

May 14, 2021

Pete Buttigieg, Secretary  
US Department of Transportation  
1200 New Jersey Ave SE  
Washington, DC 20590

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

RE: Comments from State Legislators  
Docket Nos. FHWA-2020-0001-0179 and FHWA-2020-0001-0001  
National Standards for Traffic Control Devices: Manual on Uniform Traffic  
Control Devices for Streets and Highways; Revision

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Dear Honorable Secretary Buttigieg and Acting Administrator Pollack,

Thank you for the opportunity to comment on revisions that are proposed for the Manual on Uniform Traffic Control Devices (MUTCD), released in the closing months of the previous administration. We are state legislators from across the country tasked with overseeing and establishing resources and policies to create state and local transportation systems to provide safety, health and opportunity for the wide array of constituents we represent.

We respectfully request that Federal Highway Administration (FHWA) restart the current revision process and take a new approach. We request that an entirely new MUTCD be developed that has greater focus on safety and access inclusive of all parts of the community who use and otherwise interface with our road and bridge networks, whether in a motorized vehicle or not.

As proposed, the draft presently being considered perpetuates fundamental flaws of priority and focus that decrease safety and eliminates access for many.

Speed limits are still assumed to be set at the speed at or below which 85 percent of all vehicles are observed to travel, despite this having been shown to be inappropriate and dangerous for roads with multiple types of users. The National Transportation Safety Board (NTSB) recommends that this approach no longer be used. (Safety Study NTSB/SS-17/01).

A demonstrated history of pedestrian deaths continues to be required to justify installation of a traffic signal to allow non-motorized travelers to cross a road. Further, prioritized in this analysis is the preservation of vehicular speeds. The need for individuals to cross at a given point, land uses on either side of a roadway and analysis of likely travel mode conflicts are not taken into account. This clearly works against the interests of access and safety for many road users.

Unnecessary barriers to implementing bicycle and transit infrastructure are created. These requirements only result in inordinate delays and expense for local jurisdictions. There is little or no acknowledgement of the effective and safe application of these applications already present in dozens of American cities.

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Traffic control devices appropriate for urban contexts, such as dedicated on street transit lanes and pedestrian safety measures, are subject to arbitrary and unjustified high standards of testing. Additionally, the manual inserts regulation of public art on streets, including a capricious prohibition of celebratory colorful crosswalks, shown to be a proven safety measure. Numerous traffic control devices that have long been in use, well researched and refined for their efficacy have been excluded from the draft manual. No data to suggest issues with their adoption is provided.

We stand ready to partner with the US Department of Transportation, the FHWA and the National Committee on Uniform Traffic Control Devices to help envision create a transportation system that upholds excellence in engineering and design for our communities so that everyone can easily and safely get to what they need for productive and healthy living.

Very truly yours,

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Minnesota State Senator, District 61  
Minority Lead, Transportation Committee

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New Hampshire State Representative,  
Sullivan Co., District 1

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Minnesota State Representative, District 66A

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