



ASSOCIATION OF
METROPOLITAN
PLANNING
ORGANIZATIONS



The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
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Washington, DC 20590

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

May 14, 2021

RE: National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways; Revision (FHWA-2020-0001-0001)

Secretary Buttigieg and Acting Administrator Pollack:

On behalf of the nation's local governments and planning organizations – National League of Cities, Association of Metropolitan Planning Organizations, National Association of Regional Councils, National Association of Counties, U.S. Conference of Mayors, and the National Association of Development Organizations – we appreciate your attention to our collective comments on the proposed National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).

America's local governments own almost 80% of the nation's roads, invest substantially in these assets, and continue to play a significant role in advancing excellent road design and planning standards that ensure safe and well-connected streets and sidewalks. We appreciate that an update to the MUTCD is a significant undertaking, and in the last several years of attempts, the process and proposals have elicited strong reactions among local transportation community practitioners due to the safety, cost, and design implications of the MUTCD changes. However, our input into this proposed manual prior to release for comment has been limited, and throughout the pandemic when the proposed changes were available for comment, many local governments were working to both pivot to new demands like shifting parking to restaurant outdoor space or balancing workloads with limited staff from partial furloughs. We believe the appropriate time and capacity to provide substantial and detailed comments may have been curtailed.

We respectfully request that FHWA carefully review the various concerns and feedback raised by local stakeholders that are submitted in the docket, and we also reiterate our previous feedback:

- 1) **USDOT must consider how the MUTCD can best fulfill its intended purpose in a timely update before new long-term investments are made as well as ensure a comprehensive outreach process for reframing the MUTCD.**
- 2) **We urge USDOT to provide all road users – whether pedestrians or autonomous vehicles – equal attention, rather than elevating some over others.**
- 3) **As a part of our request for a strategic review we also ask that you consider forming a diverse group of stakeholders to gather perspective and important feedback. Given that the MUTCD will guide long-term investments in our nation's transportation network it is critical that local engineering, planning, and transportation professionals are included in the process.**

Additionally, we'd like to highlight significant points from key organizations.

From the Institute of Transportation Engineers:

"The MUTCD needs to support the needs of all users -The MUTCD was originally developed and has continued to evolve as a primarily vehicle-centered document. Specific pedestrian and bicycle provisions have been added over the years, but the vast majority of the material contained in the MUTCD remains centered primarily on safely accommodating vehicle movement. We believe that the MUTCD must continue to evolve to include an equal focus on the needs of all users, especially vulnerable road users, such as motorcyclists, pedestrians, and bicyclists. Vulnerable road user safety must be prioritized over vehicle movement in the selection of traffic control devices."

From the National Association of City Transportation Officials:

"Elevate the goal of eliminating serious injuries and deaths as a guiding principle of the Manual, ensuring a "safe systems" approach throughout the document.... Eliminating the language in Section 1A.03, redefining the Manual's primary goal, and recognizing the primacy of substantive safety even above uniformity are essential to ensure that every regulation in the MUTCD serves to improve safety and accessibility for people rather than reducing motor vehicle delay."

"Remove guidance recommending the use of free-flow speeds, including the 85th percentile speed, in setting speed limits. A substantial body of published research, most recently from The National Transportation Safety Board (NTSB) in 2017, shows that using the 85th percentile approach to establish speed limits leads to increases in vehicular speed over time. As a result, a wide consortium of American safety and engineering organizations, including the National Committee on Uniform Traffic Control Devices (NCUTCD), the National Safety Council, NACTO, and the Vision Zero Network no longer endorse the MUTCD's recommended speed-limit-setting approach."

In our previous communication ([ID: FHWA-2020-0001-1181](#)), we asked USDOT to advance a strategic review of the proposed MUTCD to determine how to best meet safety and connectivity

goals across the nation as we make significant and once-in-a-generation investments, and we reiterate that here. We appreciate your consideration of these comments in your deliberations.

Thank you,

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National Association of Development Organizations
U.S. Conference of Mayors