



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:

Walk Bike Tampa, 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.

Walk Bike Tampa is a citizens-based advocacy group that promotes connected routes for Tampa's cyclists and pedestrians and safe streets for everyone. We believe that one bicycle or pedestrian death is too many, and we dedicate time and effort to helping the City of Tampa make Vision Zero goals a reality. Our organization works with the City, local schools and neighborhood groups to identify gaps in our sidewalk systems, our bicycle networks and we monitor the number of lives lost in traffic deaths each year. Florida is the deadliest state in the nation for vulnerable users, and innovative approaches to safety and street design is a must if we are going to address the safety crisis our community is experiencing.

The MUTCD update is urgently needed to reflect evolving practice and flexibility in application and experimentation at the local levels. To date, the MUTCD has done little to help stem the approximately 40,000 traffic deaths the U.S. sees each year, very little to help us address our local safety crisis. 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. To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability vision of the Biden Administration, **Walk Bike Tampa would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:**

- Pedestrians are the most vulnerable users on our streets and should be prioritized above all else. Providing signals and push buttons at signalized intersections should be a Standard, not a guide that can be opted out. In addition, the standard and guidance for aesthetic treatments (art) in intersections and crosswalks is unnecessarily restrictive and the designs provide, as examples, are arbitrary and inconsistent with those permitted by many cities across the US that have not found them to cause any safety issues. In fact, the City of Tampa has Art on the Block and Crosswalks to Classrooms programs that have contributed to safer environments in our neighborhoods and near schools. Walk Bike Tampa believes art in crosswalks and intersections in lower speed and lower

volume roads in urban environments should be permitted unless they create a documented safety issue.

- o Bicycle Facilities - The proposed amendments introduce new barriers to implementing environmentally responsible bicycle infrastructure including the addition of too many Standards and the design guidance offered is unnecessarily restrictive. For example, restricting installation of traffic control devices that are meant to increase safety of people on bicycles in urban contexts is unnecessary. FHWA must carefully review each new Standard to ensure it is necessary, as these new Standards will limit bicycle safety. This applies to guidance for different bicycle facility types, bicycle signals, bike facilities in roundabouts, use of green conflict paint and combination of traffic control devices at trail crossings.
- Continued reliance on the 85th percentile approach to setting speed limits over a safe systems approach is unacceptable. NTSB 2017 recommendations to eliminate the 85<sup>th</sup> percentile approach should be a requirement. The City of Tampa has committed to Vision Zero, Walk Bike Tampa is a firm believer that without addressing how speed limits are set, progressive approaches to safety such as Vision Zero and Road to Zero principles will not be successful in eliminating road fatalities.
- Outdated signal warrant requirements that ignore known conflicts and land use. For example, current numerical warrants require less cars to justify installation of a traffic signal, than number of people crossing at the same location. Or the safety crash warrant that suggests we need to have multiple fatalities before installing a signal.
- The draft 11th Edition of the MUTCD, released in December 2020, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure that our City residents rely on every day and does little to address existing ones. Cities that have committed to Vision Zero, walkability and livability principles need flexibility, and the rigid language will do more harm than ensure safe streets.
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing and experimentation placing a greater burden on local officials and staff. This will deter local officials from further experimentation, that could have drastic outcomes for vulnerable users.
- Elements of the new draft, particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities. Yet, the update still does not require safety safeguards (pedestrian signals and push buttons) for vulnerable users at traffic signals.

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.** Walk Bike Tampa stands ready to work with you and our partner agencies in the Tampa Region to make our streets safe.

Thank you.

  
Janet Scherberger  
President, Walk Bike Tampa