



## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF TRANSPORTATION

Stephen C. Brich, P.E.  
Commissioner

1401 East Broad Street  
Richmond, Virginia 23219

(804) 786-2701  
Fax: (804) 786-2940

May 12, 2021

Kevin Sylvester, Office of Transportation Operations  
Federal Highway Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue S.E.  
Washington, DC 20590

RE: VDOT Comments on FHWA's Notice of Proposed Amendments; National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision [Docket No. FHWA-2020-0001]

Dear Mr. Sylvester:

Thank you for the Federal Highway Administration's (FHWA's) efforts to promulgate the Notice of Proposed Amendments (NPA) for the 11<sup>th</sup> edition of the Manual on Uniform Traffic Control Devices (MUTCD) and providing this opportunity for comment.

Attached are the Virginia Department of Transportation's (VDOT's) comments on the NPA. VDOT appreciates and applauds the years of effort it has taken FHWA to reach this milestone. I wish to emphasize that although VDOT disagrees and offers feedback on certain individual aspects of the NPA, notably in areas that would result in significant fiscal, procedural and programmatic impacts to the management of traffic control devices in Virginia, in general this proposal will implement numerous significant improvements to the current MUTCD that will greatly enhance the safety and mobility of all roads users in Virginia.

[VirginiaDOT.org](http://VirginiaDOT.org)

WE KEEP VIRGINIA MOVING

FHWA Docket No. FHWA-2020-0001

May 12, 2021

Page 2 of 2

As similarly expressed by the American Association of State Highway and Transportation Officials (AASHTO) and the National Committee on Uniform Traffic Control Devices (NCUTCD), VDOT does not concur with an immediate “reframing and rewriting” of the current NPA as has been suggested by various organizations, which would require a new NPA process and in turn delay implementation of critical rule changes. To address the concerns raised by those organizations, VDOT encourages FHWA to commit to more frequent MUTCD updates in the future so as to keep the document current with the expanding body of knowledge related to traffic control devices, emerging topics such as Vision Zero and Connected/Autonomous Vehicles, and to reduce the size of future rulemakings.

If you have any questions, please contact Raymond Khoury, State Traffic Engineer, at (804) 786-2965.

Sincerely,

DocuSigned by:  
  
75CFD45FB74F4DC...

Kevin Gregg

Chief of Operations and Maintenance

Attachment: VDOT's MUTCD comments

Cc: Mr. Thomas L. Nelson, Jr., P.E., FHWA Virginia Division Administrator