



May 3, 2023

Associate Administrator Chou-Lin Chen
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Docket No. DOT-NHTSA-2023-0002

Dear Associate Administrator Chen,

Thank you for providing the City of Houston with an opportunity to comment on the Draft Model Minimum Uniform Crash Criteria Guideline, Sixth Edition (“MMUCC”). Houston published its first Vision Zero plan in 2020 and continues to build on its data-driven high injury network. Improving the MMUCC’s granular-level detail helps us capture relevant data to improve our data gathering processes. Refining data categories that better reflects the diversity of conflicts experienced by vulnerable users, helps us better achieve our safety goals.

We echo statements posited by the National Association of City Transportation Officials (NACTO): “Our streets’ most exposed users – including people walking, biking, and rolling, in particular – are experiencing distributing and disproportionate increases in death and severe injuries from traffic collisions. As an association of city transportation and transit agencies that are on the front lines of the traffic safety epidemic, our comments in response to the Sixth Edition are focused on securing the information that practitioners need to reverse this devastating trend.”¹

Please see our suggested revisions:

Page 17, S3. Police Reported / Citizen Reported

- Using “citizen” as an attribute value is associated with an individual’s immigration status, which is not material to the reported event and can potentially result in negative unintended consequences. Additionally, converting responses into a binary yes/no choice is more intuitive.

Page 27, C6. First Harmful Event

- We suggest placing “bike lane barrier” in either Concrete Traffic Barrier or Curb.

Page 31, C7. Location of First Harmful Event Relative to the Trafficway

- Add “Bike Lane” as a location
- Add “Bus Lane” as a location
- Add “at grade rail crossing” as a location

¹ National Association of City Transportation Officials (05/03/2023), comment on draft Sixth Edition of the Model Minimum Uniform Crash Criteria (MMUCC).

Page 34, C8. Manner of Collision of the First Harmful Event

- Under Attribute Values: Select 1: “The First Harmful Event was Not a Collision with a Motor Vehicle In-Transport” – if selected, will this prompt further narrative to explain the manner of collision of that one motor-vehicle?

Page 40, C11. Relation to Junction

- Add “mid-block crosswalk” to Subfield 2.

Page 44-45. C12. Type of Intersection

- Roundabout should also be grouped with traffic control type.

Page 109, V.31. Traffic Control Device

- For Group 2: Signals - does this include pedestrian-actuated signal, such as a pedestrian-hybrid beacon or rectangular-rapid flashing beacon?

Page 155, D.10. Related Factors – Driver Level

- Under Attribute Values: Suggest adding “Failed to Yield Right-of-Way to Non-Motorist.”

Page 199, NM7. Non-Motorist Specific Location

- We suggest adding “Crossing Island or Midblock Crossing” because not all midblock crossings are protected.

Page 217, Ch. 12 Aligning to MMUCC

- The City of Houston supports ways to make alignment with MMUCC more enforceable. Currently, we do not have the Non-Motorist Data Elements as part of crash reports and requiring this would be extremely helpful for crash analyses and safety improvements to meet Vision Zero goals.

The City of Houston again appreciates the opportunity to submit comments on the draft Sixth Edition of the Model Minimum Uniform Crash Criteria. As one of the most diverse cities in the United States in a state with an increase in traffic fatalities and serious injuries over the last year, it is imperative we capture data that best informs our planning and engineering methods.

Sincerely,

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