



We're leading the movement to build a bicycle-friendly America for everyone

1612 K STREET NW, SUITE 1102, WASHINGTON, DC 20006

| phone 202-822-1333 | fax 202-822-1334 |

WWW.BIKELEAGUE.ORG

July 17, 2020

Nicole Nason
Administrator (HOA-1)
Federal Highway Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: Recommendations to Request Immediate MUTCD Interim Approvals

Dear Administrator Nason,

The League of American Bicyclists (LAB) is deeply involved in matters related to the Manual on Uniform Traffic Control Devices (MUTCD). We are a sponsoring organization to the National Committee on Uniform Traffic Control Devices (NCUTCD), and we participate on its Bicycles Technical Committee.

Given the current delay in releasing a Notice of Proposed Amendments (NPA) for a revised MUTCD and the lengthy process of adopting a new MUTCD after an NPA is released, LAB suggests the time is right to consider a few immediate interim approvals to move forward with traffic control device standards that improve safety especially for vulnerable road users.

You recently received a letter request from the Institute of Transportation Engineers (ITE) regarding this subject. The purpose of our letter today is to join with ITE in reviewing and responding positively to their request.

The urgency of moving forward immediate interim approvals that protect vulnerable road users is imperative to continuing to reduce traffic fatalities in the United States. According to NHTSA figures, overall fatalities declined between 2016 and 2018 by more than 3 percent, while pedestrian and bicyclist fatalities grew by over 3 percent reaching their highest levels in 30 years. It is clear that we still have much work to do to get to zero fatalities on U.S. roadways. Continuing to advance traffic control devices that are instrumental in protecting vulnerable road users and preventing fatal crashes will help continue and accelerate the current downward trend in transportation-related deaths and contribute to overall improvements in transportation safety.

The need for these actions is made even more urgent by the COVID-19 pandemic. The numbers of people walking and biking for both health and transportation purposes has increased dramatically. Cities across the U.S. have moved to restrict vehicular traffic and open streets for pedestrians and cyclists. As traffic volumes have decreased, we have seen speeding increase

across the system. FHWA has the opportunity to take a leadership role in supporting Interim Approvals that help address these issues and enhance safety.

LAB recommends that the following proposals, which have previously been advanced from the NCUTCD to FHWA, be immediately approved by FHWA as interim approvals.

[Pedestrian-Related Proposals for Immediate Interim Approval Consideration](#)

16B-RW-02 - In-Street Pedestrian Signs Gateway Installation

This proposal would allow the use of In-Street Pedestrian Crossing (R1-6 or R1-6a) signs at either bottom of curb or top of the curb locations, in addition to currently allowed locations. The proposal cites a request for experimentation from Michigan Department of Transportation from 2014 and further testing in Florida by Dr. Ron Van Houten as supporting data for this item as an interim approval.

11A-STC-01 - Flashing Beacon Sizes

This proposal permits the use of 8-inch beacons as well as 12-inch beacons in some circumstances, which corrects an unintended consequence in the 2009 MUTCD, in revisions to section 4D.07, which now requires 12-inch lenses for both vehicular signal faces and flashing beacons.

[Bicycle-related Proposals for Immediate Interim Approval Consideration](#)

14A-STC-02 - Bicycle Signal Faces

This proposal incorporates elements from and makes further revision to IA-16 - Interim Approval for Optional Use of a Bicycle Signals Face regarding bicycle signals, including taking some bike signal controls under certain movements from optional under the current interim approval to a standard under the proposal by the NCUTCD. While such an update to IA-16 is needed and can be approved immediately, ITE is also aware of work starting under the NCUTCD to further look at additional advancements and revisions that may be necessary for this device.

18B-BIK-05 - Buffered Bicycle Lane Markings

This proposal provides standards for buffered bicycle lane markings, including the buffer area that may be used to separate a bicycle lane from an adjacent general-purpose lane and/or parking lane. This proposal standardizes current national practice and is a straightforward approach to standardize markings for buffered bike lanes.

18B-BIK-02 - Bicycle Passing Clearance Sign

This proposal adds a new Section 9B.06a Bicycle Passing Clearance Sign, and a new sign to Figure 9B-2, which may be used on roadways where bicycles are allowed and in states with a required minimum bicycle passing distance. Testing of the sign in the 2017 Traffic Control Devices Pooled Fund Study and by Dr. Ron Van Houten during Spring 2018 validates interim approval criteria.

[Other Safe System-related Proposals for Immediate Interim Approval Consideration](#)

18B-RW-03 - Setting Speed Limits

This NCUTCD proposal would provide additional flexibility in the criteria used to set speed limits based on context, particularly on lower speed roadways and those used by vulnerable road users. This will help transportation professionals focus on speed management as a strategy to prevent fatalities and serious injuries.

14B-RW-01 - Intersection Conflict Warning Systems (ICWS)

This proposal provides options for signs to be used in association with ICWS (a system of signs, vehicle detection, and either flashing warning beacons or active sign element(s) installed at or near an intersection to provide real-time information about intersection conditions).

Moving these items forward as interim approvals would help protect vulnerable road users, advance overall safety of our roads, and would standardize a number of existing practices related to traffic control devices.

In addition to the above NCUTCD proposals for interim approval consideration, we often hear that the MUTCD Request for Experimentation process, which serves as a primary way to advance and evaluate ideas for new and improved traffic control devices, is hard to initiate and navigate, and the data collection and documentation required is difficult for many public agencies due to staff and funding limitations. We believe there may be ways to streamline the experimentation process, while also making it more transparent and more accessible to public agencies that would like to support experimentation requests first made by others. LAB would appreciate an opportunity to discuss these ideas with appropriate FHWA staff to see if there is a suitable path forward.

LAB welcomes further discussion of these items. We stand ready to assist FHWA in moving forward in an expeditious manner. Please contact me if you have any questions. You may also contact Rock Miller, P.E., a former International President of ITE who currently represents LAB on the NCUTCD and its Bicycles Technical Committee. Mr. Miller can be reached at 714-743-1415 or by email at rock@rockemiller.com.

Respectfully,



Bill Nesper Executive Director
League of American Bicyclists

CC: Martin Knopp, Associate Administrator for Operations