Stephanie Pollack, Acting Administrator

Federal Highway Administration

US Department of Transportation

1200 New Jersey Ave S.E.

Washington, DC 20590

RE: FHWA Docket No. FHWA-2020-0001, RIN: 2125-AF85 - Request for an expedited reframing of the MUTCD as a proactive safety regulation

Dear Acting Administrator Pollack:

The City of Philadelphia 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 and sustainability, while reducing traffic deaths and serious injuries.

The City of Philadelphia is home to almost 1.6 million people with 104,000 streetlights, 2,500 miles of roads, 2,950 signalized intersection, and 350 miles of bike lanes. Philadelphia is committed to reaching a goal of zero traffic fatalities through our Vision Zero policy and action plan. Transportation equity is at the heart of Philadelphia’s Vision Zero program. Fatal and serious injury crashes are 30% more likely to occur in areas of the city where most residents are people of color. Philadelphia is also a multimodal city where 36% of people commute to work by walking, biking, and transit and 33% of Philadelphians do not have access to a vehicle. Given the impact of MUTCD on the miles of roads and intersections in Philadelphia, it is paramount that multimodal transportation equity and safety are at the center of any MUTCD update.

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 Philadelphia would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:**

* 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* Outdated signal warrant requirements that ignore known conflicts and land use as well as the ability to pro-actively address pedestrian needs and safety.
* 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.
* 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 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 Philadelphia stands ready to work with you.

Thank you,



Michael A. Carroll, PE

Deputy Managing Director, Office of Transportation, Infrastructure, and Utilities (OTIS)

City of Philadelphia