



April 8, 2021

U.S. Department of Transportation  
Secretary of Transportation Pete Buttigieg  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Federal Highway Administration  
Acting Administrator Stephanie Pollack  
1200 New Jersey Ave., SE  
Washington, DC 20590

**RE: Professional Comments, Concerns, and Recommended Changes to the  
11th Edition of the MUTCD**

Dear Acting Administrator Pollack and Secretary Buttigieg,

We write, as a professional firm working to make safer and more equitable places for people in cities across the country, to raise serious concerns about the current draft MUTCD under revision by the agency. The MUTCD, which lays out essential legal technical standards on the development of streets, is a major obstacle to achieving people-centered, human-scaled, non-auto-centric street-level changes that are needed in the communities in which we live and serve as consultants across the United States. In our experience, the manual has been too slow to adopt innovations rolling out in communities across our country, and the uniformity of the manual has been too restrictive for city streets.

The draft 11th Edition of the MUTCD, released in December 2020, introduces new barriers to implementing safe, multimodal, environmentally responsible infrastructure for all travelers, and would do little to fix the inequities that previous editions helped entrench. Even though fewer vehicle miles were traveled during the pandemic, the National Safety Council found that 42,060 people died in vehicle crashes in 2020, an 8% increase over 2019. Pedestrian deaths have reached the highest level in decades in most cities across the United States, especially within communities of color.

We join the National Association of City Transportation Officials (NACTO), the Association of Pedestrian and Bicycle Professionals, America Walks, Smart Growth America, AARP, and other national, regional, and local organizations to ask U.S. DOT to perform a comprehensive overhaul of the MUTCD, centering safety and equity. We need a rule book that is designed to support healthier and safer communities, one that:

- Ensures every urban and suburban signalized intersection has basic pedestrian infrastructure for safe and accessible mobility—including curb ramps, crosswalks, and pedestrian signal heads that display intuitive “Walk” and “Don’t Walk”

messages—coupled with Accessible Pedestrian Signal units providing audible and tactile messaging for people with visual impairments

- Places the safety of all travelers, regardless of mode, over the movement of cars when determining speed limits
- Gives residents a voice in the kind of infrastructure needed in their communities
- Prioritizes safety and potential municipal budget impacts in changes made to accommodate autonomous vehicles (AV), assuring that cities, counties, and states do not bear an unfair cost burden
- Gives engineers flexibility to design urban streets that are safe enough for the youngest and the oldest people to navigate by walking or rolling

**We ask for the following specific updates in processes and standards:**

1. Ensure that city transportation practitioners are actively involved in MUTCD updates. As the nation's primary roadway mileage and traffic signal owners and maintainers, cities should be recognized as the primary audience for the MUTCD and given a voice commensurate with that knowledge.
  - a. FHWA should take the lead on MUTCD revision discussions, holding frequent, virtual meetings to develop and review MUTCD content with cities, professional organizations, and other roadway owners, such as states and counties.
  - b. FHWA should create open lines of communications between NACTO and FHWA's Office of Infrastructure and Office of Operations, particularly the MUTCD team, through periodic meetings and calls (quarterly, transitioning to biannually).
2. Reform the MUTCD's structure to make frequent or partial updates more practical and expedient. FHWA can split the core standards of the MUTCD into a minimally prescriptive standards rule describing traffic control devices, such as signals and signs, and a separate guidance document that would be more readily updated. A second option would be for FHWA to shift MUTCD revisions out of the rulemaking process by adopting them via reference, as is done with other national standards.
  - a. Dramatically simplify the MUTCD regulation and make its update process fully transparent, as befits a major industry-wide document. The MUTCD can be published as a reader-friendly document that includes both guidance and rules, with the non-rule portions updated more frequently based on open professional discussion.
  - b. Transition away from signal warrants that require high numbers of pedestrians before installing a signal to a prioritization process focused on non-motorized safety and access. Issue an active transportation network signal warrant that makes people walking and biking equal to motor vehicle drivers as a basis for signalization.

3. Update critical areas in the upcoming MUTCD revision as described below and instruct states to expeditiously remove similar obstacles in their MUTCDs through design exceptions or other early action similar to FHWA interim approvals, even before rulemaking can begin.
  - a. Speed limits: Following recommendations from NTSB and other safety experts, FHWA should update the 2012 Methods and Practices for Setting Speed Limits report to develop proactive guidelines or adopt the speed limit setting methodology outlined in NACTO's *City Limits: Setting Safe Speed Limits on Urban Streets*. FHWA has indicated that it will make the modifications necessary to reduce reliance on the 85th percentile operating speed in speed-limit-setting guidance, as the NCUTCD has already approved; FHWA also should ensure that new regulations and guidance achieve the goal of injury minimization.
  - b. Signal warrants: Rationalize pedestrian signal options by revising the pedestrian signal warrant to match the easier-to-meet Hybrid Beacon warrant and eliminating language that discourages the use of Hybrid Beacons at intersections.
  - c. Pedestrian signals: Institute a requirement ("shall" clause) to install pedestrian signals when traffic signals are built or upgraded in urban and suburban contexts; pedestrian signals are currently optional despite their necessity for creating an accessible and safe roadway.
  - d. Bicycle signals: Provide flexibility in using bicycle signals and markings, which are currently subject to much stricter requirements than comparable pedestrian and vehicular signals, and remove the prohibition on continuing a marked bicycle lane at an intersection adjacent and to the right of a turn lane. Allow near-side 4" bicycle signals as a primary signal.
  - e. Color and art: Clarify that non-traffic-control color and art are permitted in the roadway (i.e., remove the prohibition on artistic crosswalks) and that colors and art may be used inside other traffic control markings so long as the function of the markings remains. If necessary, restrict this permission to roads with speeds lower than 50 mph.
  - f. Bus lanes: Change red-colored pavement for bus lanes to "may be installed for the entire length of a restricted lane or for only a portion (or portions) of the restricted lane."
  - g. Signage: Update signage in keeping with NCUTCD recommendations, in particular:
    - i. Allow in-road Yield/Stop for Bicycle and Pedestrian signs using the bicycle symbol.
    - ii. Allow the Turning Vehicle Yield to Bicycle and Pedestrian sign.
    - iii. Allow for yield markings in advance of bike lanes and crosswalks.

4. Provide a streamlined experimentation process to allow more responsive, better-informed interim approvals and changes to the MUTCD in the future.
  - a. Allow roadway owners/jurisdictions to add themselves to an existing experiment, avoiding the need to file a separate experiment.
  - b. Develop or approve a short, practical guide to experimentation, setting forth FHWA's expectations about data to be collected and criteria for declaring an experiment successful.
  - c. Develop or approve a simple experimental data collection template or checklist that roadway owners can include in grant applications, contracts, and work orders and modify as needed.
  - d. Issue a clarification letter or Interim Approval, as appropriate, permitting and describing a second stage of testing for new traffic control devices. The rules surrounding this second stage of testing should be easy to use, with simple reporting criteria using data that is readily available at most sites. This might be done through the existing Interim Approval process since that process already requires notification to FHWA.
  - e. Work to align NCHRP studies and UTC research to meet requests for experimentation requirements rather than requiring cities to entirely self-fund this research.

By taking action to reframe and rewrite the MUTCD, FHWA would provide practitioners with Federal guidance for safe urban street design, supporting the Biden Administration's bold equity and sustainability goals and making huge strides toward USDOT's mandate to reduce traffic deaths and serious injuries.

Thank you,



Jennifer Wieland  
Managing Director & Principal