



May 14, 2021

From: San Diego County Bicycle Coalition, Circulate San Diego, beautifulPB, Bike San Diego
To: Stephanie Pollack, Acting Administrator, FHWA

Subject: Comments and Recommended Changes to the Proposed MUTCD Amendment

Introduction

The San Diego County Bicycle Coalition, Circulate San Diego, beautifulPB, and Bike San Diego advocate for transportation safety throughout the San Diego region. Our organizations are joining a national effort to improve road safety by calling on the Federal Highway Administration to rewrite the technical standards of roadway design.

Our organizations respectfully request that the FHWA rewrite the Manual on Uniform Traffic Control Devices (MUTCD) in a manner that supports safe systems design, so advocates and jurisdictions alike can help build safer streets for all roadway users.

Importance of MUTCD

The MUTCD is a document of federal regulations governing the design of every roadway in the United States, requiring that all traffic signs, surface markings, and signals legally conform to national standards. The current iteration bestows serious barriers for our members and the greater bicycling community.

Of the approximately 40,000 annual traffic fatalities on U.S. streets (the highest rate, by far, of any high-income country), more than 6,500 pedestrians and nearly 1,000 cyclists were killed in 2019. This traffic violence disproportionately harms people of color and people with disabilities, further exacerbating existing inequities in our transportation system. The time for reform is now.

The proposed MUTCD amendment has a strong emphasis on autonomous vehicles and advancing the inequities associated with increasing uniformity. This is at odds with the goals of many communities and will undercut the Biden Administration's efforts to address climate change and address inequities in our transportation system. We feel strongly that the current proposed amendment would not provide the much-needed reset to the application of traffic control devices.

Our Primary Concerns

A review of proposed changes to the MUTCD reveals a prioritization of uniformity over safety and continues to elevate motor vehicles over all other road users. The proposed amendment does not meet the demands of cyclists and pedestrians and fails to consider the diverse needs of vulnerable populations that utilize our streets: children, older adults, and those with disabilities. Below is a non-comprehensive list of our primary concerns with and recommendations for the draft 11th Edition of the MUTCD:

1. **Concern** - The proposed changes fail to address the historical inequities that have plagued our transportation system since regulations were first introduced. The composition of the MUTCD team and National Committee are not representative or inclusive of the communities that are most burdened by transportation injustices.
2. **Recommendation** - Change speed limit information in the MUTCD to include an approach to proactive, safe systems that focuses on injury minimization and makes it easier to prioritize new traffic control devices where pedestrian and bicyclist risk is highest.
3. **Concern/Recommendation** - The proposed changes give design priority to autonomous vehicles while sidelining the most vulnerable road users, bicyclists and pedestrians. Regulations should instead focus on improving bicyclist and pedestrian safety and ensuring new vehicle technology is safe and beneficial to **all** roadway users before widespread adoption. We recommend consulting with stakeholders from the bicycling and walking community before implementing an autonomous vehicles chapter.
4. **Concern** - The proposed changes place burdensome restrictions on local control of street design, including prohibiting painted or celebratory crosswalk art that has come to define neighborhoods and districts across the country. Local governments should make these decisions where the street context and needs of the vision-impaired community members can be taken into account.
5. **Recommendation** - Remove overly prescriptive uses of “shall” statements that contradict practices currently being used successfully. There is currently more flexibility within car-focused sections of the manual than pedestrian and bicycle-focused sections
6. **Concern** - The process for revising the MUTCD missed many opportunities to involve critical stakeholders and remains an obscure technical document that precludes the general public from providing comments.

Closing Remarks/Looking to the Future

As stated previously, our organizations cannot support the proposed MUTCD amendment in its current form due to fundamental flaws that will continue to prioritize vehicular flow over the

needs of humans on America's roadways. The MUTCD has prioritized motor vehicles for over 50 years, and it will take a significant amount of effort to overcome the inequities created by those actions. We join numerous organizations from around the United States in calling for the FHWA to engage in a collaborative, equitable effort with bicyclist and pedestrian stakeholders to reframe and rewrite the MUTCD so that we can build a better future for our country's infrastructure.

Respectfully,



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About our Organizations

The San Diego County Bicycle Coalition advocates for and protects the rights of all people who ride bicycles. We promote bicycling as a mainstream, safe, and enjoyable form of transportation and recreation. Since 1987, we have acted as the voice for bicyclists and have advocated for safer streets and hundreds of miles of bike paths, lanes, and trails all across the San Diego region. We conduct educational programs, promote awareness of bicyclists and bicycling issues, review infrastructure improvements, and act as a voice for bicyclists to elected officials and decision-makers all over San Diego County.

Circulate San Diego is a regional organization formed through the merger of Move San Diego and WalkSanDiego. Circulate San Diego is one of San Diego County's leading organizations dedicated to advancing mobility and transforming communities through planning, outreach, and policy. Our work focuses on creating great mobility choices, more walkable and bikeable neighborhoods, and land uses that promote sustainable growth.

BeautifulPB is a nonprofit in the Pacific Beach neighborhood of San Diego that works to create safe mobility, sustainability, and equity in our community. We use placemaking, community events, and simple street interventions to encourage people to use active transportation in Pacific Beach.

Bike San Diego's mission is to establish San Diego as a world-class bicycling city and create more livable urban communities by promoting everyday riding, and advocating for safe bicycling infrastructure and complete networks. BikeSD works to bring about a culture shift where the majority of San Diegans choose to ride their bike for daily trips, commuting, and for health. Our people-powered organization advocates for safe, accessible and inclusive active transportation networks as a critical solution to the climate crisis. Through community outreach and creative programming we seek to introduce people of all ages and abilities to the joys and benefits of going by bike.