

US Department of Transportation
Federal Highway Administration
Docket Number: FHWA-2020-0001

Regulatory Identification Number: 2125-AF85

Re: Comments on Notice of Proposed Amendment for Proposed 11th Edition of the Manual on Uniform Traffic Control Devices (MUTCD)

Dear Secretary Buttigieg and Acting Administrator Pollack:

I am writing to offer comments on the December 14, 2020 Notice of Proposed Amendment (NPA) to the MUTCD. I recognize and appreciate the level of effort needed to produce a new MUTCD and commend and respect both you and the FHWA and NCUTCD staff for all the hard work that has been done. The significance of the nation's transportation infrastructure in shaping our collective future and furthering goals of safety, equity, community, sustainability, and growth cannot be understated and must meet the challenges ahead. As a resident of Florida, one of the states most affected today by the crises of traffic violence and climate change, I know firsthand that the status quo is insufficient, and change is urgently needed.

I'd like to first echo and recognize many of the excellent comments made by organizations and individuals including ITE, America Walks, NACTO, Toole Design, Drs. Sara Bronin and Gregory Shill, the League of American Bicyclists, APBP, and Don Kostolec, AICP. The transportation community is very lucky to have groups such as these and many others that have raised attention to the role the public can play in reforming the MUTCD and should be proud at the level of interest and passion that exists around these issues. I would also like to thank Secretary Buttigieg for speaking publicly about this and encouraging the public to be involved. The following comments are my own and focus on some specific areas where I feel the MUTCD currently falls short and have a high level of importance and impact.

1. I encourage a separate Part of the MUTCD focused on pedestrian facilities, like Part 9 for bicycle facilities. Since the last update to the MUTCD annual pedestrian fatalities have increased by over 50%. This surge highlights the need for a dedicated guide with a focus on protecting vulnerable road users.
2. Regarding Section 2B.1, usage of the 85th Percentile Method for setting speed limits on urban streets should be discouraged in favor of safer, more context-dependent methods such as those adopted by California and Washington in recent years. According to the NTSB, "speed increases crash risk both in terms of the likelihood of being involved in a crash and in terms of the severity of injuries."
3. Regarding Section 3C.01, the updated standard for non-intersection crosswalk markings should be extended to all crosswalks. Marked crosswalks should be the default design option at all intersections, especially ones with high pedestrian volume such as at schools and parks.
4. Regarding Section 3H.03, aesthetic crosswalk treatments on low-speed streets should be permitted absent a documented safety issue. This is one of many examples throughout the MUTCD of regulation of urban facilities using highway standards without clear evidence of increased safety. Urban streets should serve the needs of all users in a community and not focus solely on vehicle movement.
5. Regarding Sections 4L.01 and 4L.02, large changes need to be made to the design and application of Rectangular-Rapid Flashing Beacons. While they are safer than an unsignalized crossing, their deficiencies have led to motorist confusion and an inadequate level of safety for vulnerable road users. After a child was killed by a motorist who failed to yield at a crosswalk with an RRFB in my community, my state legislators passed a bill in the Florida House of Representatives with 118 yeas and 1 nay that would have banned the usage of RRFB's had it passed the Florida Senate. The MUTCD must address this now, or state governments will restrict the usage of a promising safety measure and remove many crosswalks altogether. The usage of RRFB's at crossings where traffic control signals or other road treatments would be more appropriate due to cost or vehicle movement considerations should be discouraged in favor of prioritizing the effects on user safety. Red-colored indications should be permitted to study if this increases safety over the current yellow ones.
6. The newly created Part 5 should be removed in its current form from the MUTCD. It is inappropriate to put the burden of safety for connected autonomous vehicles on the road design rather than the vehicle manufacturers. CAV's have a responsibility to develop technology that is safe enough to exist with other road users without costly infrastructure changes.

7. Regarding many items in Section 9D, the MUTCD is too restrictive on signage intended for bicyclists. The need for uniformity in signage is less given the lower speed and danger inherent of bicycling compared to driving a motor vehicle. Restrictions should be limited to treatments with proven safety concerns and experimental signs should be tolerated
8. Regarding Section 9E.08, the prohibition of contraflow bicycle lanes between general purpose lanes and on-street parking lanes should be removed. There is insufficient evidence to suggest that this practice is unsafe compared to the existing models that exist in both the US and international contexts. This is one of many examples where the MUTCD could benefit more from examining the safety record of engineers in other countries.

Additionally, I urge a shift throughout the MUTCD towards a Safe Systems Approach and a commitment to Vision Zero that brings us in line with many of our international peers that have seen success in meeting their goals. I regret that Chairman Fisher and others view public input as “cancel culture” and hope that the entire NCUTCD will use feedback such as this to make the MUTCD into the document it needs to be to fit our future. Seeking to improve the built environment and the processes that shape it is not ideological but benefits all road users and professionals.

I recently had the privilege of graduating from a civil engineering program with a heavy emphasis on traffic engineering and I hope to spend my own career using the MUTCD to benefit others in designing and implementing safer infrastructure. As a student member of ITE I was able to compete in their Traffic Bowl competition that heavily referenced the MUTCD, reflecting its important role in educating and guiding the next generation of professionals in this industry. I hope to see an improved MUTCD reflect the values and practices befitting the role it plays.

Thank you again for the opportunity to provide my views on the content of this foundational resource,

Corbin Kramer