



## NORTHWEST ARKANSAS REGIONAL PLANNING COMMISSION

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May 14, 2021

Stephanie Pollack, Acting Administrator  
Federal Highway Administration  
US Department of Transportation  
1200 New Jersey Ave S.E.  
Washington, DC 20590

RE: Comments on Proposed Amendment for the 11<sup>th</sup> Edition of the Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways

Dear Acting Administrator Pollack:

On behalf of the Northwest Arkansas Regional Planning Commission (NWARPC), thank you for your work to update the Manual on Uniform Traffic Control Devices (MUTCD). Overall, there is a lot to like in the proposed changes to the MUTCD to help ensure uniformity, consistency, and user safety. We appreciate the level of effort that it takes to produce a new MUTCD and commend you for the hard work that has been done.

With this update, we also seek safe, equitable, sustainable, multimodal accessibility for our users. Having a document providing for a comprehensive safety-based guidance is important for the future of our networks. Cost-effective and equitable street design and improved safety and accessibility for the most vulnerable road users is a priority.

Our transportation system continues to evolve and the MUTCD must continue to evolve as well. Our transportation system of today does not look like it did a decade ago nor what it will look like a decade from now. The MUTCD must be a flexible document that can be updated frequently to adapt to changing conditions, updated practices, and new research results. It must be a document that allows for flexibility and innovation where appropriate. This 11<sup>th</sup> Edition of the MUTCD is an update that is needed as soon as possible.

After careful review, NWARPC respectfully requests that FHWA consider the following concerns:

Vulnerable road users:

- The MUTCD was originally developed and has continued to evolve as a vehicle-centered document. Specific pedestrian and bicycle provisions have been added over the years, but the vast majority of the material remains centered primarily on safely accommodating vehicles. We believe the MUTCD must continue to evolve to include an equal focus on the needs of all users, but especially our vulnerable bicycle and pedestrian users. Vulnerable road user safety must be

prioritized over vehicle movement in the selection of traffic control devices as these users are at most risk for death or severe injury.

#### Bike Facility Marking through intersections and crosswalks, etc:

- Extending the marking of bike facilities through intersections (e.g. green paint through a signalized intersection or even white paint and variations of striping/dashes) in cases other than an offset intersection.
- Clarify that non-traffic-control color and art are permitted in the roadway and that colors and art may be used inside other traffic control markings so long as the function of the markings remains. If necessary, restrict this permission to under-50 mph roads.
- The Standard and Guidance for Aesthetic Treatments in Crosswalks under 3H.03 is unnecessarily restrictive and the designs provided in the figure seem inconsistent with aesthetic treatment already permitted by many agencies.
- The standard that only allows the use of In-Street or Overhead Pedestrian Crossing sign in conjunction with the Pedestrian Crossing (W11-2) warning sign is too restrictive and should be changed to a Guidance statement or only applied to higher-speed roads. This same concern also applies to the in-street trail crossing sign.
- Add additional traffic control devices may need to be considered in addition to the crossing markings at non-intersections to further increase visibility, particularly at mid-block locations or on higher-speed roadways.
- The addition of so many Standards as well as design guidance in Part 9 may unnecessarily restrict the installation of traffic control devices that are meant to increase safety of bicyclists in specific contexts. FHWA should carefully review each new Standard to ensure it is necessary to be a Standard, if use of the Standard may limit bicyclist safety, and if too much design guidance is provided beyond what is necessary for traffic control devices for bicycle facilities.
- The Standard in section 9E.05 stating “bicycle lanes shall not be provided on the circulatory roadway of a circular intersection” should be reconsidered or further clarified regarding the specific types of bicycle lanes this Standard is prohibiting, and what is specifically meant by circular intersection and “on the circulatory roadway.” Applied in the broadest sense, this Standard may prohibit safe accommodation of bicyclists at types of roundabouts that have been shown to be effective at reducing conflicts between bicyclists and motorists.

#### Speed Limits:

- In Section 2B.21 regarding speed limits. Following recommendations from NTSB and other safety experts, FHWA should update the 2012 Methods and Practices for Setting Speed Limits report, to develop proactive guidelines for speed limit setting, or adopt the speed limit setting methodology outlined in NACTO’s City Limits: Setting Safe Speed Limits on Urban Streets. FHWA has indicated that it will make the modifications necessary to reduce reliance on the 85th percentile operating speed in speed-limit-setting guidance, as the NCUTCD has already approved, and should ensure that new regulations and guidance achieve the goal of injury minimization. This is critical for the implementation of Neighborhood Greenways and for traffic calming in general. To make a complicated explanation short, basically, if enough people drive fast on a road that fact can be used to raise speed limits vs lower speed limits (85th percentile rule). We do not believe prevailing speed data should receive primary consideration in setting speed limits on urban streets, additional factors such as transit services and infrastructure and presence of pedestrian and bicycle facilities should be considered.

Signage:

- Allow the posting of "[Stop/Yield Here to Pedestrians](#)" signs with painted yield markings in advance of crosswalks on single-lane approaches instead of just multi-lane because of the historic local/rural street design.
- Allow the [Turning Vehicle Yield to Bicycle and Pedestrian Sign](#).

Shared Lane Markings:

- Adopt the currently experimental use of green paint (super sharrows)
- Move to min 12' from curb instead of 11' for markings when parking is present
- Minimal longitudinal spacing of 50'
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing.

Signalization Warrants:

- Issue an active transportation network signal warrant that makes people walking and biking equal to motor vehicle users as a basis for signalization.
- Rationalize pedestrian signal options by revising the pedestrian signal warrant to match the easier-to-meet Hybrid Beacon warrant, and eliminating language that discourages the use of Hybrid Beacons at intersections.
- Provide flexibility in using bicycle signals and markings, which are currently subject to much stricter requirements than comparable pedestrian and vehicular signals; remove the prohibition on using green bicycle signals during times when turning vehicles may proceed after yielding to bikes, and remove the prohibition on continuing a marked bicycle lane at an intersection adjacent to a turn lane. Allow near-side 4" bicycle signals as a primary signal.
- Some existing warrants are contrary to current engineering and safety practice. A good example is Section 4C.08 Warrant 7, Crash Experience, which notes fatal motorist and pedestrian crash thresholds to be considered in whether a traffic signal may be warranted. This is not consistent with the Safe System principle that any loss of life is unacceptable and potentially warrants changes to the road system in order to avoid future fatal crashes.

Autonomous vehicles:

- Elements of the new draft, particularly Part 5 aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities.
- Much more needs to be understood about how automated vehicles will safely interact with pedestrians, bicycles and other vulnerable road users and that the evolving AV guidance needs to focus as much on the safety of these users as on the operation of the automated vehicles themselves.

General Comments:

- The draft 11th Edition of the MUTCD, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does little to address existing ones.
- MUTCD doesn't fully support the guidelines laid out in the latest versions of NACTO and AASHTO.

- MUTCD could potentially be updated prior to AASHTO adopting the latest version of the [Guide for the Development of Bicycle Facilities](#) which has been much delayed.

The MUTCD needs to be updated to support cost-effective, sustainable, and equitable city street design and improve safety and accessibility for the most vulnerable users. NWARPC respectfully request that FHWA consider these comments in the MUTCD update, creating a path for guidance that more closely aligns with the equity, safety, and sustainability goals of American cities.

Thank you,



Tim Conklin  
Assistant Director