

May 13, 2021

Dear Acting Administrator Pollack:

Thank you for the opportunity to comment on the Manual on Uniform Traffic Control Devices (MUTCD). We urge you to make our streets safer for active transportation.

The Anchorage Park Foundation believes all transportation projects should increase connectivity to walk, bike and roll, including access to transit.

We want you to know we are doing our part to advocate for more state, federal and local funds to help build safety for active transportation users into these projects. We are promoting local bonds, advocating for general obligation bonds at the state level and working at the national level to increase funding in the federal transportation reauthorization bill.

COVID and the ongoing public health crisis highlight the importance of Anchorage – and our nation's - active transportation systems. In 2020, Anchorage's main shared use pathways (also known as the Moose Loop) saw an overall 15% increase in use with a 26% increase in pedestrian use as compared to the previous five years, according to data analyzed by the Municipality of Anchorage traffic department.

This is especially significant because we didn't have the usual influx of nearly a million tourists. These safe, maintained multi-use trails have been a lifesaver for Alaskans young and old. And every time we walk, bike or roll to our daily destinations, either for recreation or transportation, we eliminate one car from the road and help to reduce greenhouse gas emissions.

I would like to call attention to the following fundamental problems that should be addressed in an updated MUTCD:

- Speed limits are still based on the dangerous and disproven 85th percentile rule, and the draft MUTCD does not go far enough to implement the NTSB's clear recommendation to no longer use this approach (Safety Study NTSB/SS-17/01).
- Outdated signal warrant requirements focus on the history of pedestrian deaths, current crossing demand and maintaining high vehicular speeds instead of addressing known modal conflicts or planned land use changes.
- Dozens of new "shall" statements introduce barriers to implementing bicycle and transit infrastructure and offer little acknowledgement of the effective and safe application of these treatments already present in dozens of American cities.

- Traffic control devices appropriate for urban contexts, such as red transit lanes and
 pedestrian safety measures, are subject to high standards of testing. Additionally,
 inappropriate regulation of public art on streets, including a prohibition of celebratory
 or colorful crosswalks, work against proven safety measures;
- Rules for bike signage seem to be a burden to local engineers. Time and time again, we request standard "Bike Route" signage that traffic engineers refuse to put in place;
- The MUTCD creates prohibitive cost burdens for cities. Researchers, engineers and cities have worked for decades to refine traffic control devices, only to have them excluded from the Manual without data to suggest issues with their adoption.

We would like to see an encouragement for traffic engineers to be more bold, more creative, and more open to ideas for the future of an active, healthy America. The Anchorage Park Foundation is proud to be a part of the CDC's Active People, Healthy Nation campaign to get 27 million more Americans active by 2027. We look forward to working with you to biking, walking and rolling on city and state streets, to make Anchorage more active and healthy, together.

In Community,

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