Department of Transportation
Federal Highway Administration
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Comments on 2D.55 Community Wayfinding Signs (Previously section 2D.50 in 2009 Edition MUTCD)

Page 189, Line 5: Propose changing "system of signs that direct **tourists** and other road users" to "system of signs that direct **visitors** and other road users".

> Comment: Wayfinding Signs are just not for the tourist or tourism. Wayfinding is intended for _anyone_ who is not familiar with the local area, including local citizens, regional residents, business travelers, etc. "Tourist" implies Community Wayfinding shall only be used in cities where out-of-town tourism is an economic driver. In fact Community Wayfinding Programs are used by all types of municipalities for different purposes, beyond tourism.

Page 189, Lines 5 & 6: _"similar secondary destinations" needs a definition_
Page 189, Line 21: _"primary destinations" needs a definition_

> Comment: Establishing a Glossary of Terms related to Community Wayfinding would help narrow the interpretation between Traffic Engineers and Designers, who often use different terms for similar elements and have different expectations of what a Community Wayfinding System should be directing to.
>
> Establishing a glossary also would help create clearer guidance as to the types of destinations that may be included and how the Community Wayfinding will create a "coordinated and continuous system of signs", rather than sporadic MUTCD signs within a Community Wayfinding System.
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> Suggested definitions:
>> "Primary destination": A category of public destinations that include City/Municipal Names, Highway Routes, Street Names or Exit Ramp Identification.
>> "Secondary destination": A category of not-for-profit destinations that are local to a municipality, including, but not limited to: City Districts, visitor centers, tourism attractions, arts/culture attractions, local civic/government buildings that serve the public, parks and recreation sites, historic sites, educational facilities, and transportation facilities.

Page 189, Line 10: "*Figures 2D-18 31 through 2D-20 33 illustrate various examples of the design and application of community wayfinding guide signs.*"

> Comment: This page of examples (renumbered from 2009 MUTCD Figures 2D.18 through 2D.20) have been used very literally by the reviewers to make their decisions. The examples of illustrations should be updated and probably be shown in b/w line art instead of full color samples. Full color examples have created additional debate during the review process.
>
> The Community Wayfinding Professional Group can help with supplying more current examples or help with illustrating new examples to be used for reference.
>
> Additional language should be added on the page stating that the illustrations shown are not to dictate or restrict the design of new signs by requiring the new designs to resemble the examples shown.

Page 189, Line 14: Prohibition on community wayfinding elements on exit ramps
> Comment: Exit ramps are often where additional community wayfinding information is most required because it is the visitor's first encounter with the community and a valuable location to introduce the look and feel of the wayfinding system. We suggest allowing some flexibility within new Section 2E.50 (formerly 2E.35 in 2009 MUTCD) to allow some community wayfinding design elements to be incorporated into the Supplemental Guide Sign designs.

Page 189, Line 34: "*should not be used on a regional or statewide basis*" delete "*regional*"

> Comment: In the 10+ years since this MUTCD section first was developed, there are a number of programs that have shown Community Wayfinding can be successfully implemented on a regional or countywide basis. In fact regional and countywide systems are more cost efficient to implement and often looked upon favorably by State DOT's, because of their basis in regional partnerships.
>
> If needed, the Community Wayfinding Professional Group can help with identifying examples of successful regional wayfinding systems.

Page 189, Lines 39 - 43: *Commentary on new paragraph related to maintenance of existing regulatory, warning and guide signs.*

Comment: As industry professionals with significant experience and a clear understanding of how Community Wayfinding Programs are administered, funded and implemented, this new paragraph is extremely problematic. The various regulatory, warning and destination guide signs located in the public right of way may be maintained by several different agencies (State, County, City, Transit, Federal Agency, etc.).

This paragraph may be interpreted as, requiring **ALL** signs in the public R.O.W. to be upgraded by these other agencies first, prior to the Community Wayfinding. This is not a realistic, logistical or financial reality.

Community Wayfinding Systems are often funded and implemented by tourism bureaus, economic development departments, business improvement districts or local organizations (in coordination with the local municipality). These organizations have no responsibility in the maintenance of the regulatory signs or the funding or authority to effect those types of signs. If a local tourism bureau has funding or obtained a grant to implement a new community wayfinding system, they should not be required to wait for years for the streets department, county engineer, or state DOT to improve or replace other signs before installing a wayfinding system.

Question: Does the MUTCD have the same requirement of State Agencies prior to implementing
LOGO Sign Programs or TODS Program? Since these are sign programs that have similar intent.

Page 191, Line 14-15: Disagreement with FHWA proposal to change from "Guidance" to "Standard".

Changing *"should"* to *"shall"* change the interpretation to a highly restrictive instruction and obstructs the designer's ability to avoid a sign panel appearance that could be mistaken by road users as being a traffic control device.

Comment: We request "*should*" remain, while providing additional guidance on avoidance of specific shapes, such as octagon, diamond and circle shapes, which are reserved for critical safety related signs. This would be similar to the language related to color, where custom colors are permitted, but specific colors are clearly not allowed (page 191 / lines 6 through 9)

In the December 14, 2020 Federal Register summary, FHWA proposes changing to a Standard "to eliminate conflict with overall sign shape requirements. We do not see the conflict of community wayfinding sign shapes with the overall requirements.

The shape requirements described in Table 2A-1 in 2021 MUTCD (Table 2A-4 in 2009 MUTCD) reserve the use of shapes like octagon, equilateral triangle, circle, pentagon, crossbuck, etc. for specific signs. These are not the shapes that are used for community wayfinding signs. Many wayfinding sign systems use an irregular silhouette as a method of ensuring that the wayfinding signs are distinct from other guide signs. Often that irregular shape evokes the peaks of a mountain range or the contours of a riverbed.

So long as community wayfinding signs avoid the circles, octagons, triangles, pentagons, etc. that are exclusively reserved for other sign types, we believe that a designer should be able to use a non-rectangular sign panel shape.

Page 191, Line 35 - 38: *Paragraph related to Copy Height requirements.*

Comment: Based on our experience Copy Height is the primary problematic issue with the Community Wayfinding section. The jump from 4" high copy for roadways of 25 mph (and less) to 6" for 30mph (+) is unnecessary and typically not realistic in regards to the amount of space available in an urban, downtown and Main Street conditions, where horizontal clearance is limited. The larger copy heights create signs that are not practical and out of scale with their environment.

We request the following revisions Copy Height requirements be considered for the 2D.55 Community Wayfinding Signs section:

Consideration A	**Consideration B**
4" = 35 mph or less	4" = 30 mph or less
6" = 40mph (+)	5" = 35 mph (+)
	6" = 45mph (+)

We also request the addition of language stating that, in areas that cannot support larger panels, that smaller copy height can be used. i.e. in rural main street projects, dense downtown streets located in urban cities where sidewalks are narrow and crowded with vegetation creating line of site issues.

Page 191, Line 46 – 50 (Fonts/Lettering Styles): *Paragraph related to Font usage.*

Comment #1: The Standard Highway Alphabet fonts create large sign panels that are impractical for
Community Wayfinding Programs and the environments and conditions in which they are installed.

Comment #2: Our experience has been that the use of Clearview fonts minimizes word length and is more conducive to suburban, urban and Main Street conditions, where horizontal space and R.O.W is limited.

If lines 46 and 47 must remain: It would be extremely helpful if verbiage can be added that specifically states that certain styles of Clearview have been tested and meet the requirements and can be utilized on Community Wayfinding Programs OR if the FHWA / MUTCD Committee can issue a letter that designers can use as evidence to gain permission for use of Clearview, from local municipal engineers and State DOTs.

Page 192, Line 14 (Arrows): *"Arrows shall be of the designs provided in Section 2D.08."*

Comment: We believe that additional arrow types should be allowed. We have found that the use of the DOT highway arrow and the location of the arrow on the sign panel (right turns the arrow is on the right and left turns the arrow is located on the left) is very rigid and restrictive. There is enough research on arrows that show the Montreal Expo style is more legible than the standard MUTCD arrows, and should be permitted. (see, Garvey, et al., 2004, New font and arrow for National Park Service guide signs. Transportation Research Record, Vol 1862(1), 1-9.)

If needed, a committee can help with supplying additional arrow options that have been tested and proven to be much more effective in recent completed projects. That committee also can help with supplying additional arrow placement options that have proven more effective.

Page 192, Line 28 – 31 (Identification Markers): *Reference to Figure 2D.29 examples*

Comment: It should be noted that (in the 2009 MUTCD) the example listed did not show examples only of rectangular sign shapes. Which suggests that this Figure is in conflict with the language appearing on Page 191, Line 15.

It also should be noted in this paragraph or on the Figure pages, the examples shown are **NOT** the only way the Community Wayfinding can be accomplished. Approving engineers sometimes mistake the signs shown in the Figures, as literal examples, and expect the sign to look *exactly* like what is shown.

Additional language should be added stating that the illustrations shown are not to restrict the design of new signs by having to resemble the examples shown.

Line 33 - 35: *"An identification marker may be used in a community wayfinding guide sign assembly, or may be incorporated into the overall design of a community wayfinding guide sign"*

Comment: This needs to be more clearly worded; it may be interpreted as a contradiction to the requirement that sign panels be a "rectangular shape"

ADDITIONAL CONSIDERATIONS

Request: Arrow Placement
Alternative placement of the arrows should be considered to have the flexibility for environments that may not be conducive for the left arrows to be placed on the left and right arrows to be placed on the right methodology because of line of site and obstructed view in the environment or smaller footprint area to install a sign.

Request: Message Hierarchy on the Sign Face
Alternative hierarchy of placement of the destination message should be considered (i.e. First destination should be first and subsequent messages should follow). This methodology is what is used on the overhead highway signs.

Request: Revise the MUTCD Standard Pictogram for Visitor Information
Several years ago the MUTCD changed the official pictograph for Tourist Information from a "?" to the word "INFO" inside a box.

We believe a lowercase "i" is more common international symbol for Visitor Information. It is also utilized across all types of Tourism communications, such as brochures, kiosks, websites, maps, etc., reinforcing its recognition. "INFO" is barely used anywhere. In fact most highway signs still use the "?".

The MUTCD team should consider the more internationally accepted and recognizable symbol of lower case "i" in a square (or circle). The lower case "i" symbol is geared toward visitors and often international travelers, who may not speak English.

Utilizing "INFO" is U.S. specific reference that's purpose is broader and not effective for non-English speaking users.

We have had several projects, where we have had to argue for using the lower case "i" "But because the pictogram "INFO" is in the Manual - there is really no winning argument, because they cannot approve something outside of what the book tells them to do.

So the result is Vehicular signs with the "INFO" symbol and all other visitor communications with the "i", which is not a consistent message and does not reinforce the use.

We have been told INFO tested better – but no indication was given if the subjects who tested it were non-English speaking users.

Request: Additional Sign Types

Similar to guidance provided for Pedestrian Signs, we believe the Community Wayfinding section needs additional support of the following sign types since they are often included as part of a Community Wayfinding program and the sequence of information a road user needs to complete their journey.

Welcome Signs
While these types of signs are often regulated locally, including language that encourages the design of Welcome signs that are consistent with the Community Wayfinding Guide Signs, help communicate to the road user there is a coordinated and continuous system of signs in the area.

Parking Directional Signs
Directing to and identifying Parking facilities (Garages and Surface Lots) are a key component to a successful Community Wayfinding Program.

Conflict: We are often directed by local authorities that we "shall" use a White "P" in a Blue circle for Parking as a Standard, others will require a White "P" in a Green circle (or square) and others say the standard is the MUTCD D4-1 (Parking Sign).

Request: Within the development of a comprehensive Community Wayfinding Program, use of Parking sign D4-1 not be a mandatory MUTCD requirement and similar to the identification marker or sign panel background colors, alternate Parking Directional Sign be permitted based on the following support of a comprehensive and coordinated Community Wayfinding Program.

Support: The suggested P pictogram / and sign panel color are consistent with the overall aesthetic and graphics utilized throughout the Community Wayfinding program. This will provide consistent design and information to the end-user. This approach supports the intent of MUTCD Section 2D.55 (Community Wayfinding Signs) by providing a coordinated and continuous system of wayfinding signs. It will also reduce visual clutter.