

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

DEPARTMENT OF
TRANSPORTATION

RE: Serious concerns about the MUTCD in its current form

2021 MAY -6 A 10:14

Dear Acting Administrator Pollack and Secretary Buttigieg:

DOCKET OPERATIONS

I am writing on behalf of **New Town Goleta Safety**, representing a 600-person active senior community. Most of us moved to this area because it is walking distance to a wide range of amenities (grocery stores, restaurants, hardware and household stores, services, a theater, medical care, entertainment, and more). Unfortunately, it turns out that the routes to get to these amenities are dangerous due to high-speed limits, limited and unsafe crosswalks, antiquated signals, as well as, poor ADA accommodations. We care very deeply about our community, Goleta California, and wish to raise our serious concerns about the current draft MUTCD under revision by the agency. The MUTCD, is a major obstacle to the kind of humane, activity-supporting street level changes that are needed in my community and others across the United States.

Grassroots advocates like myself have valuable local knowledge that is too often brushed aside by traffic engineers based on the rule-bound dictates of the MUTCD. To make matters worse, much of the guidance is outdated, pseudoscientific and based on the premise that speeding cars through intersections is the most important goal.

We ask that U.S. DOT perform a comprehensive overhaul of the MUTCD with a focus on multimodal solutions (safety for pedestrians, bicyclists, scooters, transit, as well as, vehicles). We need a rule book that is designed to support healthier safer communities, **one that:**

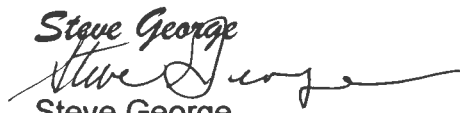
- Ensures every urban and suburban signalized intersection has accessible pedestrian infrastructure, including curb ramps, audible and tactile signals, pedestrian signal heads that display "Walk" and "Don't Walk" messages, and zebra painted crosswalks, as well as, adequate walk time for seniors, children, and disabled persons.
- Sets speed limits based on safety, not based on how fast cars are driving on the road (**get rid of the 85% rule as it encourages faster speed limits**). **Speed kills.**
- Gives local residents a voice in what kind of infrastructure is needed.
- Gives engineers flexibility to design urban streets that are safe enough for children to navigate. (**Safe routes to schools**). In low income and minority areas, school routes may extend to significant distances away from the actual school, but young children are still expected to navigate them on their own. School zones need to follow major student walking routes.
- Changes "**Senior Zones**" into senior "**areas**" and gets rid of the "**contiguous**" requirement. In our community, seniors must cross two of the busiest streets in the city to get to the shopping centers but they are not contiguous to the community. The "nearby" streets should also be

Encina Road in Goleta has over 600 residential units adjacent to it and yet it does not qualify as the doors face to the side or rear of the units. Fortunately, we have been able to work with the City and it is going to be reclassified as a senior zone (an enforceable 25 MPH).

- Solutions should be developed that facilitate bike lanes going to and through intersections instead of being stopped 50-200 feet earlier.
- Signals need to respond to bicycles so they are not obliged to run the red light or wait for a vehicle that will trigger it.
- Green bicycle lanes and red transit lanes should be the standard.
- Every city should be **required** to have a well-connected and safe **bicycle network**.
- Electric bicycles need to have speed limits or be treated like motorcycles and not allowed in bicycle/pedestrian lanes/paths or multimodal routes. Without clear speed limits, many go too fast.
- Motorcycles should not be allowed to lane share any faster than 25 MPH. Lane sharing at faster speeds is unsafe.
- **Roundabouts** need to have set back **signaled pedestrian crosswalks** (like they do in Europe). Children, seniors, and the disabled cannot be expected to navigate these treacherous environments in competition with vehicles. Goleta is planning to make a double roundabout straddling an overhead freeway to UCSB. This means that children going from the low income/minority downtown community to the Catholic school nearby, or seniors or disabled people walking to Cottage Hospital will need to risk their lives competing with vehicles exiting or entering a freeway or dealing with the 4 lanes of traffic going a posted 40 MPH.
- **Intersection curbs** need to be marked red (no parking) for at least 1 vehicle length. Sight lines for other vehicles, bicycles, and pedestrians are obscured by cars parking all the way to the corner. This needs to be a standard.

NTGS is asking 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. The guidance also needs to factor in the evolving lifestyle changes that went from vehicle focused strip malls to the pedestrian, bicycle, and transit focused environments of today.

Thank you,



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