

The following are comments from the Saint Louis County Department of Transportation regarding FHWA Docket No. FHWA-2020-0001-0001. Our comments are in reference to proposed changes to the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).

Our Department is in strong agreement with the following proposed new sections as written:

- 2A.19 expands the Excessive Use of Signs language emphasizing the need to reduce sign clutter.
- 2B.06 changes the statement, "YIELD and STOP signs should not be used for speed control." To shall not.
- 2C.24 adds a ROAD ENDS XX FT and STREET ENDS XX FT sign. This is a useful addition where DEAD END and NO OUTLET signs are not enough to alert a driver that a road is ending.
- 2C.66 replaces the SHARE THE ROAD plaque with an IN ROAD or IN STREET plaque. This change conveys a clearer message to drivers.
- 2H.05 Jurisdictional Boundary Signs was added and the standards, guidance, and options are welcomed.
- 4D.01 added that design and operation of traffic control signals shall take into consideration the needs of all modes of traffic.
- PART 5 – AUTOMATED VEHICLES is a new addition. This section highlights the importance of properly installed and maintained traffic control devices.

Our Department is opposed to the following proposed new sections as written:

- 2C.06 changes the procedure for determining when a TURN sign should be used instead of a CURVE sign. This procedure needs to be simplified and can lead to situations where a TURN sign is required, but not necessarily appropriate based on the speed limit and advisory speed.
- 2C.59 removes the support for ball bank degrees and speeds. This information was helpful and will now require reference to an old version of the MUTCD to support current practice.

Our Department has the following comments for consideration and/or found the following errors in the proposed new sections as written:

- 2B.13 Option C should not be under Warrant A: Crash Experience, as it does not pertain to crashes. It is covered under 2B.14, which is Warrant B: Sight Distance.
- Table 2C-3 has substantially higher distances for the 0 MPH condition.
- 2C.06 should address the situation where the mandated advisory speed plaque may be higher than the posted speed limit.
- 2C.06 gives the option to omit devices for changes in horizontal alignment if the speed limit is 20 MPH or less. Recommend increasing to 25 MPH residential subdivisions or use Table 2C-4a as the sole criteria for omitting.
- Table 4C-3 should be reevaluated, as it provides for a very low threshold to warrant a traffic signal based on the 3-yr crash history.
- 9E.10 gives guidance that green-colored pavement should be used if parallel bicycle and pedestrian crossing markings are used if the crossing has a high volume of either mode. This conflicts with Figure 9E-14 that states green-colored pavement is optional.

Thank you for taking our comments into consideration.

Sincerely,



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