

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:

On behalf of PeopleForBikes, thank you for your work to update the Manual on Uniform Traffic Control Devices (MUTCD). After careful review, we respectfully request that **FHWA reframe and rewrite the MUTCD, creating a path for comprehensive safety-based guidance**. Doing so will allow FHWA and the Biden administration to make strides towards equity, sustainability and vulnerable road user safety.

The PeopleForBikes Coalition (PeopleForBikes) is the national trade association representing companies that manufacture and distribute bicycles, bicycle parts and bicycle accessories. Nationwide, PeopleForBikes represents nearly 300 bicycle businesses, more than 7,000 retailers and 1.4 million individual supporters. The U.S. bicycle industry contributes \$88 billion annually to our economy and employs more than 780,000 Americans.

To date, the MUTCD has done little to stem the approximately 40,000 traffic deaths the U.S. realizes each year. The Manual's over-emphasis on motor vehicle operations and efficiency on rural highways neglects the safety needs of other modes of travel and context for applying effective measures. The Biden administration has a unique opportunity to guide the development of an improved, safety-oriented document. **PeopleForBikes would like to call attention to the following fundamental problems that should be addressed in an updated MUTCD:**

- Speed limits are still based on the dangerous and disproven 85th percentile rule, and the draft MUTCD does not go far enough to implement the NTSB's clear recommendation to no longer use this approach (**Safety Study NTSB/SS-17/01**).
- Outdated signal warrant requirements focus on the history of pedestrian deaths, current crossing demand, and maintaining high vehicular speeds instead of addressing known modal conflicts or planned land use changes.
- Dozens of new "shall" statements introduce barriers to implementing bicycle and transit infrastructure and offer little acknowledgement of the effective and safe application of these treatments already present in dozens of American cities.
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing. Additionally, inappropriate regulation of public art on streets, including a prohibition of celebratory or colorful crosswalks, work against proven safety measures.

- The MUTCD creates prohibitive cost burdens for cities. Researchers, engineers, and cities have worked for decades to refine traffic control devices, only to have them excluded from the Manual without data to suggest issues with their adoption.

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 and equitable street design and improve safety and accessibility for the most vulnerable road 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.** PeopleForBikes stands ready to work with you.

Thank you,

A handwritten signature in blue ink, appearing to read 'KW', with a stylized flourish extending to the right.

Kyle Wagenschutz
Vice President of Local Innovation