Scott".

Todd Scott
Executive Director

¹ [Countermeasures that work: A Highway Safety Countermeasure Guide for State Highway Safety Offices](#), NHTSA, 2015.

² ["Drivers brake for lower speed limit"](#), Insurance Institute for Highway Safety, 2018.

³ [Reducing Speeding-Related Crashes Involving Passenger Vehicles](#), NTSB, 2017.

⁴ [NCUTCD Proposal for Changes to the 5 Manual on Uniform Traffic Control Devices](#), 18B-RW-03, 2019.