May 13, 2021

Stephanie Pollack, Acting Administrator Federal Highway Administration  
US Department of Transportation  
1200 New Jersey Ave S.E.  
Washington, D.C. 20590

Dear Acting Administrator Pollack:

Thank you for this opportunity to comment on the MUTCD. We have read many of the comments submitted by city, county, and state officials, other organizations, and other advocates and share many of their concerns with the proposed updates to the Manual on Uniform Traffic Control Devices (MUTCD). Like AASHTO, NACTO, People for Bikes and others, we also request that FHWA reframe and rewrite the MUTCD, creating a clear path for comprehensive safety-based guidance that is truly multimodal. We concur with AASHTO's Committee on Active Transportation that: "FHWA should initiate a robust stakeholder engagement process as soon as possible to inform future iterations of the MUTCD."

We all work closely with cities, counties, MPO's, and our respective states. We all recommend that local officials use the National Association of City Transportation Officials (NACTO) Urban Bikeway Design Guide and other NACTO resources. We strongly agree that the existing MUTCD standards aren't working from a safety standpoint, especially for pedestrians, bicyclists, and transit users. We also agree with the many comments that you have received that the proposed changes place too much priority on motor vehicles and speed, not enough flexibility in some places, too much flexibility in other places, and little acknowledgement of the effective and safe application of treatments already present in dozens of American cities. Many of those treatments were developed and implemented by NACTO and the Association of Pedestrian and Bicycle Professionals members and are included in the resources they share.

We will enthusiastically work with you and the Biden Administration should you choose to reframe, rewrite, and initiate a robust stakeholder engagement process.

Sincerely,

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