

May 14, 2021

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



RE: MUTCD Update

Dear Acting Administrator Pollack and Secretary Buttigieg:

Thank you for the opportunity to provide comments on the proposed updates and revisions to the Manual on Uniform Traffic Control Devices (MUTCD). I am writing on behalf of Health by Design and the thousands of Hoosiers represented by our coalition partners. We work throughout Indiana, at the intersection of the built environment and public health, with a goal of increasing equitable, safe, accessible, convenient and connected options for walking, biking and public transit. Through our efforts, we are reminded daily that the MUTCD is an antiquated technical document, ineffective in addressing the transformational change needed to achieve vibrant, thriving communities that help all people live active, healthier lives. The manual represents a significant barrier to the activity-supporting, street-level, people-first environments we seek here in Indiana and beyond, and we join our professional colleagues and follow community advocates across the country in urging a comprehensive overhaul – indeed, a complete reframing and rewriting – of this tremendously powerful document.

In the 12 years since the last MUTCD update in 2009, we have experienced an increasingly tragic, yet preventable outcome of more injuries and deaths on our roadways, particularly among those most vulnerable. According to the National Highway Traffic Safety Administration (NHTSA), the number of pedestrian fatalities in the U.S. from 2009 to 2018 surged by 53% (from 4,109 deaths in 2009 to 6,283 deaths in 2018). At the same time, while walking has become riskier, the number of all other traffic fatalities has increased by only 2%. We're tracking similar trends locally. In ten years of pedestrian crash data analyzed by Health by Design, Indianapolis experienced 2,652 incapacitating and non-incapacitating pedestrian injuries and 178 pedestrian fatalities. In 2010, the case fatality rate (number of deaths per 100 persons injured) was 5.6%. By 2019, that rate had climbed to 6.7%, only falling below the 2010 rate twice, in 2012 and 2016.

Perpetuation of the status quo isn't acceptable, yet the MUTCD's current edition continues to prioritize a car-centric approach to our transportation network. In fact, the MUTCD guidance directly conflicts with and undermines Vision Zero safety efforts in jurisdictions large and small across the U.S., Federal Highway Administration's (FHWA) Safe System Approach, and the Biden administration's priorities of sustainability, safety, and equity. The MUTCD has the power to reframe how decisionmakers regulate and evaluate our transportation system, centering not on moving motorists quickly, seamlessly, and efficiently; but with a focus on equity, safety, and intentionality—putting vulnerable road users first.

Alongside other grassroots advocacy and transportation policy and planning groups, as well as professional associations, we insist that USDOT conduct a robust and thorough overhaul of the MUTCD. A long overdue focus on safety, equity, and accessibility is required to align the MUTCD with the realities of today and to reflect the highly variable needs in the transportation spectrum, rather than placing cars front and center.

Proximity is not access. Active transportation and mobility options are necessary to ensure that people can access daily needs and destinations including transit stops, school, work, retail centers, civic opportunities, and medical care. It is no longer a matter of assuaging communities with a few bike lanes or trails. The transportation network needs to work for everyone and allow them to get where they need to go with more than one singular option. Safe, reliable infrastructure should not be predicated on multiple people risking or losing their lives to justify its

need. People who walk, bike, use a mobility device and ride transit deserve the highest standard of safety from the onset, not a retrofit countermeasure later.

Again, we call on FHWA and USDOT to rewrite the MUTCD, rather than simply proceeding with these updates and revisions. In the interim, though, we offer the following specific comments, highlighting the words of many of our national partners (including America Walks, the League of American Bicyclists, the National Association of City Transportation Officials, Transportation for America, the Institute of Transportation Engineers, AARP and so many others), reflecting our state and local priorities, and centered on values of equity, safety and sustainability.

- Diversify the National Committee on Uniform Traffic Control Devices (NCUTCD). It is imperative that membership reflect all users of our transportation network, in both technical expertise and lived experience. This includes, but is not limited to, representation in race and ethnicity, gender, age, ability and income.
- Establish planning processes that give local residents a legitimate voice in determining what infrastructure is needed.
- Offer engineers, planners, and designers flexibility to design streets that are safe enough for children to navigate and that meet the needs of older adults and those using mobility devices.
- Elevate the goal of eliminating serious injuries and deaths as a guiding principle of the MUTCD
- Set speed limits based on safety and end reliance on the 85th percentile method, using a safe systems approach instead.
- Ensure 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.
- Update crosswalk timing to reflect the needs of people moving at slowest speeds.
- Systematically incorporate strategies such as Leading Pedestrian Intervals and prohibited turns on red to reduce conflicts between motorists and non-motorists.
- Allow more flexibility in paint markings and signage that prioritize people walking, biking, and taking transit.
- Remove restrictions on bicycle traffic control devices.
- Establish research-driven national design standards for wide, high-speed roadways that include maximum acceptable distances between safe crossing points and a standard of care for pedestrian crossings.
- Allow cities to use locally adopted design standards on all city-owned streets in the National Highway System (NHS) and require states to consider locally adopted design standards when constructing or reconstructing roadways in jurisdictions with such standards.
- Account in a meaningful way for new technology and emerging trends, including bikeshare systems, scooters, personal mobility devices, and other micromobility modes.
- Replace the new chapter on Autonomous Vehicles with one developed through an inclusive and transparent process.
- Reduce the burden to local communities required by high standards of testing, direct costs, and other implementation barriers.

We truly appreciate the opportunity to comment and are hopeful that the next iteration of the MUTCD will genuinely reflect this administration’s intent to use a Safe Systems approach to achieve Zero Deaths. A healthy, equitable, and thriving nation depend on it!

Sincerely,



Kim Irwin, MPH
Executive Director