



April 2, 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 Manual Uniform on Traffic Control Devices

Dear Ms. Pollack:

The City of Fort Lauderdale is located in southeast Florida with a population of 190,000. Over the past 8 years, the City has experienced significant growth and development throughout its urban core and along the barrier island. With such growth, the City's transportation network has observed an increase in vehicular traffic on local roads and specifically within residential neighborhoods. Based on our experiences in designing for change, the City of Fort Lauderdale would like to request an expedited reframing of the Manual Uniform on Traffic Control Devices (MUTCD).

Our vision is to be a connected City with community-focused streets that prioritize the safety and experience of its people. The City recognizes that the development of transportation and pedestrian infrastructure needs to be adaptive, well-designed, and focused on reducing traffic congestion, while enhancing the pedestrian experience.

The City has continued to focus on the future, as illustrated in our Strategic Plan Fast Forward 2035, which includes connecting residents through various mobility options through well maintained sidewalks, greenways, bicycle amenities, and public transportation options that are safe, reliable, and accessible. The City continues to focus on multimodal delivery by working with partner agencies including the Federal Transportation Administration, Federal Highway Administration, Florida Department of Transportation, Broward County, and other regional systems such as Brightline, Tri-Rail, and regional airports.

The City of Fort Lauderdale is committed to reducing all traffic fatalities. As an early adapter of the Vision Zero strategies to eliminate traffic fatalities and severe injuries, the City believes that everyone has the right to move safely in their communities, and that system designers and policy makers share the responsibility to ensure safe systems for travel.

Office of the City Manager

Annually, there are approximately 40,000 traffic deaths in the United States which is largely due 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, the City of Fort Lauderdale would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:

- The minimum spacing between signalized intersections is detrimental to the urban walkability cities are trying to build. Pedestrians would rather cross traffic at unsignalized sections of a corridor than walk a quarter mile to get to their destination. Described behavior increases opportunity for crashes including pedestrian and vehicle interactions.
- Decorative paint at intersections give residence a sense of place and pride and serves as a traffic calming device for drivers. We would like to request that FHWA accepts painted intersections in the MUTCD.
- The new language dictates that right-of-way be dedicated only to "highwayrelated functions," undermines placemaking efforts that are proven to improve safety such as street trees, shared use paths, pocket parks, and other safety features.
- 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.
- The draft 11th Edition of the MUTCD, released in December 2020, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does minimal to address existing ones.
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing.
- Elements of the new draft, particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities.

The issues described above are endemic to the manual's underlying approach and impact our 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.

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Thank you for your consideration. Should you have any questions or if the City of Fort Lauderdale may assist in any way, please reach out to Ben Rogers, Director of Transportation and Mobility, at brogers@fortlauderdale.gov or at (954) 828-3781.

Sincerely,

Chris Lagerbloom, ICMA-CM

City Manager

C: Tarlesha W. Smith, Esq., Assistant City Manager Greg Chavarria, Assistant City Manager Ben Rogers, Transportation and Mobility Director Lisa Marie Glover, Transportation Division Manager