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May 7, 2021

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

RE: Lyft Comments to Docket Number FHWA 2020-0001

Dear Administrator Pollack,

Lyft, Inc. ("Lyft") appreciates the opportunity to submit the following comments on the proposed rule to amend and update the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD). The Federal Highway Administration (FHWA) has a unique moment to create an important transportation policy framework that prioritizes safety, equity, and sustainability in the planning and design of streets in communities across the country. We respectfully request a holistic reframing and rewrite of the Manual on Uniform Traffic Control Devices (MUTCD) that better reflects the multimodal travel happening in our cities around the country and places a flag in the ground for the values of transportation equity and sustainable mobility that we hope to nurture for generations of travelers to come.

Lyft was founded in 2012 and is one of the largest transportation networks in the United States, bringing together rideshare, bikes, scooters, car rentals and transit in one mobile application. Our team is incredibly motivated by our mission: to improve people's lives with the world's best transportation. Lyft provides ridesharing services in over 600 cities across the United States, operates shared bike and scooter systems in 15 markets with local city partners, and surfaces real-time public transit information in 19 metropolitan areas. In 2020, over 1.8 million new riders tried our shared bikes and scooters as a sustainable, affordable way to get around without owning a car. Lyft's integrated network helps riders to plan their route from A to B in a single app. Shared mobility services such as transit, ridesharing, and micromobility have great potential to promote livability, expand access to opportunities, and reduce the United States' transportation carbon footprint. Street designs that ensure a safe and reliable space to ride are critical to the continued growth and adoption of these modes.

Currently, the MUTCD over-emphasizes and prioritizes the movement and operation of motor vehicles. A new version of the MUTCD would allow for comprehensive safety-based guidance that would help reduce the nearly 40,000 traffic deaths in the U.S. each year. Substantial efforts are needed to better support and represent the needs of people traveling by transit, foot, or on micromobility devices like bikes and scooters.

In particular, Lyft would like to call specific attention to the following fundamental issues that must be addressed in an updated MUTCD:

85th percentile speed limits. The continued reliance on the 85th percentile approach to setting speed limits prioritizes vehicle speeds must be discontinued. Speeding makes crashes more likely and also more severe. The 85th percentile rule was based on research from rural roads in the 1950's, and should not govern how we set speed limits today. This method is dangerous and has been [critiqued](#) by the National Transportation Safety Board: a safe systems approach should be implemented instead.

Bicycle infrastructure. The proposed draft of the MUTCD introduces new barriers to implementing bicycle infrastructure and does little to address the challenges that already exist for urban planners and engineers who are tasked with retrofitting vehicle-centrics right-of-ways with new designs that facilitate safety and equitable access.

Rather than blocking innovation, the MUTCD should instead validate and encourage bicycle design treatments that have proven to prevent traffic crashes and encourage daily bicycling. For example, in 9th Avenue in Manhattan, NYCDOT introduced the first protected bicycle lane in the United States and [saw](#) a 58% decrease in injuries to all street users. Similarly, the draft should proactively include a definition for separated/protected bike lanes and offer guidance on how to design a protected intersection that reduces crashes between motorists and people on foot and on two-wheels.

Public art on streets. New language in this draft will unnecessarily regulate the use of public art on streets. 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. In cities and towns across the United States, public art on streets has proven to not only improve safety but also to facilitate better order in the public right-of-way, including responsible parking of micromobility devices. In Kansas City, the city revitalized an intersection with public art, wider curbs, plants, and dedicated park biking - and [found](#) the improvements reduced overall vehicle speeds by 45%. In Washington D.C, the District recently [launched](#) a scooter corral ground mural project to help promote local economic development, promote placemaking, and ensure a safe and accessible public right of way with dedicated bike and scooter parking.

Street design is a determining factor in how people make daily transportation decisions. Without a significant overhaul to the MUTCD, our country is not propelling a wholesale change in approach to how streets are designed and engineered. This in turn will foreclose the potential for streets to be welcoming to non-drivers and limit the potential of public transportation, walking and bicycling to scale into a larger share of daily transportation trips. The famous adage, "if you build it, they will come" holds true in transportation and the MUTCD has an opportunity and obligation to drive modeshift in powerful ways in its next iteration. If revised with biking, walking and transit in mind, the MUTCD can be a standard bearer that supports the decarbonization of our transportation network and that makes multimodal transportation safe and access to it more equitable in communities across

America. We urge you to use this moment to advance meaningful safety, equity, sustainability benefits in our cities and communities.

We appreciate FHWA's work in this process and look forward to continued engagement on the MUTCD's revisions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Caroline Samponaro', with a long horizontal flourish extending to the right.

Caroline Samponaro
Head of Transit & Micromobility Policy