



May 10, 2021

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

[DELIVERED ELECTRONICALLY]

RE: Comments on Proposed Amendments to the Manual on Uniform Traffic Control Devices (MUTCD)

Dear Secretary Buttigieg and Acting Administrator Pollack:

The Palm Beach Transportation Planning Agency (TPA) serves as the Metropolitan Planning Organization (MPO) for Palm Beach County, Florida and acts as a liaison between local communities, their citizens, and the state and federal departments of transportation. The TPA is committed to vision zero, the systematic elimination of traffic-related fatalities and serious injuries, as it collaboratively plans, prioritizes, and funds transportation projects and services.

However, the TPA's metro area (Miami-Fort Lauderdale-West Palm Beach) is currently ranked 13th most dangerous for pedestrians in the [2021 Dangerous by Design](#) report developed by Smart Growth America and the National Complete Streets Coalition. Additionally, the approximately 40,000 traffic deaths in the U.S. cry out for a migration away from the MUTCD's over-emphasis on motor vehicle operations and efficiency at the expense of other modes and contexts.

This MUTCD update represents a unique opportunity for FHWA and the Biden Administration to advance equity and sustainability on a national scale while reducing traffic deaths and serious injuries. The update can and should facilitate investments in transportation projects that increase safety for all transportation system users by removing barriers and limitations due to engineering standards.

To that end, the TPA offers the following comments regarding the MUTCD update:

- Proposed Section 2.B.17 should be modified to include item D: "Manage vehicle speeds to reduce potential crash severity."
- Proposed Section 2.B.21 should be modified to include item E: "Designers of roadway modifications should establish a target speed for the design project based on road context and desired road characteristics. Existing speed distribution of free-flowing vehicles should not inform selection of a target speed or of roadway design elements. Upon construction of the roadway modification, speed limit should be selected target speed."
- Proposed Figures 4.C-5 through 4.C.8 should be revised to use 20 pedestrians per hour as the lower threshold volume to warrant installation of a traffic control signal. This would produce a more appropriate balance between pedestrian safety and motor vehicle efficiency.
- Proposed Figures 4.J-1 and 4.J-2 should be revised to use 5 pedestrians per hour as the lower threshold volume to warrant installation of a pedestrian hybrid beacon. This would produce a more appropriate balance between pedestrian safety and motor vehicle efficiency.
- Section 8.B.18 (TRAINS MAY EXCEED 80 MPH, sign W10-8) should be revised to instead state the maximum permitted train speed based on the class of track at the railway crossing (e.g., use "TRAINS MAY REACH 110 MPH" for Class 7 railway crossings).



- Generally, the MUTCD update should promote installation of environmentally responsible pedestrian, bicycle and transit infrastructure within urban and urbanizing contexts and reduce or eliminate barriers to implementation for associated traffic control devices to advance investment in multimodal transportation facilities within our nation's cities.

The TPA commends FHWA and the Biden Administration for providing an opportunity for comment on proposed updates to this important document. With collaboration, the MUTCD can provide clear pathways to safe, multimodal accessibility in urban settings.

Please consider the above comments along with the input from the myriad of engaged stakeholders to support cost-effective, sustainable, and equitable city street design and improve safety and accessibility for the most vulnerable users. The Palm Beach TPA stands ready to work with you.

Sincerely,

Nick Uhren, P.E.
Executive Director

Ec: Village of Royal Palm Beach Mayor Fred Pinto, TPA Chair
Palm Beach County Vice Mayor Robert Weinroth, TPA Vice Chair