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US Department of Transportation
Federal Highway Administration
1200 New Jersey Avenue SE
Washington, DC 20590-001

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SUBJECT: Federal Highway Administration Docket # 2020-001

Dear Madam or Sir:

This is to provide comment on the FHWA's proposed rulemaking on the National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways; Revision. First, thank you for publishing the Notice of Proposed Amendment. Many developments have occurred since the publication of the current Manual in 2009, thus illustrating the need for an updated Manual. I have been a bicycle and pedestrian transportation planner at the municipal, county and state levels for over four decades and a staunch proponent of the Manual.

Second, I wish to encourage the FHWA to expedite publication of a final rule and once the final rule is published, I also encourage the FHWA to undertake regular and targeted revisions of the 11th edition. Lastly, I encourage the FHWA to incorporate the comments of the National Committee of Uniform Traffic Control Devices comments on the NPA.

I am a member of the NCUTCD. However, the following comments are solely personal and do not represent the NCUTCD. I am writing in opposition to the proposed standard in Section 9D.03 that would prohibit the use of the bicycle symbol on street name signs.

Section 9D.03

Proposed Standard:

The bicycle symbol shall not be used on a Street Name sign.

Objections

1. There is no rationale given for this prohibition. The proposed standard recognizes a need to identify a street that is part of an overall bicycle network in conjunction with a

street name but seeks to prohibit the use of the recognizable bicycle symbol. To compensate for the loss of the symbol on the D-3 sign it would permit attaching the D11-1bP BIKE ROUTE plaque to a street name sign instead.

2. Currently the MUTCD permits the use of the D-3 Street Name sign to help guide bicyclists under 9B.20 on page 798. Option 4 reads, "Destination (D-1, D1-1a) signs, Street name (D-3) signs, or Bicycle Destination (D1-1b, D1-1c, D1-3b, D1-3c) signs (see Figure 9B-4) may be installed to provide direction, destination, and distance information as needed for bicycle travel. How the D-3 Street Name signs accomplish this purpose is unsaid but certainly does not appear to preclude the use of the bicycle symbol on a D-3 sign. Therefore, this proposal takes away a tool for guiding bicyclists.
3. Substituting the placement of the bicycle symbol on D-3 signs but allowing the attachment of the D11-1bP BIKE ROUTE plaque has the following drawbacks:
 - A. Making the simple more costly and complicated. Attaching the BIKE ROUTE plaque to D-3 signs instead of placing the bike symbol on street name signs is more costly in terms of both material and labor. Traffic engineers and public works decision-makers who might be resistant to the concept of using street signs to guide bicyclists are given a new rationale for their opposition; having to purchase a separate set of signs and attaching them to D-3 signs.
 - B. Decreased understanding for non-English readers. A bicycle symbol is universally recognized. The words "BIKE ROUTE" are not. Under Section 1A.02 Principles of Traffic Control Devices on page 1, the third guidance statement under 02 which discusses the five basic requirements of an effective traffic control device, the third requirement states, "Convey a clear, simple meaning." In this context a bicycle symbol is clearer than the words, BIKE ROUTE.
 - C. Contributes to visual clutter. Why use two signs when one will do?
4. *Permitting pictographs while prohibiting the bicycle symbol on D-3 signs.* The MUTCD does not prohibit pictographs on D-3 signs, although there are restrictions on their use. Jurisdictions place items on street name signs that arguably do not provide guidance. Examples include local government seals, flags, and tourist symbols. It is inconsistent to permit placement of these items on street name signs but prohibit the bicycle symbol which has a stronger claim of providing guidance to highway users.
5. *Inconsistent treatment of the bicycle symbol compared to numbered highway symbols.* Under Section 2D.09 Numbered Highway Systems on page 142 the first sentence under Support states, "The purpose of numbering and signing highway systems is to identify routes and facilitate travel" Bicycle guide signs share a similar function as they identify designated bicycle routes and facilitate bicycle travel. This is reinforced by Section 2A.05 Classification of Signs on page 28 where the standard statement reads, **Guide signs**

show route designations, destinations, directions, distances, services, points of interest and other geographical recreational or cultural information.”

Figure 2D-3 Route signs on page 143 illustrates the following route signs, M1-1- Interstate Route Sign; M1-Off Interstate Business Route Sign; M1-4- U.S. Route Sign; M1-5-State Route Sign; M1-6 – County Route Sign; and M1-7 Forest Route Sign. These are classified as guide signs. Under Section 2D.43 Street Name Signs (D3-1 or D3-1a) the Option statement reads, “For streets that are part of a U.S., State, or county numbered route, a D3-1a Street Name sign (see Figure 2D-10) that incorporates a route shield may be used to assist road users who might not otherwise be able to associate the name of the street with the route number”.

Bicycle symbols and numbered route symbols are both used to guide roadway users. For example, a guide sign using a bicycle symbol such as a D11-1 BIKE ROUTE and a guide sign using a M1-4 U.S. ROUTE symbol can be used to inform roadway users they are traveling on a street that is a designated bikeway or on a street that is designated as a U.S numbered route respectively. Yet while there is an option to allow three types of numbered route guide symbols on street name signs, this proposal would prohibit using the bicycle symbol to accomplish the same task on street name signs.

Proposed Solution

This is to propose both deleting this proposed prohibition and adding language creating a new sign based on the D3-1a Street Name sign where M1-4, M1-5 and M1-6 symbols would be placed. This language would read as an Option statement in Part 9 as follows:

“For streets that are designated as a bikeway, a D3-1X Street Name sign (see Figure XX-XX) that incorporates a bicycle symbol may be used to assist road users who might not otherwise be able to associate the street as a designated bikeway”.

The proposed option of attaching BIKE ROUTE plaques on street name signs could remain in place.

Thank you for considering my objection to prohibiting the inclusion of the bicycle symbol on street name signs. Please let me know if there are any questions regarding this matter.

Sincerely,


Michael E. Jackson