



CITY OF PROVIDENCE
Jorge O. Elorza, Mayor

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

March 12, 2021

RE: Request for an expedited rewrite of the MUTCD

Dear Acting Administrator Pollack:

On behalf of the City of Providence, Rhode Island, I write to join with other cities across the country and respectfully request that FHWA reframe and rewrite the Manual on Uniform Traffic Control Devices (MUTCD) to help make our communities more equitable, safe, and sustainable. To date, the MUTCD has done little to help stem the approximately 40,000 traffic deaths the U.S. sees each year or encourage sustainable modes of transportation. 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. Furthermore, the general frame of the MUTCD today leaves open too much space for unimaginative literal interpretation to ignore vulnerable road users and, unfortunately, the currently proposed revisions do not improve on this.

Much like the Biden Administration, Providence has established bold goals for racial equity and climate mitigation that we seek to address through our transportation systems in tandem with other efforts. This once-a-decade chance to amend the MUTCD needs to be re-examined to better align with these goals. To guide the development of an improved, safety-oriented document that supports our goals as well as the goals of the Biden Administration, Providence calls attention to the following fundamental problems that must be addressed in an updated MUTCD:

- 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- Outdated signal warrant requirements that ignore known conflicts and land use;
- New barriers to implementing environmentally responsible bicycle and transit infrastructure that were introduced as part of the draft 11th Edition of the MUTCD;
- Testing standards that create additional barriers to implementing many traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures; and,
- An exacerbation of already prohibitive cost burdens for cities by the new automated vehicle requirements.

We respectfully request that FHWA use this opportunity to work with cities to completely reframe and rewrite the MUTCD, and create a path for guidance that more closely aligns with the equity, safety, and sustainability goals of American cities and the Biden Administration. Providence stands ready to work with you in this effort.

Thank you,

Martina L. Haggerty
Director of Special Projects
City of Providence