

Janeen Abar

From: Janeen Abar
Sent: Thursday, March 18, 2021 2:16 PM
To: 'Kevin.Sylvester@dot.gov'; 'William.Winne@dot.gov'
Subject: FW: NPRM: MUTCD Chapter 2A.20 - Supplemental LED use on STOP signs
Attachments: MUTCD Excerpt - Proposed 2021 Modifications.pdf; 2020-26789 (1).pdf

Good day,

I realize the deadline was March 15th but I am writing just a couple of days late with my input on this issue at the request of the Michigan Department of Transportation (MDOT) Rail Safety Section.

Monroe County, Michigan is half rural and half urban situated between 3 large urban centers of Ann Arbor, Michigan, Detroit, Michigan and Toledo, Ohio and all connected suburbia. We are riddled with numerous requests from citizens who want something to make things safer and either suggest things that are not safe or they do not know what they want. Through state and federal laws, we have very little to offer in our toolbox. The flashing border stop sign with solar detection & timer has been a tool that we have started using recently.

We started to use flashing border stop signs in rural settings in 2018 at high severity locations. Due to the rural communities, we did NOT want the light pollution on 24/7. As such, we investigated and started using solar detection with a set timer. These signs have been met with nothing but positive feedback. Drivers like that the solar detection is eye-catching. Residents like that it turns off when not necessary.

This positive feedback translated to discussion with MDOT Rail Safety and Ann Arbor Railroad about using flashing border stop signs with solar detection & timer at a crossing on a rural street but within a couple of miles from the City of Milan. Also in 2019, the Monroe County Road Commission secured more safety money to install flashing border stop signs with solar detection & timer at 3 more locations- this time in a suburban/urban areas. Again, all positive feedback was received. The railroad loves being able to use this device and has now suggested it at other similar sites in the State of Michigan. The Monroe County Road Commission now receives requests from the local communities/citizens wanting more of these devices installed.

Crash statistics show that that number and severity has decreased at these locations. After installation data is only 2 years at this time but it is my hopes that this downward trend will continue. I would be happy to share this information with you.

I know that the MMUTCD proposed would allow installation with the flashing borders on signs occurring 24/7. In some settings, I feel that this would be a barrage of lights and information for the driver and eventually fade into the background like all other signs. I am confused as to why there is discussion and MUTCD language of limiting the ability of this type of device, especially if we can utilize it to make things safer on our roadways. This would be eliminating one of our tools to use and a positive one at that.

Just my thoughts.

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From: Foondle, Kris (MDOT) [mailto:FoondleK@michigan.gov]
Sent: Friday, March 5, 2021 1:28 PM
To: Janeen Abar <JAbar@mcr-mi.org>
Subject: NPRM: MUTCD Chapter 2A.20 - Supplemental LED use on STOP signs

As discussed, I am attaching a PDF file with the part of the MUTCD they are proposing to modify, that would impact our collaborative use of vehicle approach-lit activation of supplemental LED border lighting on STOP signs. I have already prepared the following synopsis and sent it along to our Highway Safety staff, asking that they include these comments/concerns as part of the overall response to the NPRM. I also attached the actual NPRM document as published to the Federal Register – the deadline for replies to the NPRM is MARCH 15 – we were asked to look at Chapter 8, Railroads, with responses due internally this week..... so I had not previously looked at the actual NPRM until today after we talked. If Monroe County wishes to file comments, you'll need to have it done in the next 10 days.... Sorry for short notice, as I was only working on this myself just last week!

Synopsis and proposed corrective language.

Topic/Issue: NPRM Proposed language in MUTCD 2A.20 Paragraph 17: [Where used in STOP or YIELD signs, flashing LED units shall operate continuously. Actuation of the LED units shall not be allowed.](#)

Concern: absent previous MUTCD restrictions on the use of approach-activated supplemental LED lights embedded in sign borders, there are a significant number of recent federal-aid projects where such technology has been tested and proven effective in application. In particular, where engineering studies have determined approach-activated supplemental LED lights will help increase motorist awareness and compliance with stop signs at lower-volume intersections, and where there is concern for the impact of continual operation of flashing lights upon nearby residents, the option to allow for approach-activation of supplemental LED lights embedded in the sign border has been a significant factor in enabling these projects to move forward. Studies have shown improved motorist behavior in response to this technology, with community and road agency appreciation for the low environmental impact and lower operating costs of such installations. MDOT is concerned that the new language prohibiting actuation of supplemental LED border lighting on stop or yield signs will restrict future opportunities to invest in low-cost safety solutions, particularly in locations where all affected parties concur with an engineering study that would permit conditional actuation.

Proposed Corrective Language: Where used in STOP or YIELD signs, flashing LED units shall operate continuously, *unless an engineering study determines that actuation of LED units along the edge of the signs is appropriate.* ~~Actuation of the LED units shall not be allowed.~~

Hopefully your independent study results and feedback would support an argument for including conditionally permissive language so that approach-lit borders can continue to be used where warranted. Thanks as always!!!!

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