

Comments of the South Dakota Department of Transportation to the Federal Highway Administration in Docket No. FHWA-2020-0001 National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD)

March 29, 2021

Ms. Stephanie Pollack
Acting Administrator
Federal Highway Administration
United States Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Acting Federal Highway Administrator Pollack,

The National Association of City Transportation Officials (NATCO) has asked the FHWA to rewrite and reframe the MUTCD on an expedited basis and has questioned the safety value of the MUTCD. Approving their request would reject or at least delay many beneficial changes suggested by reviewers of the NPA that have required many hours of work. We do not support the entire MUTCD being rewritten or reframed. We think concerns with the current MUTCD and the proposed revisions to it should be addressed issue by issue. Each element should be reviewed individually, and recommendations and decisions should be based on the merits of the comments and recommendations.

There are many important changes in the Notice of Proposed Amendments (NPA) from official experiments, interim approvals, and research over the last 12 years that would allow all agencies to easily implement these devices and practices. Some of the changes being incorporated into the manual that will benefit our highway operations, not only for motorists but pedestrians and bicyclists as well, include:

- rectangular rapid flashing beacons,
- vehicle speed feedback signs,
- late merge signing (zipper merge operation),
- allowing temporary signals to be used with pilot car operations, and
- pedestrian channelizing devices.

Incorporation of these changes into the manual provides for uniform and consistent application across the nation. Uniformity is important to avoid confusing the traveling public and to elicit predictable responses to devices, which aid in safe treatments being provided. The many additions to Part 6 for accommodating pedestrians and bicycles in the work zone will greatly enhance safety and consistency for these users.

The NPA also contains important proposals to further accommodations for connected and autonomous vehicles. Changes such as wider pavement marking lines would not only aid machine vision systems but have a proven safety benefits for human drivers as well.

The South Dakota Department of Transportation (SDDOT) would like to voice support for continuing the current rulemaking process for the next edition of the MUTCD.

The SDDOT supports the joint letter that was sent by the Institute of Transportation Engineers, the American Association of State Highway and Transportation Officials, and the National Committee on

Uniform Traffic Control Devices. A Vision and Strategic plan for the MUTCD was developed between the publishing of the 2009 edition and now. After the 11th Edition of the manual is published, work can begin to determine whether revisions to the MUTCD's Vision and Strategic plan are needed to address the concerns organizations may have, but work should continue now to complete the rulemaking process and to publish a new edition of the MUTCD.