



Charles D. Baker, Governor  
Karyn E. Polito, Lieutenant Governor  
Jamey Tesler, Acting Secretary & CEO



May 13, 2021

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

Dear Administrator Pollack:

The Massachusetts Department of Transportation (MassDOT) welcomes the opportunity to comment on the proposed update to the Manual on Uniform Traffic Control Devices (MUTCD) and appreciates the extended comment period. We understand the complexity of updating such a large and important document, but as you know, meaningful review and comment also take time.

As everyone has experienced, 2020 was a year of much change. One of the many issues brought to light during these trying times was roadway safety. Traffic related fatalities were flat in Massachusetts even though the number of people driving was significantly lower. This is a trend that cannot continue. One crash is one too many. MUTCD manual plays a significant role in safety for all users, and our comments will reflect and focus on the safety of all users and their interaction with each other.

The MUTCD has not been updated since 2009. In that time, there have been industry changing advancements in transportation safety, research, technology, practice, and services that are not reflected in the current Manual. In 2009, Transportation Network Companies (TNCs) did not exist, there were no regional bikeshare systems, let alone the micromobility companies that now operate on our streets. On top of these new emerging modes, many more technology advancements are underway. Just around the corner from our offices, engineers are testing prototypes not only Autonomous Vehicle (AV) technology, but the resulting innovations to on demand microtransit, as well as unmanned aerial vehicle use that is poised to change how goods and services are delivered.

These advances in transportation and related technology are likely to continue at an even greater rate. MassDOT is a state agency that embraces mobility advancements; however, the

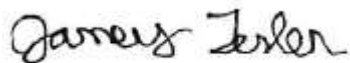
manual plays a very important role in how fast these advancements can be implemented. This, combined with the unique density of use within the Commonwealth, requires a quicker advancement of manual updates and inputs. In the future, we would like to see the manual updated more often. In doing so, State DOTs would be able to react to changes in technology and right-of-way use with the guidance and research that the Manual is intended to provide.

With this said, MassDOT asks FHWA to ensure that the 2021 MUTCD update is completed with the safety of all users in mind and with an eye towards the future. Of note, MassDOT would like FHWA to pay particular attention to:

- The interaction and safety of all users of the system with focus on people, regardless of what mobility vehicle/device they are using
- Encouraging the inclusion of safe bicycle and pedestrian facilities
  - E.g., pedestrian crossing warrants should not be based on number of people who currently cross, but instead if people would cross to make it safe and comfortable and able to do so
- Providing additional guidance and flexibility for placemaking projects in the Right-of-Way, i.e. Shared Streets and other placemaking efforts
- The safety benefits of pavement marking and less about the technology needs of Automated Driving Systems
- Providing a flexible approach to the establishment of speed limits that separates out limited access roadways from the roadway network that serve all road users and accounts for safety and land use
- Understanding the role of the State DOT to provide oversight, guidance, and support for local government in their adherence to the Manual with political sensitivity
- Decisions on how to add items and/or standardize their usage based on research

I look forward to FHWA's response on the recommendations included in this letter and the attached detailed comments. The MUTCD manual is an essential tool in helping MassDOT continue to advance the Commonwealth's safety and mobility goals.

Sincerely,



Jamey Tesler, Secretary of Transportation  
Massachusetts Department of Transportation

CC:

MassDOT Chief of Staff Pitman

MassDOT Administrator Gulliver

MassDOT Deputy Administrator/Chief Engineer Leavenworth

MassDOT Director of Sustainable Mobility DeWolfe