

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

RE: Urgent request for reframing the MUTCD to protect all road users

Dear Acting Administrator Pollack:

The Loisaيدا Open Streets Community Coalition (LOSCC) respectfully requests that FHWA reimagine and significantly update the MUTCD, opening the door to comprehensive safety-based guidance across the nation. Doing so will allow FHWA and the Biden Administration to make strides towards equity and carbon neutrality while reducing the country's silent epidemic of traffic deaths and serious injuries.

LOSCC is a group of New York City residents advocating for pedestrian-friendly streets in Lower Manhattan. Without universal guidelines for proper daylighting at intersections, paint and physical infrastructure to prioritize pedestrian and cyclist movement, it takes far too long for life-saving infrastructure to be built. Our non-drivers are at risk for injury and death each day. This year, [nearly 10,000 crashes](#) have already occurred in New York City.

It's no wonder New Yorkers' car ownership is [on the rise](#), threatening our climate and increasing traffic fatalities, given how street design prioritizes motorist level of service over our most vulnerable road users.

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 tunnel vision around motor vehicle operations and efficiency. To guide the development of a safety-focused document that supports the equity, safety, and sustainability vision of the Biden Administration, LOSCC 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 is reckless. Human lives must come before motorist speeds.
- 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. We are running out of time during this climate crisis—with transportation accounting for a third of the city's emissions, blocking carbon-free transit is irresponsible to say the least.
- Red transit lanes and pedestrian safety measures require far too much study to be efficiently deployed. We know [buses move quicker](#) and ridership goes up via dedicated lanes. Increased congestion and carbon emissions are the result.

The issues described above undercut efforts to provide safe and accessible cities. The MUTCD needs to reorient its priorities to support cost-effective, carbon reducing and equitable city street design and improve safety for 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. LOSCC stands ready to work with you.

Thank you,

Sophie Maerowitz
Co-Founder, Loisaida Open Streets Community Coalition