



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

RE: Request to reframe the MUTCD as a proactive safety regulation

Dear Acting Administrator Pollack:

GObike 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.

Based in Western New York, GObike promotes active mobility options, trails and greenways, and complete streets. We connect and empower communities through advocacy, education, planning, and engagement. Our collective efforts are having a positive impact on wellness, our environment, our streets, and our economy.

Our work at GObike aims to create equitable solutions for modes of transportation beyond the personal vehicle. The current draft of the MUTCD must be updated in order to remove obstacles for infrastructure that would make our city a safer place to navigate. 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, GObike would like to call attention to the following fundamental problems that must 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 National Transportation Safety Board's clear recommendation to no longer use this approach.
- Outdated signal warrant requirements focus on the history of pedestrian deaths or current crossing demand, instead of known conflicts or planned land use changes. The Manual limits the installation of traffic signals because of the potential that they will slow car travel, and as result the guidelines place pedestrians at risk of being injured or killed before new signals are recommended. The requirement to meet a signal warrant in the Manual requires more people walking at a subject intersection than cars for the same safe crossing.
- Pedestrian signal indications are not required at existing or even new traffic signals, while redundant motor vehicle signals are required – even at urban intersections.
- The MUTCD prioritizes prescriptive uniformity at the expense of contextually appropriate design. Cities need guidance on common, safe traffic control elements, but flexibility to adjust designs for all users within their local setting is limited.



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- Inappropriate regulation of public art on streets, including a prohibition of celebratory or colorful crosswalks. New language stipulates that “the right-of-way is dedicated exclusively to highway-related functions” and that people should not be encouraged to “engage” with the street. Data shows that high-contrast crosswalks play a key role in pedestrian safety, with color and pattern added to further reflect community character and support neighborhood vitality.
- New ‘study’ requirements for using red transit lanes, the type of procedural requirement that adds veto points and can expose cities to litigation risks that are not present for single-occupant vehicle infrastructure. This has happened before; FHWA required 13 years of study before approving the use of red color in transit lanes, delaying implementation nationwide. Without the red tape that the MUTCD has historically created, cities across the U.S. today would likely have hundreds more miles of red colored transit lanes, making transit service more convenient, reliable, and accessible to the country’s essential workers.
- 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, 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.** GObike stands ready to work with you.

Sincerely,

Justin Booth
Executive Director
GObike