

FHWA should heed the request of the National Association of City Transportation Officials to reframe and rewrite the MUTCD to create a path for the creation of comprehensive safety-based guidance. In the current MUTCD, safety is not a priority.

For example, I asked the Maryland State Highway Administration (MD SHA) to install pedestrian signal heads for the marked crosswalk across the two-lane off-ramp from southbound I-270 at the signalized intersection with Shady Grove Road in Gaithersburg, Maryland. Without pedestrian signal heads, pedestrians, wheelchair users, and sidewalk-riding bicyclists must guess when they are supposed to cross. This is dangerous, especially at an interstate off-ramp. Here are two pictures showing the crossing from both directions:



In response, MD SHA cited “very low pedestrian activity” at the crossing (see the e-mail exchange appended below, starting on p. 3).

The MUTCD explicitly allows MD SHA to refuse to provide safe facilities for pedestrians, wheelchair users, and bicyclists unless these non-motorists are present in large numbers.

This is immoral; the MUTCD should require MD SHA to provide safe facilities for non-motorists everywhere, not just in places where there are already large numbers of non-motorists.

In addition, it’s bad engineering; the MUTCD’s failure to require MD SHA to provide safe facilities for non-motorists, is itself a major reason why numbers of non-motorists are low. People with a choice will choose to walk or bike when there are safe facilities, but not when there aren’t.

Also, if the FHWA decides not to comprehensively reframe/revise the MUTCD, then the revised MUTCD must:

1. Add a requirement that all non-rural traffic signals must have pedestrian signal heads for each pedestrian crossing direction.
2. Add a requirement that all non-rural signalized intersections must have marked crosswalks on all legs of the intersection, unless pedestrians are prohibited from the roadway or section thereof, or if there is physically no pedestrian access on either corner and no likelihood that access can be provided.
3. Add a signal warrant for pedestrians based on pedestrian origin and destination (e.g., a residential area on one side, and a grocery store, convenience store, or school on the other). The MUTCD should not require multiple pedestrians to be hit before a signal is warranted. Neither should the MUTCD require large numbers of pedestrians to risk their lives at an unsafe crossing that would be safe if there were a signal.
4. Eliminate the proviso that pedestrian signal warrants “shall not be applied at locations where the distance to the nearest traffic control signal along the major street is less than 300 feet, unless the proposed traffic control signal will not restrict the progressive movement of traffic.” Pedestrians’ safety should be a higher priority than the progressive movement of traffic.

MIRIAM SCHOENBAUM

INDIVIDUAL COMMENT

RE: I-270 and Shady Grove Road

From: SHA D3TrafficTeam (shad3trafficteam@mdot.maryland.gov)

To:

Cc: trafficops@montgomerycountymd.gov

Date: Monday, April 19, 2021, 11:59 AM EDT

Dear Ms. Schoenbaum:

Thank you for your inquiry.

Please allow us to apologize for the delayed response to your traffic concerns at the subject intersection in Montgomery County. The Maryland Department of Transportation State Highway Administration (MDOT SHA) District Three traffic engineering staff has completed its initial study and is writing to provide you with the results.

You requested pedestrian signals across the I-270 off ramps at their intersections with Shady Grove Road. Our initial study revealed that pedestrian activity at these intersections is very low

However, we will be revisiting the subject location this spring to collect updated field observations, which should better reflect conditions at this location, after which, we will share our findings with you.

Thank you again for your inquiry.

Sincerely,

Robert O. Owolabi

From: M Schoenbaum

Sent: Thursday, April 8, 2021 5:15 PM

To: SHA D3TrafficTeam <SHAD3TrafficTeam@mdot.maryland.gov>

Cc: TrafficOps <trafficops@montgomerycountymd.gov>

Subject: Re: I-270 and Shady Grove Road

Is there an update on this request?

Thank you,

Miriam Schoenbaum

On Wednesday, November 18, 2020, 7:03:06 AM EST, SHA D3TrafficTeam
<shad3trafficteam@mdot.maryland.gov> wrote:

Dear Ms. Schoenbaum:

MIRIAM SCHOENBAUM

INDIVIDUAL COMMENT

Thank you for your request to address traffic operations and pedestrian safety concerns at the above subject location in Montgomery County. The Maryland Department of Transportation State Highway Administration (MDOT SHA) District Three traffic engineering staff appreciates the opportunity to be of assistance.

Our office has received your request to add pedestrian signals to the signalized crossing across the off-ramp from southbound I-270 to northbound and southbound Shady Grove Road. We will review conditions at the subject location and anticipate that our review process will take approximately 30 days to complete, after which we will share our findings with you.

Thank you again for sharing your concerns. If you have any additional questions or concerns, please feel free to contact us at 301-513-7300 or 1-800-749-0737. We will be happy to assist.

Sincerely,

Robert O. Owolabi, M.Eng., CPM
Team Leader/Transp. Engineering Manager II
District 3 Traffic Engineering Section
Gaithersburg – Montgomery County

From: TrafficOps <TrafficOps@montgomerycountymd.gov>
Sent: Tuesday, November 17, 2020 6:31 PM
To:
Cc: SHA D3TrafficTeam <SHAD3TrafficTeam@mdot.maryland.gov>
Subject: RE: I-270 and Shady Grove Road

Dear Ms. Schoenbaum:

Thank you for your email dated November 15, 2020, requesting to add pedestrian signals at the intersection of I-270 and Shady Grove Road.

I-270 ramp is a state-maintained roadway operated by the Maryland Department of Transportation State Highway Administration (MDOT SHA). Therefore, by a copy of this email, we are forwarding your request to MDOT SHA for review and response. In the interim, you may contact them directly at (301) 513-7300 or SHAD3TrafficTeam@sha.state.md.us.

If you require any assistance regarding a County-maintained roadway, please feel free to contact us at (240) 777-2190 or TrafficOps@montgomerycounty.gov.

Regards,

TrafficOps

Division of Traffic Engineering and Operations

Montgomery County Department of Transportation

lhm

From: MCDOT <no-reply@wufoo.com>
Sent: Sunday, November 15, 2020, 3:56 PM
To: Director DOT
Subject: MCDOT Contact Us - - Miriam Schoenbaum

[EXTERNAL EMAIL]

Choose your topic	Traffic Signals / Signs / Streetlights
Name	Miriam Schoenbaum
Street Address	15004 Clopper Rd
City	Boyds
State	MD
ZIP Code	20841
Email	
My comment or question is	Please add pedestrian signals to the signalized crossing across the off-ramp from southbound 270 to northbound and southbound Shady Grove Road. People who use this crossing have to guess when it's safe to cross, which is extremely dangerous at this location with the high speeds from drivers exiting 270.



[screenshot_395.png](#) 2.64 MB · PNG

Attach a
File



For COVID-19 Information and resources, visit: www.montgomerycountymd.gov/COVID19