



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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May 11, 2021

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE, W12-140
Washington, D.C. 20590-0001

**RE: Docket Name: National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision
Docket No. FHWA-2020-0001
Regulatory ID Number RIN No. 2125-AF85**

Thank you for the opportunity to comment on the National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways; Revision Notice of Proposed Rulemaking (NPRM).

Staff of the Washington Utilities and Transportation Commission (UTC) reviewed the NPRM and provide comment on the following Section for consideration:

Section 8B.03 Grade Crossing (Crossbuck) Sign (R15-1) and Number of Tracks Plaque (R15-2P) at Active and Passive Grade Crossings: In the NPRM, the Federal Highway Administration (FHWA) proposes a new Guidance statement recommending the Crossbuck sign to be at least 12 feet from the center of the nearest track. The FHWA proposes this change to formalize the dimensions shown on Figure 8D-2. The existing MUTCD also provides minimum Crossbuck sign placement distances in Section Section 8B.04(11) and Figure 8C-2.

Comment: UTC staff recommends that language be added to relevant sections of the MUTCD to also provide a **maximum** placement distance for Crossbuck signs at grade crossings. Crossings that are either perpendicular with the roadway or skewed with a placement configuration of near right to far left should have a required maximum

distance. An exception where additional distance may be needed is at skewed crossings with a placement configuration of near left to far right.

UTC staff identified multiple crossings in Washington State where Crossbuck signs appear to be placed farther than necessary; far enough away from the crossing that a roadway user may not realize that the sign is intended for the crossing. For example, at the Marine Drive crossing (USDOT 096151F) near Bellingham, the Crossbuck sign is located approximately 115 feet from the crossing. At Depot Road/3rd Street (USDOT 396919C) in Lynden, the Crossbuck sign is located approximately 343 feet from the crossing. There are numerous other crossings throughout the state where this condition exists. Guidance in the MUTCD regarding maximum placement distance would help ensure consistency in Crossbuck sign placement at crossings around the state.

Thank you for the opportunity to comment. If you have questions, please contact Betty Young, UTC Rail Safety Program Advisor, at betty.young@utc.wa.gov, or (360) 292-5470.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark L. Johnson", with a stylized flourish at the end.

Mark L. Johnson

Executive Director and Secretary