

ANDREW FRIEDSON COUNCILMEMBER DISTRICT 1

March 25, 2021

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

RE: Request for an expedited rewrite of the MUTCD

Dear Acting Administrator Pollack,

As a local elected official in Montgomery County, Maryland working to make our streets safer for all users, I join local jurisdictions and traffic safety advocates from around the nation to respectfully request that FHWA reframe and rewrite the Manual on Uniform Traffic Control Devices (MUTCD) so that it prioritizes safety in all of its standards and guidelines.

While I'm grateful to our County Department of Transportation and Maryland State Highway Administration for the strides they have made when it comes to re-engineering roads to protect vulnerable pedestrians and bicyclists as well as drivers, the MUTCD still too often serves as a barrier to commonsense safety engineering changes. Meanwhile, our roads, sidewalks, and intersections appear to be growing more dangerous despite an apparent decline in traffic volume. In 2020, 43 people died in crashes in Montgomery County, an increase of seven deaths compared to 2019 that puts us further from Montgomery County's Vision Zero goal of zero traffic deaths or severe injuries by 2030.

The draft 11th edition of the MUTCD released in December 2020 does not adequately address the hurdles the previous edition of the MUTCD frequently created for County and State traffic engineers investigating potential safety improvements including, but not limited to, installing pedestrian signals and marked crosswalks on all legs of an intersection, increasing pedestrian crossing times, and removing multiple-threat scenarios by implementing road diets at unsignalized mid-block crossings. It continues to rely on the flawed 85th percentile approach to setting speed limits and determining whether traffic calming improvements are warranted over a more appropriate "safe systems" approach that allows slower streets where residents aren't afraid to walk, bike, or cross the street to catch a bus.

I am also concerned that the draft MUTCD effectively requires people to be killed or injured before allowing the installation of new traffic signals, reacting to tragedies that could be prevented if the document allowed the flexibility to employ proven measures necessary to avoid them in the first place. Additionally, it appears to introduce new barriers to implementing important bicycle and transit infrastructure and doesn't allow for

the type of context-sensitive flexibility engineers need – especially in a jurisdiction such as Montgomery County that features urban, suburban, and rural settings.

We often refer to the MUTCD as the "traffic engineer's bible" when discussing dangerous roads, sidewalks, and intersections with concerned constituents. Too often, the MUTCD results in us explaining why requested safety improvements can't be done, rather than how they can in order to keep residents safe. We need standards and guidelines that reflect our community's desire to prioritize safety in the traffic engineering decisions we make. Doing so is critical to making Montgomery County and so many other places throughout the country healthier and safer.

Thank you for the opportunity to comment and I look forward to the FHWA creating a new MUTCD that truly prioritizes the safety of all road users.

Sincerely,

Andrew Friedson

Councilmember, District 1

Montgomery County, Maryland