

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>
(EXAMPLE) 1D.08	YES	N/A	N/A	Agree - maintains uniformity.
(EXAMPLE) 2E.41, 2E.42	NO	YES	N/A	Agree with the alternate proposal that freeway and expressway Diagrammatic signs should be discontinued, contingent upon the adoption of the Partial-Width Overhead Arrow-per-Lane signs, which should allay concerns over excessively wide and costly signs at non-major interchanges.
(EXAMPLE) 2E.42	NO	YES	N/A	Agree that the proposed Modified or Partial-Width Overhead Arrow-per-Lane sign should be adopted, but do not agree with exception for an existing Exit Direction sign to remain at the theoretical gore (p. 189, Lines 39-44). This exception creates a non-uniform application and violates the expectancy of the road user.
General	NO	YES	N/A	While technology allows for smaller, more frequent updates, there is concern about the lag time in states following up with adopting new changes. One large update is easier to track than many bite-sized updates, especially if not all states are on the same schedule. We understand that the smaller updates will be easier for FHWA to review comments on. We hope that if more frequent updates are used going forward, that they could follow a set schedule, (e.g., expect a new release every January 1 and July 1).
Figure 2B-18	NO	YES	N/A	The figure appears to be missing an optional symbol for the southbound far right ONE WAY sign.
1B.01, Items A-D in the second list	NO	NO	YES	While it is understandable to not require the MUTCD to be applied to certain privately-owned facilities, we would recommend text be added to encourage MUTCD compliance for the benefit of all users
1D.07	NO	YES	N/A	Colors listed as "reserved for future designation" should be reevaluated and the number of such colors potentially reduced

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				<p>based on difficulty for system uses with color deficiencies to properly discern the difference in colors, in addition to machine recognition issues caused by fading/weathering</p> <p>We also recommend that the use of Fluorescent Yellow-Green should be limited to school zone-specific signage to further enhance the importance of the area.</p>
2A.20, Item A	NO	YES	N/A	LEDs used within YIELD sign borders should be limited to white LEDs only, as flashing red lights are defined elsewhere that vehicles are required to come to a stop at all times, regardless of the presence of conflicting traffic. The use of flashing red therefore contradicts the definition of a YIELD sign.
2B.30	NO	YES	N/A	Placement of R3-8 series lane control signs series within the taper contradicts the placement used for other lane-specific signage (e.g., ALL TURNS FROM RIGHT LANE). Placement at the beginning of the full the lane is too late in many urban situations for drivers to complete a safe lane change as necessary. We recommend retaining placement of this sign to be at the start of the taper to provide the greatest comprehension and maneuver time for the motorist.
Figure 2A-4	NO	YES	N/A	We recommend adding text discouraging the use of overhead guide signs and diagrammatic signs on the same approach to a roundabout, as it leads to sign overload/clutter and may overwhelm the motorist.
2B.12	NO	YES	N/A	We support the addition of items such as sight distance and crash experience to the AWSC warrant process. This aligns with practices underway by other agencies and engineering firms. We would also recommend that AADT be added as an additional item to the warrant list.
2B.21	NO	YES	N/A	While we applaud the revised speed limit establishment guidance, we feel the speed distribution study should still be required and not just "recommended", as observational speed information is otherwise very subjective and prone to error in judgement by the observer. As long as the data is collected correctly, the results provide evidence as to generally what motorists feel comfortable driving on a given roadway and can give an indication as to how well posted speed limits are working and when other roadway modifications may be needed in order to gain better speed compliance. The expanded emphasis on contextual characteristics is an essential consideration in setting speed limits and is a welcome modification.
Figure 2B-27	NO	YES	N/A	We recommend a variation of R10-15/15a be created to show bicyclists and a pedestrian/bicyclist combination for turn lane paths that cross bicycle or mixed-use paths
2B.40 & Figure 2B-11	NO	NO	YES	Recommending the use of the R4-7b/8b KEEP RIGHT signs contradicts the general encouragement of the use of symbolic signs over worded signs, with signs that arguably have a shorter legibility distance. The use of the existing symbolic R4-7/8 KEEP RIGHT signs should instead be encouraged, supplemented with alignment warning signs as the geometry requires.
2B.49, Figure 2B-14	NO	YES	N/A	We recommend encouraging the use of a consistent mounting height for lower signs - recommend the use of 4-ft as used for horizontal alignment signs and median nose object markers.

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Removed Section 2B.43	NO	NO	YES	While the use of a black on yellow sign has been shown in studies to have superior legibility, deletion of the ROUNDABOUT DIRECTIONAL ARROW seems too extreme. If it is prone to misuse, clearer limitations to their use, and/or remove the option for smaller signs should be provided. Placement of multiple ROUNDABOUT DIRECTIONAL ARROW signs have been used in crash mitigation techniques. The use of multiple LARGE ARROW signs in a line may not have the same improvement effect and is aesthetically more out of place.
2C.07	NO	YES	N/A	We urge that the delineation of the use of the TURN versus CURVE sign be as simple as possible, as the current advisory speed policy is routinely ignored and/or the signs being used interchangeably regardless of the conditions. An alternative suggestion is for the sign to be used be based on the radius of the curve and not speed based.
Figure 2D-12	NO	YES	N/A	The figure should show or note that a non-curved left-pointing arrow is acceptable, or retitle figure to say that these are "examples"
2C.13	NO	YES	N/A	We agree with the implementation of black on yellow speed feedback signs, as it increases the places the sign can be used, including with horizontal alignment warning signs. We recommend instituting a practice recently implemented by MnDOT, which matches the sheeting based on the context of the primary sign (e.g., work zone = Orange, school zone = Fl. Yellow-Green, etc.).
2C.39	NO	YES	N/A	We recommend the NEW TRAFFIC PATTERN AHEAD and NEW SIGNAL OPERATION AHEAD (W23-2/2a) signs be orange, as these advisories should be temporary conditions. Yellow signs lead to the sign being left installed longer than necessary, as they are easily mistaken for regular warning signs, thereby decreasing their long-term effectiveness. The "should" condition regarding the sign's removal should be changed to "shall" to prevent the sign from "blending into the background".
2C.48	YES	N/A	N/A	The [BOTH] LANES MERGE signs have been needed for a long time. This is a very welcome addition.
3A.04	NO	NO	YES	Speed-based line widths overcomplicates a relatively simple existing system, while also adding additional cost for material and application tools. Minimum visibility maintenance standards would be easier and cheaper for reapplication than moving to wider lines. Wider lines also have very little positive safety impact when roads are covered in snow, slush, or ice. The text as presented does not address roadways with varying speed limits that bounce between the line width thresholds.
Figure 3B-11, Section 3B.07	NO	YES	N/A	Guidance should be provided for how far a dotted line should extend for a downstream lane drop when there is more than a mile between intersections. Only indicating the use of "engineering judgement" provides no guidance.
3D	NO	YES	N/A	The section is being retitled "Circular Intersection Markings"; however, the majority of the text references roundabouts. We recommend consistent language be used throughout
3D.04	NO	YES	N/A	The "shall" condition which requires the use of YIELD LINES at multilane roundabouts contradicts the "optional" statement shown in Figure 3D-2. We recommend the YIELD LINE remain optional as long as an EDGE LINE EXTENSION is present.

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3D.06	NO	YES	N/A	Since one of the goals of the MUTCD is to provide uniform markings, the manual should promote only one style of arrow to be used for roundabouts. Since the use of roundabouts is still growing, there is a significant opportunity for motorists to encounter an arrow style they have not seen before. Studies have shown little improvement in the use of fishhook-style arrows over conventional arrows. If the arrow styles are not consolidated, text should be added requiring the arrow style used for the pavement marking match any lane control and/or guide signs to minimize motorist confusion.
4C.01	NO	YES	N/A	Since bicycle signals are being added to the manual, consider adding a bicycle volume warrant to the list of applicable warrants.
4C.05	NO	YES	N/A	Consideration should be given to site conditions where pedestrian volumes are likely to increase with the installation of a traffic signal - as existing volumes may not accurately capture the volume that would use the crossing if a control was present (also safety component).
4C.08	YES	N/A	N/A	We welcome the addition of crash threshold values to aid in the decision-making process, as the current system leaves room for gray area of interpretation/subjectivity.
4E.01	NO	YES	N/A	We recommend the removal of the option for use of dual-arrow/bimodal arrows, as they are hard for motorists with color deficiencies to comprehend given the lack of change in position of the arrow.
Figure 4L-1	NO	YES	N/A	More figure examples and/or guidance is needed to cover a wider range of environments encountered when installing RRFBs: mid-block/non-intersection with/without medians or intersections with only one crosswalk.

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
(EXAMPLE) FHWA-2020-0001-59	YES	N/A	