



March 10, 2021

Stephanie Pollack, Acting Administrator  
Federal Highway Administration  
US Department of Transportation  
1200 New Jersey Ave S.E.  
Washington, DC 20590

RE: Request for an expedited reframing of the MUTCD as a proactive safety regulation

Dear Acting Administrator Pollack:

The City of Houston respectfully requests that FHWA reframe and rewrite the MUTCD, creating a path for the creation of comprehensive safety-based guidance. Doing so will allow FHWA and the Biden Administration to make strides towards equity and, sustainability, while reducing traffic deaths and serious injuries.

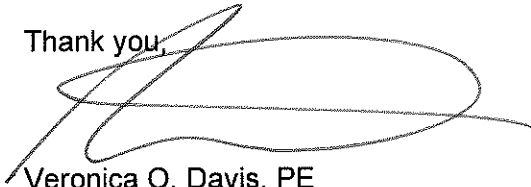
Houston is the 4<sup>th</sup> largest city in population. Within the 671 square miles of land area, Houston has 16,000 miles of street, over 1 million traffic signs, 25,000 signal heads, and 2,400 signalized intersections. Even with our vast road network, 60% of crashes happen on 6% of our streets. As we aim to make our streets safer for people walking, biking, using wheelchairs, and people driving, we look to documents like the MUTCD to guide our decision-making.

To date, the MUTCD has done little to help stem the approximately 40,000 traffic deaths the U.S. sees each year. This is due largely to the Manual's over-emphasis on motor vehicle operations and efficiency geared for rural highways, and neglect of other modes and contexts. To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability vision of the Biden Administration, the City of Houston would like to call attention some examples of the fundamental problems that must be addressed in an updated MUTCD:

- **Context:** The purpose of a standard is to maintain uniformity across our transportation system throughout the country. However, the updated regulations do not adequately address different land use. Overall, the MUTCD still seems to approach local roads with mixed land uses and all travel modes as one would with highways with limited multimodal interactions.
- **Speed Limits:** The MUTCD has a continued reliance on the 85th percentile approach to setting speed limits. However, this approach is ineffective for multi-modal users. During COVID, traffic volumes in Houston decreased leading to increased speeds and in turn increased crashes. MUTCD should provide guidance on setting speed limits that optimizes safety and mobility for all travelers. Even for highways, the 85th percentile approach leads to high speed limits and high-speed crashes that result in fatalities.
- **Signal Warrants:** The warrants are focused on reacting to historical data, including pedestrian volumes, which misses opportunities to improve safety conditions proactively to encourage the latent pedestrian demand.
- **Elements of the new draft,** particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities.

The issues described above are endemic to the document's underlying approach and undercut efforts to provide safe, multimodal accessibility in urban settings. The MUTCD needs holistic reframing to support cost-effective, sustainable, and equitable city street design and improve safety and accessibility for the most vulnerable users. We respectfully request that FHWA reframe and rewrite the MUTCD, creating a path for guidance that more closely aligns with the equity, safety, and sustainability goals of American cities, as well as those of the Biden Administration. The City of Houston stands ready to work with you.

Thank you,



Veronica O. Davis, PE  
Director, Transportation & Drainage Operations  
Houston Public Works



David Fields, AICP  
Chief Transportation Planner  
Houston Planning and Development