

Comments on Docket No. FHWA-2020-0001 National Standards for Traffic Control Devices; The Manual on Uniform Traffic Control Devices for Streets and Highways; Revision

Please use this form to provide comments on the Notice of Proposed Amendments for the MUTCD.

INSTRUCTIONS:

1. Add your name or organization name where indicated in the footer of this form.
2. Use Table 1 to provide your original comments.
3. Use Table 2 to indicate your agreement with a comment that another commenter has submitted to the docket.
4. Do not adjust formatting of the rows and columns; text will automatically wrap and expand the row height as you type.
5. To add rows to this form, use the "Insert Rows" function, or hover just outside the left edge of the row below which you would like to add a row and click the encircled "+" that appears.
6. If you choose to provide a letter to accompany this comment form, please **print the document as a PDF; please do not scan a hard copy**. This will assist FHWA with cataloging your comments.

TABLE 1. ORIGINAL COMMENTS ON PROPOSED CHANGES. Please indicate the applicable proposed Section numbers in the far-left column. In the next three columns, please indicate your agreement, disagreement, or whether the column is applicable to your response by placing a, "YES," "NO," or "N/A" in the appropriate column of the row. If you agree with a proposed change, then there is no need to fill out the additional columns beyond the first two. However, it can be helpful to explain why you agree with a proposed change based on your objective experience as a roadway operator and/or empirical data. If you disagree in part or in whole, then please provide additional information that FHWA may find helpful.

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept; suggested rewording of text in Comments	Disagree with concept	Comments <i>Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.</i>
1A.03	N/A	N/A	YES	I disagrees with 1A.03 as proposed in the NPA. Recommend to delete section 1A.03. Issue with vehicle operator definition and "Basic" understanding of traffic laws. This should be a higher standard. Also pedestrian definition puts a burden on pedestrians to act a certain way and applies unnecessary contributory negligence to any conflict with vehicles. (p. 2).
2B.08	NO	YES	N/A	I generally agrees with 2B.08 as proposed in the NPA but recommends to add "Unless pedestrian safety is the major concern". (p. 67, Lines 35--36).
2B.19	NO	NO	YES	I recommend a more visible and enforceable yield sign for pedestrian crossings. I also believe the manual should clearly state that a R1-2 yield sign is permitted at a crosswalk. I encourage FHWA to look for new yield type signage to enhance pedestrian safety at crosswalks. The current R1-5 series are very small for higher speed and wider roadways. There yield and stop symbols within such signs are very small. See attachment for yield sign ideas including a downward arrow plaque to be installed below a R1-2, and two variations of a triangle yield sign with a pedestrian symbol. These should be used for approaches to crosswalks and not for turning vehicles. These would replace the W11-2 pedestrian sign with downward arrow which is a warning sign being used to enforce a regulation to yield to pedestrians in the crosswalk. See attachment.
2B.45	NO	YES	N/A	I generally agrees with 2B.45 as proposed in the NPA but recommend to add 24X24in size for lower speed roads. (p. 92-93).
2B.61	NO	YES	N/A	I recommends changes to 2B.61 as proposed: <ul style="list-style-type: none"> • Add leading pedestrian interval for no turn on red criteria. • Add Separated Bike Lane, Counterflow bike lane and Bike Box for no turn on red criteria.

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				<ul style="list-style-type: none"> • Add "Unless local law" prohibits all no turn on red movements citywide. The sign is not required if local or state law prohibits all right turn on red unless otherwise posted. Then a "After stop right turn on red permitted" is installed. See NYC. • At Bullet E, change accident to crashes. <p>. (p. 109).</p>
2C.36	N/A	YES	N/A	Create a new Do Not Enter Ahead sign. This sign would be used to warn motorist that there is a head-on condition where vehicles must turn left and/or right at an intersection. This would be in the same family of the stop, yield, signal ahead, and speed reduction warning sign which give advance notice of a necessary move, in this case that a motorist cannot proceed straight. See attachment.
Table 2D-3	NO	YES	N/A	I generally agrees with Table 2D-3 as proposed in the NPA but recommends to add "Av" to standard abbreviation for streets.
2E.09	NO	NO	YES	I believe that FHWA should consider changing the color of guide signs for freeways and expressways to blue. The purpose is to make it apparent that a roadway about to travel on is a freeway and expressway. While the blue interstate shield is obviously a freeway, it is less apparent for freeways signed as US, State, Local highways or by street name. Motorist following green guide signs do not know the context of the road they will be on until they are on the road or some other traffic control device makes it apparent. The purpose is for a driver to have complete expectation that a roadway is a high speed freeway or slower speed roadway. Also green guide signs assist motorist to reach destinations. Freeways and expressways are not destinations. They allow one to reach a destination where green is more appropriate. An example would be a motorist traveling on a roadway and turns onto a freeway that has a blue guide sign. Subsequent exits to freeways would have blue signs and local roads would have green signs. The driver would exit the freeway at the green sign closest to their destination. This color system is used throughout the world.
2F.01	NO	YES	N/A	I generally agrees with 2F.01 as proposed in the NPA but recommends the toll section incorporate congestion pricing zone facilities. NYC is planning to have a congestion toll zone in the central business district soon. (p. 240).
2H.03	N/A	N/A	YES	I disagrees with 2H.03 as proposed in the NPA. The airport symbol should be allowed on overhead guide signs. It is easy to understand compared to full airport name. Typical airport signage at the airport is full of symbols and colors". (p. 281, Lines 42-43).
3B	NO	YES	N/A	I generally agrees with 3B as proposed in the NPA but recommends to add section for the applications of signs and markings in shared streets, where people are expected to walk in front of motor vehicles or against oncoming motor vehicles. (p. 339).
3C.01	NO	YES	N/A	I generally agrees with 3C.01 as proposed in the NPA but recommend: <ul style="list-style-type: none"> • Pedestrian controls such as signs, signals, islands, markings be placed in a separate Chapter such as Chapter 7. See comments for Part 7 for proposed pedestrian chapter. (p. 368). • Remove detectable warning contrast details. Refer to USDOT ADA 2006 for the details. (p. 368, Lines 28-36). • Include applications of detectable warnings at cut-Throughs and median islands. (p. 368, Lines 28-32).
3C.03	NO	YES	N/A	I generally agrees with 3C.03 as proposed in the NPA but recommends to add "Where curb ramps are required, crosswalk markings shall be located

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				so that curb ramps and clear space are within the extension of crosswalk markings (outside of parallel travel lane)". (p. 370, Line 25).
3C.04-3C.05	NO	YES	N/A	I generally agrees with 3C.04-3C.05 as proposed in the NPA but recommends to reword or deemphasize basic crosswalk and to instead emphasize the high visibility crosswalk. All crosswalk Figures should use high visibility crosswalks, to deemphasize the basic crosswalk. Basic crosswalk may need to be phased out of the manual. (p. 370-371).
3C.05	NO	YES	N/A	I recommends revisions to 3C.05: <ul style="list-style-type: none"> • For B, C, and F, replace the term "Establishing" with "Emphasizing". The term "Establishing" infers a marked crosswalk should be provided. • Emphasizing a crosswalk where substantial numbers of pedestrians cross without any other traffic control device. • Emphasizing a crosswalk at an uncontrolled intersection F. Emphasizing a school crossing. (p. 371, Lines 8-10 & 15).
3C.12	NO	YES	N/A	I generally agrees with 3C.12 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Expanding on pedestrian islands. (p. 373, Line 35). • Adding Figures. (p. 373).
3H.03	NO	YES	N/A	I generally agrees with 3H.03 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Removing restrictive language on multicolor arrangements within crosswalks. Proposed language is too restrictive. No evidence it is distracting. Add option that Engineering judgement may be used in deciding the aesthetic treatment and multiple color arrangements for an aesthetic crosswalk. (p. 390).
Figure 3H-1	NO	YES	N/A	I generally agrees with Figure 3H-1 as proposed in the NPA but recommends Figure 3H-1 be modified to remove restrictive treatments for aesthetic treatment for basic crosswalk.(p. 390).
Chapter 3J	NO	YES	N/A	I recommends revisions to Chapter 3J to reconsider the downgrading of islands. Islands formally had an entire Chapter up until the 2000 edition. (p. 397).
3J.07	NO	YES	N/A	I generally agrees with 3J.07 as proposed in the NPA but recommends adding <ul style="list-style-type: none"> • Painted plazas and sidewalk extensions in this section to demonstrate these cases. • Figures for sidewalk extension and median islands. • Whole intersection by revising partial intersection Figures. • Adding to guidance to show consistency with Figure 3J-6. • Crosswalk markings should extend to the sidewalk curb in marked curb extensions. • Delineators should be added, similar to tubular markers and other methods like planters. (p. 399). (p. 400, Line 36).
4A.03	N/A	N/A	YES	I disagrees with 4A.03 as proposed in the NPA. When there is no pedestrian signal but possibly a crosswalk, pedestrians must yield to vehicles (Albeit only when the light first changes). "The pedestrian may yield the right-of-way to vehicles lawfully within the intersection..."(p. 402, Lines 47-49 & 403, Lines 1-2).
4A.05	N/A	N/A	YES	I disagrees with 4A.05 as proposed in the NPA, specifically with the shall statement for a bike signal sign at every bike signal face but also the text "Only to make the movement indicated by the lane-Use arrow(S) displayed on the bicycle signal sign (See section 9B.22) that is located immediately adjacent to the signal face" seems in conflict with section 9B.22 which includes "If used" in regards to the bike signal signs. (p. 405, Lines 19-20).

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				Permit the usage of a single lens flashing yellow bike symbol to be used where turning or approaching traffic must always yield to bicyclists. No red or green would be displayed.
4A.06	N/A	N/A	YES	I disagrees with 4A.06 as proposed in the NPA: <ul style="list-style-type: none"> • The following text appears counterintuitive to pedestrian safety, "At the time that the walking person (Symbolizing walk) signal indication is first shown". Is this to include vehicles that may already be in the intersection? It is not understood why this language is used if pedestrian safety is paramount over all others road users. (p. 406, Lines 11-12). • Recommend reverting safety island back to pedestrian refuge island. Safety island is not defined. (p. 406, Lines 18-19). • The shall statement that pedestrians shall not cross on a flashing don't walk indication conflicts with New York City law allowing pedestrians to cross during the flashing don't walk countdown. With a countdown timer present, pedestrians are given enough information to decide whether to cross. With a countdown timer, this language should be more flexible for pedestrians. NYC vehicle and traffic law language: "Pedestrians facing such signal are advised that there may be insufficient time to cross the roadway". (p. 406, Line 13).
4C.01	NO	YES	N/A	I generally agrees with 4C.01 as proposed in the NPA but recommends to include/Mention transit stops as a criteria for consideration (E.G under the bullets for engineering study criteria)? (p. 413).
4C.02-4C.10	YES	N/A	N/A	I generally agrees with the changes to the signal warrants to allow greater flexibility. Signal Warrant One, Two, Three – Change To Guidance. (p. 414-421).
4C.05	NO	YES	N/A	I generally agrees with 4C.05 as proposed in the NPA but recommend having crash and injury factors to reduce the warrant threshold. Pedestrian warrant volumes should be reduced to 20 at peak hour .
Table 4C-7	NO	YES	N/A	I generally agrees with Table 4C-7 as proposed in the NPA but recommends the pedestrian traffic generated by a bus stop could be utilized as a factor in the pedestrian warrants.
4E.01	NO	YES	N/A	I recommends revisions to 4E.01 as proposed in the NPA: <ul style="list-style-type: none"> • The flashing yellow signal indication include bicyclists as Ill as pedestrians and opposing traffic as this is how dot often uses the flashing yellow.(p. 438, Lines 8-11). • Clarify when a pedestrian can cross a street at a legal marked or unmarked crosswalk absent pedestrian signals, steady circular green, flashing yellow arrow, and flashing red arrow. (p. 436-439).
4H.04	NO	YES	N/A	I recommends revising 4H.04 by dropping to option. Bicycle signal signs may be installed adjacent to a bicycle signal. Requiring this sign only adds to sign clutter at an intersection when the intent of a bicycle signal face is clear. (p. 465).
4I.05	NO	YES	N/A	I generally agrees with 4I.05 as proposed in the NPA but recommends <ul style="list-style-type: none"> • Adding an option for maximum dwell time for pedestrians after pushing the button. Should generally be one minute maximum? Need research on pedestrian impatience. Reference driver impatience. . (p. 473, Lines 19-21). • Additional push button location guidance when using one support at a corner.(p. 471-473).,I generally agrees with 4I.05 as proposed in the NPA

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				<p>but recommends to</p> <ul style="list-style-type: none"> • Add to end of line: "Refer to section 4K.02 for requirements of accessible pedestrian push buttons that are placed less than 10 feet apart." (p. 471, Lines 41-43). • Clarify "Sufficient width" as per USDOT ADA 2006 section 406.7 and DOT ADA 2006 or DOJ ADA 2010 Standards, or any superseding revision of DOT or DOJ ADA Standards. (p. 473, Lines 1-3). • Maintain a 1.5 feet min. And 6 feet max. Clear space from the face of curb or from the outside edge of the shoulder, (Or if no shoulder exists, from the edge of the pavement) ;(p. 472, Lines 16-17).
4I.06	NO	YES	N/A	<p>I generally agrees with 4I.06 as proposed in the NPA but recommends to</p> <ul style="list-style-type: none"> • Upgrade should to shall. Pedestrians shall have enough time to cross the street but not for preemption. (p. 473, Lines 5-6). • Add guidance that pedestrian should be given enough time to cross entire roadway. (p. 473, Line 8). • The flashing red signal during flashing don't walk phase. Pedestrians should not have simultaneous vehicle conflict. (p. 473, Lines 32-35). • Change standard to support. (p. 475, Lines 24-27).
Part 7	NO	YES	N/A	<p>I recommends revising Part 7 to combine all other major pedestrian items into this Chapter and make this a pedestrian chapter. Consider seniors, and high senior areas. Design treatments for different ages/ abilities. (p. 668).</p>
9A.01	NO	YES	N/A	<p>I recommends revisions to 9A.01 as proposed in the NPA:</p> <ul style="list-style-type: none"> • 9A.01 seems to imply that bicyclists will not be accepted as legitimate road users by other road users unless they follow all TCDs in the manner as they are designed for motor vehicles. All road users do not follow TCDs exactly and for different reasons. I agree that appropriate design will improve compliance of TCDs by bicyclists, but that is only if they are designed with their needs are considerations. This needs to be made clear. While they may be legally defined as vehicles, bicyclists are vulnerable, human powered, less visible, and exposed to the elements and the roadway should be appropriately designed to accommodate safe, comfortable, and efficient travel by bicyclists. I recommend deleting the last support paragraph on designing bicycle facilities and deleting the standard on standard on the absence of a marked bicycle lane and replacing with a standard statement that Bicyclists are allowed on any roadway unless otherwise prohibited by traffic control device or law. . (p. 739, Lines 2-21). • Reference chapter containing Information On Green Colored Pavement For Bikeways. (p. 739, Lines 6-9). • Recommend remove line 9-15, especially line 12-15 - about designing poor bicycle facilities, not needed. (p. 739, Lines 15-21).
9A.02	N/A	N/A	YES	<p>I disagrees with 9A.02 as proposed in the NPA. I recommend deleting the support statement on nonstandard signing on bikeways. Is there supporting documentation that nonstandard bicycle branding on signs contributes to public non-Acceptance? Overly restrictive. Appears to restrict naming and promoting biking and biking facilities. (p. 740, Lines 12-14).</p>
9B.03	YES	N/A	N/A	<p>I generally agrees with 9B.03 but thinks a warning sign like the W6-3 (Two Way Traffic Sign) With The Bike Symbol can be created. (p. 744).</p>

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Figure 9B-3	NO	YES	N/A	I generally agrees with Figure 9B-3 as proposed in the NPA but recommends to revise the Figure. The bike lane does not need to be dashed in front of the back-In angle parking. The bike lane is not dashed along parallel parking. Is there evidence that this improves driver looking and yielding? Revise to make solid lines, similar to design for parallel parking. Also to show the angle parking sign in the Figure.
9D.03	N/A	N/A	YES	I disagrees with 9D.03 as proposed in the NPA on prohibiting bike symbol shall on a street name sign. (p. 757, Line 2).
9E.05	N/A	N/A	YES	I disagrees with 9E.05 as proposed in the NPA prohibiting bike lanes in circular intersections. Research has shown that while a standard bike lane is not appropriate for a circular intersection, the separated bicycle lane is. Separating cyclists on high volume, high-Speed and/or multilane roundabouts is safe and provides safe connectivity for a bike lane network while removing the conflicts of having bicycles merge with general traffic or bicycles merging with pedestrians onto the sidewalk or having to dismount. Language should allow for SBL that proceed around the circular intersection but any crossing of the approach and exit lanes shall be at least 20Ft from the edge of circular roadway, much like the crosswalk language at roundabouts. See also NCUTCD NPA proposal on 9E.05. One difference with this language is that the roundabout should allow the SBL. Proposed language is: a Support statement: Separated bicycle lanes allow bicyclists to navigate a circular intersection and its crossing points without a merge into traffic or pedestrian facilities or without dismounting and using a crosswalk at the intersection crossing point. This is beneficial at multi-lane and higher speed circular intersections. An option statement that Separated bicycle lanes may be used in circular intersections. And a guidance statement that If used, bicycle crossings should be a minimum of 20 feet from the edge of the circulatory roadway. (p. 771).
9E.06	NO	YES	N/A	I generally agrees with 9E.06 as proposed in the NPA but recommends to not require a break in the buffer lines for a buffered bike lane where there is parking? This is a more complicated design to implement and does not have a clear purpose. I have not seen any research to suggest or even heard of anecdotal evidence that drivers do not understand that they are able to cross the solid bike lane buffer lines if they intend to use an available on-Street parking space. (p. 771-772).
9E.06-9E.07	NO	YES	N/A	I generally agrees with 9E.06-9E.07 as proposed in the NPA but recommends to add guidance to encourage buffered bike lane or separated bike lane for speed greater than 35 mph and multilane and not use shared lane markings or a standard bike lane. (p. 771-774).
9E.08	NO	YES	N/A	I generally agrees with 9E.08 as proposed in the NPA but recommends to <ul style="list-style-type: none"> • Allow counter-Flow bike facilities where there is on-Street parking. There are many low-Speed corridors throughout the U.S. With this condition that could be used for a study but it's never come up as a safety hazard as far as I know. (p. 774, Lines 22-23). • Make one way sign an option. (p. 774, Line 29).

TABLE 2. AGREE WITH ANOTHER COMMENTER. If you agree with another commenter, please indicate the commenter with whom you agree with and note any additional information FHWA may find helpful or any exceptions.

Docket Comment Number and/or Commenter Name	Agree with commenter's comments as written	Agree with commenter; with exception(s)	Additional information helpful to FHWA, or exceptions to commenter's comments
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(EXAMPLE) NCUTCD	NO	YES	NCUTCD comment for 9E.05 allows for separated bicycle lanes for circular intersections except roundabouts. The roundabout exemption should be removed as SBLs can safely be built into a roundabout
ITE	YES	NO	Agree with their letter that a pedestrian part should be created.
NYCDOT	YES	NO	Agree with their comment that a pedestrian part should be created. Also agree on the creation of a pedestrian refuge island chapter as this would improve pedestrian safety.