

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

RE: Serious concerns about the MUTCD in its current form

Dear Administrator Pollack and Secretary Buttigieg:

The leadership Bicycle and Pedestrian Advisory Committee in Alexandria, VA has serious concerns about the current draft MUTCD under revision by the Federal Highway Administration. The draft MUTCD prioritizes people who drive above all other modes, regardless of the impact on safety for people who walk or ride bikes. Pedestrian deaths [increased](#) 51% and bicyclist deaths [increased](#) 36% in the past decade. The MUTCD is one of the key reasons why we have lost some of our friends and neighborhoods to traffic violence.

The MUTCD, an obscure technical document, is a major obstacle to the kind of humane, activity-supporting street level changes that are needed in my community and others across the United States.

Grassroots advocates such as our organization have valuable local knowledge that is too often brushed aside by traffic engineers based on the rule-bound dictates of the MUTCD. To make matters worse, much of the guidance is outdated, has no basis in science or studies, and based on the premise that speeding cars through intersections is the most important goal.

We join America Walks and many other advocacy groups to request that U.S. DOT perform a comprehensive overhaul of the MUTCD, centering safety, equity and accessibility instead of convenience for people who drive. We need a rule book that is designed to support healthier safer communities, one that:

- Puts safety first instead of fourth on the first page so that uniformity no longer outweighs safety.
- Separates turning vehicles from people walking and biking because half of our pedestrian crashes involve turning vehicles. Had the MUTCD required separation on an intersection in Alexandria, [Justin Benedict](#) would be alive today. Pure [luck](#) was the only reason why no one died in this crosswalk in nearby Arlington County, VA.
- Requires use of the FHWA Bikeway Selection Guide to determine the appropriate facility for a bikeway (Chapter 9A) as it is based on studies and science.
- Ensures every urban and suburban signalized intersection has accessible pedestrian infrastructure, including curb ramps, audible and tactile signals,

pedestrian signal heads that display “Walk” and “Don’t Walk” messages, and painted crosswalks. Actively retrofitting this equipment should not be optional.

- Does not ban contraflow bike lanes adjacent to parked cars. This proposed ban prohibits almost all current contraflow bike lanes (Section 9E.08) in the name of uniformity and despite every study of contraflow lanes show increased safety. The only reason this has been proposed is because a few FHWA engineers do not like double-yellow lines adjacent to parked cars. Your agency has confirmed that they have ZERO evidence to support this ban.
- Replaces all references to the 85th percentile with a requirement set speed limits based on safety. Your agency, the FHWA has stated that “the original research between speed and safety which purported that the safest travel speed is the 85th percentile speed is dated research and may not be valid under scrutiny.”
- Explicitly allow crosswalks of any color or painted to look like the third dimension because there is no evidence of that non-white crosswalks decrease safety.
- Ban trail stop signs which cause confusion and imply that people walking and bicycling do not have the right of way at crossings. Instead, require vehicles to stop at trail crossings where trail users outnumber people driving or at crossings with low visibility.
- Prohibits right turn on reds on all streets with bike lanes, crosswalks with significant pedestrian volume and areas of low visibility.

**We join America Walks in asking that FHWA to completely reframe and rewrite 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.**

Thank you,

**Zack DesJardins, Josephine Liu, Erin Meter and Mary-Jane Roth**

**Bicycle and Pedestrian Advisory Committee**

**Alexandria, VA**