Dear Acting Administrator Pollack:

Thank you for the opportunity to comment on the Manual on Uniform Traffic Control Devices (MUTCD). After careful review, I respectfully request that FHWA reframe and rewrite the MUTCD, creating a clear path for comprehensive safety-based guidance. Doing so will allow FHWA and the Biden administration to make strides towards equity, sustainability and vulnerable road user safety.

I would like to call attention to the following fundamental problems that should be addressed in an updated MUTCD:

- Speed limits are still based on the dangerous and disproven 85th percentile rule, and the draft MUTCD does not go far enough to implement the NTSB’s clear recommendation to no longer use this approach (Safety Study NTSB/SS-17/01).

- Outdated signal warrant requirements focus on the history of pedestrian deaths, current crossing demand and maintaining high vehicular speeds instead of addressing known modal conflicts or planned land use changes.

- Dozens of new “shall” statements introduce barriers to implementing bicycle and transit infrastructure and offer little acknowledgement of the effective and safe application of these treatments already present in dozens of American cities.

- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing. Additionally, inappropriate regulation of public art on streets, including a prohibition of celebratory or colorful crosswalks, work against proven safety measures.

- The MUTCD creates prohibitive cost burdens for cities. Researchers, engineers and cities have worked for decades to refine traffic control devices, only to have them excluded from the Manual without data to suggest issues with their adoption.

I 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.