

Appendix A: ITE Public Agency Council - Small Group Review, Highest Priority Review Comments

NPA Document Type (SUMMARY)	Section	Topic	Comment / Concern	Suggested updates for consideration
28	1D.11	All devices in place before opening roadway	This was guidance, now Standard, requiring everything in place before opening a road to public. This is an upgrade to safety but could be a concern to "on-time" opening or give rise to conflict between agency and contractor. If a roadway is opened for traffic but still has construction signing, is it open under 1D-11 requiring all traffic control devices be installed or is it timed when the construction signing is removed? Another concern is with the practice by some agencies to install speed limit signs only after a road has been open to traffic for a period of time in advance of a state review of speed authorizations.	Remove the Standard and revise to Guidance as roads can be opened in a safe manner with not all traffic control devices being installed prior to the opening. Sound engineering judgement needs to be used to mitigate the missing traffic control devices prior to their installation. An example would be overhead guide signs that are mitigated with temporary ground mounted guide signs until the overhead signs are installed.
59	2B.13	AWSC - crash experience	Section as option is applicable. Crash Experience criteria for A (four-leg intersections) vs. B (3-leg) has a difference of 1 crash in the consideration criteria with less crashes for a T-intersection which has less conflict points. Regarding C - sight distance -- what guide is being used for "non adequate" sight lines. Suggest the following changes be considered. 1. Add volume or differential in volume criteria as a consideration perhaps reduced from the initial criteria in consideration of crashes. Rationale: observe greater crash risk with rolling or missed stopped on a high speed mainline roadway when there are few vehicles on the side road). 2.	Consider changes to provide additional direction around the sight distance in consideration of other factors -- volume, ability for users to pull up to improve sight line and stopping sight for mainline as part of consideration with road design and engineering review would provide great level of guidance and direction.
67	2B.21	Speed Limit Sign - Setting Limits	Revisions provide additional, and helpful, direction to practitioners selecting appropriate speed limits; a good update to the MUTCD. However, statement lines 19-23 provides stronger, and more specific, recommendations for setting speed limits within 5 mph of 85th percentile. Though statement lines 19-23 are supported, it appears to subdue other guidance considerations outlined in Factors B-D as noted above.	A revision to statements in lines 19-23 should include some language in reference to where factors B-C noted above create an exception based on engineering study and professional judgement.
296	2I.02	Applications of Changeable Message Signs	Revisions are generally good and a positive change. Reinforcing the ban of advertising and other messages is a benefit to drivers. The new standard is very clear on maintaining respect for the CMS as a traffic control device and not a general message board. There is concern for prohibition of logos, names, or other markings to identify the ownership of the sign. It is important not to distract the driver with non-traffic related information but this is also needed for public safety to identify the owner of the sign for traffic reporting or maintenance needs. The new standard requires a policy on proper use of the CMS be established by the jurisdiction. There is guidance provided in the Manual but it could lead to interpretation by different agencies within the jurisdiction. The guidance specifies "Messages with obscure or secondary meanings, such as those with popular culture references, unconventional sign legend syntax, or that are intended to be humorous, should not be used as they may be misunderstood or understood only by a limited segment of road users and require greater time to process and understand." This is intended to simplify the meaning for drivers and avoid distraction or cognitive overload but may be considered as detrimental by an agency to their safety campaigns.	
17	1C.02 (42)(49)(57)(106)(117)(122)(153)(189)(195)(212)(236)(265)	Definitions of Words and Phrases	Revisions are good to greater clarify the applicability and use of the MUTCD; however, where excepted (e.g. private gated streets, parking lots, etc.) the blanket omission disregards the need for any traffic control device used to comply with MUTCD. This creates opportunity for inconsistency and conflict with MUTCD requirements. For example, though a parking lot may not be required to use or apply MUTCD standards, guidance and options; where a parking lot has traffic control that traffic control should be MUTCD compliant in some regard. The use of a yield line with stop sign would not be appropriate in a parking lot, but permitted under the conditions of inapplicability.	If and where traffic control devices found in the MUTCD are used in excluded areas of applicability, those traffic control devices should comply and shall not conflict with provisions of the MUTCD (at least with regard to standard shapes, colors, legends, etc.)
21	1D.04	Responsibility and Authority	Statement Lines 33-43, Page 36, should provide some consideration that permits a public authority or the official having jurisdiction to lawfully assign or delegate authorizations; not only for situations of temporary traffic control devices as outlined in Lines 39-43, Page 36. Private encroachments in public rights-of-ways are often granted by the jurisdiction whereby there's a legal instrument of assigned responsibility to the private entity for installation, maintenance and removal. Likewise, it is common for a public authority outside the jurisdiction to enter agreement with the owning public agency within the jurisdiction for maintenance, operation, etc. responsibility of such traffic controls (e.g. County maintains a local road in exchange for locality maintaining a County road where the maintenance limits are mutually beneficial to exchange, or Municipality maintaining parts of State System in Interchanges, cross jurisdictional Signal Coordination Agreements, or other legally bound arrangements that are not inherent to the jurisdiction in control of the right-of-way). In addition to this consideration/clarification to Statement lines 33-43, why was the Guidance for "Removal of unauthorized placements..." beginning on Line 24, Page 37, deleted? This paragraph may be somewhat redundant given previous text, but is often referenced during enforcement as explicit guidance for removals. New Support text (Line 28, Page 37) almost reads as though advertising in the ROW is acceptable where not resembling Traffic Control Devices; is this the desired interpretation? If so, this may encourage the proliferation of advertising signs that have no resemblance of Traffic Control Devices in the right-of-way; a driver distraction and safety issue.	Provide clarification in Lines 33-43, Page 36, as noted in the comment. Do not delete Guidance Lines 23-26, Page 37. Strike the portion of Line 30, Page 37, "from resembling traffic control devices." to further discourage the use of advertising signs on general text; with 23 CFR 750.108 referenced, additional definition is available.
320	3A.04	Functions, Widths and Patterns of Longitudinal Pavement Markings	Proposed revisions provide a new Standard that requires the use of 6-inch lines on all roadways above 40 MPH. How was this speed limit determined as the applicable Standard threshold? Why > 40 mph and not >45 mph or >30 mph? This Standard changes marking requirements on conventional, municipal roads in such way that adversely impacts consistency, application and costs on 45 mph urban, suburban and rural roads (i.e. not freeways, expressways, interstates). There appears to be no consideration of how a speed limit may change within a corridor impacting changes to line width, line types, lane width, or corridor characteristics (e.g. narrow lanes, multi-lane, median divided cross sections) not best suited for the new Standard. Furthermore, implementation of this Standard, the same as all updates to the MUTCD proposed, provides very little time for preparation and transition (e.g. markings tend to be annual; a year or less for change). As Guidance, this change could be more easily implemented over a longer period of time for jurisdictions and give more flexibility to practitioners that considers the impacts more comprehensively.	Provide greater flexibility to practitioners with a change to the proposed Standard applicable to all roadways with speed limits >45 mph and Guidance for roadways with speed limits less than or equal to 45 mph (excluding speed limits <35 mph).
389	4C.01	Studies and Factors for Justifying Traffic Control Signals	Comment: Revision includes a guidance statement to consider alternatives to traffic control signals listed in 4B.05 which includes other geometric elements. While these other considerations or actions are applicable. When side stop or AWS is not reasonable, other geometrics (including a roundabout may be applicable). However, right of way constraints and extreme differences in costs may be applicable elements for agencies. Language doesn't list these considerations. Since the reference to 4b.05 is guidance, perhaps this is implied but could be noted as additional considerations for agencies.	
390	4C.02	Signal Warrants - criterion to considered an engineering study from Standard to Guidance	Comment: Revisions better align section with official interpretation which is good.	
413	4F.17	Yellow Change and Red Clearance Intervals	Remove reference to "Guidelines for Determining Traffic Signal Change and Clearance Intervals: A Recommended Practice of the Institute of Transportation Engineers" and revert to original language. These guidelines have been adopted without experimentation with analysis including before and after crashes and human factors considerations. The new formulas to not take into consideration the specific rules of the road as detailed in the Uniform Vehicle Code for the meaning of the clearance intervals.	Remove reference to "Guidelines for Determining Traffic Signal Change and Clearance Intervals: A Recommended Practice of the Institute of Transportation Engineers" and revert to original language. These guidelines have been adopted without experimentation with analysis including before and after crashes and human factors considerations. The new formulas to not take into consideration the specific rules of the road as detailed in the Uniform Vehicle Code for the meaning of the clearance intervals.

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346	3C.01	General - Crosswalk markings	Proposed Standard requires crosswalk markings at non-intersection crosswalk locations; Line 4, Page 368. Legally established crosswalks, as defined in many codes, may be at marked or unmarked locations based on the presence of sidewalk ramps on either side of the roadway. Moreover, the new Standard proposed in Lines 23-25, Page 370, states "Where curb ramps are provided, crosswalk markings shall be located...". These new Standards could unnecessarily require all unmarked crosswalks at non-intersections, and/or where any curb ramps are provided, to be marked given limited text and strict interpretation; regardless of conditions, speed, engineering study, etc. in conflict with other MUTCD provisions and intentions, particularly Guidance provided on Lines 3-24, Page 369. Some neighborhood crossings are an issue of consistent application and resources under these new Standards. This will add cost to municipal operating budgets and may reduce safety by marking many crosswalks that do not need to be marked. Related Guidance Lines 16-20, Page 370, is also in conflict. Required on low-volume, 25 mph, local roads regardless of conditions (anywhere a crossing occurs and is aided by ADA ramps) seems like an unintended crosswalk application that detracts from necessary crosswalk markings elsewhere. Consider clarifications and/or revisions to the new Standards.	Remove the new Standards referenced, modify or clarify to address the issues noted.
16	1C.01	Definition of a Standard	Comment: This revised definition of a Standard is very good as it allows a higher degree of latitude and flexibility that would be beneficial for local agencies due to the diversity of field conditions and situations.	
20	1D.02	Traffic Control Devices Characteristics and Activities	Comment: Revisions are good to greater clarify the applicability and use of the MUTCD	
50	B.06 thru 2B.1	Warrants for intersection control - no control, TWSC, AWSC, Yield	Changes use of yield or stop signs for speed control to a shall not condition; this is good.	
13	1B.06	Experimentation	The revisions proposed appear to present the following concerns as a result of the added standard language. The standard language provides no exceptions, is a conflicting standard with model ordinances and provides no allowances for circumstances under a State of Emergency. Some jurisdictions have adopted local ordinances following the UVC/State Model Ordinances giving authority to the city's traffic engineer and chief of police to install experimental traffic control devices. For example, an action taken locally to establish curbside zones to better provide accommodations during the COVID-19 pandemic. Additionally, responses to emergent situations and new technology may not be afforded the length of time for FHWA approvals. The proposed standard language may present a conflict between state statutes, which adopt the MUTCD and local ordinances. In some cases, local code may overrule state code.	With regards to proposed amendment #13 for section 1B.06, an alternative may be acceptable revision that prohibits permanent experimental installations as standard with consideration of permitted temporary installations under certain conditions (and applicable guidance).
41	2A.17	Posts and Mountings	New Standard, Lines 4-8, Page 56, prohibits typical placement of solar panels above a sign (e.g. solar powered school zone flasher, RRFB, warning beacon, etc.), even when crashworthy. This new Standard only permits placement below or behind the sign. This creates extraordinary replacement costs, unnecessary theft and vandalism risks, design and functional concerns. There appears to be no justification for this new Standard except a vague association to shadowing; which may or may not occur as a result of installed solar panels above the sign as typical practice. Shadowing also occurs from adjacent building projections, tree canopy, street lighting, and any other assortment of right-of-way uses and encroachments. This Standard should be limited to crashworthy performance and so as not to physically obscure the shape of the sign with the portion of latter sentence restated as Guidance. Guidance: Where practical the mounting location should be such to avoid casting shadows onto the sign.	Remove this Standard, change to Guidance or revise as noted in the comment for part Standard, part Guidance, to address the issues.
467	6B.01	TTC Plans	New guidance recommended TTC Plans account for planned and unplanned activities. Planning for any (or all) unplanned activities is unreasonable.	
348	3C.03	Design of Crosswalk Markings	Review new standard for minimum widths at 40 mph or greater (6' and 8'). Crosswalk widths that exceed the width of pedestrian route could be a conflict for users to an obstructed ADA path on either end. Where curb ramps are provided, crosswalk markings shall be located...within extension of crosswalk markings. Not a condition of where crosswalk markings are used, if or option for crosswalk markings. This will create significant issues to mark crosswalks everywhere ramps are provided.	