



## Hillsborough TPO Transportation Planning Organization

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Beth Alden, AICP  
Executive Director

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

RE: Request a reframing of the MUTCD

Dear Acting Administrator Pollack and Secretary Buttigieg:

The Hillsborough Transportation Planning Organization (TPO), located in Tampa, Florida, has been dedicated to eliminating the alarming number of people hurt and killed on our roadways. As the first TPO to embrace Vision Zero, we are prioritizing safety projects that have started to move the crash trend downward, but our community continues to mourn lives lost on our streets, on a daily basis. Fortunately, the update of the Manual on Uniform Traffic Control Devices (MUTCD) provides an opportunity to make significant progress and we appreciate the opportunity to provide comments to the draft update.

As the manual that specifies guidelines for how traffic signs, road surface markings, and signals are designed, installed, and used by state and local agencies, we are pleased with the additions of proven safety and multimodal options but are concerned that the draft manual continues to over-emphasize motor vehicle operations and neglects other modes and contexts. We would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD to have it centered on safety, equity, and accessibility.

- Speed limits should no longer be set by relying on how fast drivers are driving – i.e. the 85th percentile of current driving speeds. Instead, speed limits should be set using a safe systems approach, appropriate for the context. Context sensitive design has been a widely accepted engineering practice for more than a decade.
- The warrant for installing a new traffic signal should not require fatal and injury crashes to have occurred. This does not align with Vision Zero principles and ignores known conflicts.
- Installing traffic signals to help pedestrians should not have to meet a higher threshold demand than traffic signals to help cars.
- Consistent with Americans with Disabilities Act, every signalized intersection needs accessible pedestrian infrastructure, including curb ramps, audible and tactile signals, pedestrian signal heads that display “Walk” and “Don’t Walk” messages, and painted crosswalks.
- Requiring that engineering studies be published without compensation inhibits innovative improvements such as red transit lanes and pedestrian safety measures.



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- Requiring coordination between pedestrian crossing beacons and intersection traffic signals if they are within 600 feet of each other places an extra burden on being able to provide safe crossings for pedestrians. Beacons that can be coordinated (e.g., HAWK) are many times the cost of other beacons (e.g., RRFB).
- New language perpetuates inequity by defining the “design pedestrian” as a “reasonable and prudent individual” who is “alert and attentive” and is “demonstrating due care,” while the manual is replete with guidance for “design vehicles” that gives wide latitude to motorist error (e.g., “shy distance”).
- The MUTCD update creates new barriers to implementing bicycle and transit infrastructure and does little to address existing barriers.
- Elements aimed at accommodating automated vehicles exacerbate already prohibitive cost burdens.

We are confident that at every level of government, there is a belief that no life should be lost on our roadways. The MUTCD should reflect Federal Highway’s commitment. 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 our community and those around the country.

Sincerely,

DocuSigned by:

*Beth Alden*

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Beth Alden, AICP  
Executive Director