



CITY OF CHICAGO



CHICAGO DEPARTMENT OF TRANSPORTATION

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590-0001

July 20, 2023

Acting Administrator Carlson,

Thank you for the opportunity to provide comments on the Advanced Notice of Proposed Rulemaking for side underride guards on large trucks. The Chicago Department of Transportation prioritizes vulnerable road users in our street design and policy making and have determined side underride guards to be a useful tool in protecting vulnerable road users. As of 2021, the City requires that all large vehicles used on large City contracts utilize underride guards.

Among the most fatal roadway crashes, those involving large trucks and vulnerable road users remain a significant concern. By requiring side underride guards, we have the potential to save numerous lives. We strongly encourage the National Highway Traffic Safety Administration (NHTSA) to include vulnerable road users in cost-benefit analysis concerning underride guards and that includes assessment of the benefit of saving the lives of people biking, walking, and rolling.

Each year, approximately 500 vulnerable road users lose their lives in collisions with large trucks. A study conducted by the National Transportation Safety Board highlights that a significant number of bicyclist and pedestrian fatalities involving large trucks occur in side impact crashes. Furthermore, the US DOT Volpe Center's research reveals that side guards can reduce fatalities and serious injuries as a proportion of all injuries from bicycle-large truck crashes by 55-75 percent and pedestrian-large truck crashes by 20-27 percent.

We encourage NHTSA to focus on the impact for non-motorized users, the most vulnerable road users, who face the highest risk of fatality in crashes involving large trucks. We respectfully request NHTSA to reassess the cost-benefit analysis by incorporating the fatalities and serious injuries of vulnerable road users and motorcyclists into the rulemaking process for side underride guards. Taking these critical steps will not only protect the lives of vulnerable road users but also contribute to achieving the goals outlined in the National Roadway Safety Strategy.

Thank you for your attention to this urgent matter.

Sincerely,

Gia Biagi
Commissioner