



CITY OF CHICAGO

CHICAGO DEPARTMENT OF TRANSPORTATION

March 12, 2021

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

RE: Request for an expedited reframing of the MUTCD as a proactive safety regulation

Dear Acting Administrator Pollack:

The Chicago Department of Transportation (CDOT) strongly urges the FHWA to reframe and rewrite the Manual on Uniform Traffic Control Devices (MUTCD) so that it will address safety in a comprehensive manner, and reflect the leadership, design innovation, and investments that cities across the nation are making to put Vision Zero, livability, economic development and equity at the forefront of our streets.

The current draft of the MUTCD is far too focused on motor vehicle operations and perpetuates the status quo by placing higher burdens of proof and restrictions on implementing and inovating traffic control devices for walking, biking, transit, and multi-modal safety. Among the fundamental problems which need to be addressed in a rewrite of the MUTCD are:

- The introduction of new barriers to implementing environmentally responsible bicycle and transit infrastructure which have been included in the draft 11th Edition of the MUTCD.
- Signal warrant requirements that ignore known conflicts and land use and stifle the ability to be proactive about safety *before* people are killed or injured.
- Traffic control devices known to be appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to unreasonably high standards of testing.
- The over-prioritization of the needs of still-emerging automated vehicles at the expense of other modes.
- New langaguge that stipulates that right-of-way be dedicated exclusively to “highway-related functions,” undermining placemaking efforts that are proven to improve safety.

On behalf of the Chicago Department of Transportation, I respectfully request that FHWA begin the process anew to reframe and rewrite the MUTCD so that it more closely aligns with the equity, safety, and sustainability goals of American cities, as well as those of the Biden Administration.

Thank you for your consideration of this important request.

Sincerely,

Gia Biagi
Commissioner