



The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

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

April 16, 2021

RE: National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways; Revision (FHWA-2020-0001-0001)

Secretary Buttigieg and Acting Administrator Pollack:

The National League of Cities, Association of Metropolitan Planning Organizations, National Association of Regional Councils, and the National Association of Development Organizations have reviewed the National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways; Revision (FHWA-2020-0001-0001) as proposed. Our review has led us to request that the leadership of the U.S. Department of Transportation (USDOT) advance a strategic review of the proposed and future Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) to determine how to best meet safety and connectivity goals across the nation.

America's local governments own and maintain almost 80% of the nation's roads, and therefore, have a significant role and interest in excellent road design and planning standards that ensure safe and well-connected streets and sidewalks. However, our input into this proposed manual has been limited. We believe the MUTCD is overloaded from its original purpose of cataloging traffic devices and has become a stumbling block to better design, delaying a decade of new technology, and failing to make road users safer for all users. For local transportation leaders, MUTCD represents perhaps the most egregious unfunded federal mandate that does not meet today's challenges. USDOT should address MUTCD now to ensure that every new federal transportation dollar made available is used well.

In this interim comment, local leaders ask that:

- 1) USDOT consider how the MUTCD can best fulfill its intended purpose in a timely update before new long-term investments are made as well as ensure a comprehensive outreach process for reframing the MUTCD.
- 2) We urge USDOT to provide all road users – whether pedestrians or autonomous vehicles – equal attention, rather than elevating some over others.

- 3) As a part of our request for a strategic review we also ask that you consider forming a diverse group of stakeholders to gather perspective and important feedback. Given that the MUTCD will guide long-term investments in our nation's transportation network it is critical that local engineering, planning, and transportation professionals are included in the process.

We appreciate your consideration of these comments in your deliberations. Local engineering, planning, and transportation professionals are continuing to review the extensive changes listed within the MUTCD, and many will be providing preliminary and additional comments during the remaining open period.

Thank you,

National League of Cities  
Association of Metropolitan Planning Organizations  
National Association of Regional Councils  
National Association of Development Organizations