

May 12, 2021

Stephanie Pollack, Acting Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Reference: **Manual of Uniform Traffic Control Devices for Streets and Highways (MUTCD), Revision FHWA-2020-0001**

Dear Acting Administrator Pollack:

Based upon the Express Lanes work that Atkins has been conducting as the State Road and Tollway Authority's (SRTA) General Engineering Consultant/Program Manager in Georgia, we offer the following comments for your consideration:

Comment 1: In the MUTCD NPA Section 2E.36 and in Figure 2E-32, new guidance is provided for showing exit numbers for exits along C-D roads. This new guidance conflicts with a statement in proposed Section 2E.22 that states "Exit numbers and suffix letters shall only be used to designate individual exit departure points directly from the freeway mainline."

Comment 2: The MUTCD NPA does not provide interoperability signing guidance in Chapter 2G, Preferential and Managed Lane Signs. As more State Tolling Agencies provide interoperability access, a standard is needed so that users understand that other States' Registered Toll Payment Devices will work in Toll and Express Lanes. Agencies are concerned that signing with the pictograph adopted by the State's toll facility's ETC payment system and the word ONLY might confuse motorists from other States that may not understand that they can use the lanes with their State's transponder. A common pictograph, as intuitive as the HOV black diamond, or similar to what has been developed in 16A-GM1-01 by NCUTCD and IBTTA, would be a welcome standard to be included in the MUTCD.

Comment 3: Related to Comment 2, current required marking of a priced managed lane is "a word marking or pictograph using the name of the ETC payment system required for use of the lane, such as E-Z PASS ONLY". This again might confuse motorists now that interoperability is the norm in most states. A common pictograph marking, would be a welcome standard to be included in the MUTCD.

Comment 4: In the MUTCD NPA Section 2L.07, guidance states that travel time should be tied to a distance to a particular destination. However, Figure 2G-26 shows a sign that only displays destinations and travel time. In certain situations, such as comparing Express Lane versus Local Lanes travel times or speeds, it may make sense to only show travel time or speeds. Regardless, suggest that this conflict be addressed.

Comment 5: In the MUTCD NPA Section 3A.04, new standards require a normal width line to be 6" on freeways and wide lines on freeways to be a minimum of 10". This new standard could cause lane width issues on freeways with preferential lanes such as example A in Figure 3E-3. For example, the existing lines and space between a preferential lane and general purpose lane allowed under the previous MUTCD would be 8" line, 8" space, 8" line. The new standard would potentially change this to 10" line, 10" space, 10" line, effectively reducing lane width by 6". Recommend that new line widths as they apply to preferential lanes should be guidance rather than standard to allow states flexibility in situations such as this.

Sincerely,

Atkins



Steve Kahle, P.E.
SRTA Program Management Team