



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:

C & G Technical Services LLC 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 to make strides towards equity, sustainability, while reducing traffic deaths and serious injuries.

C & G Technical Services LLC has spent several years providing services to organizations and government entities in the transportation sector. One undeniable truth that our managers have observed is the change in the needs and desires of the public with respect to transportation. Many times, the unintended consequences of the current public participation models are that the needs of the community are forgone to comply with public engagement regulations.

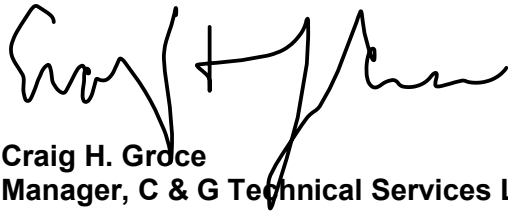
That is right, the very goal of public engagements is missed to satisfy those special interests' groups who game the system to promote the short-sighted views of the special interest. Decisions that are data-driven reach the optimal needs of transportation. We respect the documentation of the MUTCD in our planning and designs but find that many requirements do not meet the fundamental goals of transportation.

To date, the MUTCD has failed to stem the sad consequence of 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. Why, quite simply because it is easy to do. Most of the public has been funneled to the use of the personal automobile. To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability, **C & G Technical Services LLC of Cary, NC would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:**

1. Discontinue the reliance on the 85th percentile approach to setting speed limits over a safe systems approach.
2. Signal Warrant requirements must utilize data that sustains land use plans and not exacerbation of the land use.
3. The draft most recent draft of the new MUTCD, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does little to address existing ones.
4. Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, must be standardized and not dependent on public opinion.
5. Elements of the new draft, particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities. These new vehicles will be the future of transportation. Built for the future and do not tag underfunded entities to carry this financial responsibility.

We have spent a great deal of time trying to make the coming years an improvement of our past mistakes. The document's underlying approach h 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. C & G Technical Services LLC** stands ready to work with your staff to improve this process.

Thank you,

A handwritten signature in black ink, appearing to read 'Craig H. Groce', with a stylized flourish at the end.

**Craig H. Groce**  
**Manager, C & G Technical Services LLC**