

May 14, 2021

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

Dear Acting Administrator Pollack:

RE: Rewriting MUTCD

I write today seeking your help in the modernization of the MUTCD. My hope and request is a rethinking of this manual from one that prioritizes moving cars efficiently to one that takes context into account, recognizes the multiple ways that people get around in urban areas, and that prioritizes the pedestrian's right to safely use the urban right-of-way – especially in center city areas.

You have no doubt received very detailed responses from professionals in the transportation field. I will speak more generally as a person who has worked for 35 years in the downtown redevelopment field. The function and management of the urban street system in most American cities is one of the most damaging things government does to urban property and business owners. Because the MUTCD is treated like religious doctrine by cities, most city leaders act powerless to make the changes to their urban streets that would make the adjacent urban buildings economically viable.

Urban streets need to prioritize the safety of the pedestrian while accommodating the vehicle. I am not amongst the crowd that wants to close streets to make pedestrian plazas. In most American cities where this has been done, it has been a disaster. Boulder, Denver, and Burlington are notable exceptions and there are market and management reasons for their successes that do not exist in most cities. Let me speak specifically about my city – Mobile, Alabama. We have a beautiful urban street grid that grew out of the 1711 city plan laid out by French planner Jacques Pailloux. Only at the edges was the historic grid obliterated about 50 years ago with a high speed ring road. With the exception of one street, (Government Street/mentioned later) all of the streets inside the ring road have less than 5000 cars per day using them. Actually, most have less than 2000 cars per day using them. On these delicate old world streets with little daily vehicle travel are 21 intersections with traffic signals where stop signs would suffice. Drivers are often stopped by a red light where one or no cars cross when given the green at the opposing light. Drivers gun it to “make the light.” They never gun it when headed to a stop sign. The restrictive nature of the federal guidance makes fixing this more costly and involved than it should. The result is that in order to realize a safer outcome for pedestrians and drivers, we have an expensive, time-consuming, and involved process that maintains an unsafe urban condition. I might add that Alabama was recently named the 2nd most dangerous state for pedestrian deaths and Mobile was the 2nd most dangerous city for such deaths in the state.

On Government Street, a beautiful signature street running east-west through the center of our downtown, and also US Highway 90, there are 17 intersections and 11 traffic signals. The street carries about 20,000 cars/day. A recent study by Speck & Associates in concert with Nelson\Nygaard recommended pedestrian-activated signals at the intersections with no traffic signals. They also

recommended LPI signals and painted cross-walks at every signalized intersection. These do not exist at all signalized intersections now. The result of this being that people make a run for it too many times. FHWA should make it safer to cross America's urban streets by reforming the process for signal and hybrid beacon warrants. The high volume of people crossing a street required to warrant a pedestrian signal is ridiculous, unreasonable, and prioritizes cars over human beings. Urban areas only thrive when there are large numbers of pedestrians. The current policy contributes to the difficulty of American's center cities to revive including Mobile's.

Our study also makes recommendations for a number of bike lanes, in part to encourage safer speeds on unnecessarily wide streets. We ought to be able to emphasize these and other special places with color-painted lanes. Please remove the unnecessary restrictions on the use of green paint for bike lanes, red paint for bus lanes, and other colored paint for crosswalks. We need to be able to paint creatively inspired cross-walks in our center cities where vehicles are moving slowly and appropriate to the context. Our city has consistently denied every request to do any design for a crosswalk in our arts district except for the most basic manual design. To what purpose?

One of the problems with our center city streets is the speed at which vehicles drive. Part of that is the design of the street and part of that is the small number of vehicles using the streets as mentioned earlier. Most streets are signed at 30 mph in the downtown area. This is too fast for most streets if the goal is to encourage development of the adjacent historic buildings. Only in the areas where vehicles are moving at 10-20 mph are buildings and businesses thriving in the center city. Using the 85th percentile approach to setting speed limits misses the point in urban settings. While it is proposed to become a "recommendation" over a "requirement," that is still too strong in the center city context. Eliminating all guidance recommending the use of free-flow speed in setting speed signals an intention to heed the latest in safety research and tells the states that this approach is no longer endorsed.

America's center cities need FHWA to recognize the special nature of the built environment and street-system relationship. A street design that emphasizes the automobile over the pedestrian causes great harm in a historic grid setting. Businesses die and buildings fall into economic ruin. Cities suffer and people migrate to newer parts of town. There is ample research showing the economic gains city centers can make when the streets are managed with the pedestrian's safety and comfort as a priority. For thousands of years, public bodies have invested in infrastructure like roads to induce development – not just to make it easier for people to move elsewhere. Let our nation chart a course where the transportation infrastructure is a blessing to the center cities and let us begin today.

I thank you for your consideration.

Yours truly,

Elizabeth P. Stevens
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