

May 11, 2021

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

RE: GPI Comments on Notice of Proposed Amendment for Proposed 11<sup>th</sup> Edition of the Manual on Uniform Traffic Control Devices (MUTCD)

Dear Acting Administrator Pollack:

I am writing to offer comments on the December 14, 2020 Notice of Proposed Amendment (NPA) to the MUTCD on behalf of Greenman-Pedersen, Inc. (GPI) and its more than 1,500 employees consisting of nearly 1,000 transportation professionals planning, designing, and constructing transportation systems in the U.S.

Overall, there are a lot of additions and changes in the NPA that have addressed prior interim approvals and proposals to ensure uniformity, consistency, and user safety. We recognize the significant amount of work involved in preparing an update, and we are confident that comments and feedback will only make the update an improved guidance manual for our professionals, cities, counties, and states to rely on.

We urge FHWA to hold the safety of the traveling public our priority, while uniformity in how signs, markings and signals look, the application of the various tools referenced in the MUTCD should be flexible to allow for innovation and advancement of practice. We also highly encourage the reframe and rewrite of the MUTCD, creating a path for the creation of comprehensive safety-based guidance. Doing so will allow FHWA and the Biden Administration to make strides towards equity and sustainability, while reducing traffic deaths and serious injuries.

As transportation professionals, our daily work carries a high level of responsibility to stem the approximate 40,000 traffic deaths each year. The communities we work with day in day out expect innovative street design approaches that meet the needs of people – people of all ages and abilities that rely on multimodal networks to access jobs, education, health care, as well as other fundamental services and recreation. While some tools may not be different, how these tools are applied in each unique intersection, street, corridor, or community has evolved significantly. We must do more, as we surely can all agree that even just one life lost on our streets is not acceptable.

Significant evolution of our practice has relied upon the ability to use engineering judgement, inherent flexibility, and bold experimentation by communities and professionals across the country. The opportunity to update this Federal document is timely. It should continue to allow the flexibility and build on the progress over the last decade. What we see is the need to largely refocus the Manual's over-emphasis on motor vehicle operations and efficiency on rural highways and focus on the safety of the users of all modes in a wide array of contexts.

To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability vision of the FHWA and Biden Administration, GPI would like to highlight the following areas that must be addressed in an updated MUTCD and we support many of the technical comments provided by NACTO, America Walks, Transportation for America, APBP and ITE:



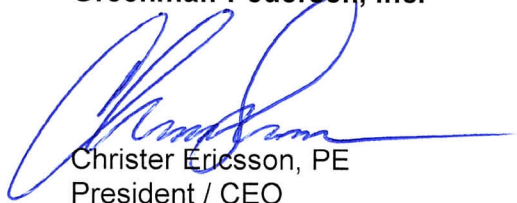
- **The MUTCD needs to support the needs of all users** – The MUTCD was originally developed and continues to evolve as a primarily vehicle-centered document. We believe that the MUTCD must prioritize vulnerable road users' safety over traffic flow, capacity and speed in the planning, design, and selection of traffic control devices. Vulnerable road users are people riding a motorcycle, a bicycle or walking. A few examples where the manual falls short include:
  - **Speed Limit Setting** – GPI is a firm believer that without addressing how speed limits are set, progressive approaches to safety such as Vision Zero and Road to Zero principles will not be successful in eliminating road fatalities. The continued reliance on the 85th percentile approach to setting speed limits must be eliminated and replaced by a safe systems approach. We are in support of other organizations and the NTSB that recommend removal of all speed limit setting guidance from the MUTCD. We do not believe prevailing speed data should receive primary or special consideration in setting speed limits on urban streets.
  - **Pedestrian facilities** – pedestrians are the most vulnerable users on our streets and should be prioritized and protected the most. Providing signals and push buttons at signalized intersections should be a Standard, not a guide that can be opted out. In addition, the standard and guidance for aesthetic treatments in intersections and crosswalks is unnecessarily restrictive and the designs provide, as examples, are arbitrary and inconsistent with those permitted by many cities across the US that have not found them to cause any safety issues. GPI believes aesthetic treatments in crosswalks and intersections in lower speed and lower volume roads in urban environments should be permitted unless they create a documented safety issue. Another major issue is the outdated signal warrants that are contrary to current engineering and safety practice. For example, the Crash Experience Warrant, notes fatal motorist and pedestrian crash thresholds to be considered in whether a traffic signal may be warranted. This is contrary to the Safe System approach that says any loss of life is unacceptable and requires changes to the road system to avoid future fatal crashes.
  - **Bicycle facilities** – The proposed amendments introduce new barriers to implementing environmentally responsible bicycle infrastructure including the addition of too many Standards and the design guidance offered is unnecessarily restrictive. For example, restricting installation of traffic control devices that are meant to increase safety of people on bicycles in urban contexts is unnecessary. FHWA must carefully review each new Standard to ensure it is necessary, as these new Standards will limit bicycle safety. This applies to guidance for different bicycle facility types, bicycle signals, bike facilities in roundabouts, use of green conflict paint and combination of traffic control devices at trail crossings.
- **The MUTCD needs to be grounded in current practice while supporting flexibility and innovation** – The MUTCD should standardize traffic control devices (signs, markings, and signals) where necessary to ensure safety, but should not unnecessarily set Standards that limit the ability of agencies and professionals to adapt traffic control devices to specific contexts. A couple of examples where the proposed changes fall short include:
  - **Standards Statements** - GPI is very concerned with the overall number of Standards statements in the NPA. The NPA contains many Standard statements both new and existing, where strict uniformity is not essential and may in fact lead to safety concerns by prohibiting proven innovative techniques. These Standard statements should be changed to guidance statements to allow engineering judgement and application of flexibility based on local conditions and needs.
  - **Experimentation** - The proposed changes to the Experimentation section do not improve a process that is already too complex, too inflexible, too costly, and not straightforward for agencies to apply, many of which simply want to sign onto an experiment already proposed by another jurisdiction. Making the entire process part of a Standard statement and adding numerous new requirements makes this situation worse. The proposed language is a significant cost and resource burden for many local agencies that would eliminate experimentation and innovation. We believe this process needs to be recast as Guidance, not a Standard.

- **The MUTCD needs to be a forward-looking document** – The transportation system today does not look like it did a decade ago nor what it will look like a decade from now. The MUTCD must be a more flexible and nimbler document that allows professionals to adapt swiftly to changing conditions, updated practices, and new research outcomes. If the MUTCD provides flexibility, it's updates can be shorter and more frequent. A couple of examples where the manual falls short include:
  - **AV Content** – Accommodating traffic control device provisions to support AV's may be forward-looking, however, we would caution that much more needs to be understood about how automated vehicles will safely interact with pedestrians, bicycles and other vulnerable road users and that the evolving AV guidance needs to focus as much on the safety of these users as on the operation of the automated vehicles themselves. This must be stressed to be Guidance and not a Standard; otherwise this would exacerbate already prohibitive cost burdens for cities.
  - **Reframing the MUTCD** - we believe that the process of rethinking what a new version of the MUTCD should look like must start sooner rather than later and must include a full reevaluation of the content and structure of the MUTCD, removal of unnecessary material, increased flexibility where possible, and a more streamlined and timely process for updating the provisions contained in the MUTCD.

Rethinking a new version of the MUTCD must start with how each of the comments and concerns noted are addressed, then a firm commitment to address the rest of the document must be made by FHWA sooner rather than later. GPI stands ready to work with you, as our communities are expecting a lot more from all of us.

Sincerely,

**Greenman-Pedersen, Inc.**



Christer Ericsson, PE  
President / CEO