



Transportation, Traffic & Parking Department

City of New Haven



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New Haven, CT 06510

Justin Elicker
Mayor

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Director

April 8, 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 City of New Haven 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.

The City of New Haven has experienced, like most of the country, a steep rise in pedestrian and cyclist deaths in the past decade, going from 0 deaths in 2015 to 11 in 2020. Over 30% of households in New Haven lack access to a car and over 60% of households have fewer than one car per worker in the household. One in five New Haven residents walk or bike to work with more and more residents moving into our 20 square miles. We must do more to protect our most basic commuter: the pedestrian.

To date, the MUTCD has done little to help stem the approximately 40,000 traffic deaths the U.S. sees each year. 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, **the City of New Haven would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:**

- **Examples include:**
 - 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 - Outdated signal warrant requirements that ignore known conflicts and land use.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 little 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.

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.** The City of New Haven stands ready to work with you.

Thank you,

CITY OF NEW HAVEN



Doug Hausladen

CC Senator Richard Blumenthal
 Senator Chris Murphy
 Representative Rosa DeLauro
 Joseph Giulietti, Commissioner Connecticut DOT
 Garrett Eucalitto, Deputy Commissioner Connecticut DOT
 State Representative Roland Lemar
 State Senator Will Haskell