

# BIKE<sup>^</sup>AUSTIN

May 11, 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:

Bike Austin (Austin, TX) respectfully **requests that FHWA reframe and rewrite the MUTCD, creating a path for the creation of comprehensive safety-based guidance.** Doing so will allow FHWA and the Biden Administration to make strides towards equity and sustainability while reducing traffic deaths and serious injuries.

Bike Austin is the largest and oldest organization in Austin, TX, advocating for the interests of people on bicycles. We envision Austin as a place where biking is a regular part of daily life, accessible and inviting to everyone. Rules imbedded within the MUTCD that prioritize car movements and speed make Austin's street and roads dangerous for walking and biking.

We support a revised MUTCD which supports safe, bikeable communities over vehicle speed. In particular, the revised MUTCD should do the following:

- **Ensure every signalized intersection has effective bicycle and pedestrian infrastructure**, including bicycle signals, curb ramps, audible and tactile signals, pedestrian signal heads that display "Walk" and "Don't Walk" messages, and painted crosswalks.
- **Give engineers flexibility** to design urban streets that are safe enough for children to navigate.
- **Drop the use of the 85th percentile approach to setting speed limits**, which has been widely criticized, and adopt a safe systems approach instead.
- **Revise signal warrant requirements** that ignore known conflicts and land use.

The draft 11th Edition of the MUTCD, released in December 2020, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does little to address existing ones. Traffic control devices appropriate for urban contexts, such as bicycle signals, red transit lanes, and pedestrian safety measures, are subject to burdensome regulatory requirements. We are especially concerned about the following:

- **The draft MUTCD unjustifiably restricts bike-friendly street design.** For example:
  - The draft states that chevrons “shall not” be used to extend bike lanes through intersections and conflict points. Many cities, including Austin, use this treatment extensively, and we know of no research that supports prohibiting it.
  - The draft states, “A through bicycle lane shall not be positioned to the right of a right turn only lane” -- even though this arrangement is the basis of a protected intersection.
  - The draft states that a buffered or protected bike lane should not bend away from the roadway as it approaches an intersection -- which is considered best practice.
  
- **The draft MUTCD imposes onerous requirements on bike signals.** For example:
  - The draft makes phasing of a bike signal very challenging for a two-way bikeway, and would greatly limit the available green time.
  - The draft states that bike signal faces “shall not” be used in a PHB, which is very problematic, counter to existing applications, and not supported by research. NACTO has a phasing diagram showing how a bike signal can work at a PHB; it should be adopted wholesale into the MUTCD.
  
- **The draft MUTCD continues archaic requirements for pedestrian signals.**
  - For years, Austin has been unable to get a Pedestrian Hybrid Beacon at the busy crossing of 4<sup>th</sup> Street and I-35 because TxDOT conforms with the very restrictive warrant requirements of the MUTCD.
  - The warrants for vehicle traffic signals, in contrast, allow for significant engineering judgment.
  - The draft should be revised to allow for bike/ped signals or PHBs based on engineering judgment, especially when an urban trail or bikeway is involved.

These problems are endemic to the document’s underlying approach and undercut efforts to provide safe, multimodal accessibility in urban settings. The MUTCD needs holistic reframing to support cost-effective, sustainable, and equitable city street design and improve safety and accessibility for the most vulnerable users.

**We respectfully request that FHWA reframe and rewrite the MUTCD, creating a path for guidance that more closely aligns with the equity, safety, and sustainability goals of American cities, as well as those of the Biden Administration.**

Thank you,

Chris Riley, Board President  
Bike Austin