



2208 Missouri Blvd  
Ste. 102 #200  
Jefferson City, MO 65109

**MoBIKEFED.ORG**  
**816-336-2550**

**EXECUTIVE DIRECTOR:**

Brent Hugh  
director@mobikefed.org

**BOARD OF DIRECTORS:**

Michael Hennies, St. Louis  
Wesley Ridgeway, St. Louis  
Stefanie Smith, Gladstone  
David Hutchison, Springfield  
Laura Vie, Columbia

**ADVISORY COMMISSION**

Josh Adams, St. Louis  
Bruce Adib-Yazdi, Springfield  
Clark Allen, Poplar Bluff  
Barry Bean, Bean Cotton, Gideon  
Virginia Blaine, Farmington  
Kim Cella, Citizens for Modern Transit, St. Louis  
Andy Clements, St. Joseph  
Matt Davis, Jackson County  
Chuck Daugherty, ACT Missouri, Jefferson City  
Christopher Dunn, Columbia  
Gary Elmstad, St. Charles  
Joe Ferguson, Washington  
David Fiedler, St. Louis  
Kyle Frakes, Cycling Kansas City  
Caryn Giarratano, Jefferson City  
Jeff Glenn, Missourians for Transportation Investment  
Janet Godon, Columbia City Parks  
Nicholas Grigsby, St. Charles  
Greg Harris, Missouri Rock Island Trail  
Trevor Harris, Columbia  
Shawn Hayden, Springfield  
Douglas Hermes, Liberty  
William Hill, Nixa  
Mark Hines, Overland Park  
Braden Horst, Joplin Trails Coalition  
Jeff Huff, Jefferson City  
Steve Johnson, MO River Communities, Columbia  
KartaPurkh Khalsa, Kansas City  
Robert Johnson, St. Robert  
Anissa Lockett, Columbia  
Doug Long, Green Hills Trail Association  
Matt Maher, Prologue Cycling  
Rickie Maples, Ozark Vitality, Doniphan  
Steve Marquardt, Nevada Area Multisport  
Brian McEntire, Saddle Time, Farmington, MO  
Christopher McNeese, A&B Cycles, Springfield  
Noah Madling, University City  
Martin Meyer, Hannibal  
Becky Nace, Blue Springs  
Chrysta Niewald, Owensville  
Christopher Parrott, Prairie Village  
Vance Preman, Kansas City  
Steve Raper, Springfield  
Rachel Ruhlén, Roanoke  
Dave Schieffer, Kansas City  
Fred Schmidt, Washington DC  
Hugh Share, Cycle St. Louis  
Paul Sidwell, Kansas City  
Paul Skeans, Ozark  
Brandy Smith, McDonald City Health Dept  
Sean Staggs, MS Society, Kansas City  
Sam Swearingin, Cycling Kansas City  
BJ Taylor, Kansas City  
Alex Tetlak, Kirksville  
Ian Thomas, Columbia  
Frank Thompson, Look 4-States  
Joe Torrisi, Saint Louis  
Patrick Tuttle, Joplin CVB  
Patrick Van Der Tuin, St. Louis B/Works  
Patty Vinyard, St. Louis  
Mac Vorce, Warsaw  
Mike Weiss, Big Shark Bicycle Co., St. Louis  
Pam Wennerberg, Bainbridge Isl  
Robin White, Augusta  
Steven White, Prairie Village  
Mitchell Williams, Kansas City  
Sheryll Williams, St. Louis  
Paul Wojciechowski, Horner & Shifrin, Wildwood  
Matthew Wyczalkowski, SafeTGA, St. Louis  
Caroline Zukoski, St. Louis

# MAKING MISSOURI A BETTER PLACE TO WALK AND RIDE A BICYCLE!

May 13<sup>th</sup>, 2021

RE: Proposed changes to the MUTCD must prioritize safety, needs of vulnerable road users

The Missouri Bicycle & Pedestrian Federation is a statewide organization working on behalf of the millions of Missourians who walk and bicycle regularly, with over 5000 direct members and 50,000 members of affiliated organizations across Missouri. We are currently in our 25th year advocating for advancement of bicycle and pedestrian access, safety and education.

The Missouri Bicycle & Pedestrian Federation and our members strongly support the comments submitted by the League of American Bicyclists, AmericaWalks, the National Association of City Transportation Officials (NACTO), and other organizations that ask that this update of the MUTCD provide proactive safety guidance so that the United States can make progress on equity, sustainability, and traffic safety goals. As written, the proposed MUTCD updates choose to prioritize speed and vehicle flow over safety in numerous ways.

The MUTCD should prioritize safety, emphasize road design that reduces or eliminates serious injury and death, and forefront the needs of vulnerable road users, such as those who walk and bicycle, people with disabilities, children and seniors, and people who use public transportation.

- 1. Allow Better Bike Networks by removing restrictions on bicycle traffic control devices.** In Missouri, we have seen far too many examples of situations where local decision-makers deny needed bicycle facilities that would improve access and safety because the facility does not meet some detail of MUTCD requirements.
- 2. Orient Streets to People by allowing paint markings that prioritize people walking, biking, and taking transit.** Here in Missouri we have seen city public works departments remove beautiful and highly visible pedestrian crosswalk markings strongly supported, installed, and maintained by neighborhood groups because they did not meet MUTCD requirements. The replacements—which met the letter of MUTCD standards—were ugly, less functional, less visible, and less safe.
- 3. Create a Safe System through proactive safety rather than a reactive warrant system.** Many times here in Missouri we have seen crosswalks, pedestrian facilities, and other intersection improvements denied because the intersection did not meet some warrant for including pedestrian access. *It is vital to remember that lack of safe facilities greatly suppresses the amount of bicycling and walking in an area.* The fact that an area does not currently meet



warrants becomes an excuse to deny much needed safe infrastructure for walking and bicycling—and lack of safe places to walk or bicycle is the very reason the amount of walking and bicycling is low in that area.

Standards like the MUTCD should lead and guide communities towards creating and maintaining complete, connected, comfortable, and safe pedestrian and bicycle networks that connect all the places people need and want to go. *MUTCD guidelines should never discourage creation of complete, connected, comfortable, and safe bike/ped networks.*

4. **In general, we strongly support AmericaWalks request to ensure “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 painted crosswalks.” Even in the year 2021, far too many intersections—including newly installed intersections—in Missouri lack these basic facilities.
5. **Eliminate the antiquated 85% rule for setting speed limits.** We know that slower traffic speeds are one of the most important tools for improving safety, reducing the number of fatal and serious crashes and improving access and safety for vulnerable road users like people who walk and bicycle. Here in Missouri we have seen sensible and much-needed requests for lower speed limits denied numerous times on the basis of the 85% rule. The 85% rule is antiquated and not supported by current research. As AmericaWalks says, the MUTCD should “Set speed limits based on safety, not based on how fast cars are driving on the road.” The MUTCD should allow and encourage road designers to alter road design in such a way as to encourage drivers to adhere to desired operating speeds—the systems-based approach to safety—rather than simply allowing random factors and driver preference to take the lead in this important area.
6. **Generally, safety for all road users, a systems approach to safety, and the needs of vulnerable road users must be prioritized above traffic flow and speed.**
7. **Autonomous Vehicles are a particular problem.** Self-driving cars have both great promise and significant peril—particularly for vulnerable road users. Any guidance must be based on an inclusive and transparent process that fully involves all stakeholders, including representatives of groups working to improve safety and access for vulnerable road users. Autonomous Vehicle Industry voices *must not* be allowed to dominate the rule-making process.
8. **Give local residents a voice in what kind of infrastructure is needed and give engineers flexibility to design urban streets that are safe enough for children, seniors, people with disabilities, and other vulnerable road users, to navigate.** Our experience here in Missouri is that the urban core of very large cities, outer areas of large cities, inner-ring suburbs, outer-ring



suburbs, large rural communities, small rural communities, heavily populated counties, lightly populated counties, and many other specific places and jurisdictions have very, very different needs for traffic control devices. Facilities like contra-flow bicycle lanes, bi-directional bicycle lanes, green bicycle lanes through intersections, and other signs and markings now commonly used in larger cities, work very well in those highly urban environments. They may or may not work well in a more suburban or exurban environment, or a small rural community.

The purpose of the MUTCD is to promote standardization of road markings and signs across the nation. But it is evident that *not every sign, marking, or type of infrastructure works equally well in every place.*

For far too long, road markings and design appropriate for rural highways has been forced into use in highly populated urban areas, in suburbs, and in the populated areas of rural towns—places where that type of road design is simply not appropriate or safe.

It is not appropriate to force rural road design into areas where it is unsafe and inappropriate. By the same token, it is not appropriate to force rural communities and counties to use design elements that are proven effective in major urban areas but are unneeded or unworkable in a rural context.

The MUTCD must find guidance, procedures, and a process to foster the kind of location-appropriate design that creates a safe and functional transportation network in *all* locations it serves.

We appreciate the progress the proposed draft of the MUTCD has made in many areas, the work and contributions of staff, contributors, and committee members from across the U.S., and the openness of FHWA to allowing and carefully considering broad public input on this important update to the MUTCD.

We hope that the recommendations above can be incorporated into the MUTCD before it is released, so that it can become an even more effective document for promoting safety and access for all Americans, no matter their transportation choice.

Sincerely yours,

Brent Hugh  
Executive Director