



CITY OF BEND

April 19, 2021

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

RE: RIN 2125-AF85 - Request for an expedited reframing of the MUTCD as a proactive safety regulation

Dear Acting Administrator Pollack:

The City of Bend, Oregon respectfully requests the Federal Highway Administration (FHWA) further revise the Manual on Uniform Traffic Control Devices (MUTCD) to align with the priorities of communities nationwide that are working to reduce traffic deaths and serious injuries and expand facilities to equitably serve vulnerable users.

City leaders, staff, and residents spent over two years and considerable resources working to adopt an updated Transportation System Plan. The new plan includes projects to improve vehicle travel, create safer crosswalks, slow speeds, and increase safe routes for people walking and biking. Our community reinforced its support for a safer, multi-modal transportation system with the passage of a nearly \$200M infrastructure bond during a tumultuous economic time. The safe travel options in our plan also support sustainability and work to meet our Climate Action Plan goals by recognizing the need to reduce Vehicle Miles Traveled and increase the number of people cycling, walking, and using transit.

We recognize the significant work that has gone into getting the revised manual to this point. The City of Bend supports many changes already in the MUTCD, such as including Rectangular Rapid-Flashing Beacons (RRFB), clarifying that traffic calming tools are not traffic control devices, and adopting interim and new measures for bicycles. However, the MUTCD update needs further revision so it clearly aligns with the goals of FHWA and Cities across the nation to eliminate traffic deaths with safer system designs and complete streets.

To guide the development of safe streets for all users, please revise the MUTCD to clearly support equity, safety, and sustainability. In particular, consider the following:

- Modify the sections of the MUTCD that create undue cost burdens for local jurisdictions, such as the new section for automated vehicles, which will create immediate and prohibitive cost burdens for cities by, for example, requiring new striping machines and increased development costs for temporary traffic control striping requirements.

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- Commit to increased flexibility to better address emerging technology, signing, and striping that serve and even prioritize the needs of the more vulnerable people using our streets. In particular, the MUTCD should be modified so that it fully recognizes the needs for varying size and configuration of walking and biking facilities, signals, and signage on neighborhood streets and busy crossings.
- Add language that recognizes the different needs of urban streets and vulnerable users. Some examples are:
 - Change the purpose to include “safety and efficiency for all modes of travel”
 - Add more evaluation criteria that moves away from the 85 percentile standard and emphasizes the needs of local jurisdictions to adopt slower speeds to promote safety for vulnerable road users, especially at crossings and on neighborhood streets.
 - Change the targeted road users definition to recognize the vulnerability of bicyclists and pedestrians and not lump bicyclists with vehicles.
- Establish a process for routine updates and an accelerated adoption process so newly identified safety tools can be more quickly implemented by states and local jurisdictions.

The City of Bend along with many other communities, state agencies, and the FHWA are initiating large infrastructure packages in the next few years. It is imperative that the FHWA publish a new MUTCD soon for use on these projects. Given the rise in transportation-related injuries and deaths that has been occurring in the country, with a dramatic uptick over the last year, the City of Bend strongly feels that the new MUTCD should prioritize standards that will allow us to dramatically improve safety and recognize the needs of all people using our streets. We urge you to make the changes necessary to achieve this result.

Sincerely,

A handwritten signature in black ink that reads "Sally Russell". The signature is written in a cursive, flowing style.

Sally Russell,
Mayor