

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 Chattanooga 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 and sustainability, while reducing traffic deaths and serious injuries.

Like many cities, Chattanooga's transportation decisions have been driven historically by highway design principles that since the 1950s and 1960s have had little regard for the place-making qualities of our streets that are so important to the health and well-being of our city's people. We acknowledge and appreciate the need for many of the uniform standards established in the MUTCD for certain contexts. But we also recognize that many of those standards respond to the characteristics of high volumes of vehicles travelling at high speeds in the context of a state and national highway system. However in the City of Chattanooga over 75% of our streets are local streets that include storefront businesses, pedestrians, bus-stops, front porches, basketball goals, and sidewalk cafes. Cities need standards that respect our people in fundamentally urban contexts and not just cars on our highways.

In Chattanooga, year to year, more people die in traffic crashes, simply trying to move around our city, as do by gunshot. While gunshot violence is consistently headline news in our community, death by traffic crash if reported at all is done so as though it is an expected consequence of how our cities work. My fifteen year old daughter commented the other day on her second day of driving that the man jaywalking across the street was behaving dangerously. To my vast appreciation, she understood when I disagreed with her perspective and suggested that it might be us in a two ton box going 35 mph that is the danger. While the safety standards of the MUTCD and other national guidelines are invaluable to our department's work because of the car-dominance of the cities we've built, we have to move towards an approach that more strongly legitimizes the safety and comfort of people.

To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability vision of the Biden Administration, the Chattanooga Department of

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Transportation would like to call attention to the following opportunities that should be addressed in an updated MUTCD:

- Creating more guidance for the creative use of artful implementations on our city streets such as street murals.
- Establishing context distinctions with different standards for people-oriented streets.
- Development of alternative speed-setting methodologies beyond the 85th percentile approach.
- Providing more streamlined mechanisms for new alternative approaches for traffic control devices appropriate for urban contexts
- Assuring that the introduction of new technology such as automated vehicles requires the technology to conform to an urban, pedestrian environment rather than requiring impractical wholesale upgrades to city street infrastructure.

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 Chattanooga Department of Transportation stands ready to work with you.

Thank you.

Blythe Bailey
Administrator
Chattanooga Department of Transportation

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