City of Boston Transportation
1 City Hall Square, Room 721
Boston, MA 02201

March 19, 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

Acting Administrator Pollack:

The City of Boston Transportation Department 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.

To date, the MUTCD has done little to help stem the approximately 40,000 traffic deaths the U.S. sees each year. The number of fatalities among people walking or biking have been on the rise, topping 10,000 nationally each year — a disproportionate number of which happen in low-income communities and to indigenous people, to Black people, and to other people of color. The MUTCD over-emphasizes motor vehicle operations and efficiency at the expense of other modes and contexts, making it difficult to implement appropriate, safe solutions within our City.

The draft 11th Edition of the MUTCD, released in December 2020, does not do enough to address issues of cities like ours. The City of Boston Transportation Department would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:

- Continued reliance on the 85th percentile approach to setting speed limits over a safe systems approach results in the opposite of what our residents want: safer, slower streets where they aren't afraid to walk or bike with their families or to cross the street when catching a bus.

- Part 5 of the new draft, the new section aimed at accommodating automated vehicles (AVs), exacerbates already prohibitive cost burdens for cities. For example, work zones requirements are very favorable and perhaps critical to a current edge case for AVs but only moderately important to a human roadway user. We are also

concerned that the AV requirements will override sound judgement regarding the best and most appropriate accommodate for bicyclists on our streets.

- Currently, sections 4D.01 and 3B.16 make it nearly impossible to create a safe midblock pedestrian crossing — even at key pedestrian desire lines. For example, a current design project on Boylston Street near Fenway Park contemplates a midblock crossing, but the MUTCD creates the following issues:
    - **Section 4D.01** requires an unrealistic distance for the application of a midblock crossing in an urban environment. Many of our blocks are shorter than the 600' requirement for a midblock signal. Additionally our signals are old and updating them to synchronized would be prohibitively expensive. Nothing in these standards accounts for ease of use of pedestrian crossings, instead focusing on vehicular movement.
    - **Section 3B.16** suggests yield markings and signs for midblock crossings of more than one travel lane in either direction. If the crossing is unsignalized there is no safe option from a double threat collision.

- The speed limit for the City of Boston is 25 mph, and many neighborhood streets are or will be posted at 20 mph. Many striping and signage advanced placements are unrealistic for a city environment. For example:
    - **Section 3B.09** calls for lane reduction signs to be placed 325' in advance of a lane reduction on a 25 mph road. Guidance acknowledges that this is unrealistic in urban environments but provides no further instruction on placement, leaving it to engineering judgement.
    - **Section 3B.10** calls for 150' of striping changes before and after a 5' shift for an obstruction. These striping requirements have large implications for narrow urban corridors and often lead to the removal of other needs in the community such as protected bike lanes, wide sidewalks, or parking. These changes can slow or stop a project for years.

- Striping requirements often do not match the needs of a dense urban environment. For example:
    - **Section 3B.24** calls for a minimum width of diagonal crosshatch markings to be 8". Allowing the width of these lines to be the same as the travel lanes would save a great deal of time and money during implementation without impacting safety.
    - **Section 3B.01** creates difficulty in designing contraflow bike lanes where engineering judgement deems it safe. In our city, we have low-volume streets with parking on both sides and one direction of travel. Adding a contraflow

bike lane adjacent to the travel lane could provide bike connectivity, but the MUTCD provides no legal way of adding a yellow centerline that can be crossed over by drivers who are parking their vehicles.

The issues described above are endemic to the document's underlying approach and undercut efforts to provide safe, multimodal access in urban settings. We respectfully request that FHWA commit to reframing the MUTCD so that its guidance aligns more closely with the needs of cities. The City of Boston Transportation Department looks forward to working with you on this important task.

Sincerely,

Amy Cording, Director of Engineering
Boston Transportation Department