

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

RE: MUTCD Should be revised to prioritize safety

Dear Acting Administrator Pollack and Secretary Buttigieg:

I write as a resident of Pittsburgh PA, concerned about the safety risks that our automotive transportation system represents to my family, community, and country. The Manual for Uniform Traffic Control Devices (MUTCD) inappropriately prioritizes motorist convenience over safety, and fails to appropriately consider the needs of non-motorists.

Various advocacy groups such as NACTO and America Walks have called for a rewrite of the MUTCD to address its flaws. I concur with this request, and wanted to add my specific thoughts.

MUTCD should Prioritize Safety in Establishing Speed Limits

- Speed limits should be limited to safe levels based on the availability of pedestrian infrastructure in locations with pedestrian generating land uses such as commercial and residential land uses. In these pedestrian areas:
 - Speed limits on streets without sidewalks shall not exceed 15 mph.
 - Speed limits on streets without a buffer between the street and the sidewalk, such as a bollards, street trees, or guard rails, shall not exceed 25 mph.
- If mid-block crosswalks lack hybrid beacons or equivalent electrified signalization, the posted limit shall not exceed 25 mph.
- The speed limit on streets with travel lanes narrower than 10 ft shall not exceed 15 mph. This requirement shall not be construed to discourage construction of such narrow streets in locations where pedestrians may be present.
- While it is not necessary to have the same quality of infrastructure for cyclists as pedestrians on every street, cities should have a network of streets that allows cyclists to travel safely. Streets may be safe for cyclists either by providing a low speed limit (25 mph or lower) or a buffer protected dedicated bike lane. Cyclists should not have to excessively increase their travel distance to take a path on streets that meet one of these criteria.
- Use of the 85th percentile rule to set speed limits should be prohibited.

Traffic Control Devices Shall not Encourage Motorists to Exceed the Speed Limit

The use of double yellow lines to separate traffic encourages motorists to travel above 25 mph. These shall not be used on streets that lack side walks and should be discouraged on streets without buffered sidewalks.

Street markings should limit lane widths and turn radii to encourage motorists to limit speeds to the posted speed limit.

MUTCD should prioritize limiting the Travel Delay for Non-Motorists

Making travel convenient for non-motorists reduces automotive mode share, reducing congestion and air pollution, and improving travel times for motorists as well.

- Crosswalks should be located in a manner that avoids unreasonable pedestrian delay. Pedestrians will cross at a location without a crosswalk if required to travel unreasonably far for a crosswalk.
- Crosswalks shall not be positioned so as to require multistage crossings at signalized intersections if it can possibly be avoided.
- A crosswalk shall be placed as closely as practical to bus and transit stops.
- Content should facilitate municipalities giving dedicated lanes and signal priority to transit vehicles.
- A lack of pedestrian crossings or collisions shall not be the basis for failing to provide a marked crosswalk.

Require Safe Intersections

MUTCD should ensure that every urban and suburban signalized intersection has accessible pedestrian infrastructure, including curb ramps, audible and tactile signals, pedestrian signal heads that display “Walk” and “Don’t Walk” messages, and painted crosswalks.

Give Flexibility to Innovate

Traffic engineers should have the flexibility to try innovative methods to improve safety and the speed of transit vehicles. Artistic crosswalks should be permitted. Municipal engineers should also have flexibility to innovate with road surface markings to reduce the speed of cars, and safely increase the speed of transit vehicles and give them priority over lower occupancy vehicles.

Conclusion

I ask 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.

Thank you,

Jonathan Salmans