



March 22, 2021

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

RE: Serious concerns about the MUTCD in its current form  
Dear Acting Administrator Pollack and Secretary Buttigieg:

I write, as a licensed civil engineer with over 30 years of traffic engineering experience, a career long member of ITE, as a supporter of America Walks, and a person who cares very deeply about my community, Western New York, to raise serious concerns about the current draft MUTCD under revision by the agency. The MUTCD, an obscure technical document, is a major obstacle to the kind of humane, activity-supporting street level changes that are needed in my community and others across the United States.

Advocates like myself have valuable local and professional knowledge that is too often brushed aside by entrenched institutions, based on past auto dominated practices and the rule-bound dictates of the MUTCD. To make matters worse, much of the guidance is antiquated, racist, pseudoscientific and based on the premise that speeding cars through intersections is the most important goal. I join America Walks and other groups to ask that U.S. DOT perform a comprehensive overhaul of the MUTCD, centering safety and equity. We need a rule book that is designed to support healthier safer communities, one that:

- Is compatible with the USDOJ Pedestrian Right of Way Access Guidelines (PROWAG)
- Ensures every urban and suburban signalized intersection has basic pedestrian infrastructure, like curb ramps, ADA compliant pedestrian signal heads that display "Walk" and "Don't Walk" messages and crosswalks on each leg.
- Set speed limits based on safety, supports design outcomes and do not reinforce the 85<sup>th</sup> percentile speed circular reference
- Gives local residents a voice in what kind of infrastructure is needed.
- Support engineers flexibility to design urban streets that promote best practices and are safe enough for children to navigate. Supports statutory speed limit reductions to 15 MPH as warranted.

I join America Walks in asking 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.

Thank you,

A handwritten signature in black ink, appearing to read "James B. Jones".

James B. Jones, P.E., Owner

Cc: America Walks