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

May 5, 2021

RE: Serious concerns about the MUTCD in its current form

Dear Acting Administrator Pollack and Secretary Buttigieg:

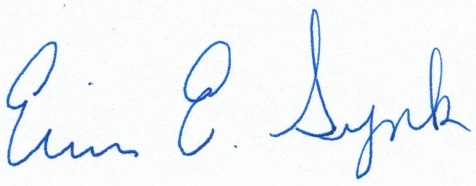
The Columbus South Side Area Commission (CSSAC) is a community-based commission within the City of Columbus, Ohio that advises City officials on matters such as land use polices, zoning, and transportation planning withing our community. Much of our work over the last decade has centered around increasing pedestrian safety and walkability. As such, we are obliged to raise serious concerns about the current draft MUTCD under revision by the agency. The MUTCD, a highly technical document, is a major obstacle to the kind of humane, activity-supporting street level changes that are needed in South Columbus and many communities across the United States.

CSSAC and the residents we represent possess valuable local knowledge that is too often brushed aside and overridden by the rule-bound dictates of the MUTCD. On numerous occasions, our efforts to improve safety, slow speeding traffic, and preserve safe pedestrian crossing are refused based on signal warrants and speed guidance set by the MUTCD that do not represent best practices for addressing vulnerable user safety and enhancing urban vitality. To make matters worse, much of the guidance is outdated, pseudoscientific, and based on the premise that speeding cars through intersections is the most important, primary goal.

CSSAC asks that U.S. DOT perform a comprehensive overhaul of the MUTCD, centering safety, equity, and accessibility; prioritizing the safety and needs of people, not cars, above all else. We need a rule book that is designed to support healthier, safer communities, one that:

* Ensures 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.
* Set speed limits based on safety, not based on how fast cars are driving on the road known as the 85th percentile method.
* Gives local residents a voice in what kind of infrastructure is needed.
* Ensures safe, comfortable, and where appropriate, separated and protected bicycle facilities.
* Gives engineers flexibility to design urban streets that are safe enough for children to navigate.
* Allows colorful and intuitive road markings and pedestrian crossing. Agencies should be afforded engineering judgment and the ability to install community-identifying and desired crosswalks. Urban environments are not the same as highway environments and flexibility should be provided. The restrictions on colorful crosswalks is not supported by studies and evidence. The restrictions should be removed until a time where evidence is provided that decorative crosswalks perform worse than other types of crosswalks.
* Reduces pedestrian warrants necessary for 4-way stops and signalized intersections with crosswalks. The current language is circular, requiring the presence of users before accommodating them safely.
* Reduces the engineering study requirements for bus and transit lanes.
* Allows the use of bike signals at hybrid beacons (HAWKs) and conventional pedestrian/bike activated signals to be used where HAWKs are warranted. The proposed language is overly restrictive of bike signals.
* Allows the use of green for shared-use paths, trails, and green-backed sharrows which are currently unreasonably prohibited, with unworkable distinctions between on-street and 'independently aligned' protected bike lanes, without data to support the prohibition, and in contradiction to accepted engineering practices.
* Puts vulnerable users such as pedestrians and bicyclists at the same level or higher as vehicles and in particular Automated Vehicles (AVs) in the hierarchy of road users.
* The current proposed language for AVs would require significant community expenditures to upgrade pavement markings and maintain them at very high visibility. AV companies should not be absolved of the responsibility to address aging infrastructure in their programming.

**On behalf of CSSAC and the communities on the South Side of Columbus, 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,

**Erin E. Synk**

Vice-Chair

Columbus South Side Area Commission