

March 12, 2021

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

**RE: Request for an expedited reframing of the MUTCD as a proactive safety regulation**

Dear Acting Administrator Pollack:

The City of Vancouver (British Columbia, Canada) supports the call from U.S. cities to respectfully **request that the Federal Highway Administration (FHWA) reframe and rewrite the Manual on Uniform Traffic Control Devices (MUTCD), creating a path for the creation of comprehensive safety-based guidance.** Doing so will allow the FHWA to make strides towards a more equitable and sustainable transportation systems globally, while reducing traffic deaths and serious injuries.

While as a Canadian city we are not subject to the MUTCD, the MUTCD has a strong influence on the practices across North America. As such, MUTCD policies can affect the safety and comfort of people walking, rolling, and cycling in Canadian cities, and its directions related to the adoption of emerging automated vehicle technology will shape municipal practices and investments for decades to come. Motorists from the U.S. can and will drive to Canada, and if Canadian cities are not willing or able to fund these infrastructure changes for automated vehicles, there may be significant safety issues or road authorities may need prohibit their use.

**The City of Vancouver would like to call attention to the following concerns with the draft MUTCD:**

- The new section related to automated vehicle accommodation would require municipalities to assume an unrealistic burden in capital and operational costs, through new infrastructure, increased separation of travel modes, and higher maintenance standards, to ensure automated vehicles can operate in complex urban environments.
- While separating cycling from general purpose traffic is a good design approach in some street environments, it is not always feasible or necessary and municipalities must retain the autonomy to make these decisions based on a complex and wide range of considerations and not exclusively to accommodate the needs of automated vehicle sensors and algorithms.
- The inclusion of bike signals, red transit lanes, and public space/curb extensions on the roadway is encouraging, but the associated restrictions or study requirements warrant

considerable more thought as they preclude or overburden many important design interventions that help us improve the safety of vulnerable road users on our city streets.

- The draft document still contains outdated signal warrant requirements for very high pedestrian volume thresholds, and do not consider network connectivity goals, geometry, driver behaviour, cycling network needs, or the land use context.
- The continued reliance on an 85th percentile method for setting speed limits over a safe systems approach is deeply concerning and counter to our existing policies in the City of Vancouver.
- The new outright prohibition on crosswalk art, as opposed to providing guiding parameters, is unjustified and counterproductive.
- Such significant and important changes to national practices warrant a correspondingly significant engagement effort with municipal governments, the public, and other key stakeholders.

The issues described above are endemic to the document's underlying approach and undercut efforts to provide safe, multimodal access in urban settings, and to prioritize low-cost, healthy, sustainable transportation choices such as walking and cycling. Many of Vancouver's bolder recent street re-designs—which have had significant, positive impacts on safety and sustainable transportation mode share—would be non-conforming in a U.S. city if this draft MUTCD were to be adopted.

We strongly recommend that the FHWA seize this opportunity to address long-standing known issues and biases inherent in the MUTCD, to create an important reference document that more closely aligns with the equity, safety, and sustainability goals of cities across North America.

Thank you,

A handwritten signature in black ink that reads "Paul Storer". The signature is written in a cursive, flowing style.

Paul Storer, *P. Eng*  
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