



*Bike Delaware advocates for safe,
convenient and fun cycling and walking
for everyone*

May 14, 2021

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Executive Director

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

May 14, 2021

Dear Secretary Pollack,

Bike Delaware is a member-supported 501(c)(3) nonprofit charitable organization dedicated to making cycling and walking safe, convenient and fun transportation options for everyone in Delaware through policy research and nonpartisan advocacy. On behalf of our members, we are submitting 29 comments on the upcoming revision of the Manual of Uniform Traffic Control Devices (MUTCD).

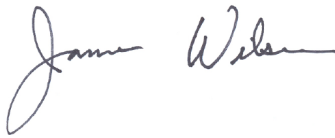
The common thread that runs through most of these 29 comments is that adding new standards and prohibitions to the MUTCD that are not based upon any published safety research will make it even more difficult than it already is for communities and user agencies to innovate and make changes to local systems based on local knowledge and local needs.

In addition, many of these new standards and prohibitions appear to be a continuation of an historic pattern in the development of the MUTCD that stretches back decades and which is based on the unexamined assumption that strict uniformity in the design and application of traffic control devices always results in improved safety. To the extent that uniformity enables higher vehicle speeds on streets

that are not limited access, and include pedestrians and cyclists, however, the safety value of uniformity is not supported by either research or experience.

It is vitally important that FHWA be disciplined in following, and amplifying, published research on proven safety treatments but not otherwise clutter up the MUTCD with arbitrary rules that are unsupported by published research, cause confusion and impede progress towards reducing injuries and fatalities.

Sincerely,

A handwritten signature in black ink, appearing to read "James Wilson". The signature is fluid and cursive, with the first name "James" and last name "Wilson" clearly distinguishable.

James Wilson
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