



RUSTIC ROADS COMMISSION FREDERICK COUNTY, MARYLAND

30 North Market Street, Third Floor Frederick, Maryland 21701 (301) 600-1149



July 10, 2024

Tracy Diggs
Chief, Office of Transportation Engineering
355 Montevue Ln.
Suite 200
Frederick, MD 21702

Dear Tracy Diggs,

In our continuing work to preserve Frederick County's Rustic Roads for the benefit of all users, the Rustic Roads Commission has become aware of a bridge project that involves two candidate roads; Hessong Bridge Road and Blacks Mill Road. The Commission feels this is an opportunity for a replacement bridge to be designed with the values and objectives set forth in the recommendations of *A Rustic Roads Program for Frederick County Maryland*.

Given this bridge replacement's design phase began prior to the establishment of the Rustic Roads Commission, and at a time when the impacts to all users were potentially not considered, the Commission requests that this letter be retroactively treated as part of the study phase, and to be considered when moving forward into the design phase.

Referencing page 24 of the report, under Bridge Replacement: "*Bridge replacement must be of a design and material which preserves or enhances the historic appearance of the road. Bridges must be replaced at a scale and with materials similar to those of the previously existing structure.*" It is our understanding that the initially designed replacement bridge would have been significantly wider, 32 feet including shoulders, the road would be straightened, and the design speed would increase for the south approach to the bridge. This change would have negatively affected the safety of all users, particularly vulnerable, non-automobile users. Recent studies have shown that lane widening increases vehicle speeds, induces increased traffic volume, increases construction costs, and reduces safety.¹

Hessong Bridge Road is one of the roads most frequently used by cyclists in Frederick County. It is a critical north-south corridor from US15 to MD550 for the County's cycling network and is featured on many cycling routes and events. In this six-mile segment it makes connections to not just Blacks Mill Road, but many other low-speed, low-volume

¹ Shima Hamidi, PhD, *A National Investigation on the Impacts of Lane Width on Traffic Safety: Narrowing Travel Lanes as an Opportunity to Promote Biking and Pedestrian Facilities Within the Existing Roadway Infrastructure*, Johns Hopkins Bloomberg School of Public Health, November 2023, pages 4, 17.



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rural roads, including Lakeview Road, Stull Road, Utica Road, Lewistown Road, Powell Road, Fish Hatchery Road, Angleberger Road, Kellys Store Road, Blue Mountain Road, and Layman Road. This road is an important cornerstone of Frederick County's cycling network. While wide shoulders on the bridge would seemingly provide safety to cyclist and other vulnerable road users, any safety benefits afforded by that space would be undone by increasing speed and traffic. Existing nearby higher speed roads parallel Hessong Bridge Road on both sides: US15 and Old Frederick Road - serving the same destinations to automobile users.

The Commission agrees that the current bridge has safety concerns and was never intended to be a permanent bridge. However, it is in the best interests of the residents, users, and taxpayers of the County to ensure that a suitable design moves forward. The design should not be excessively wide to keep design speeds at their current level. This bridge also has the opportunity to become a visible gateway feature from Utica into the Catoctin Furnace area through stamped concrete, pronounced corner pillar, or other architectural details.

There are good examples in Frederick County of shoulder-less, two lane bridges on collector roads, such as the LeGore Bridge over the Monocacy River. While LeGore Bridge's structure differs in overall scale from the Hessong Bridge project, the road design on the bridge is more in keeping with the values and objectives of the Rustic Roads Program than the potential 32-foot-wide bridge.

The Rustic Roads Commission respectfully requests that the future design of the Hessong Bridge Road bridge replacement be sensitive to the Rustic Roads setting north of the project and consider the suggestions outlined in this letter. The Project Review Subcommittee of the Commission is open to meet with the Project Manager for the bridge replacement if they have any further questions.

Our intention is not to cause delay but rather to explore the possibility of finding a more appropriate and suitable solution that better serves the criteria set forth in *A Rustic Roads Program for Frederick County Maryland*, the users of these roads, and the residents and taxpayers of Frederick County.

Respectfully,

A handwritten signature in black ink that reads "Susan Hanson".

Susan Hanson, Chair
Frederick County Rustic Roads Commission



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A Rustic Roads Program for Frederick County Maryland

Page 24: Road Maintenance and Reconstruction Guidelines: Reconstruction of Rustic Roads:

iv) Bridge Replacement: Bridge replacement must be of a design and material which preserves or enhances the historic appearance of the road. Bridges must be replaced at a scale and with materials similar to those of the previously existing structure. If a different design is required for environmental, economic, or safety reasons, new bridges must be of a design and material that complement or enhance the rustic appearance of the roadway. Correction of substandard approach road geometries must be made in character with existing unmodified portions of the roadway. All new bridges must adhere to weight bearing capacity and safety requirements. Consultation with the HPC or County historic preservation planner must precede improvements to bridges that are designated County landmarks, listed in the National Register of Historic Places, or evaluated as eligible for the National Register of Historic Places.



Image 1: LeGore Bridge road surface



FREDERICK COUNTY GOVERNMENT

DIVISION OF PUBLIC WORKS

Department of Engineering & Construction Management

Jessica Fitzwater
County Executive

Jason M. Stitt, P.E., Division Director
Bret Fouche, Department Head

August 6, 2024

Susan Hanson
Chair, Frederick County Rustic Roads Commission
30 North Market Street, Third Floor
Frederick, MD 21701

RE: **RRC Hessong Bridge Replacement Letter – DPW Response**

Dear Susan Hanson,

Frederick County Division of Public Works (DPW) received the Rustic Roads Commission (RRC) letter dated July 10, 2024, regarding the Hessong Bridge Replacement project. DPW has reviewed the information provided in the RRC letter and understands its intent to request retroactive inclusion into the project study phase.

The Hessong Bridge Replacement project has been a part of the Frederick County Capital Improvement Program (CIP) since 2017 and has been listed on Frederick County's Federal Highway Administration (FHWA) approved structure management plan for Federal funding eligibility. Since then, the project has completed the initial design study and begun the design work, specifically the preliminary design. As required for FHWA funding, review of the preliminary design is required by Federal and State stakeholders in the project, including but not limited to the Maryland Department of Transportation State Highway Administration (MDOT SHA), Maryland Department of the Environment (MDE), Maryland Historical Trust (MHT), United States Army Corps of Engineers (USACE), and others. These stakeholder reviews are required to ensure compliance with Federal design specifications and to receive funding to offset the direct cost impact to Frederick County. Therefore, to maintain eligibility for FHWA funding, considerations for specific design components must comply with FHWA design criteria. These stakeholders have since provided comments on the preliminary design for DPW and its design consultants to utilize. Additional comments beyond those of the funding stakeholders already received may delay the project.

As stated in the RRC letter, both Hessong Bridge Road & Blacks Mill Road are included on the candidate roads list. However, the portions of Hessong Bridge Road & Blacks Mill Road as shown on the RRC candidate road list are outside of the limits of the bridge replacement and project limits-of-disturbance. The advisory review and subsequent comments of the RRC would have very limited, if any, application to this project.

Regarding the RRC's statements on changes to the design speed, DPW presumes that RRC's concern is about posted speed rather than design speed. As such, DPW must clarify that the current

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design will not change the existing posted road speed, however, changes in design speeds are being considered. Design speed is the speed at which a road is intended to be safely traveled when taking into consideration elevation, curvature, and other factors, and is used during the design process. Design speeds and posted road speeds are distinct and may not be the same value. Typically, the posted road speed is lower than the design speed, providing additional layers of safety in design consideration.

DPW agrees with the RRC's statement that it is in the best interest of the residents, users, and taxpayers of the County to ensure that a suitable design is implemented. In this situation, the best interest of the County and its residents & users is for this project to adhere to the requirements and specifications of the FHWA program and its reviewing agencies. Not only will this be in the best interest monetarily, the design specifications and guidelines have considerations for safety in the highest regard. Accordingly, DPW declines RRC's request for the July 10th letter to be retroactively treated as part of the study phase and for consideration moving forward. Delay to the completion of the project's design or design changes that are not approved by the FHWA stakeholders may have negative consequences to County taxpayers, residents, and users. Additionally, delays and design changes may potentially risk the project's qualification for receiving Federal funding.

DPW respectfully notes that the RRC's responsibility is to advise the County on the protection of designated rustic roads and candidate roads. In the instance of the Hessong Bridge project, the limits of disturbance are beyond the boundaries of both the designated rustic roads list and candidate list. Further, the project will not objectively impact the features that contribute to the definition of a rustic road or candidate road in a negative fashion. Going forward, DPW will consider the input of the Rustic Roads Commission for transportation projects impacting rustic and candidate roads.

Sincerely,

Tracy Diggs
Tracy Diggs
Chief, Office of Transportation Engineering
Frederick County Division of Public Works