

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>
NPA Process	YES	N/A	N/A	I support the current NPA process and encourage timely completion of the NPA and publication of the 11 th Edition of the MUTCD. I do <u>NOT</u> agree with those who are calling for termination of the NPA and a complete re-write of the Manual. I am a professional engineer who uses the MUTCD daily in traffic engineering and transportation planning. It has been over a decade since the last edition with no significant revisions in the interim. If the NPA process were to be terminated, it would set back many years the process of incorporating 10 years of new research and safety findings into practice now.
1A.05 (#7)	NO	YES	N/A	Reference #5 to the AASHTO Green Book should be updated to the 2018 Edition (7 th Edition). Reference #16 to the TRB Highway Capacity Manual should be updated to the 2016 Edition (6 th Edition)
2B.21 (#67)	YES	N/A	N/A	I agree with FHWA's proposed changes to reorganize and revise how speed limits are determined. I do <u>NOT</u> agree with the NTSB recommendation to completely remove 85th-percentile speed as a consideration in setting speed limits regardless of the type of roadway; NTSB's recommendation is not supported by research. I also do <u>NOT</u> agree with the NTSB recommendation to require the use of an expert system to validate a speed limit that has been determined through engineering study; the FHWA-proposed Support statement is appropriate.
2B.43 - old (#90)	YES	N/A	N/A	I agree with the proposal to delete existing Section 2B.43 Roundabout Directional Arrow Signs. I prefer the use of ONE WAY regulatory signs rather than one-direction large arrow warning signs in roundabout central islands.
2D.01 (#155)	YES	N/A	N/A	I agree with the proposed new Support and Guidance statements, along with a new figure, describing signing for airport facility roadways. Airports are notorious for disregarding the MUTCD for their guide signage, in color and font.

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2H.03 (#259)	NO	YES	N/A	I agree with the creation of an Airport Signs section, but I ask for a change in the use of the Airport (I-5) symbol and sign. The Airport (I-5) symbol and sign should be reserved for <u>Commercial Service</u> airports. An alternate symbol, such as the light propeller-driven aircraft used in California's G94-1(CA) sign, should be used for <u>Non-Carrier</u> (general aviation) airports. In urban areas with multiple airports, it is confusing for unfamiliar drivers to have the I-5 symbol to direct them to general aviation airports. I have attached a PDF of the example G94-1(CA) sign.
2L.02 (#296)	YES	N/A	N/A	I agree with the proposed Applications of Changeable Message Signs, specifically that that messages with obscure meaning, references to popular culture, that are intended to be humorous, or otherwise use nonstandard syntax, not be displayed because they can be misunderstood and degrade the overall effectiveness of the sign as an official traffic control device.
2L.04 (#298)	YES	N/A	N/A	I agree that use of warning beacons on CMS should be limited to messages that are critical to real-time conditions, to ensure that CMS maintain the same level of respect of road users expected of all traffic control devices.
2L.06 (#300)	YES	N/A	N/A	I agree with the new section that addresses the potential for habituation to CMS due to excessive use for the display of messages that are not related to real-time traffic conditions. Overuse for unnecessary purposes breeds disrespect. This relates directly to the proposed changes in 2L.02.
3A.04 (#320)	NO	YES	N/A	The speed limit threshold to use 6-inch-wide lines for "other roadways" should be increased to <u>greater than 50 MPH</u> . Using a >40 mph standard is unnecessary and would be overly burdensome on local governments.
3B.05 (#325)	NO	NO	YES	I <u>DISAGREE</u> with the new guidance statement that two-way left-turn lane markings should not extend to intersections and with the changes to Figure 3B-7. TWLTLs are widely used and extremely valuable at the many minor intersections and accesses that currently exist. Engineering judgment should continue to be used to determine a "minor cross street" where a TWLTL is appropriate and a "major cross street" where a dedicated left-turn lane is required. Also, some states have guidelines in the number of vehicles per hour when a TWLTL should be changed to a dedicated left-turn lane.
3B.09 (#329)	NO	NO	YES	I <u>DISAGREE</u> with the proposed guidance that edge lines on two-lane roadways should be at least 6 inches wide, regardless of the width of the normal line used on the roadway. This is unnecessary and would be overly burdensome on local governments.
3B.19 (#336)	YES	N/A	N/A	I agree with making a standard, and removing any ambiguity, that a yield line pavement marking cannot be installed without an enforceable regulatory sign.
3D.06 (#358)	NO	YES	N/A	I agree with the proposed changes to Arrow Pavement Markings for Roundabouts, but I ask that an Option statement be added to allow <u>Curved Arrows</u> within the circulatory roadway of Mini-Roundabouts (in lieu of the standard through/left arrow, as seen in Figure 2B-21). Curved Arrows are currently being used in many Mini-Roundabouts. In fact, FHWA's Mini-Roundabout publication shows photos of such applications. I have attached a PDF template of such a curved arrow.

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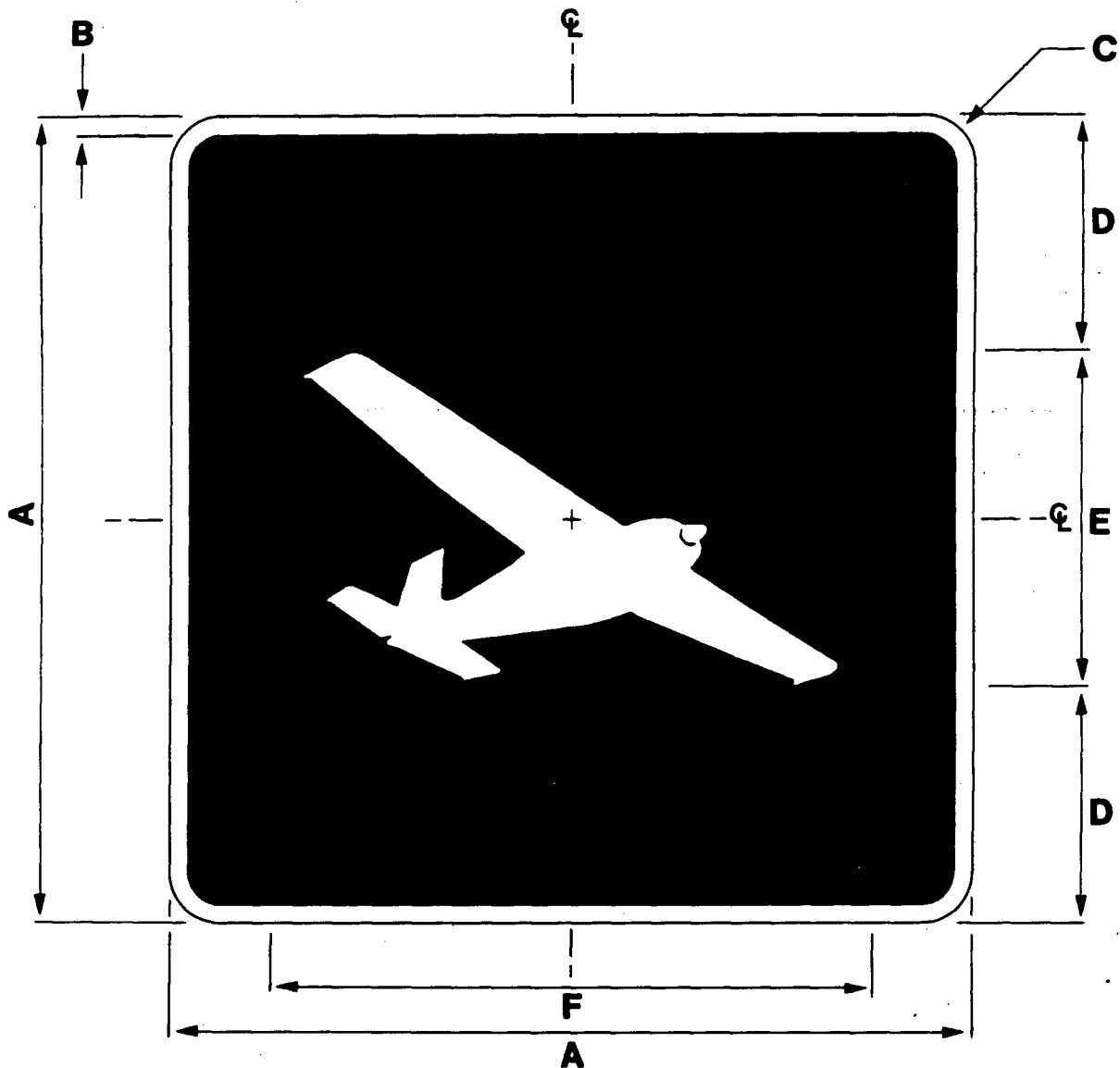
3H.03 (#367)	YES	N/A	N/A	I agree with the new section and Figure 3H-1, which clarify the limitations of Aesthetic Treatments in Crosswalks. There are too many examples of agencies allowing bright colors, complex graphics, images, or words that interfere with the uniform appearance of traffic control devices, which could confuse and distract road users. In addition, and more importantly, non-compliant treatments have been shown to be confusing to vision-impaired pedestrians.
3I.02 (#374)	NO	YES	N/A	The Guidance statement reference to the value of N should point to new section 3B.14, instead of old section 3B.11.
4F.02 (#383)	NO	NO	YES	I <u>DISAGREE</u> with allowing Flashing Yellow Arrow operation in five-section signal heads; it is not supported by the 2014 TRB research. From <i>Evaluation of the Flashing Yellow Arrow (FYA) Permissive Left-Turn in Shared Yellow Signal Sections</i> : "The FYA indication retrofit is not recommended for use in any section of a five-section cluster signal display with or without simultaneous indications."
4F.09 (#383)	NO	NO	YES	I <u>DISAGREE</u> with allowing Flashing Yellow Arrow operation in five-section signal heads; it is not supported by the 2014 TRB research. From <i>Evaluation of the Flashing Yellow Arrow (FYA) Permissive Left-Turn in Shared Yellow Signal Sections</i> : "The FYA indication retrofit is not recommended for use in any section of a five-section cluster signal display with or without simultaneous indications."
4F.16 (#383)	NO	NO	YES	I <u>DISAGREE</u> with allowing Flashing Yellow Arrow operation in five-section signal heads; it is not supported by the 2014 TRB research. From <i>Evaluation of the Flashing Yellow Arrow (FYA) Permissive Left-Turn in Shared Yellow Signal Sections</i> : "The FYA indication retrofit is not recommended for use in any section of a five-section cluster signal display with or without simultaneous indications."
4I.06 (#424)	YES	N/A	N/A	I agree with the proposed Standard requiring the Walk interval to include the required minimum time in addition to any time provided for a leading pedestrian interval, at locations without accessible pedestrian signals. This is a good compromise that does not penalize vision-impaired pedestrians, while allowing the inexpensive implementation of LPI, a proven safety countermeasure. I do <u>NOT</u> agree with those who are calling for mandatory installation of APS anywhere LPI is used.
4J.02 (#426)	NO	NO	YES	I <u>DISAGREE</u> with the proposed Guidance statement recommending accessible pedestrian signals be installed at all pedestrian hybrid beacons. This would be inconsistent with section 4K.01, which states that an engineering study should be conducted before installing APS. I recommend changing the proposed 4J.02 Guidance statement to refer to the engineering study in 4K.01
4J.03 (#427)	NO	YES	N/A	I agree with the proposed changes to the Pedestrian Hybrid Beacon, except for the operation of flashing CIRCULAR RED signal indications during the pedestrian change interval. The operation should be changed from alternating flashing to <u>Simultaneous Flashing</u> , for the same reason that is stated in Section 4S.05 (Stop Beacons): to avoid being confused with grade crossing flashing-light signals.
4L.02 (#432)	NO	NO	YES	I <u>DISAGREE</u> with the proposed Guidance statement recommending audible information devices be installed at all RRFBs. This would be inconsistent with section 4K.01, which states that an engineering study should be conducted before installing APS. I recommend changing the proposed 4L.02 Guidance statement to refer to the engineering study in 4K.01.

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4U.02 (#447)	NO	NO	YES	I <u>DISAGREE</u> with the proposed Guidance statement recommending audible information devices be installed at all IRWLs. This would be inconsistent with section 4K.01, which states that an engineering study should be conducted before installing APS. I recommend changing the proposed 4U.02 Guidance statement to refer to the engineering study in 4K.01.
6N.19 (#514)	YES	N/A	N/A	I agree with new section Late Merge and its accompanying new signs and figures.

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
FHWA-2020-0001-0427 NCUTCD	YES	N/A	I support the current NPA process and encourage timely completion of the NPA and publication of the 11 th Edition of the MUTCD.

MUTCD NUMBER 1-5CODE G94-1

SIGN	DIMENSIONS (INCHES)					
	A	B	C	D	E	F
MINIMUM	18	1/2	1 1/2	5 1/4	7 1/2	13 1/2
CONVENTIONAL	24	1/2	1 1/2	7	10	18
FREEWAY	30	3/4	1 7/8	8 5/8	12 1/2	22 1/2

COLORS

BORDER & LEGEND - WHITE (REFL)

BACKGROUND - GREEN

- THE POLICY FOR INTENDED USAGE OF THIS SIGN IS SHOWN ON THE REVERSE SIDE -

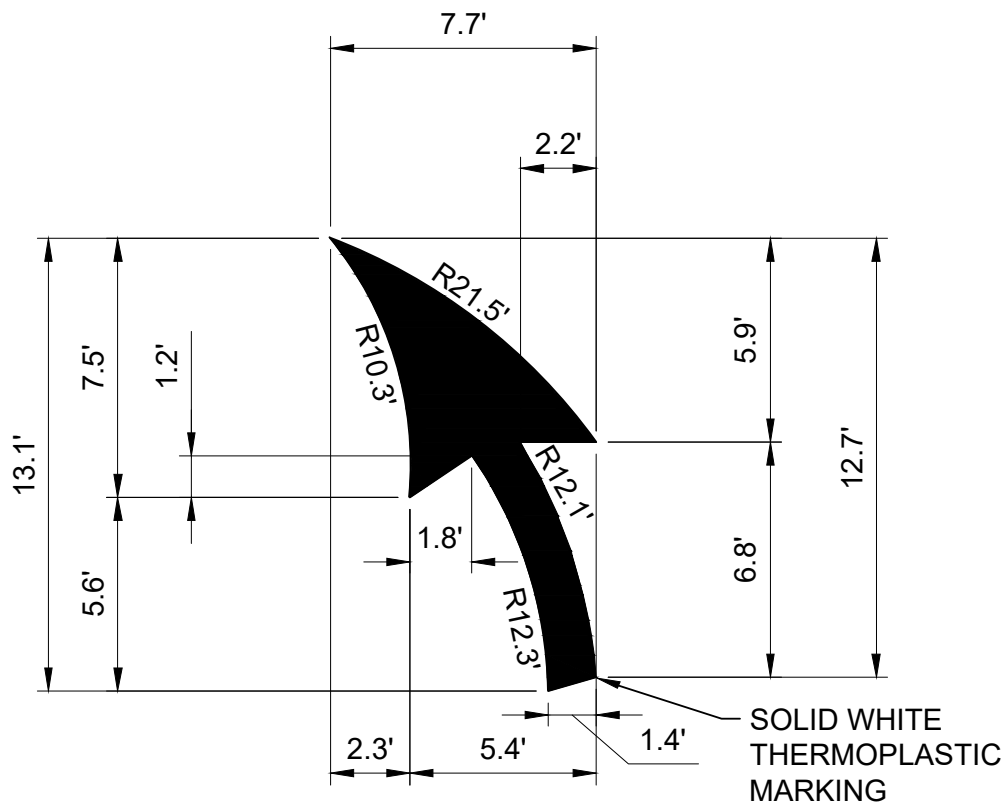
CHIEF, DIVISION OF TRAFFIC ENGINEERING

12/5/89

DATE

REVISION

REVISION



CURVED ARROW SYMBOL DETAIL NTS