

Comment from Matt Fall

Posted by the **National Highway Traffic Safety Administration** on Mar 1, 2023

Section: C5. Global Position

Comment: Any language that can be used to make this stringent as possible is recommended. When mapping crash locations for bike and peds there are frequently odd locations like where a building or bodies of water where no bikes-peds could possibly be. These are scrubbed from the data resulting in less accurate overall analysis.

Section C8: Manner of Collision of the First Harmful Event

Comment: Bicycle and pedestrian crashes should include crash typing which strictly aligns with the crash typing established in USDOT's Pedestrian and Bicycle Crash Analysis Tool (PBCAT), which can be found here: <https://pbcats.org/userguide.php>. MMUCC draft appears to only include crash typing for autos.

Section: General

Comment 1: Race, ethnicity, age, and sex must be included in bicycle and pedestrian crash reports. Much of the analysis from a bike-ped perspective leads to outreach/educational programs and that data helps combine those demographics with age, sex, etc. to identify target audiences and tailor campaigns.

Comment 2: Recommend including language or form section that allows reporting officers to distinguish between "pedestrian" and "unintended pedestrian," with pedestrian defined as per usual and unintended pedestrian being drivers that were forced to leave their vehicles due to a vehicle failure or initial crash. This would help determine recommended safety countermeasures based on each type.

Comment 3: Please include language that allows bicyclists and pedestrians to be categorized as "unhoused" if the cyclist/pedestrian does not live in an addressed residence. Again, this helps planners determine the type of outreach necessary when implementing programs. Some areas have a disproportionately large number of bicycle and pedestrian fatalities involving unhoused nonmotorized individuals.