



April 15, 2021

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

RE: Comments on the Draft MUTCD Update

Dear Acting Administrator Pollack and Secretary Buttigieg:

The Coalition for Responsible Transportation Priorities (CRTP) is a non-profit organization located on California's North Coast. Our mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy.

In its current form, the Manual for Uniform Traffic Control Devices (MUTCD) is a major obstacle to achieving CRTP's mission in the communities on the North Coast. The MUTCD almost universally prioritizes the smooth and rapid flow of vehicular traffic above all else, including safety. Its infamous "warrants" regularly prevent life-saving interventions such as the installation of crosswalks, stop signs, and pedestrian hybrid beacons. The "85th percentile rule" requires local governments to allow speeders to set speed limits, resulting in a ratcheting-up of roadway speeds that puts vulnerable road users at steadily increased risk.

The MUTCD has long been grounded in debunked science and outdated priorities, and the currently proposed draft is no different. Extensive research shows that many of the pedestrian and bicycle safety features which the MUTCD makes so difficult to install really do save lives, and shows that lowering speed limits *does* lower travel speeds and reduce severe crashes, refuting the basis for the 85th percentile rule. Research also shows that safer pedestrian and bicycle infrastructure leads to more walking and biking, which contradicts the MUTCD's "warrant" framework requiring minimum numbers *before* installing new infrastructure.

Further, as a nation, we now recognize the critical urgency of reducing greenhouse gas emissions from transportation. Building infrastructure which supports and encourages active transportation and transit, rather than single occupancy vehicle travel, is a national priority. The MUTCD stands in the way.

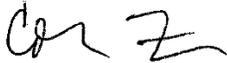
We join with other citizens and public interest organizations nationwide in calling on the U.S. Department of Transportation to completely overhaul the MUTCD. An MUTCD for the twenty-first century must:

- Be organized around evidence-based practices for addressing the climate crisis, safety for vulnerable road users (including people walking and biking, children, elders and people with disabilities), and long-standing inequities in the transportation system.
- Make bicycle and pedestrian infrastructure the default rather than the exception.

- Provide guidance for speed limits based on the safety of vulnerable road users, not the speed of the fastest drivers.
- Make allowances for local communities to conduct data-driven experiments with local variations in street design that go above and beyond minimum safety standards.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Fiske', with a stylized flourish at the end.

Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
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