



Department of Transportation

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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 Madison Department of Transportation respectfully **requests that FHWA reframe and rewrite the MUTCD, creating a path for the creation of comprehensive safety-based guidance.** Doing so will allow FHWA and the Biden Administration to make strides towards equity, sustainability, while reducing traffic deaths and serious injuries.

Madison Department of Transportation is responsible for developing and maintaining a safe, efficient, economical, equitable, and sustainable transportation system for Madison's residents and visitors in a way that is consistent with the City's land use system and regional transportation goals. MUTCD heavily impacts us, as it sets the standards on how we can design, install and use traffic control devices such as traffic signs, roadway pavement markings and signals.

We hope that the MUTCD can do much more to help stem the approximately 40,000 traffic deaths the U.S. sees each year. The Manual overly emphasizes motor vehicle operations and efficiency on rural highways, and largely neglects other modes and contexts. To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability vision of the Biden Administration, **The City of Madison Department of Transportation would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:**

- The current edition and the draft 11th Edition of the MUTCD narrowly focus on uniformity of traffic control devices, while ignoring many other needs and values of communities, such as equity, sustainability and curbing climate change.
- The draft 11th Edition of the MUTCD takes away tools that engineers can use to improve mobility and safety for vulnerable users in challenging and complex urban settings, such as counter flow bike lanes next to parallel parking and the use of HAWK signals (Pedestrian Hybrid Beacons) with bike signals. Lack of these treatments will make many locations more dangerous and harder to access by vulnerable road users.

March 12, 2021

MUTCD Comments – City of Madison Department of Transportation

Page 2

- The draft 11th Edition of the MUTCD introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does little to address existing ones.
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing.
- Continued reliance on the 85th percentile approach to setting speed limits over a safe systems approach.
- Outdated signal warrant requirements that ignore known conflicts and land use and requires unreasonably high amount of pedestrians to warrant a traffic signal.
- Elements of the new draft, particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities, yet do not provide clear guidance for practitioners to follow and may expose cities to unreasonable amount of legal liabilities.

The issues described above are endemic to the document's underlying approach and undercut efforts to provide safe, multimodal accessibility in urban settings. The MUTCD needs holistic reframing to support cost-effective, sustainable, and equitable city street design and improve safety and accessibility for the most vulnerable users. **We respectfully request that FHWA 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.** The City of Madison Department of Transportation stands ready to work with you.

Sincerely,



Thomas W. Lynch, PE, PTOE, PTP, AICP
Director of Transportation
City of Madison



Yang Tao, PhD, PE
City Traffic Engineer
City of Madison