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MARCH 11, 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 Atlanta Department of Transportation 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, sustainability, while reducing traffic deaths and serious injuries.

As a city transportation agency, we are charged with implementing the city's Vision Zero program, which aims to eliminate serious injuries and fatal crashes on our city streets. We are charged with prioritizing safety for all roadway users, and especially vulnerable users, such as pedestrians and bicyclists. In 2019, Atlanta had 73 fatalities, in which over 1/3 of those were pedestrians, bicyclists or scooter riders. Additionally, more than half of those fatal crashes were attributed to speeding. We take very seriously our charge and goals for making Atlanta's streets safer for all. We have utilized the MUTCD in the creation of our standards and details, in development of roadway at street designs, large and small. However, in order to ensure that we are creating safer streets for all, we need the MUTCD to also align with this and prioritize the most vulnerable users of our roads.

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 on 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 Atlanta Department of Transportation 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. The City of Atlanta recently reduced speeds on certain streets to 25 mph. We do not support utilizing the 85th percentile approach for establishing and setting speeds in an urban environment, such as ours. The NCHRP 3-67 report recommends using 50th percentile in urban environments and the omission of that guidance in the MUTCD text will lead to improper use of the guidance by practitioners.

- Outdated signal and pedestrian hybrid beacon warrant requirements that ignore known conflicts and land use.
- The draft 11th Edition of the MUTCD, released in December 2020, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does little to address existing ones
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing and study.
- 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 Atlanta Department of Transportation stands ready to work with you.

Thank you,

Josh Rowan, Commissioner
City of Atlanta Department of Transportation

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