

The Action Committee for Transit is a community advocacy group in Montgomery County, Maryland, founded in 1986. We advocate for more and better transit in Montgomery County, in addition to better infrastructure to make walking, rolling, and biking safe.

For the proposed rule FHWA-2020-0001, we support the comments of the National Association of City Transportation Officials (NACTO), including (but not limited to) their request that FHWA reframe and rewrite the MUTCD to create a path for the creation of comprehensive safety-based guidance.

For almost a century, traffic engineering has prioritized motor-vehicle throughput over the safety of road users, including pedestrians, wheelchair-users, bicyclists, bus riders, and motorists. The philosophy of throughput over safety is baked into both the current and the revised draft MUTCD. The result is a road system that is killing over 40,000 people a year. People are afraid to make short trips on foot, by bike, or by bus, lest they be injured or killed. Meanwhile the earth's climate continues to warm.

In the past 5 years, we have made many requests to the Montgomery County Department of Transportation and Maryland State Highway Administration for safer streets. Here are some of their responses:

- NO to a request to put walk signals on recall next to a bus transit center, on grounds that there wasn't enough pedestrian traffic.
- NO to a request for a safe pedestrian crossing in a residential neighborhood with a mile between marked crosswalks, on grounds that there wasn't enough pedestrian traffic and the speed limit is 40.
- NO to a request for a safe pedestrian crossing at an intersection on the route between a high-density apartment complex and a shopping center, on grounds that there hadn't been enough pedestrians struck.
- NO to multiple requests for a Leading Pedestrian Interval next to multiple high schools, on grounds that when they went out and looked, drivers mostly stopped for pedestrians who had a walk signal.
- NO to a request to reduce the speed limit from 50 mph next to a high school, on grounds that a different transportation agency had recently added a bike lane and lowered the speed limit at an intersecting road.
- NO to a request to add a marked, signalized crosswalk at an unmarked crosswalk where a 75-year-old pedestrian had been killed, on grounds that it would complicate the signal phasing and delay turning drivers.
- NO to a request to add a marked crosswalk at an intersection separating a school from a residential neighborhood, on grounds that there wasn't enough pedestrian traffic outside school arrival/departure times.
- NO to a request to add a right-on-red restriction on a school walk route, on grounds that impatient drivers would violate it.
- NO to a request to lower the speed limit on a road next to a mixed retail/residential destination development, on grounds that drivers would just drive faster anyway.

- NO to a request to mark/signalize an unmarked crosswalk at an intersection where only one side (the side *without* the sidepath) has a marked, signalized, crosswalk, on grounds that people don't cross in the unmarked crosswalk.
- NO to a request to extend the crossing time of a walk phase with the minimum 7 seconds, on grounds that pedestrians had enough time to finish crossing during the solid red don't-walk before the signals turned green for motorists.
- NO to a request to add a sidewalk where pedestrians must walk in the road, on grounds that there wouldn't be enough space for cars and trucks.
- NO to a request for a safe crossing to a bus stop used by residents of a high-rise apartment/condo community, where 2 elderly residents had been killed within 5 years, on grounds that it was safer to remove the bus stop.
- NO to a request to add pedestrian signals to a new traffic signal on a walk-to-school route for high school students, on grounds that the signal phasing for turning drivers made it too complicated to also have pedestrian signals.
- NO to a request to add pedestrian signals to a new traffic signal at an intersection used by a walking/mountain-biking park trail, on grounds that the traffic counts showed no pedestrian traffic.
- NO to a request for a right-on-red restriction at the entrance to a "town center" development, on grounds that right on red is safe when drivers obey the law.

Fiddling with this or that provision in the MUTCD, as in the proposed regulation, will not make the roads safe. Although the proposed regulation is better in some ways than the current MUTCD, it will still allow state and local departments of transportation to prioritize motor-vehicle throughput over safety. The FHWA must comprehensively rewrite the MUTCD to positively and explicitly require state and local departments of transportation to use the safe systems approach.

Since August 2019, we have held roadside memorial events for every non-motorist killed in Montgomery County, Maryland, to remember the real human beings killed and to demand safer streets. I have attached a document with information and roadside memorials for 30 of those lives lost in Montgomery County. Our roads should be safe for all users, for all modes of transportation, in all communities, for people of all ages and abilities – not just as designed, but as real human beings actually use them.

Sincerely,

Paul Goldman
President
Action Committee for Transit