



Public Works

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Friday, March 26, 2021

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

RE: Request for an expedited reframing of the MUTCD as a proactive safety regulation

Dear Acting Administrator Pollack:

The City of San Luis Obispo respectfully requests that the FHWA rewrite the MUTCD, creating a path for the creation of comprehensive safety-based guidance. Doing so will allow to communities to make strides towards equity, sustainability, while reducing traffic deaths and serious injuries.

San Luis Obispo, a small city along California's central coast with a population of roughly 47,000 people, has made big plans to be climate neutral by 2035. As with most cities, transportation is the largest contributor to greenhouse gas emissions. In order to help reach the City's climate action goals, the City's General Plan has identified a target to achieve ambitious mode split objectives to reduce single occupancy vehicle use to 50% of all trips and increase trips by bicycle to 20%, 18% by foot and carpooling, and 12% by transit. In addition, the City has established a Vision Zero goal to eliminate all fatal and severe injury collisions by 2030. These commitments require as much flexibility as possible in the design of roadways to encourage use off transportation modes other than the motor vehicle and to reduce injuries for all modes of transportation, of which disproportionately affect those on foot and bike.

The City of San Luis Obispo has been a leader in providing innovative traffic control devices to encourage more use of bicycling, walking, and transit. Results from resident surveys consistently indicate that the biggest barriers to bicycling and walking are safety concerns about sharing the road with motor vehicle traffic and lack of high-quality pedestrian and bicycle infrastructure. To help address these barriers, the City has installed innovative traffic control devices over the last decade and beyond that have consistently resulted in an increase in bicycling and walking and a decrease in traffic collisions. These are devices that have been requested by the community and proven safe and effective here locally. These traffic control devices include (among other innovations):

- bicycle traffic signals
- rectangular rapid flashing beacons
- pedestrian hybrid beacons
- pedestrian lead intervals
- green bike lanes and green-backed shared lane markings
- bike boxes
- two-stage bicycle turn boxes
- buffered bike lanes

The City is also in the planning stages of constructing a core network of protected bike lanes as well as several protected intersections at high volume locations. Since speed is a top collision factor, the City also has goals to reduce speeds on city roadways including neighborhoods and near schools to as low as 15-20

miles an hour but is prohibited from doing so by the California Vehicle Code, of which the MUTCD plays a major role.

Therefore, it is concerning that the proposed changes to the MUTCD provide less flexibility to small cities such as ours which have made commitments to addressing climate change and achieving Vision Zero. To date, the MUTCD has done little to help stem the approximately 40,000 traffic deaths the U.S. sees each year. This is due largely to the Manual's over-emphasis on motor vehicle operations and efficiency on rural highways, and neglect of other modes and contexts. To guide the development of an improved, safety-oriented document that supports the equity, safety, and sustainability vision of the FHWA, the City of San Luis Obispo **would like to call attention to the following fundamental problems that must be addressed in an updated MUTCD:**

- Continued reliance on the 85th percentile approach to setting speed limits over a safe systems approach. The City of San Luis Obispo has adopted goals to reduce traffic speeds on residential and local roads to as low as 15 mph. But continued reliance on the 85th percentile approach in the MUTCD and its relationship to California Vehicle Code do not provide the flexibility to explore these changes in the speed limit.
- Outdated signal warrant requirements that ignore known conflicts and land use.
- The draft 11th Edition of the MUTCD, released in December 2020, introduces new barriers to implementing environmentally responsible bicycle and transit infrastructure and does little to address existing ones.
- Traffic control devices appropriate for urban contexts, such as red transit lanes and pedestrian safety measures, are subject to high standards of testing.
- Elements of the new draft, particularly a new section aimed at accommodating automated vehicles, exacerbate already prohibitive cost burdens for cities.

The issues described above are endemic to the document's underlying approach and undercut efforts to provide safe, multimodal accessibility in urban settings. The MUTCD needs holistic reframing to support cost-effective, sustainable, and equitable city street design and improve safety and accessibility for the most vulnerable users. We respectfully request 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 City of San Luis Obispo stands ready to work with you.

Sincerely,



Matt Horn
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