

MIRIAM SCHOENBAUM  
COMMENTS ON FHWA-2020-001

The MUTCD is based on a century of US traffic engineering beliefs and practices that prioritize vehicle throughput over all other considerations, including the safety of motorists and the mobility and safety of transit riders, pedestrians, wheelchair users, bicyclists, and other non-motorists and vulnerable road users.

As a pedestrian, bicyclist, driver, parent, and advocate for safe streets in Montgomery County, Maryland, I therefore request that FHWA reframe and rewrite the MUTCD, creating a path for the creation of comprehensive safety-based guidance.

In addition, I ask that the traffic control principles in the reframed/rewritten MUTCD explicitly be developed for all road users, in recognition of the fact that we the people are the ones who live with – or are injured or killed by – the decisions made by the duly authorized and qualified professionals.

As support for my requests, here are summaries of two recent decisions related to traffic control devices, made by the state department of transportation in my county.

	Decision #1	Decision #2
Road conditions	2 T intersections controlled by stop signs, approximately 300 feet apart, involving 3 two-lane roads with 30 mph speed limits	An uncontrolled median crossover at a 6-lane road with additional dedicated turn lanes and a 40-mph speed limit
Safety history	No injury crashes at either intersection in the past 5 years	2 81-year-old pedestrians killed within 5 years
Problem	Episodic traffic back-ups during peak morning commuting hours during the middle of the week during the fall return-to-school period, and occasionally at other times during the school year	A deadly uncontrolled, unmarked pedestrian crossing of a wide, high-speed road for the residents of the 1,000+ units in high-rise apartment buildings on the north side of the road to access the bus stop on the south side
Decision	Spend \$1 million to install 2 linked TCDs	Remove the bus stop, requiring residents to walk 7 times as far to access the bus
Provision for non-motorists	None (despite the presence of a regional hiking/mountain-biking trail)	None
Effect on vehicle throughput	Increased vehicle throughput	Vehicle throughput unchanged
Effect on safety	Increased danger for pedestrians, bicyclists, and motorists due to higher speeds	Continued danger for non-motorists and motorists on a high-speed suburban arterial that prioritizes vehicle throughput over safety

People's lives should be more important than vehicle throughput. Please comprehensively reframe and rewrite the MUTCD for the safety of all road users.