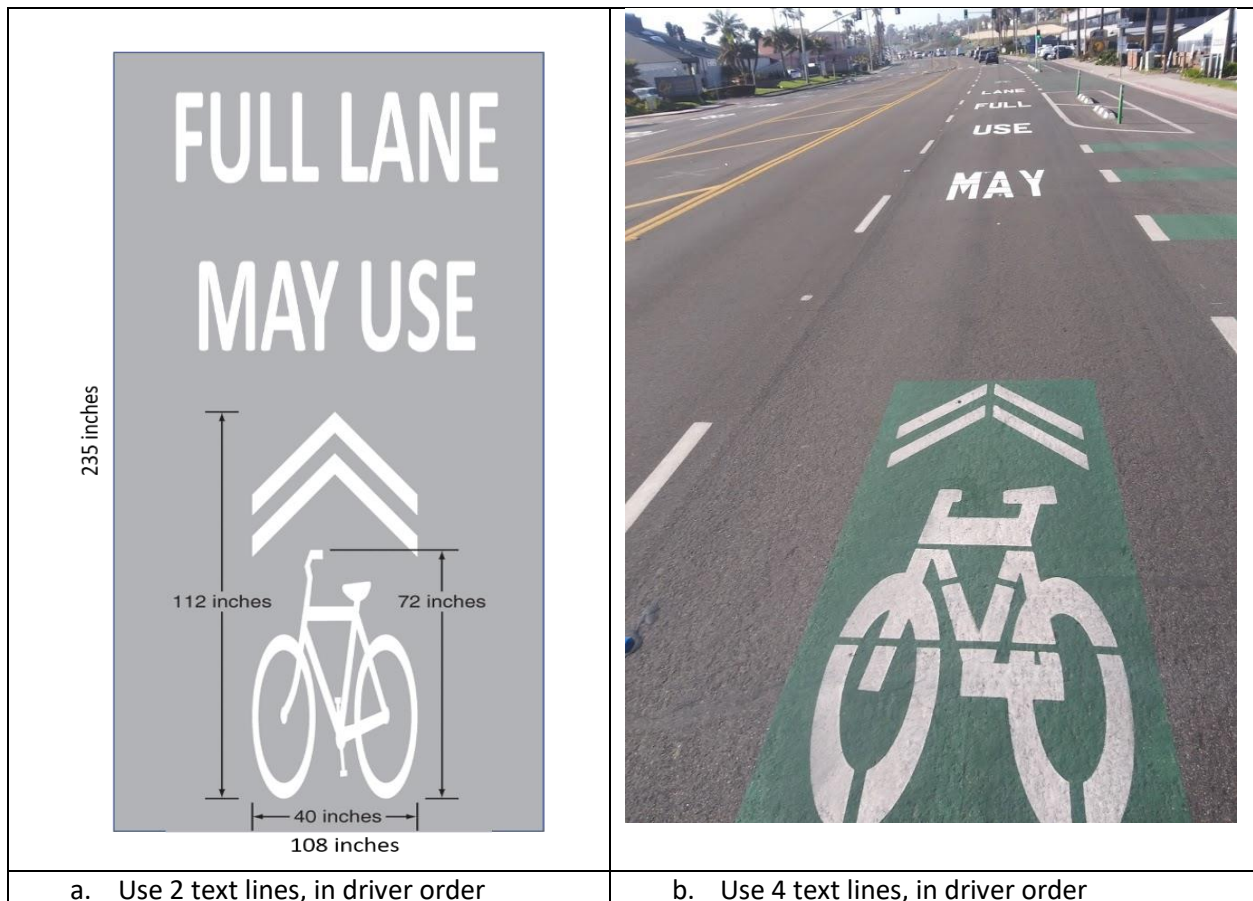


May 13, 2021

As a lifelong cyclist and bicycle advocate in San Diego County, I concur with many of the overarching general comments from bicycle advocates on the current update to the MUTCD regarding better accommodation of the exciting forward trends in active transportation and how an updated MUTCD can actually encourage safer and more attractive streets for non-motor vehicle users of roads across the USA. Those comments point out that a poorly updated MUTCD can actually stifle some of the current guidelines and recommendations for Complete Safe Streets. I support all the comments at the general level you have received from the League of American Bicyclists, the Association of Pedestrian and Bicycle Professionals (APBP), the California Association of Bicycle Organizations (CABO), the San Diego County Bicycle Coalition and our local EncinitasBikeWalk group.

I would like to specifically focus on improving the Bikes May Use Full Lane message in sign R4-11. That sign is almost always used sparsely along the side of the road in conjunction with shared lane markings (sharrows) in a travel lane. Informal polling of road users, including some city planners, indicates that these signs are not noticed; some even exclaim “I never even saw that sign before.” That is largely due to drivers paying more attention to the roadway in front of them. These signs are small and pass by in a fleeting moment on the side of the road, often far right of where sharrows are placed.

I would like to recommend that, where one might normally place a R4-11 sign on the side of the road, that a sharrow at strategic points be accompanied by the R4-11 words on the pavement. There are a couple of possibilities:



I would leave it to someone with Traffic Engineering expertise to determine the correct dimensions, spacing and the stretching of the letters for optimal readability as motorists drive over this augmented sharrow.

The second option (b.) in the figure has been recently implemented on a stretch of Hwy 101 in Encinitas, CA by Abe Bandegan, Traffic Engineer for the city of Encinitas, CA. [Click here for a video](#) of what that looks like from a motorist point of view driving at 35 mph.

Although state regulations may allow some flexibility in pavement legends, having a uniform standard in the Federal MUTCD would ensure uniformity across the USA, instead of leaving it up to local engineers to experiment.

This is not only for regulatory purposes, such as in CA where this signage indicates a substandard width lane per CA Vehicle Code 21202, but really more for education and awareness. It will make motorists more likely to understand why a cyclist may be controlling the full lane, as well as instructing cyclists for the safest position for them to ride in these lanes where it is unsafe to share a lane side-by-side with a motor vehicle.

Thank you for the opportunity to comment,

Karl Rudnick
Solana Beach, CA

League of American Bicyclists League Cycling Instructor #3481

Affiliations, although I'm speaking as an individual here, not for these organizations:

San Diego County Bicycle Coalition Board Member

BikeWalkSolana Member, Active Transportation Advisory Committee to Solana Beach, CA

North County Cycle Club of San Diego Board Member and Ride Leader