

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.
1A.03	NO	NO	YES	This seems contradictory to the City's adopted Vision Zero Action Plan which focuses on ensuring the safety of ALL roadway users, including children, non-English speakers, the disabled, and other members of the community that are not represented here. Also presents a victim-blaming posture that is not consistent with Vision Zero.
2B.12	NO	YES	N/A	Consideration should be included for school zones.
2B.13	NO	YES	N/A	The warrant is limiting in that we cannot be pro-active. Requires many crashes to occur before measures can be taken to improve safety. More context needed such as vehicle speeds, and consideration for the High Injury Network where we know there is a higher potential for crashes that could be prevented before occurring.

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2B.21	NO	YES	N/A	The City supports contradictory state legislation: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=20210220AB43
2B.53	N/A	N/A	N/A	Seems like this could be prohibitive, especially as we test different kinds of curbside management - flagging for Parking
2B.60	NO	YES	N/A	"The LEFT TURN YIELD TO Bicycles (R10-12b) sign shall be limited to applications where the conflicting bicycle movement would be unexpected in direction, location, or some other quality that would run counter to the expectation of a turning motorist." The term "unexpected" could be problematic i.e.: there is a bike lane, so bikes are expected but a high volume of turns across traffic make motorists turn suddenly without looking for oncoming bikes.
2C.13	NO	YES	N/A	Language prohibits flashing sign legends on Vehicle Speed Feedback signs. The flashing sign is used to get motorists' attention. This supports safety improvement/Vision Zero efforts.
3H.03	NO	YES	N/A	Remove guidance stating, "'The right-of-way is dedicated exclusively to highway-related functions" however, in the definitions section the right-of-way is defined as, "the limits of real property, including the traveled way, shoulders, median, and the land alongside, that are owned by the public highway agency having jurisdiction..."
3H.03	NO	NO	YES	The proposed language is not consistent with the City's recently adopted Creative Crosswalk Policy. Research not cited for prohibiting multiple colors.
3H.06	NO	YES	N/A	"Green colored pavement shall not be incorporated into shared use paths..." Green colored pavement should be appropriate on shared use paths at conflict points.
3H.06	NO	YES	N/A	opposed to including taxis in the transit only lanes, no mention of shared bus/bike lanes
3H.06	NO	YES	N/A	These two statements seem to contradict each other: "Red-colored pavement shall be applied only where general traffic not allowed to use..." and "Red colored pavement may be used for full or part time operations" In a situation with a part time transit lane, painted red, can general traffic not use the lane?
4A.03	NO	YES	N/A	"Such vehicular traffic, including vehicles turning right or left or making a U-turn movement, shall yield the right-of-way to: (a) Pedestrians lawfully within an associated crosswalk, and (b) Other vehicles lawfully within the intersection." Does this second item include bicycles in the bike lane? What about a separated bike lane? If not, additional clause is needed.
4B.02	NO	YES	N/A	"Traffic control signals should not be installed or operated for the purpose of penalizing drivers who are speeding..." This could have implications for the legitimate and important practice of controlling platoon speed through signal coordination
4C.01	NO	YES	N/A	The existing guidance is prohibitive and could be changed to support achieving goals (like Vision Zero). Consider replacing "should not unless" statements with "The installation of a traffic control signal should be considered if an engineering study indicates that installing a traffic control signal will improve the overall safety of the intersection or roadway on which it is located, the operation of the street system, access or safety for people walking or riding bicycles or personal mobility devices, or transit reliability or access." This is also more consistent with new "should" statements in the warrants themselves
4C.05, 4C.06	NO	YES	N/A	The Pedestrian and School Crossing warrants should specify that volumes may incorporate demand-based assumptions for estimating how many users would utilize the signal were it provided.

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				This may help address the chicken/egg-esque "How do you count how many people are crossing a river without a bridge?" issue.
4C.08	NO	YES	N/A	According to Table 4C-2 at least 3 fatal and injury crashes are required to justify a signal (?) If I am reading this accurately, it is contradicting with our Vision Zero Goal to use a data-driven approach (identify systemic issues and solutions) to eliminate traffic fatalities. We will never reach our goal with a reactive signal warrant requirement.
4H.01	NO	YES	N/A	"Guidance: Agencies should exercise consistency with the decision to introduce bicycle signal faces to a roadway or bikeway network and use caution with any non-systematic policy to use bicycle signal faces" We need the opportunity to use engineering judgement to determine individual locations for bike signals, not consistently along a corridor.
Part 5	NO	NO	YES	The new Part 5 may result in placing a burdensome and expensive liability on agencies to comply with difficult standards down the line, and entirely shifting liability away from AV companies, does not recognize people walking and biking, and contradicts with Vision Zero Safety Policies. This section should be removed, and AVs should be required to fully function on streets without updating standards to accommodate their use.
Part 6	NO	YES	N/A	The following comments are for consistency and support of the City of Sacramento Construction Detour Policy: FHWA-2020-0001-0038_attachment_1.pdf: <ul style="list-style-type: none"> • Pg. 533 line 48: should not to shall not • Pg. 596 line 4: should to shall • Pg. 596 lines 9 & 10: should to shall FHWA-2020-0001-0005_attachement_5.pdf: <ul style="list-style-type: none"> • Figure 6p-48 Bicycle Lane Closure with on-Road Detour (TA-48): We prefer the "May Use Full Lane," instead of "Share the Road." This figure shows that either sign could be used, but both are listed as "optional." This should not be optional because a bicyclist is being detoured from a bikeway onto a roadway with no bikeway and will be sharing the lane with automobiles. Both bicyclists and motorists need to be alerted. • Same response as above for Figure 6p-47: Bicycle Lane Closure with Detour. Bikes may use full lane should not be optional. • In our policy, we've had a difficult time finding guidance for scenarios where a cycle track or a separated bikeway is impacted by construction. There needs to be guidance and a diagram for a temporary traffic control plan in these situations.
9A.01	NO	NO	YES	Second paragraph fails to recognize the many differences between operating a bicycle and a vehicle: A more useful paragraph would describe the specific responsibilities of the engineer to bicycle riders. Bicycles have operating characteristics that present opportunities for operation and control distinct from those of motor vehicles. For example, bicycles operate in environments shared with people walking, as on shared pathways. A bicycle rider is neither a fast pedestrian with poor balance at low speeds, nor a highly maneuverable underpowered motor vehicle. If retained, the introductory paragraph to Part 9 needs to recognize that duality, and the way that bicycle-specific traffic control helps resolve these contradictions. Their operating characteristics also present considerations for the fact that their operators view the operation of their vehicles in a manner markedly

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				different when people are operating motor vehicles. The key operating difference between bicycles and motor vehicles is the recognition of proximity to potential sources of risk or personal injury.
9E.12	NO	NO	YES	This statement seems counter-productive: "At intersections where a discernible number of conflicts between vehicles turning across through bicycles in a bicycle lane has been demonstrated during the green interval of a signal, the bicycle box should not be used." If there is a history of conflicts, the person on a bike should be positioned in a more visible location
2A.11	NO	YES	N/A	The word "Conspicuity" has been used for some time in the MUTCD. However, with changes being made to the MUTCD, I would like to ask if the word could be changed to something more user friendly such as "Visibility."
2B.13	no	yes	n/a	Option C in Warrant A is redundant and covered in Section 2B.14 for Warrant B.
2B.19	no	yes	n/a	Agree with lines 8 - 10 but do not agree with Option (lines 30 - 33) The option (lines 30-33) seems to negate the shall statement of lines 8-10. Clarify or remove the option.
2B.21	Yes	Yes	n/a	Agree with lines 34 -37. providing a web page for more info is helpful.
2A.11	NO	YES	N/A	I agree with the above comments/concerns with the word "Conspicuity". Simplify the meaning by using the word "Visibility."
2A.04-06	No	Yes	N/A	Chapter 2A pg. 43-46 They propose to add "Letter Styles" why not use what we feel is the appropriate word "Font"
2A.19	Yes	n/a	n/a	Chapter 2A. 56 (20-43) section "STRONGLY SUPPORT"
3A.01	No	Yes	N/A	Chapter 3A pg. 335 line 30 seems confusing as to communicate that the markings under street or highway lighting was ok to not have glass beads?
3A.04	No	No	Yes	Chapter 3A pg 337 line 29. Do not agree with " 6" for all other roadways > 40 MPH. The city has thousands of lane miles striped with 4" lines. This change will be a financial burden on the agency.
4c	Yes	Yes	no	Agree with proposed changes to text, tables and figures.
4J.03	no	yes		"Guidance: The duration of the flashing yellow interval should be determined by engineering judgment." There should be guidance for length of the flashing yellow time before the solid yellow
4J.03	No	NO	yes	pedestrian hybrid beacon should be able to flash red or yellow when in conflict or placed in flash. It should be limited to flashing yellow
4J.02	no	yes		"Guidance: B. If installed within a signal system, the pedestrian hybrid beacon should be coordinated." Disagree the PHB should be allow general on corridors with signal system. This should have move guidance. how close to traffic signal? Coorinated corridors could end with with close spaced signal and PHD which would dark, This is confusing to road user.

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4J.01	no	no	yes	Why is the warrant different for PHB and pedestrian signal? They provide the same level of protection and cost the same to install. If PHB is warranted, then a pedestrian signal should also be warranted. The engineering study should be able to determine which is the best installation.
8A.02	no	no	yes	PHB should not be used within 500' maybe more. The PHB Red flash and rail flashing have contradictory meanings
8D.10	no	no	yes	Mentioned RRFB but does not talk about the PHB
9E.11	no	yes		two-stage Bicycle turn box need special consideration for detection. Passive detection cannot determine when the bike changes direction in the small box with little movement
9E.12	no	yes		Guidance on the traffic signal phasing and lane alignment should be provided. Bike boxes work with split phase operation to prevent bicyclist entering turn when green. The addition of the Countdown ped head does not help the bicyclist unless the ped is in recall operation. the count ped head should be removed from standard.
2B.26, pg 81, line 48-50	Yes	N/A	N/A	Support the use of part-time blank out signs.
2B.60	No	Yes		Allow R10-15 to be modified to use a bike symbol in place of the ped symbol. Allow both symbols to be used simultaneously when appropriate. The R10-15 is better than R10-12 since symbols can be understood by more road users than English word messages.

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	