



We're leading the movement to build a Bicycle-Friendly America for Everyone

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Dear Administrator Pollack:

The League of American Bicyclists (League) is a national non-profit organization dedicated to building a Bicycle Friendly America for Everyone. The League is a sponsoring organization of the National Committee on Uniform Traffic Control Devices (NCUTCD) and identified a [drafting error](#) in December 2020 in the Manual on Uniform Traffic Control Devices (MUTCD) Notice of Proposed Amendment (NPA). The League wants to thank FHWA for its quick correction of that drafting error and for providing an extended comment period on the NPA.

Today, I am writing to say that the League agrees with the National Association of City Transportation Officials (NACTO) and other organizations that have expressed the need for this NPA to lead to the adoption of a MUTCD that will provide proactive safety guidance so that the United States can make progress on equity, sustainability, and traffic safety goals.

As a sponsoring organization of the NCUTCD, the League also wants to acknowledge the work and dedication of the NCUTCD, and the advancements that are contained in the NPA. An updated MUTCD is a priority for enabling safer roadway infrastructure and we hope that FHWA acts swiftly and thoroughly to produce an updated MUTCD that provides proactive safety guidance.

The FHWA has a difficult job of balancing the need for updating a decade old MUTCD and with the need to fully address the ways in which the MUTCD, over decades, has prioritized the speedy movement of motor vehicles over the safety of people. The League agrees with NACTO that now is the time for bold action and meaningful change. The FHWA should complete the current NPA process and create a transformative MUTCD that speaks to the equity, sustainability, and safety needs of the United States as soon as possible.

The League supports a process that produces the strongest document for improving traffic safety. In doing this, the FHWA may find it necessary to identify some safety critical items for further review and some items that do not structurally affect safety and can be finalized sooner. We recognize that the MUTCD does not purport to be a comprehensive safety manual, but as written it chooses to prioritize speed and vehicle flow over safety in numerous ways. Putting safety first should be a critical outcome of this NPA.

In the coming months, the League will be submitting additional comments and we hope that many members of the public do as well. We appreciate FHWA's work in this process and hope that FHWA hears the need for bold action, creativity, and a significant change from the status quo. Tens of thousands of lives each year depend on us improving traffic safety practices, and the MUTCD is a foundational document that fails to prioritize safety. The FHWA has the opportunity to change the MUTCD so that it is a safety document and the FHWA should take that opportunity.

Sincerely,

Ken McLeod
Policy Director