



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:

We are so excited about your appointment at FHWA! As you know, this is a crucial modal administration at DOT, influencing the shape and prospects of communities nationwide. Your track record makes you the perfect fit to lead programs and staff forward, tackling the intertwined national crises of racial injustice, climate change, the pandemic, and the economic crash. We look forward to collaborating with you and your staff.

We join our partner the National Association of City Transportation Officers in recommending that FHWA reframe and rewrite of the Manual on Uniform Traffic Control Devices (MUTCD), creating a path for a comprehensive safety-based guidance that supports livable and sustainable communities. Doing so will facilitate and encourage local and state strides towards equity and sustainability, while reducing traffic deaths and serious injuries.

Americans in communities across the country use our streets every day to access jobs, nature, education and social opportunities. But the current MUTCD prioritizes high-speed vehicle travel at the expense of safe, healthy corridors that support equitable and climate resilient communities.

To date, the MUTCD has done little to help stem the approximately 36,000 traffic deaths the U.S. sees each year (including 7,000 bicyclists and pedestrians), and does not adequately support travel by foot, bike and transit.

This is due largely to the Manual's over-emphasis on motor vehicle operations and efficiency on rural highways, and neglect of other modes and contexts. To guide the development of an improved, safety-oriented document that supports equity, safety, and sustainability, we would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:

- The continued reliance on the 85th percentile approach to setting speed limits prioritizes vehicle speeds over a safe systems approach.
- The outdated signal warrant requirements ignore known conflicts and land uses.
- 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.

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- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to excessive standards of testing.
- Elements of the new draft, particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities.

A well-crafted MUTCD could underpin a major shift towards safer, healthier and more sustainable streets for Americans. But, to do this the MUTCD needs holistic reframing to support cost-effective street designs that improve safety and accessibility for the most vulnerable users.

We respectfully request a reframe and rewrite of 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, and we stand ready to work with you.

Thank you,

A handwritten signature in black ink, appearing to read "Carter Rubin", written in a cursive style.

Carter Rubin
Mobility and Climate Advocate, NRDC