



**Office of Traffic Engineering
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Roseville, Minnesota 55113**

May 13, 2021

Stephanie Pollack
Acting Administrator
Federal Highway Administration
1200 New Jersey Avenue SE
Washington, DC 20590

FHWA Docket No. FHWA-2020-0001: National Standards for Traffic Control Devices: The Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD); Revision

Dear Acting Administrator Pollack:

The Minnesota Department of Transportation (MnDOT) provides the attached comments on the December 14, 2020 Notice of Proposed Amendment (NPA) to the MUTCD. We appreciate the opportunity to comment and commend FHWA staff for the substantial amount of work done in developing the NPA - we recognize that updating a document of this magnitude after 12 years is no easy task. We also want to thank FHWA for extending the public comment period. With the additional time, we were able to complete a more thorough review and provide more thoughtful, constructive comments.

In addition to our attached comments, we offer the following considerations for the current proposal and future MUTCD updates:

- As stated in the current MUTCD, “The purpose of traffic control devices, as well as the principles for their use, is to promote highway safety and efficiency by providing for the orderly movement of all road users on streets, highways, bikeways, and private roads open to public travel throughout the Nation.” While we need to continue to look for and find solutions that improve both safety and efficiency (i.e. roundabouts), we also need to find and promote through the MUTCD a new balance between safety and efficiency– a balance that prioritizes reducing the risk of life changing crashes on our transportation system, even when it comes at the expense of efficiency. The significant number of lives lost or negatively altered every year on our transportation system is not acceptable, and needs to be more directly addressed by the provisions of the MUTCD.

- The MUTCD should provide for flexibility and support opportunities to directly mitigate safety risks on our transportation system. The MUTCD should standardize traffic control devices where necessary to ensure safety, but should not unnecessarily set standards that limits an agency's ability to achieve safety in specific contexts.
- As technologies and system user behaviors evolve at increasing rates, the MUTCD must be more nimble in responding to our evolving needs. Along these lines, more frequent updates of the MUTCD will be needed in the coming years.
- The MUTCD was originally developed and has evolved as a primarily vehicle-centered document. Specific non-motorized elements have been added over the years, but much of the MUTCD centers on efficient vehicular travel. The MUTCD must continue to evolve to more adequately address the needs of all users, especially vulnerable road users, such as motorcyclists, pedestrians, and bicyclists. We therefore support future efforts to rethink the MUTCD content so that it best serves the needs of all users. We believe that the MUTCD update process should begin immediately after the 11th edition of the MUTCD is published, rather than pull back the current NPA to perform a major overhaul of the content of the MUTCD. We support the current rulemaking action and look forward to the timely publication of the 11th edition.

Again, we appreciate the time and effort invested in the proposed changes included in the NPA. If you have questions or if clarification is needed for any of MnDOT's comments, please contact Tiffany Kautz at tiffany.kautz@state.mn.us or 651-234-7388. Thank you for your consideration of our comments and suggestions.

Sincerely,

Brian K. Sorenson, PE
State Traffic Engineer