Government of the District of Columbia

Department of Transportation

May 13, 2021

Stephanie Pollack, Acting Administrator
Federal Highway Administration
200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: District Department of Transportation Comments on Notice of Proposed Amendment for Proposed 11th Edition of the Manual on Uniform Traffic Control Devices (MUTCD)

Dear Acting Administrator Pollack:

I am writing to offer comments on the December 14, 2020 Notice of Proposed Amendment (NPA) to the MUTCD. The District of Columbia appreciates this opportunity to comment.

Firstly, I would like to acknowledge and commend the thoughtful consideration and hard work of FHWA staff in assembling the proposed changes to the MUTCD. The MUTCD is a critical resource for transportation agencies to ensure the application of traffic control devices in a consistent, uniform, and safe manner. In general, the proposed amendments provide additional clarity and incorporate necessary changes to the MUTCD.

The District's urban plan was conceived by Pierre L'Enfant long before the automobile, with wide diagonal avenues and a dense street grid. Now, 230 years later, this historic and remarkable plan still provides the District's structure and fosters a dense urban community where transportation options such as walking, biking, micromobility, and transit are viable, efficient, and sustainable modes. However, these uses often compete with automobiles for public space and their users are vulnerable to crashes involving motor vehicles.

The current MUTCD, which is largely focused on traffic devices for motor vehicles, creates challenges for designers who are balancing community needs for livable streets with mobility concerns across a spectrum of modes. The District's historic traffic circles and skewed intersections create delightful urban spaces but require creativity, innovation, and flexibility to find transportation design solutions that balance safety, livability, equity, and mobility. In addition, these same urban streets often host new types of vehicles and modes of transportation, such as e-scooters and other forms of microtransit. To meet the needs of the District and other urban core areas, **the Manual needs to better balance the needs of all types of roadway users in the context of the roadway setting.**

This evolving nature of transportation in dense urban settings, where motorists may be a minority of roadway users, demands innovative and flexible approaches to meet transportation safety needs. I urge you to consider allowing for **a more expansive, timely and streamlined**

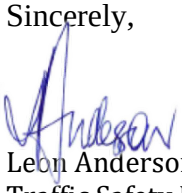
experimentation process. Allowing for shared experimentation across multiple jurisdictions, removing unnecessary restrictions and processes, as well as providing flexible support for experimentation will not only improve compliance but will help create a more responsive MUTCD.

FHWA should also carefully evaluate the use of new Standard statements, and where not absolutely necessary consider using Guidance statements. This would provide needed design flexibility as well as the opportunity to create supplements that are tailored to the needs of each jurisdiction. This would also mitigate some of the cost implications associated with changes that may not be suited for each jurisdiction.

The District, as the only entirely urban jurisdiction with a state level transportation department, working with FHWA, would like to explore the possibility of producing **a robust supplement to the MUTCD** that better meets the needs of dense urban street networks. While there is a requirement that State supplements be in substantial conformity with the MUTCD, other Federal Agencies such as the National Park Service, have been able to create supplements with substantial differences that integrate placemaking with traffic control. While such a supplement would primarily benefit the District, it may provide a platform for MUTCD policy distinctly suited for urban cores.

Thank you again for the opportunity to comment on the NPA.

Sincerely,



Leon Anderson, P.E., PTOE
Traffic Safety Manager
Transportation Operations Administration

Reviewing Division within the District Department of Transportation	Section	Page	Line Num.	Ref Doc	Comment
Sustainable Transportation Branch	1A.03	2	6	MUTCD 11ed NPA Text-Mark-up	Bicyclists are named as operators of vehicles. This should include all micromobility vehicles.
Sustainable Transportation Branch	1A.03	2	7,8	MUTCD 11ed NPA Text-Mark-up	The target user has demonstrated a basic proficiency in operating a vehicle on a specific facility--Is this referring to license tests--that a person must drive in all roadway conditions? This doesn't feel specific.
Parking & Ground Transportation Division	1B.02	7	50	MUTCD 11ed NPA Text-Mark-up	Does the statement also include jurisdictions which are not states (i.e. DC, Puerto Rico, etc.)?
Traffic Operations & Safety Division	1B.06	10		MUTCD 11ed NPA Text-Mark-up	Consider revisions to the experimentation process that would allow jurisdictions to sign on to approved experiments. This approach would ease the testing and development burden on jurisdictions while providing for a larger sample in outcomes data. Further, this provides for uniformity from the start of the experimentation process likely resulting in broader adoption of the uniform approach as a natural extension of the experiment.
Traffic Operations & Safety Division	1C.01	15	13	MUTCD 11ed NPA Text-Mark-up	Removal of the phase "but not mandatory" would render the manual more restrictive, inflexible, and create additional burdens and costs for agencies. Agree with the comments of the Transportation Departments of Idaho, Montana, North Dakota, South Dakota, and Wyoming that this change NOT be adopted (dated 4/25/2021).
Parking & Ground Transportation Division	1C.02	17	1	MUTCD 11ed NPA Text-Mark-up	Busway should be relabeled as "transitway" - traveled way that is used exclusively by transit vehicles such as buses, light rail vehicles.
Parking & Ground Transportation Division	1C.02	16	35	MUTCD 11ed NPA Text-Mark-up	The bike facility / bike lane definition should be more encompassing to be inclusive of all human powered (and low powered) vehicles (roller blades, skateboards, scooters, etc.). That way future mention of bike facilities of MUTCD is inherently inclusive without major rewriting needed. That or a generic term replacement (i.e. micro-mobility facility/lane, etc.).
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	There should be a definition for the term "curbside management" = Development, implementation, management, and enforcement of policy, assets, and technology governing the uses that interact with the CURB LANE, CURB SPACE, or CURBSIDE.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add : CURB The physical barrier between sidewalk and street. Most CURBS are elevated above the street to inhibit motor vehicle impingement on the sidewalk, as well as control drainage on the sidewalk. Some curbs are “free-form” where the sidewalk is at the same elevation as the street.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add : CURB CUT A break in the structure of the CURB leading to loading dock, alley, or driveway.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add: CURB LANE The area of space on a street, adjacent to the CURB. CURB LANES may be used for a variety of purposes, including as motor vehicle throughways, parking, bike facilities, loading, and delivery space.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add: CURBSIDE The space adjacent to the physical curb in public right-of-way including but not limited to all or a portion of the street, inner CURB, outer edge of street, sidewalk, shoulder, or other condition depending on road type. This area serves as the interface for different functions that interact at or with the CURB.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add: CURB SPACE The physical CURB (e.g., concrete edging, gutter plan, or other barrier) that is a barrier between the sidewalk, the street, and where markings and signage may be placed to regulate the curbside.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add: BLOCK (important for ADA treatments of parking signs) A measurement of space, typically between streets or at a prescribed distance. A BLOCK may start at one intersection of two streets and end at the next intersection of two streets. A BLOCK may also be considered as the four block faces surrounding a building or group of buildings and used for purposes of delineating accessible parking spaces.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add: FLEXIBLE/DYNAMIC CURB SPACE CURB space that is designed to have a multitude of uses depending on time of day, corresponding land use, or street typology, etc. For example, during rush-hour, PARKING may be disallowed in an urban area to allow for an additional lane of traffic. In residential areas, curb space may function to serve residents during primary dwelling hours and commercial/commuter traffic during daytime peaks.
Parking & Ground Transportation Division	1C.02			MUTCD 11ed NPA Text-Mark-up	add: PARKING The act of temporarily storing a vehicle unattended in a given location, which may be along a CURB and may be subject to a PARKING METER or a PARKING METER ZONE.
Sustainable Transportation Branch	1C.02	27	17	MUTCD 11ed NPA Text-Mark-up	Road User. The definition goes straight into the types of user when this should/could be. I have 2 options. 1. a person using the roadway which may include …. (this leaves space for those using the road for illegitimate uses) 2. Add micromobility users. 3. And I also think that a 'worker' (#284) should be added to this list. They are using the road for a legitimate purpose.
Sustainable Transportation Branch	1C.02	24	39	MUTCD 11ed NPA Text-Mark-up	Definition of a pedestrian is not consistent
Sustainable Transportation Branch	1C.02	24	21-24	MUTCD 11ed NPA Text-Mark-up	The two parking definitions are for traditional motor vehicles and freight and don't include other vehicle types. Also, if 148 excludes options, these should be explicitly stated in 149.
Sustainable Transportation Branch	1C.02	15		MUTCD 11ed NPA Text-Mark-up	Include a definition for a micromobility vehicle. The definition for a bicycle is "a pedal powered vehicle upon which the human operator sits. Option for micromobility vehicle "A electric (or motor-powered) vehicle intended to be used by one human operator.
Parking & Ground Transportation Division	2A.04	44	46	MUTCD 11ed NPA Text-Mark-up	Regarding the option as it refers to QR codes, for purposes of cybersecurity, it should be stressed that QR codes only be used to convey information and should NEVER be used to gather information or payment.

Reviewing Division within the District Department of Transportation	Section	Page	Line Num.	Ref Doc	Comment
Parking & Ground Transportation Division	2B.06	65	11	MUTCD 11ed NPA Text-Mark-up	There should be some mention that any traffic control at a minimum, must accommodate vulnerable road user circulation, unless otherwise prohibited in the facility. Traffic circles are major hazards for pedestrians and should be designed to be more accommodating, vs free flow motorized traffic.
Traffic Operations & Safety Division	2B.06	65	29	MUTCD 11ed NPA Text-Mark-up	Consider the addition of micromobility users, or more inclusive language
Traffic Operations & Safety Division	2B.13	70		MUTCD 11ed NPA Text-Mark-up	Consider the application of severity criteria to crash experience section similar to that applied under signal warrant 7 (NPA section 4C.08).
Traffic Operations & Safety Division	2B.19	73	1	MUTCD 11ed NPA Text-Mark-up	Add bike symbol variant to R1-5 Sign (Stop/Yield Here for Peds/Bikes)
Planning & Sustainability Division - Active Transportation	2B.20	74	16-17	MUTCD 11ed NPA Text-Mark-up	In response to, "In-Street Pedestrian or Trail Crossing sign shall not be post-mounted on the left-hand or right hand side of the roadway," the District Department of Transportation objects to this regulation and strongly recommends that a post-mounted, side of the street sign reading "State Law Stop (or yield) to Pedestrians within Crosswalk" be added to the permissible signs used at unsignalized crosswalks. Please note that this post mounted, side of the street sign would not take the place of the R1-6 or R1-6a pylon sign but be an additional available option. This recommendation is based on research conducted by Howard University on behalf of the District Department of Transportation entitled, *2-660 (E) – Experimental Study for Experimental Pedestrian Crossing Signs in DC* that examined the effectiveness of experimental post-mounted side-of-street R1-6a signs compared to W11-2 signs at 32 crosswalk locations with and without rectangular rapid flashing beacons (RRFBs) across the District of Columbia. Over the course of one year, the study collected video-based data, step out surveys, and driver and pedestrian opinion surveys to assemble quantitative data to determine the effectiveness (defined as the proportion of drivers who stop or yield the right of way to a pedestrian in the crosswalk when approaching a crosswalk) of the experimental R1-6a signs. The study found that the experimental R1-6a signs with and without RRFBs generally resulted in higher driver compliance rates than W11-2 signs with and without RRFBs. Although compliance rates of drivers were higher at locations with the R1-6a signs, the findings were not statistically significant at the 5% significance level. Also, driver and pedestrian surveys revealed that people better understood the meaning of the experimental R1-6a signs compared to the W11-2 signs as evidenced by the higher numbers of drivers and pedestrians that agreed that drivers are required to stop and yield to pedestrians when they were shown the experimental R1-6a signs compared to the W11-2 signs. Further, the experimental R1-6a signs were found not to pose an adverse effect on driver behavior or give pedestrians a false sense of security. Largely, the results showed that the experimental R1-6a signs more clearly directed drivers approaching crosswalks with and without RRFBs to stop for pedestrians at crosswalks than W11-2 signs. Finally, the research showed that over time, more people understood the law with the R1-6a signs as is evidenced in driver compliance rates at the beginning of the study compared to the end of the study.
Parking & Ground Transportation Division	2B.46	94		MUTCD 11ed NPA Text-Mark-up	Don't see selective exclusion signs for No Buses (we use those signs in DC)
Parking & Ground Transportation Division	2B.53	101	2	MUTCD 11ed NPA Text-Mark-up	This should be reworded to "…with curb use exceptions, such as…"
Parking & Ground Transportation Division	2B.53	101	10	MUTCD 11ed NPA Text-Mark-up	Strike, for it contradicts line 2-3 of this same page. ADA parking is restrictive parking, not permissive.
Parking & Ground Transportation Division	2B.53	101	12	MUTCD 11ed NPA Text-Mark-up	This is an example of regulated parking. This is not permissive parking.
Parking & Ground Transportation Division	2B.53	100	43	MUTCD 11ed NPA Text-Mark-up	reword (2) to "permitting regulated parking (how vehicle storage on the roadway is allowed)"
Parking & Ground Transportation Division	2B.53	101		MUTCD 11ed NPA Text-Mark-up	There needs to be a definition between permissive (allow all user types), regulated (allowing specific user types), and prohibitive (allow no user types) parking signage. Right now there is only permissive and prohibitive and the language is blurring between the two, which is best categorized as regulated parking.
Parking & Ground Transportation Division	2B.54	102	1	MUTCD 11ed NPA Text-Mark-up	This definition needs to be split as regulated vs permissive parking. Permissive parking shall be used where only time limited, angled, or back-in parking is allowed. Regulated parking shall be used where parking is allowed only for specific users.
Parking & Ground Transportation Division	2B.54	102	2	MUTCD 11ed NPA Text-Mark-up	Regulated parking signs shall have a black or red legend and border on a white background. Permissive Parking signs shall have a green legend and border on a white background.
Parking & Ground Transportation Division	2B.54	103	6	MUTCD 11ed NPA Text-Mark-up	Figure 2B-24 is not user friendly for Limited English Proficiency (LEP) populations. Additionally, with parking becoming more dynamic, signage needs to be simpler by using symbols versus text, and deferring to multispace meter devices to communicate specific nuances on screens or decals. The parking meter signs should just be indicating by symbol basic information to make a decision to park in a meter regulated curbside. If text must be used, then there needs to be (1 a text character limit per sign (Twitter rule of 140 characters max) and (2 there should be a max number of signs to communicate the curb use, to deter Christmas tree parking sign installations. This also has jurisdictions think about curb management to best communicate to the customer, which the end goal of traffic control devices. It is also becoming more important that jurisdictions are consistent with parking symbols and text, to communicate curb uses for the CAV future.
Parking & Ground Transportation Division	2B.54	102	7	MUTCD 11ed NPA Text-Mark-up	The restriction, permissive regulation, or prohibition;
Parking & Ground Transportation Division	2B.54	103	11	MUTCD 11ed NPA Text-Mark-up	There should be an option for jurisdictions to incorporate the digital payment information on the parking sign, vs needing a plaque. Otherwise lead to Christmas tree situation. Likewise, with the plaque missing, in some cities, parking is unenforceable.
Parking & Ground Transportation Division	2B.54	103	23	MUTCD 11ed NPA Text-Mark-up	This language has the mindset that ADA users do not need to pay to park. This should be broadened, to provide standard requirements on how to communicate the restrictive use, but not mandate a specific design. DC being one of the handful of jurisdictions in the USA that does metered ADA parking, we have designed a metered ADA parking sign.
Parking & Ground Transportation Division	2B.54	103	31	MUTCD 11ed NPA Text-Mark-up	This language is too prescriptive and doesn't accounted for metered EV charging signs. This guidance should cover the core information pieces and how it should be presented, vs saying use this specific design and add plaques for additional restrictions.
Parking & Ground Transportation Division	2B.54	102	32	MUTCD 11ed NPA Text-Mark-up	The use of text to describe limits is not accessible to LEP populations. Arrows should be the standard and there should not be an option to use text based descriptors.
Parking & Ground Transportation Division	2B.54	103	41	MUTCD 11ed NPA Text-Mark-up	This language and design is too prescriptive and also is not LEP friendly. This should provide guidance of how to lay out information, with restrictive/prohibitive language on top or left, then progressing to permissive on bottom or right. DC designs signs in a single 12x18 sign as much as possible, to reduce signage clutter. In jurisdictions with complex curb use, this guidance is short sighted and adds to sign clutter and confusion.
Parking & Ground Transportation Division	2B.54	104	41	MUTCD 11ed NPA Text-Mark-up	What is the process to review and adjust symbology? There is a need to deemphasize text and use more symbols to convey standard signage information.
Parking & Ground Transportation Division	2B.54	103	51	MUTCD 11ed NPA Text-Mark-up	The use of words should be strongly discouraged if there is a designated symbol. This is to facilitate LEP access and concentrate any required text to additional information conveyance.

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Parking & Ground Transportation Division	2B.54	102		MUTCD 11ed NPA Text-Mark-up	There should be language: OPTION (For ADA regulated parking, signs may have a white legend and border on a blue background). This is consistent with universal communication of Accessibility.
Parking & Ground Transportation Division	2B.55	104	50	MUTCD 11ed NPA Text-Mark-up	There should be some minimum guidance for jurisdictions to follow on the placement of parking signs, especially for long blocks. Perhaps 250-300 linear feet between signs at maximum?
Parking & Ground Transportation Division	2B.58	106	32	MUTCD 11ed NPA Text-Mark-up	What are those additional features? This is where the MUTCD should reference the ADA Accessibility Guidelines (and list in Section 1A.05), so an engineer isn't left hanging where to look to provide ADA accommodations. ADA streetscape accommodations are a frequent oversight without targeted guidance that the MUTCD provides.
Traffic Operations & Safety Division	2B.60	109	3	MUTCD 11ed NPA Text-Mark-up	Add bike symbol or combined bike/ped variant to R10-15 Sign (Turning vehicles yield to pedestrians and/or bicycles)
Sustainable Transportation Branch	2B-12	23		Part 2 Combined Figures	Restrictions for all types of vehicles. Micromobility should be added.
Traffic Operations & Safety Division	2C.27	134	25	MUTCD 11ed NPA Text-Mark-up	Add more terms to be interchangeable with 'Speed Hump', including raised crosswalk
Parking & Ground Transportation Division	2L	316		MUTCD 11ed NPA Text-Mark-up	Will this section have guidance regarding changeable parking signs? There is technology out there that cities want to pilot to convey changing curb uses.
Traffic Operations & Safety Division	3A.04		39	MUTCD 11ed NPA Text-Mark-up	If the width of dotted lines varies by use (lane vs extension) it may not be possible to adhere to this "shall" condition when meeting channelizing lines. Guidance also does not conform to Figure 3-B.
Traffic Operations & Safety Division	3B.06	344	31	MUTCD 11ed NPA Text-Mark-up	Provide definition of "curved transition".
Traffic Operations & Safety Division	3B.08	346	15	MUTCD 11ed NPA Text-Mark-up	On urban streets, wide lines or double lines may not be always be appropriate for marking excess pavement areas. The District often uses smaller design vehicle than many other jurisdictions. Gore areas narrowing the streets at intersection approaches are designed so that an occasional larger vehicle may track over the channelized area. Another example is gore areas adjacent to parking boxes to indicate areas where parking is not permitted on intersection approaches. These areas may be adequately delineated with a normal solid line, especially on low-speed streets.
Traffic Operations & Safety Division	3B.13	352	21	MUTCD 11ed NPA Text-Mark-up	Consider allowing less than 100 FT taper for roadway 25 MPH or less when L is satisfied. Pedestrian refuge islands and horizontal deflection work best for traffic calming when designed for the desired speed - which may be 25 MPH. Lateral offset for pedestrian islands may only be 5 FT or less in each direction and L would be 52 FT.
Traffic Operations & Safety Division	3B.21	360	16	MUTCD 11ed NPA Text-Mark-up	Consider allowing reduced size word messages on streets 25 MPH or less. This may be particularly useful for reducing spacing on short urban blocks or for BUS STOP word messages.
Traffic Operations & Safety Division	3B.25	364	28	MUTCD 11ed NPA Text-Mark-up	Consider allowing the use of 4" diagonal marking on roadways 25 MPH or less.
Traffic Operations & Safety Division	3B.30	367	11	MUTCD 11ed NPA Text-Mark-up	Figure 3B-28 is not provided.
Traffic Operations & Safety Division	3B.31	367	35	MUTCD 11ed NPA Text-Mark-up	Figure 3B-29 is not provided.
Traffic Operations & Safety Division	3C.01	368	4	MUTCD 11ed NPA Text-Mark-up	Consider providing definition of "non-intersection crosswalk location"
Traffic Operations & Safety Division	3C.09	372	34	MUTCD 11ed NPA Text-Mark-up	It's unclear if other circular intersections, other than roundabouts, may have crosswalks.
Traffic Operations & Safety Division	3C.11	373	32	MUTCD 11ed NPA Text-Mark-up	Figure 3B-28 is not provided.
Transit Delivery Division	3H.07	347	40	MUTCD 11ed NPA Text-Clean	To avoid wheel wear, it should be permissible to apply red color in squares or rectangles within the lane but not all the way to the edge of the lane; this can be permitted without allowing 'red stripes'.
Transit Delivery Division	3H.07	347	28-29	MUTCD 11ed NPA Text-Clean	The "engineering clause" along with the various characteristics listed is overly prescriptive. There is now ample evidence that red transit lanes are beneficial and there is no evidence that they would be counterproductive, absent of the characteristics identified prior to installation via an engineering study. The characteristics should be listed as conditions that may improve with the use of red colored pavement in transit lanes. The sentence could be rephrased as "Red colored pavement may provide the following benefits as a result of its application in transit lanes:"
Transit Delivery Division	3H.07	347	36-39	MUTCD 11ed NPA Text-Clean	This restrictive language is in conflict with the allowance of red colored pavement in transit lanes which operate part time and/or those that allow motorists to make right turns from.
Transit Delivery Division	3H.07			MUTCD 11ed NPA Text-Clean	Guidance/allowance should be provided for red colored pavement to be used as intersection extensions/within intersections where transit lanes cross.
Traffic Operations & Safety Division	3I.02	396	3	MUTCD 11ed NPA Text-Mark-up	Reference to Section 3B.11 is incorrect.
Traffic Operations & Safety Division	3J.07	400	21	MUTCD 11ed NPA Text-Mark-up	Do the "other methods of physical separation" need be crashworthy? Provide clarification.
Traffic Engineering & Signals Division	4A.05	358	19-20	MUTCD 11ed NPA Text-Clean	Suggest add a new requirement to place a bicycle signal sign indicating lane use control directly adjacent to the bicycle signal head. Without an example of the proposed bicycle signal sign(s) it is hard to evaluate this new requirement.
Traffic Engineering & Signals Division	4B.02	361	18-20	MUTCD 11ed NPA Text-Clean	Agree with the added paragraph. Please note there is inconsistent use of "traffic signal" and "traffic control signal" throughout Part 4. However, re-wording of what is now Paragraph 2 seems to weaken the language regarding use of a study to justify a traffic signal. By removing the word "selection" and replacing with the word "design" it essentially eliminates the previously recommended "should" practice of a study for determining placement of a signal.
Traffic Engineering & Signals Division	4D.05	374	n/a	MUTCD 11ed NPA Text-Clean	Change from Standard to Guidance in P1, P3, P7 & P13 is reasonable. However, changing P2 from Standard to Guidance seems unnecessary. From a safety perspective, the "clear and unmistakable indication of whether they are being directed to stop or permitted to proceed" is better as a SHALL statement. It is unclear what flexibility is gained by making this a "should" statement.
Traffic Engineering & Signals Division	4F.16	403	n/a	MUTCD 11ed NPA Text-Clean	Agree, display of circular green and circular yellow signal indications should be prohibited to an approach with no through movement and an approach speed 35 mph or greater. Common practice in several jurisdictions in the DMV area. but it would be helpful to provide guidance on what signal head display is acceptable in the case of a single combined left/right lane that falls under the new Paragraph 4.
Traffic Engineering & Signals Division	4F.17	406	1-3	MUTCD 11ed NPA Text-Clean	The "Guidelines for Determining Traffic Signal Change and Clearance Intervals: A Recommended Practice of the Institute of Transportation Engineers" is not widely accepted and should not be incorporated into the MUTCD in such a way that it could be interpreted as the defacto standard "engineering practices". Many agencies have their own policies and procedures for Yellow and All Red calculation that are variations of this practice. It is suggested that Support P7 be further clarified to reflect that other engineering practices are acceptable.

Reviewing Division within the District Department of Transportation	Section	Page	Line Num.	Ref Doc	Comment
Traffic Engineering & Signals Division	4H	412	n/a	MUTCD 11ed NPA Text-Clean	Addition of this section is a good start and we support the provision allowing for flashing yellow arrow left turns across a bike lane in the same direction and allowing a flashing yellow bike display to such bike movements. This provision should be expanded to additional lane configurations and two-way cycle tracks. In a city environment with limited right of way, the availability of a dedicated turn lane is limited and therefore we often will be unable to provide a flashing yellow arrow to make use of this option. However, the provisions for the use of bike signals continue to be highly restrictive (including the inability to use bike signals at a pedestrian hybrid beacon). The downside to these restrictive provisions is that we end up having to have bicyclists use pedestrian signals or regular vehicle signals even though bicycles have markedly different kinematic characteristics than pedestrians and vehicles, and therefore should be presented with dedicated bicycle signal displays whenever possible. As noted in a previous comment, the lack of a true warrant that considers bicycles is a gap that needs to be addressed. Simply treating bikes as pedestrians or vehicles in a typical signal warrant analysis is inadequate since bicycles are distinctly different and have different safety and operational needs to be considered. The new requirement for bicycle signal signs that indicate the lane control cannot be fully evaluated without seeing the proposed signs.
Traffic Engineering & Signals Division	4I.04	419	2-3	MUTCD 11ed NPA Text-Clean	Agree with this clarification as we have many locations with overlapping pedestrian phases. However, we propose that the standard "Countdown displays shall not be used during the walk interval" be changed or clarified to allow for countdown displays to operate during the walk interval when in operation at fixed time location. The majority of traffic signals in the District of Columbia are operated with the countdown displayed during the walk interval. A study performed by Howard University in 2006 (http://d92016.eos-intl.net/eLibSQL14_D92016_Documents/2006_Countdown%20Ped%20Signals%20Evaluation_Final%20Report.pdf) evaluated pedestrian behaviors where such countdown operation is in place and did not indicate any adverse pedestrian behavior associated with this display. In addition, 80% of pedestrians surveyed favored the use of countdown displays in this manner.
Traffic Engineering & Signals Division	4I.06	421	n/a	MUTCD 11ed NPA Text-Clean	Agree with the changes in general. However, the proposed change to require that the minimum Walk Interval be served in addition to a Leading Pedestrian Interval if APS are not present should be relaxed, revised or clarified. Installation of APS at all traffic signals in general is a desirable outcome; however, it is extremely cost intensive. At the same time, provision of LPI at as many locations as possible is also desirable as they are a proven low-cost safety measure. This new standard may result in unintended consequences where signal timing capacity is limited or a pedestrian phase is already at its minimum – the signal engineer may be confronted with situations where an LPI with a longer duration must be removed rather than adding additional walk time (e.g. if adding the walk time would exceed the network cycle length or result in unacceptable traffic impacts). It is also the case that LPIs have been deployed widely throughout many jurisdictions and this change will create a significant burden in terms of evaluation and correction of signal timings to meet this standard. As a specific suggestion, this standard could be clarified to require at least 4 seconds of Walk time in addition to the Leading Pedestrian Interval rather than the entire Minimum Walk duration.
Traffic Engineering & Signals Division	4J.02	425	n/a	MUTCD 11ed NPA Text-Clean	Agree. However, we are aware of other agencies using bicycle signals in conjunction with Pedestrian Hybrid Beacons and would suggest that the prohibition proposed as part of this NPA be re-evaluated based on the experiences those agencies have with such an operation.
Traffic Engineering & Signals Division	4K.01	428	44-47	MUTCD 11ed NPA Text-Clean	Agree in concept but is there a reason that push buttons specifically, rather than a detection device which can be activated at close range without the need for physically pushing it? The purpose of this guidance is not entirely clear.
Traffic Engineering & Signals Division	4L	434	n/a	MUTCD 11ed NPA Text-Clean	Agree in general but it would be helpful if there was guidance or criteria provided for selection/warranting of RRFBs. The current guidance leaves a significant grey area for when an RRFB should be used.
Parking & Ground Transportation Division	5B.01	513	2	MUTCD 11ed NPA Text-Mark-up	It will be crucial that parking signs have a bit more uniformity to better facilitate Section 5B.01. The use of symbols can help as well.
Traffic Operations & Safety Division	Figure 3E-4	52	ne buffer	Part 3 Combined Figures	If the buffer is too wide (>6'), there could be confusion with the marking pattern of reversible buffered lanes. Motorist may perceive the buffer as a second reversible lane.
Traffic Operations & Safety Division	Figure 9E-10	36	A - Between the through bicycle movement and the parallel crosswalk	Part 9 Combined Figures	"A" graphic seems to have arrows in the intersection that should be removed.
Sustainable Transportation Branch	General			MUTCD 11ed NPA Text-Mark-up	No scooter symbol available for any use. NACTO has a good piece on this. It would be great to come up with a universally accepted micromobility sign.