

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>
1A.02	YES	N/A	N/A	NYCDOT Agrees With 1A.02 As Presented.
1A.03	N/A	N/A	YES	NYCDOT disagrees with 1A.03 as proposed in the NPA. Recommend to delete section 1A.03. Issue with vehicle operator definition and "Basic" understanding of traffic laws. This should be a higher standard. Also pedestrian definition puts a burden on pedestrians to act a certain way and applies unnecessary contributory negligence to any conflict with vehicles. Also goes against FHWA literature on pedestrian safety including their pedsafe initiative, located at pedbikesafe.org. Definition of pedestrians is subjective, assumes the medical model of disability, and language on pedestrians with disabilities is disjointed from entire paragraph. (p. 2).
1A.04	NO	YES	N/A	NYCDOT generally agrees with 1A.04 as proposed in the NPA but recommends to include "All" to sentence to emphasize inclusion of all type of road user: ...Efficiency (Mobility) of all road users at that location, including those with disabilities; the effective utilization of agency resources; cost-Effectiveness; and enforcement and education aspects of traffic control devices.(p. 3, Lines 8-11).
1A.05	NO	YES	N/A	NYCDOT generally agrees with 1A.05 as proposed in the NPA but recommends to: <ul style="list-style-type: none"> • Add the NACTO urban street design guide. • Replace ADAAG with USDOT ADA 2006 and ADA2010 in the list of references. • Include DOT ADA 2006 or DOJ ADA 2010 Standards, or any superseding revision of DOT or DOJ ADA Standards (Proposed accessibility guidelines for pedestrian facilities in the public right of way) in the list of references. • Recommended to provide a general legend and make Figures consistent throughout the documents.(p. 4).

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1C.02	NO	YES	N/A	Add terms "access route" - an accessible route in conformance with the standards of Chapter 4 of USDOT ADA 2006. "circulation path" - as defined in section 106.5 of USDOT ADA 2006. Is this redundant with the defined term, "pathway"? "Pedestrian" is already defined in MUTCD. Additionally, add "clear space" - FHWA to provide a definition that should be in agreement with the guidance in section R304.5.5 of PROWAG
1D.06	NO	YES	N/A	NYCDOT recommends revising 1D.06 to drop to should statement. This is an issue when the R5-1 sign is behind the R1-1 sign. The do not enter sign extends beyond the octagonal stop sign. This is a very common installation which would be prohibited and cost prohibited to enlarge all stop signs.(p. 39, Lines 4-10).
1D.07	NO NO	YES YES	N/A N/A	NYCDOT generally agrees with 1D.07 as proposed in the NPA but recommends the color code should clarify that black or white in the standards are in reference to background since text is typically either black or white, as provides greatest contrast, for most all signage regardless of color.(p. 39).
2A.08	NO	YES	N/A	NYCDOT generally agrees with 2A.08 as proposed in the NPA but identified a text error for the line for 2A.08 between 2A.04 & 2A.05. Appears to now be section 2A.20.(p. 45, Line 29).
Figure 2A-4	NO	YES	N/A	NYCDOT generally agrees with Figure 2A-4 as proposed in the NPA but recommends to show bike lane prior to intersection.
2A.20	NO	YES	N/A	NYCDOT generally agrees with 2A.20 as proposed in the NPA but comments that flashing LEDs are allowed on a lot of signs now. There may be a future concern of led sign clutter if too many signs flash in the same corridor and diminish the clarity of non-Led signs. Ensure that led lighting has luminosity levels that will not blind those using the road. Consideration should be given to light intensity reduction at night.(p. 56-58).
Table 2B-1	NO	YES	N/A	NYCDOT generally agrees with Table 2B-1 as proposed in the NPA but recommends to add missing dimensions applicable to trails regulatory signs (Bicycling).
2B.06	NO	YES	N/A	NYCDOT generally agrees with 2B.06 as proposed in the NPA but recommends to: <ul style="list-style-type: none"> • Fix text error: there are two b's in the alphabetical order of the guidance. • Clarify if right of way signing on line 17, 20, 23, 25 correctly references 2B.04. • Fix bullet letters which are off • NYCDOT believes bus signal signs need to be explicitly included in this list NYCDOT agrees with language in 2B.06 regarding yielding to pedestrians + bikes.(p. 65, Lines 31-32).
2B.08	NO	YES	N/A	NYCDOT generally agrees with 2B.08 as proposed in the NPA but recommends to add "Unless pedestrian safety is the major concern".(p. 67, Lines 35--36).

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2B.12	NO	YES	N/A	NYCDOT generally agrees with 2B.12 as proposed in the NPA but recommends School proximity should have larger impact on approving all-Way stops. there is currently support statements for crossing signs and signals but not stop controls. NYCDOT agrees with 2B.12 regarding the crash experience warrants – at 4 leg intersection: 5 in 12 months, 6 in 36 months-That could be corrected.(p. 69-70).
2B.13	YES	N/A	N/A	NYCDOT agrees with 2B.13 as presented in the NPA.
2B.17	NO	YES	N/A	NYCDOT generally agrees with 2B.17 as proposed in the NPA but recommends to add school criteria to consider for stop control. See also 7A.01.(p. 71).
2B.21	NO	YES	N/A	NYCDOT recommends changing 2B.21 as proposed to clarify that removing the 85th percentile is for urbanized areas. . (p. 76, Line 4).
2B.25	YES	N/A	N/A	NYCDOT agrees with 2B.25 as presented in the NPA regarding Higher Fine Zone Sign Downgraded To Guidance – No Longer Standard, and reducing signage in school zones.(p. 79).
2B.28	NO	YES	N/A	NYCDOT generally agrees with 2B.28 as proposed in the NPA but recommends <ul style="list-style-type: none"> • Revising text "Mandatory movement lane control (R3-5 and R3-5A) symbol signs: if used, shall be mounted overhead over the specific lanes to which they apply". Recommend changing shall to should. • NYCDOT agrees with 2B.28 regarding the addition of the except buses and except bicycles riders. (p. 83, Lines 39-40). • Remove limitation of mandatory movement lanes only being overhead. Recommend allowing R3-5 and R3-6 series to have smaller version and be post mounted. Should not have to be overhead. Should be smaller 24X30 version for post-Mounted signs.(p. 83, Lines 39-40).
2B.29	NO	YES	N/A	NYCDOT generally agrees with 2B.29 as proposed in the NPA but recommends to: <ul style="list-style-type: none"> • Add R3-5S as post mounted. And clarify why the guidance is "Should" used instead of shall when "Shall" is used in all other instances? • Allow a smaller version of R3-5 series that can be post mounted. (P. 85, Lines 6-9) Add a 24X30 version in Table 2B-1 or option to use in 2B.28 and 2B.29.(p. 84, Lines 34-51).
2B.30	YES	N/A	N/A	NYCDOT agrees with 2B.30 as proposed in the NPA.
2B.40	YES	N/A	N/A	NYCDOT agrees with 2B.40 as proposed in the NPA.
2B.45	NO	YES	N/A	NYCDOT generally agrees with 2B.45 as proposed in the NPA but recommends to add 24X24In size for lower speed roads.(p. 92-93).
Figure 2B-12	YES	N/A	N/A	NYCDOT agrees with Figure 2B-12 as proposed in the NPA.

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2B.48	YES	N/A	N/A	NYCDOT generally agrees with 2B.48 as proposed in the NPA. A support statement should be added that signs should not be lower if installed on a sidewalk.(p. 96).
2B.54	NO	YES	N/A	NYCDOT generally agrees with 2B.54 as proposed in the NPA but recommends to Change meter parking to pay parking. See NCUTCD similar recommendation.(p. 101, Lines 41-48).
2B.59	NO	YES	N/A	NYCDOT generally agrees with 2B.59 as proposed in the NPA but recommends to modify Figure 2B-26. The sign is not clear what it is for. Perhaps add speaker symbol or just a walk symbol and speaker symbol.(p. 107, Lines 20-22).
2B.60	NO	YES	N/A	NYCDOT generally agrees with 2B.60 as proposed in the NPA but recommends Flexibility to use this sign for the steady red/Flashing red signal configuration.(p. 108-109).
2B.61	NO	YES	N/A	NYCDOT recommends changes to 2B.61 as proposed: <ul style="list-style-type: none"> • Add leading pedestrian interval for no turn on red criteria. • Add Separated Bike Lane, Counterflow bike lane and Bike Box for no turn on red criteria. • Add "Unless local law" prohibits all no turn on red movements citywide. The sign is not required if local or state law prohibits all right turn on red unless otherwise posted. Then a "After stop right turn on red permitted" is installed. See NYC. • At Bullet E, change accident to crashes. .(p. 109).
2B.73	YES	N/A	N/A	NYCDOT agrees with 2B.73 as proposed in the NPA.
2C.06	YES	N/A	N/A	NYCDOT agrees with 2C.06 as proposed in the NPA.
Figure 2C-2	YES	N/A	N/A	NYCDOT agrees with Figure 2C-2 as proposed in the NPA.
2C.12	YES	N/A	N/A	NYCDOT agrees with 2C.12 as proposed in the NPA.
Figure 2C-3	YES	N/A	N/A	NYCDOT agrees with Figure 2C-3 as proposed in the NPA.
2C.13	NO	YES	N/A	NYCDOT generally agrees with 2C.13 as proposed in the NPA but recommends fixing error that Should be W13-20Ap.(p. 127, Line 43).
Table 2C-4A & 2C-4B	YES	N/A	N/A	NYCDOT agrees with Table 2C-4A & 2C-4B as proposed in the NPA.
2C.17	YES	N/A	N/A	NYCDOT agrees with 2C.17 as proposed in the NPA.
2C.24	NO	YES	N/A	NYCDOT generally agrees with 2C.24 as proposed in the NPA but recommends to Correct text error for section 2C.Xx.(p. 133, Line 19).

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2C.41	YES	N/A	N/A	NYCDOT agrees with 2C.41 as proposed in the NPA.
2C.49	YES	N/A	N/A	NYCDOT agrees with 2C.49 as proposed in the NPA.
2C.52	NO	YES	N/A	NYCDOT generally agrees with 2C.52 as proposed in the NPA but comments that the new two way traffic signs to match number of lanes is confusing.(p. 143).
2C.54	YES	N/A	N/A	NYCDOT agrees with 2C.54 as proposed in the NPA.
2C.60	YES	N/A	N/A	NYCDOT agrees with 2C.60 as proposed in the NPA.
2C.66	NO	YES	N/A	NYCDOT generally agrees with 2C.66 as proposed in the NPA but recommends to add pedestrians to list of use of “In street” plaque. See NCUTCD recommendations.(p. 151, Line 3).
Figure 2D-3	YES	N/A	N/A	NYCDOT agrees with Figure 2D-3 as proposed in the NPA.
Table 2D-3	NO	YES	N/A	NYCDOT generally agrees with Table 2D-3 as proposed in the NPA but recommends to add “Av” to standard abbreviation for streets.
Table 2D-3, 2D-4	YES	N/A	N/A	NYCDOT agrees with Table 2D-3, 2D-4 as proposed in the NPA.
2E.12	YES	N/A	N/A	NYCDOT agrees with 2E.12 as proposed in the NPA.
2E.22	NO	YES	N/A	NYCDOT generally agrees with 2E.22 as proposed in the NPA but recommends more research. It would seem this works over long distances but could be more difficult if several exits are within a mile of each other.(p. 209, Line 24).
Figure 2E-16	YES	N/A	N/A	NYCDOT agrees with Figure 2E-16 as proposed in the NPA.
2E.34	NO	YES	N/A	NYCDOT generally agrees with 2E.34 as proposed in the NPA but recommends to clarify Figure 2E-30 – not clear of distributor roads.(p. 221).
2F.01	NO	YES	N/A	NYCDOT generally agrees with 2F.01 as proposed in the NPA but recommends the toll section incorporate congestion pricing zone facilities. NYC planning to have a congestion toll zone in the central business district soon.(p. 240).
2F.12	NO	YES	N/A	NYCDOT generally agrees with 2F.12 as proposed in the NPA but recommends to correct to w16–20P, not w16–7P. “Toll” sign.(p. 248, Line 25 & 28).
Figure 2G-1	NO	YES	N/A	NYCDOT generally agrees with Figure 2G-1 as proposed in the NPA but recommends to allow flexibility so our bus signs which have blue in them are compliant.
2G.05	NO	YES	N/A	NYCDOT generally agrees with 2G.05 as proposed in the NPA but recommends to allow flexibility so our bus signs which have blue in them are compliant.(p. 261-262).
2H.03	N/A	N/A	YES	NYCDOT disagrees with 2H.03 as proposed in the NPA. The airport symbol should be allowed on overhead guide signs. It is easy to understand compared to full airport name. Typical airport signage at the airport is full of symbols and colors".(p. 281, Lines 42-43).
2L.04	YES	N/A	N/A	NYCDOT agrees with 2L.04 as proposed in the NPA.
Figure 2M-5	N/A	N/A	YES	NYCDOT disagrees with Figure 2M-5 as proposed in the NPA. Sign rs-008 is a warning sign for falling rocks– not a cultural interest sign. It should thus be yellow and should preferably be diamond shaped. "
Figure 2M-6, and 2M-14	YES	N/A	N/A	NYCDOT agrees with Figure 2M-6, and 2M-14 as proposed in the NPA.

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3A.03	NO	YES	N/A	NYCDOT generally agrees with 3A.03 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Color surface treatments need to be addressed here. This is too restrictive as stated. Consider subcategorizing markings into “Lines” and “Color surface treatments” so as to keep applicable guidance and standards distinct.(p. 336-337). • It Should Be Clearly Called Out That Left Side Solid Lines Used For Edge Of Travelled Way Should Be White When There Is Parking On A One Way Street So As Not To Encourage Two-Way Travel When No Cars Are Parked.(p. 336-337).
3A.04	YES	N/A	N/A	NYCDOT agrees with 3A.04 as proposed in the NPA.
3B	NO	YES	N/A	NYCDOT generally agrees with 3B as proposed in the NPA but recommends to add section for the applications of signs and markings in shared streets, where people are expected to walk in front of motor vehicles or against oncoming motor vehicles.(p. 339).
3B.06	NO	YES	N/A	NYCDOT generally agrees with 3B.06 as proposed in the NPA but recommends to relocate option – solid white lines for approaches to crosswalks to crosswalk section 3C.(p. 343).
3B.11	YES	N/A	N/A	NYCDOT agrees with 3B.11 as proposed in the NPA.
3B.19	NO	YES	N/A	NYCDOT generally agrees with 3B.19 as proposed in the NPA but recommends a revision to yield teeth application at crosswalks and Figure 3B – 16. Change to should as this is an issue with mixing zones and bike lanes.(p. 356-357).
3B.20	NO	YES	N/A	NYCDOT generally agrees with 3B.20 as proposed in the NPA but recommends the standard hwy signs and markings book should be updated to reflect the new MUTCD. The guidance “Exceptions” currently contradicts the standard, so standard must be reworded or the “Standard Highway Signs and Markings” book should have dimensions removed. Hopefully that book will be renamed and reorganized.(p. 358-360).
3B.22	YES	N/A	N/A	NYCDOT generally agrees with 3B.22 for the Pedestrian Symbol On Share These Paths. However it Does Not Specify if this symbol can be used On Travel Lanes.(p. 361).
3C.01	NO	YES	N/A	NYCDOT generally agrees with 3C.01 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Pedestrian controls such as signs, signals, islands, markings be placed in a separate Chapter such as Chapter 7. See comments for Part 7 for proposed pedestrian chapter.(p. 368). • Remove detectable warning contrast details. Refer to USDOT ADA 2006 for the details.(p. 368, Lines 28-36). • Include applications of detectable warnings at cut-Throughs and median islands.(p. 368, Lines 28-32).
3C.02	NO	YES	N/A	NYCDOT generally agrees with 3C.02 as proposed in the NPA but recommends to upgrade to standard to require crosswalks where engineering judgement indicates a need to direct peds to proper crossing paths. And add desire lines as a consideration for crosswalk applications.(p. 369, Line 36).
3C.03	NO	YES	N/A	NYCDOT generally agrees with 3C.03 as proposed in the NPA but recommends to add "Where curb ramps are required, crosswalk markings shall be located so that curb ramps and clear space are within the extension of crosswalk markings (outside of parallel travel lane)". (p. 370, Line 25).

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3C.04-3C.05	NO	YES	N/A	NYCDOT generally agrees with 3C.04-3C.05 as proposed in the NPA but recommends to reword or deemphasize basic crosswalk and to instead emphasize the high. All crosswalk Figures should use high visibility crosswalks, to deemphasize the basic crosswalk. Basic crosswalk may need to be phased out of the manual. This appears to be a similar approach to the 8 inch signal lenses where 12 inch is standard but a few exceptions to the 8in remain.(p. 370-371).
3C.05	NO	YES	N/A	NYCDOT recommends revisions to 3C.05 : <ul style="list-style-type: none"> • For B, C, and F, replace the term "Establishing" with "Emphasizing". The term "Establishing" infers a marked crosswalk should be provided. • Emphasizing a crosswalk where substantial numbers of pedestrians cross without any other traffic control device. • Emphasizing a crosswalk at an uncontrolled intersection F. Emphasizing a school crossing.(p. 371, Lines 8-10 & 15).
3C.12	NO	YES	N/A	NYCDOT generally agrees with 3C.12 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Expanding on pedestrian islands. See proposed language in attachment.(p. 373, Line 35). • Adding Figures.(p. 373).
3E.02	NO	YES	N/A	NYCDOT generally agrees with 3E.02 as proposed in the NPA but recommends to <ul style="list-style-type: none"> • Not to specify spacing of the chevrons. NYC uses less than the 100'.(p. 380, Line 9).
3E.04	NO	YES	N/A	NYCDOT generally agrees with 3E.04 as proposed in the NPA but recommends for "Bus may use shoulder" suggesting changing "Shall" to "Should". Make sure this doesn't apply to parking lanes or part-Time travel lanes that are not shoulders. According to this text, it would seem that we would be required to utilize bus only markings.(p. 383, Lines 13-20).
3H.03	NO	YES	N/A	NYCDOT generally agrees with 3H.03 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Referring to chromacity of colored pavement found at appendix to sub Part f of 23CfR655.(p. 390). • Removing restrictive language on multicolor arrangements within crosswalks. Proposed language is too restrictive. No evidence it is distracting. Add option that Engineering judgement may be used in deciding the aesthetic treatment and multiple color arrangements for an aesthetic crosswalk.(p. 390).
Figure 3H-1	NO	YES	N/A	NYCDOT generally agrees with Figure 3H-1 as proposed in the NPA but recommends Figure 3H-1 be modified to remove restrictive treatments for aesthetic treatment for basic crosswalk.(p. 390).
Figure 3H-3	NO	YES	N/A	NYCDOT generally agrees with Figure 3H-3 as proposed in the NPA but recommends a requirement to delineate the space between the colored pavement and travel lane. Need the line. Also Figure A should show the lane line. And both figures should show radius and curved line.
3H.06	YES	N/A	N/A	NYCDOT agrees with 3H.06 as proposed in the NPA.

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3H.07	NO	YES	N/A	<p>NYCDOT recommends revising 3H.07:</p> <ul style="list-style-type: none"> • To consider changing “Shall” to “Should”. Concerned this would force us to drop the red bus lanes when there are right turn conflicts Figure 3H-5 shows this). • Also concerned about the text indicating that general traffic isn't allowed to use the bus lane for any purpose, given that we allow expeditious pick up or drop off activities in most of our curbside bus lanes.(p. 393, Lines 6-8). • Delete "an engineering study" requirement in the option statement for red-colored pavement. • Revise standard statement for using red-colored pavement to: Standard: If used, red-colored pavement shall be applied only in lanes, areas, or locations where: <ul style="list-style-type: none"> A. Public transit and multi-modal traffic are the only permitted traffic to use, queue, wait, idle, or otherwise occupy the lane, area or location where red-colored pavement is used. B. General traffic is allowed in a transit lane in advance of a turn C. General traffic is allowed during part-time operation where the transit lane, area or location is not in operation.
3I.01	NO	YES	N/A	<p>NYCDOT generally agrees with 3I.01 as proposed in the NPA but recommends to adding lane separators in line 6 and in line 7-8 add pedestrian facilities.(p. 395, Line 6-8).</p>
3I.02	NO	YES	N/A	<p>NYCDOT generally agrees with 3I.02 as proposed in the NPA but recommends:</p> <ul style="list-style-type: none"> • Tubular be markers added to channelizing device section. • Add vertical panels section. • Don't delete lane separators or islands (Quik kurb) from list.(p. 395).
Chapter 3J	NO	YES	N/A	<p>NYCDOT recommends revisions to Chapter 3J to reconsider the downgrading of islands. Islands formally had an entire Chapter up until the 2000 edition. See curb extension section for proposed island chapter.(p. 397).</p>
Figure 3J-2	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 3J-2 as proposed in the NPA but recommends to provide Figures for islands with pedestrian crossings.</p>
Figure 3J-3	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 3J-3 as proposed in the NPA but recommends Figure 3J-3 be redrawn. Optional arrows appear to point to a white line but is actually the curb.</p>
Figure 3J-4	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 3J-4 as proposed in the NPA but recommends showing high visibility crosswalks in Figures instead of the basic crosswalk across multiple Figures. And include aesthetic crosswalk too.</p>
Figure 3J-6	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 3J-6 as proposed in the NPA but recommends to</p> <ul style="list-style-type: none"> • Revise Figures to show pedestrian ramps at the sidewalk curb. Figures should be consistent throughout. Show ramps with DWS. • Show sidewalks in existing Figures. • The inside crosswalk area should be colored since drivers may see the crosswalk and confuse it as the traveled way.

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3J.07	NO	YES	N/A	<p>NYCDOT generally agrees with 3J.07 as proposed in the NPA but recommends</p> <ul style="list-style-type: none"> • Delineators should be added, similar to tubular markers and other methods like planters. (p. 399).(p. 399-400). • Delineators should be added, similar to tubular markers and other methods like planters. (p. 399).(p. 399-400).
3J.07	NO	YES	N/A	<p>NYCDOT generally agrees with 3J.07 as proposed in the NPA but recommends adding</p> <ul style="list-style-type: none"> • Painted plazas and sidewalk extensions in this section to demonstrate these cases. • Figures for sidewalk extension and median islands. (See proposed pedestrian island chapter) • Whole intersection by revising partial intersection Figures. • Adding to guidance to show consistency with Figure 3J-6. • Crosswalk markings should extend to the sidewalk curb in marked curb extensions. • Delineators should be added, similar to tubular markers and other methods like planters. (p. 399).(p. 400, Line 36).
4A.03	N/A	N/A	YES	<p>NYCDOT disagrees with 4A.03 as proposed in the NPA. When there is no pedestrian signal but possibly a crosswalk, pedestrians must yield to vehicles (Albeit only when the light first changes) this conflicts with NYC vehicle and traffic law. Change standard to support to say "The pedestrian may yield the right-of-way to vehicles lawfully within the intersection..."(p. 402, Lines 47-49 & 403, Lines 1-2).</p>
4A.05	N/A	N/A	YES	<p>NYCDOT disagrees with 4A.05 as proposed in the NPA, specifically with the shall statement for a bike signal sign at every bike signal face but also the text "Only to make the movement indicated by the lane-Use arrow(S) displayed on the bicycle signal sign (See section 9B.22) that is located immediately adjacent to the signal face" seems in conflict with section 9B.22 which includes "If used" in regards to the bike signal signs.(p. 405, Lines 19-20).</p>
4A.06	N/A	N/A	YES	<p>NYCDOT disagrees with 4A.06 as proposed in the NPA:</p> <ul style="list-style-type: none"> • The following text appears counterintuitive to pedestrian safety, "At the time that the walking person (Symbolizing walk) signal indication is first shown". Is this to include vehicles that may already be in the intersection? it is not understood why this language is used if pedestrian safety is paramount over all others road users.(p. 406, Lines 11-12). • Recommend reverting safety island back to pedestrian refuge island. Safety island is not defined. (p. 406, Lines 18-19). • The shall statement that pedestrians shall not cross on a flashing don't walk indication conflicts with New York City law allowing pedestrians to cross during the flashing don't walk countdown. With a countdown timer present, pedestrians are given enough information to decide whether to cross. With a countdown timer, this language should be more flexible for pedestrians. NYC vehicle and traffic law language: "Pedestrians facing

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				such signal are advised that there may be insufficient time to cross the roadway".(p. 406, Line 13).
4C.01	NO	YES	N/A	NYCDOT generally agrees with 4C.01 as proposed in the NPA but recommends to include/Mention transit stops as a criteria for consideration (E.G under the bullets for engineering study criteria)? .(p. 413).
4C.02-4C.10	YES	N/A	N/A	NYCDOT generally agrees with the changes to the signal warrants to allow greater flexibility. Signal Warrant One, Two, Three – Change To Guidance.(p. 414-421).
4C.05	NO	YES	N/A	NYCDOT generally agrees with 4C.05 as proposed in the NPA but recommends • An alternative warrant 4, pedestrian peak hour (50% factor) see attached proposed warrant 4 alternative. • An alternative warrant 4, pedestrian peak hour (70% factor) with preventable crashes data. See attached proposed warrant showing safety benefits using this alternative warrant. • An alternative warrant 4, pedestrian peak hour (80% factor) with preventable crashes data. See attached proposed warrant showing safety benefits using this alternative warrant.(p. 417, Lines 40-41).
Table 4C-7	NO	YES	N/A	NYCDOT generally agrees with Table 4C-7 as proposed in the NPA but recommends the pedestrian traffic generated by a bus stop could be utilized as a factor in the pedestrian warrants.
4D.01	YES	N/A	N/A	NYCDOT agrees with 4D.01 as proposed in the NPA.
4D.02	YES	N/A	N/A	NYCDOT agrees with 4D.02 as proposed in the NPA.
4D.05	YES	N/A	N/A	NYCDOT agrees with 4D.05 as proposed in the NPA.
4D.08	YES	N/A	N/A	NYCDOT agrees with 4D.08 as proposed in the NPA.
4D.09	YES	N/A	N/A	NYCDOT agrees with 4D.09 as proposed in the NPA.
4E.01	NO	YES	N/A	NYCDOT recommends revisions to 4E.01 as proposed in the NPA: • Transit signals should be added to this list .(p. 431, Lines 4-5). • The flashing yellow signal indication include bicyclists as well as pedestrians and opposing traffic as this is how dot often uses the flashing yellow.(p. 438, Lines 8-11). • Clarify when a pedestrian can cross a street at a legal marked or unmarked crosswalk absent pedestrian signals, steady circular green, flashing yellow arrow, and flashing red arrow.(p. 436-439). • We disagree allowing the 12 o'clock green signal arrow for permissive turns with conflicting approaching traffic as long as conflicting traffic yields. NYC does not follow this standard.(p. 437-438).
4F.02	YES	N/A	N/A	NYCDOT agrees with 4F.02 as proposed in the NPA.
4F.02 & 4F.04	YES	N/A	N/A	NYCDOT agrees with 4F.02 & 4F.04 as proposed in the NPA.
4F.16	NO	YES	N/A	NYCDOT generally agrees with 4F.16 as proposed in the NPA but recommends to drop item b to an option.(p. 455-457).
4F.17	YES	N/A	N/A	NYCDOT agrees with 4F.17 as proposed in the NPA.
4F.18	NO	YES	N/A	NYCDOT generally agrees with 4F.18 as proposed in the NPA but recommends to add transit vehicles and adjust language to be broader about the type of transit vehicle. Prefer "Public transit vehicle" signal (Per NACTO recommendation). Change queue jump language to be more

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				board (Public transit exclusive phase) since there may be other applications besides queue jumps (Per NACTO recommendation).(p. 458, Lines 3-9).
4F.19	YES	N/A	N/A	NYCDOT agrees with 4F.19 as proposed in the NPA.
4F.20	NO	YES	N/A	NYCDOT generally agrees with 4F.20 as proposed in the NPA but recommends to adjust language to be broader about the type of transit vehicle. Prefer "Public transit vehicle" signal (Per NACTO recommendation). remove "Remaining on schedule" and include "Improve operations" (Bus lanes speed up transit, not just keep it on schedule).(p. 460).
4H.01	NO	YES	N/A	NYCDOT generally agrees with 4H.01 as proposed in the NPA but recommends removing this support statement to allow greater flexibility.(p. 464, Line 20).
4H.03	YES	N/A	N/A	NYCDOT agrees with 4H.03 as proposed in the NPA.
4H.04	NO	YES	N/A	NYCDOT recommends revising 4H.04 by dropping to option. Bicycle signal signs may be installed adjacent to a bicycle signal. Requiring this sign only adds to sign clutter at an intersection when the intent of a bicycle signal face is clear.(p. 465).
4H.06	NO	YES	N/A	NYCDOT recommends revising 4H.06 by dropping to option.(p. 465, Lines 31-32).
4H.02	NO	YES	N/A	NYCDOT recommends revising 4H.02 By dropping to support statement to not use for simultaneous movements (Exclusive bicycle phase/Barnes dance/Scramble) to allow flexibility.(p. 465, Line 45).
4A.05	NO	YES	N/A	NYCDOT recommends revising 4A.05 by <ul style="list-style-type: none"> • Dropping language that bikes should cautiously enter intersection on a green bike signal should be removed. Delete "Cautiously" • Not requiring the bicycle signal sign adjacent to bicycle signal faces.(p. 465).
4H.06	NO	YES	N/A	NYCDOT recommends revisions to 4H.06 to remove this option for flashing yellow bike and flashing arrow for vehicles. The bicycle has the right-Of-Way in this scenario. We don't have flashing yellow balls for motor vehicle traffic when opposing lefts are shown a flashing yellow arrow. the intent here seems to be to make bicyclists aware of the potential turn conflict but it seems to only make the right-Of-Way more ambiguous. More study of this seems to be needed.(p. 466).
4H.07	NO	YES	N/A	NYCDOT recommends revisions to 4H.07 by dropping to should. NYC has lenses facing to the right.(p. 466).
4H.09	YES	N/A	N/A	NYCDOT agrees with 4H.09 as proposed in the NPA.(p. 467).
4H.12	YES	N/A	N/A	NYCDOT agrees with 4H.12 as proposed in the NPA.
4I.01	YES	N/A	N/A	NYCDOT agrees with 4I.01 as proposed in the NPA.
4I.02	YES	N/A	N/A	NYCDOT agrees with 4I.02 as proposed in the NPA.
4I.03	YES	N/A	N/A	NYCDOT agrees with 4I.03 as proposed in the NPA.
4I.05	NO	YES	N/A	NYCDOT generally agrees with 4I.05 as proposed in the NPA but recommends <ul style="list-style-type: none"> • Adding an option for maximum dwell time for pedestrians after pushing the button. Should generally be one minute maximum. Need research on pedestrian impatience. Reference driver impatience. .(p. 473, Lines 19-

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				<p>21).</p> <ul style="list-style-type: none"> • Additional push button location guidance when using one support at a corner.(p. 471-473).NYCDOT generally agrees with 4I.05 as proposed in the NPA but recommends to • Add to end of line: "Refer to section 4K.02 for requirements of accessible pedestrian push buttons that are placed less than 10 feet apart.".(p. 471, Lines 41-43). • Clarify "Sufficient width" as per USDOT ADA 2006 section 406.7 and DOT ADA 2006 or DOJ ADA 2010 Standards, or any superseding revision of DOT or DOJ ADA Standards.(p. 473, Lines 1-3). • Maintain a 1.5 feet min. And 6 feet max. Clear space from the face of curb or from the outside edge of the shoulder, (Or if no shoulder exists, from the edge of the pavement);.(p. 472, Lines 16-17).
4I.06	NO	YES	N/A	<p>NYCDOT generally agrees with 4I.06 as proposed in the NPA but recommends to</p> <ul style="list-style-type: none"> • Upgrade should to shall. Peds shall have enough time to cross the street but not for preemption.(p. 473, Lines 5-6). • Add guidance that pedestrian should be given enough time to cross entire roadway.(p. 473, Line 8). • The flashing red signal during flashing don't walk phase. Pedestrians should not have simultaneous vehicle conflict.(p. 473, Lines 32-35). • Change standard to support.(p. 475, Lines 24-27).
Figures 4I-2 and 4I-3	NO	YES	N/A	<p>NYCDOT generally agrees with Figures 4I-2 and 4I-3 as proposed in the NPA but recommends:</p> <ul style="list-style-type: none"> • Showing one pole location because issue with complying with the 10Ft max between the pedestrian ramp edge of curb and the pushbutton. See attachment • Adding APS placement guidance for both single and double ramps at a corner. • Adding another case in situations where 2 APS units can be accommodated on one existing pole per corner (Using audible speech message) at an existing signalized intersection. this would apply to corners with either two tangent ramps or one apex ramp. .(p. 471-473). • Clarify the purpose of the 1' min space. This conflicts with the 10In. Max. Unobstructed side reach specified in ADA2010 section 308.3.1. • Show legend graphic as gradation to show that preference is not discrete but continuous. • Indicate top landings for ramps. Show 4' min. Pedestrian access route at the back of the landing space. • Correct APS location not directly adjacent to top landing. • Revise Figure 4I-3 to show that the 1.5Ft min. Clear space start from the face of curb.(p. 471, Line 33).
Figure 4I-3	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 4I-3 as proposed in the NPA but recommends to:</p> <ul style="list-style-type: none"> • Refer to ADA reach range for APS placement at parallel ramp. • Show landing space at the bottom of the parallel ramp. • Refer to comment regarding USDOT ADA 2006 and ADA2010 regarding note 4.
Figure 4I-4	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 4I-4 as proposed in the NPA but recommends to add LPI and exclusive pedestrian phase to Figure 4I-4. See attachment pedestrian intervals.</p>
4J.01	YES	N/A	N/A	<p>NYCDOT agrees with 4J.01 as proposed in the NPA.</p>
4J.03	N/A	N/A	YES	<p>NYCDOT disagrees with 4J.03 as proposed in the NPA allowing traffic to proceed after stopping during flashing don't walk phase.(p. 478-479).</p>
Chapter 4K	YES	N/A	N/A	<p>NYCDOT agrees with Chapter 4K as proposed in the NPA.</p>

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4K.02	YES	N/A	N/A	NYCDOT agrees with 4K.02 as proposed in the NPA.
4K.04	YES	N/A	N/A	NYCDOT agrees with 4K.04 as proposed in the NPA.
4L.01	YES	N/A	N/A	NYCDOT agrees with 4L.01 as proposed in the NPA.
Figure 4L-1	YES	N/A	N/A	NYCDOT agrees with Figure 4L-1 as proposed in the NPA.
4L.03	NO	YES	N/A	NYCDOT generally agrees with 4L.03 as proposed in the NPA but recommends RRFB should not be used for large high speed arterial roadways based on Texas Transportation Institute study.(p. 488-489).
Part 5	N/A	N/A	YES	NYCDOT disagrees with Part 5 as proposed in the NPA because: <ul style="list-style-type: none"> • Remove entire section 5 as this may lead to unfunded mandates for municipalities that will need to be implemented and maintained which could prove to be burdensome and could result in possible liability risk. • There is not one mention of pedestrians. (p. 510-516).
5B.02	YES	N/A	N/A	NYCDOT agrees with 5B.02 as proposed in the NPA.
5B.04	N/A	N/A	YES	NYCDOT disagrees with 5B.04 as proposed in the NPA: • Requiring installation of markings prior to opening street is an issue with repaving operations where markings are not installed right after paving. NYC cannot keep a road closed for days awaiting markings installation. <ul style="list-style-type: none"> • Remove guidance on 8Inch wide minimum for channelizing devices. We shouldn't have different standards for automated vehicles. This is shifting liability to government agencies.(p. 514).
5B.06	NO	YES	N/A	NYCDOT recommends revisions to 5B.06 as proposed in the NPA because: <ul style="list-style-type: none"> • Segregating bicycle facilities for CAV should be reserved for high speed and high volume multilane roadways. This is a liability issue. • Consideration should be given to bike lane lines not adjacent to general travel lanes that can be narrower than 6 inches and an autonomous vehicle would not need to "View" the outer line.(p. 515).
6C.02	NO	YES	N/A	NYCDOT generally agrees with 6C.02 as proposed in the NPA but recommends to: <ul style="list-style-type: none"> • Replace the term "Pedestrian route" to "access route".(p. 531, Lines 25-27). • Replace the term "Temporary pedestrian pathway" with temporary access route.(p. 531, Lines 1-37).
6K.01	NO	YES	N/A	NYCDOT generally agrees with 6K.01 as proposed in the NPA but recommends to add bicycle facilities (Like in Part three).(p. 566, Lines 11-13).
6K.02	YES	N/A	N/A	NYCDOT agrees with 6K.02 as proposed in the NPA.
6K.11	YES	N/A	N/A	NYCDOT agrees with 6K.11 as proposed in the NPA.
6M.03	NO	YES	N/A	NYCDOT generally agrees with 6M.03 as proposed in the NPA but recommends to: <ul style="list-style-type: none"> • Replace the term "Pathway" with "Pedestrian circulation path" • At pedestrian crossing locations, temporary raised islands shall have an opening or be shortened to provide at least a 60-Inch wide pedestrian circulation path for the crossing pedestrian.(p. 588, Lines 11-12).
6N.04	NO	YES	N/A	NYCDOT generally agrees with 6N.04 as proposed in the NPA but recommends <ul style="list-style-type: none"> • Bikeway should continue through the zone. Especially at speed greater than 35 mph. Figures 6P-49 and Figures 6P-53.(p. 595-596). • Include shared use paths: "When existing pedestrian facilities or shared-

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				Use paths, are disrupted, closed, or relocated in a TTC zone, the temporary facilities shall be detectable and shall include accessibility features consistent with the features present in the existing pedestrian facility or shared-Use path.".(p. 595, Line 36).
6P.01	NO	YES	N/A	NYCDOT generally agrees with 6P.01 as proposed in the NPA but recommends to: <ul style="list-style-type: none"> • Refer to ADA 2006, 2010, or DOT ADA 2006 or DOJ ADA 2010 Standards, or any superseding revision of DOT or DOJ ADA Standards instead of explicitly infer slopes and dimensions.(p. 639, Lines 13-15). • Sidewalk closed cross here signs shall include audible information devices or flagger to provide adequate communication to pedestrians with visual disabilities.(p. 639, Lines 19-20). • Include reference to temporary ramps. Temporary ramps shall be provided at temporary crosswalks.(p. 641, Lines 3-14).
Figure 6P-28	NO	YES	N/A	NYCDOT generally agrees with Figure 6P-28 as proposed in the NPA but recommends to depicting one perpendicular and one parallel ramp at temporary pedestrian access route since Figure is not clear.
Figure 6P-29	NO	YES	N/A	NYCDOT generally agrees with Figure 6P-29 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Sidewalk closed sign should include audible information device or flagger in the Figure. • Showing temporary ramps at both ends of the temporary crosswalks. • Showing barrels for the full length of the work limit. • Showing channelizing devices extending the full width of the sidewalk.
Figure 6P-47	NO	YES	N/A	NYCDOT generally agrees with Figure 6P-47 as proposed in the NPA but recommends dropping "Share the road" sign. This was removed in Part 2.
Figure 6P-48	YES	N/A	N/A	NYCDOT agrees with Figure 6P-48 as proposed in the NPA.
Figure 6P-49	NO	YES	N/A	NYCDOT generally agrees with Figure 6P-49 as proposed in the NPA but recommends to <ul style="list-style-type: none"> • Show lane being closed. • Include detectable edging as per section 6M.04. • Clarify if this Figure is intended for shared-Use roadways between vehicles and bicycles, and not intended for pedestrian movements. If the Figure Also applies to pedestrians, include detectable edging as per section 6M.04.
Figure 6P-50	NO	YES	N/A	NYCDOT generally agrees with Figure 6P-50 as proposed in the NPA but recommends to clarify if this Figure is intended for shared-Use roadways between vehicles and bicycles, and not intended for pedestrian movements. If the Figure Also applies to pedestrians, include pedestrian detours.
Chapter 7A	NO	YES	N/A	NYCDOT generally agrees with Chapter 7A as proposed in the NPA but recommends checking if Chapter title is correct.(p. 668).

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Part 7	NO	YES	N/A	NYCDOT recommends revising Part 7 to combine all other major pedestrian items into this Chapter and make this a pedestrian chapter. Consider seniors, and high senior areas. Design treatments for different ages/ abilities.(p. 668).
7A.01	NO	YES	N/A	NYCDOT generally agrees with 7A.01 as proposed in the NPA but recommends to add language to refer to the stop control section for stop control (Including all-Way) for school crossings. May need to revise 2B.17 to emphasize school crossings. See also 2B.17.(p. 668).
7A.03 (2009 version)	N/A	N/A	YES	NYCDOT disagrees with removing 7A.03 (2009 version) as proposed in the NPA. We recommend keeping this section and provide guidance on how a gap study can be implemented when artificial gaps are created by a crossing guard. It makes a signal study difficult since gaps cannot be determined (Page 669-670 of markup). removing crossing guard to conduct gap study is typically not an option. Guidance needed.(p. 668-669).
7B.02	YES	N/A	N/A	NYCDOT agrees with 7B.02 as proposed in the NPA.
7B.03	NO	YES	N/A	NYCDOT generally agrees with 7B.03 as proposed in the NPA but recommends to clarify if this is applicable to exit ramps.(p. 672-673).
7B.06	YES	N/A	N/A	NYCDOT agrees with 7B.06 as proposed in the NPA.
8A.13	YES	N/A	N/A	NYCDOT agrees with 8A.13 as proposed in the NPA.
8D.15	NO	YES	N/A	NYCDOT generally agrees with 8D.15 as proposed in the NPA but recommends to adjust language to be broader about the type of transit vehicle. Prefer "Public transit vehicle" signal (Per NACTO recommendation).(p. 725-726).
8D.16	NO	YES	N/A	NYCDOT generally agrees with 8D.16 as proposed in the NPA but recommends buses be explicitly stated here.(p. 726, Line 727).
8E.02	NO	YES	N/A	NYCDOT generally agrees with 8E.02 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Referencing access route design standards in the USDOT ADA 2006.(p. 729, Lines 47-49). • Replacing ADAAG with the reference to pedestrian access route design standards in the USDOT ADA 2006.(p. 730, Lines 5-7).
8E.04	NO	YES	N/A	NYCDOT generally agrees with 8E.04 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Replace text to: The length of the detectable warnings in the direction of pedestrian travel must be at least 2 feet, as per USDOT ADA 2006.(p. 732, Line 5). • Detectable warnings should be placed after 'Stop here' word message. Revise text to: Detectable warnings should be placed immediately downstream from the pathway or sidewalk 'Stop here' word message (If a 'Stop here' word message is present). • Revise Figures 8E-2 - 8E-6 to show that detectable warnings are placed after the 'Stop here' word message. Contrast of detectable warnings must comply with USDOT ADA 2006.(p. 732, Line 6).

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Figures 8E-5, 8E-6, & 8E-7	NO	YES	N/A	NYCDOT generally agrees with Figures 8E-5, 8E-6, & 8E-7 as proposed in the NPA but recommends to correct Figure numbers for Figures 8E-5, 8E-6, 8E-7 since they are inconsistent with the titles in text.
Figure 8E-8	NO	YES	N/A	NYCDOT generally agrees with Figure 8E-8 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Detectable warnings should extend the full width of the pathway, and show detectable warning at the upstream from the stop bar. • Show detectable warnings and stop bar at the existing sidewalk. • Add reference to the landing and turning space requirements to note 2: Maze fencing should be designed to fit pathway users. Maze fencing and landing and turning space should be designed to meet USDOT ADA 2006 requirements. .
Figure 8E-14	NO	YES	N/A	NYCDOT generally agrees with Figure 8E-14 as proposed in the NPA but recommends to provide a double bar gate. the lower bar should be 4In. Max from the ground and 6In. Min. Tall.
9A.01	NO	YES	N/A	NYCDOT recommends revisions to 9A.01 as proposed in the NPA: <ul style="list-style-type: none"> • 9A.01 seems to imply that bicyclists will not be accepted as legitimate road users by other road users unless they follow all TCDs in the manner as they are designed for motor vehicles. All road users do not follow TCDs exactly and for different reasons. We agree that appropriate design will improve compliance of TCDs by bicyclists, but that is only if they are designed with their needs are considerations. This needs to be made clear. While they may be legally defined as vehicles, bicyclists are vulnerable, human powered, less visible, and exposed to the elements and the roadway should be appropriately designed to accommodate safe, comfortable, and efficient travel by bicyclists. We recommend deleting the last support paragraph on designing bicycle facilities and deleting the standard on standard on the absence of a marked bicycle lane and replacing with a standard statement that Bicyclists are allowed on any roadway unless otherwise prohibited by traffic control device or law. . (p. 739, Lines 2-21). • Reference chapter containing Information On Green Colored Pavement For Bikeways.(p. 739, Lines 6-9). • Recommend remove line 9-15, especially line 12-15 - about designing poor bicycle facilities, not needed.(p. 739, Lines 15-21).
9A.02	N/A	N/A	YES	NYCDOT disagrees with 9A.02 as proposed in the NPA. We recommend deleting the support statement on nonstandard signing on bikeways. Is there supporting documentation that nonstandard bicycle branding on signs contributes to public non-Acceptance? Overly restrictive. Appears to restrict naming and promoting biking and biking facilities.(p. 740, Lines 12-14).
9A.03	NO	YES	N/A	NYCDOT generally agrees with 9A.03 as proposed in the NPA but recommends to consider bike lane lines except those adjacent to general purpose lane to be less than 6 inches. Consider keeping at 4 inches.(p. 741, Line 30).
Figure 9B-1	NO	YES	N/A	NYCDOT generally agrees with Figure 9B-1 as proposed in the NPA but recommends to add a new sign "All bikes (Symbol) <-" and "All bikes (Symbol) ->" similar to the new all traffic sign in Part 2. This sign works well to direct cyclists when they must make a turn.

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9B.02	N/A	N/A	YES	NYCDOT disagrees with 9B.02 as proposed in the NPA for requiring an engineering study for an 'Except bicycles' plaque. A standard policy would be appropriate in many circumstances?.(p. 743, Lines 36-37).
9B.03	YES	N/A	N/A	NYCDOT generally agrees with 9B.03 but thinks a warning sign like the W6-3 (Two Way Traffic Sign) With The Bike Symbol can be created.(p. 744).
Figure 9B-3	NO	YES	N/A	NYCDOT generally agrees with Figure 9B-3 as proposed in the NPA but recommends to revise the Figure. the bike lane does not need to be dashed in front of the back-In angle parking. the bike lane is not dashed along parallel parking. Is there evidence that this improves driver looking and yielding? revise to make solid lines, similar to design for parallel parking. Also to show the angle parking sign in the Figure.
9B.11	NO	YES	N/A	NYCDOT generally agrees with 9B.11 as proposed in the NPA but recommends to add language recommending not to use the R9-6 sign when a don't walk phase is displayed with a concurrent green circular signal and the intention is to stop cyclist while concurrent traffic has green. This could be confusing to cyclists. Recommended guidance statement: If used, the R9-5 sign should not be installed at signalized intersections where the intent is for the bicyclists to stop at the UPRaised HAND (DON'T WALK) with a concurrent steady CIRCULAR GREEN signal for traffic in the same direction.(p. 746-747).
9B.12	NO	YES	N/A	NYCDOT generally agrees with 9B.12 as proposed in the NPA but recommends to add guidance that R9-6 sign "Bikes use pedestrian signal" may be used where bikes and pedestrian have a leading pedestrian interval. See NYC research on benefits.(p. 747).
9B.12 (9B-4)	NO	YES	N/A	NYCDOT generally agrees with 9B.12 (9B-4) as proposed in the NPA but recommends: For A: loading zone 1. Provide a passenger loading zone with 5 ft. min. Wide access aisle as per USDOT ADA 2006 section 503. For B: midblock transit stop 1. A 8Ft min. Wide bus boarding island is not identified in this Figure As per USDOT ADA section 810.2 (Bus boarding and alighting areas). If the bus boarding island cannot be raised, it should be marked. For C: corner transit stop 1. remove ramp or extend the tip of the island and include cut-Throughs with a bull nose at the tip of the island. 2. R7-107A sign is not necessary for this Figure.
Figure 9B-4	NO	YES	N/A	NYCDOT generally agrees with Figure 9B-4 as proposed in the NPA but recommends to Chapter 3J or our attached proposed island section should mention bus stop islands as shown in fig 9B-4.
9B.15	YES	N/A	N/A	NYCDOT agrees with 9B.15 as proposed in the NPA.
9B.18	NO	YES	N/A	NYCDOT recommends revising 9B.18 as proposed in the NPA to • Revise R9-23 to 'Left turn use turn box' rather than 'Must use...' for use

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				<p>when bicyclists are not required to use the turn box but one is provided.(p. 749).</p> <ul style="list-style-type: none"> • Change to guidance. This is currently too restrictive to require all these signs for two-Stage turn box.(p. 749). • Correct error as this is not a standard.(p. 749, Lines 26-27).
Figure 9B-6	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 9B-6 as proposed in the NPA but recommends:</p> <ul style="list-style-type: none"> • Add option to swap left for right on R9–23A. Add option to right turn box • Clarify the advanced R9–23 omittance. Text doesn't indicate where to omit. Does R3-1,2,3 need "Except bikes" plaque if all turns prohibited except bikes? line 13 should be "All turns are prohibited at the intersection except where a turn facilitates a bicycle turn.
Figure 9B-7-2	NO	YES	N/A	<p>NYCDOT generally agrees with Figure 9B-7-2 as proposed in the NPA but recommends:</p> <ul style="list-style-type: none"> • Show two perpendicular ramps at corners instead of apex ramps. • At the corner where bike route is entering the sidewalk area, add bike stamps and yield to pedestrian sign. Also, show pedestrian access route. • Revised second Figure to include a sign for cyclists mounting a sidewalk needing to yield to peds unless no signage needed.
9B.21	NO	YES	N/A	<p>NYCDOT generally agrees with 9B.21 as proposed in the NPA but recommends to add a right turn version of the sign.(p. 750).</p>
9B.22	NO	YES	N/A	<p>NYCDOT generally agrees with 9B.22 as proposed in the NPA but recommends to drop to should statement. Appreciate the use of "If used" to imply these are not required but not sure if other sections should be implying these are required if they do not need to be used.(p. 750, Lines 1-5).</p>
9B.25	YES	N/A	N/A	<p>NYCDOT agrees with 9B.25 as proposed in the NPA.</p>
Figure 9C-1	YES	N/A	N/A	<p>NYCDOT agrees with Figure 9C-1 as proposed in the NPA.</p>
9C.06	NO	YES	N/A	<p>NYCDOT generally agrees with 9C.06 as proposed in the NPA but recommends:</p> <ul style="list-style-type: none"> • Changing to should. There should be greater flexibility to install a bike cross traffic plaque in advance of the intersection.(p. 753, Line 25). • Change guidance to allow sign along a two-Way bike facility. See Shore Front Parkway in Brooklyn when there are several intersecting roads/Driveways using this sign.(p. 753, Lines 36-38).
9C.07	YES	N/A	N/A	<p>NYCDOT agrees with 9C.07 as proposed in the NPA.</p>
9C.08	NO	YES	N/A	<p>NYCDOT generally agrees with 9C.08 as proposed in the NPA but recommends to add variation of the W6-3 sign with two way counterflow sign with the bike symbol.(p. 754).</p>
9D.02	NO	YES	N/A	<p>NYCDOT generally agrees with 9D.02 as proposed in the NPA but recommends to allow travel time on the sign.(p. 756, Lines 41-42).</p>
9D.03	N/A	N/A	YES	<p>NYCDOT disagrees with 9D.03 as proposed in the NPA on prohibiting bike symbol shall on a street name sign.(p. 757, Line 2).</p>
9D.11	NO	YES	N/A	<p>NYCDOT generally agrees with 9D.11 as proposed in the NPA but recommends to correct typo "Mod" instead of mode.(p. 764, Line 18).</p>
9D.12	YES	N/A	N/A	<p>NYCDOT agrees with 9D.12 as proposed in the NPA.</p>

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9D.13	NO	YES	N/A	NYCDOT generally agrees with 9D.13 as proposed in the NPA but recommends to drop to should. Figure 9D –7. .(p. 766).
Figure 9D-7	NO	YES	N/A	NYCDOT generally agrees with Figure 9D-7 as proposed in the NPA but recommends to drop to should. If turn box used – turn box guide sign shall be used. Figure 9D –7. .
Figure 9E-1	N/A	N/A	YES	NYCDOT disagrees with Figure 9E-1 as proposed in the NPA and recommends FHWA restore use of bicycle symbol with helmet cyclist as 2009 MUTCD.(p. 767).
9E.02	NO	YES	N/A	NYCDOT generally agrees with 9E.02 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • To not require a turn arrow in mixing zones. There is no evidence that this is safer it adds to the clutter and the amount of markings in a short mixing zone and it may not even really fit. The shared lane marking is more important for these short mixing zone designs. NYC has found that short mixing zones are safer than long mixing zones. Delete in text. Delete arrow from Figure B.(p. 768-770). • Evaluate shifting a separated bicycle lane closer to general purpose lane is safe given any examples or research.(p. 769, Lines 22-25). • Consider this a protected intersection.(p. 768-770). • Correct typo extra “Is” in sentence.(p. 769, Lines 22-25). • Drop from shall to should for greater flexibility. Page 769 line 1 .(p. 769, Lines 1-2). • Correct typo for a should statement.(p. 769, Lines 45-47).
Figure 9E-3	NO	YES	N/A	NYCDOT generally agrees with Figure 9E-3 as proposed in the NPA but recommends to add green bike lane up to stop bar.
9E.03	N/A	N/A	YES	NYCDOT disagrees with 9E.03 as proposed in the NPA and recommends deleting the restriction on chevron markings. Why can chevron markings not be used for lane extensions? the other options can add to the cost considerably (Bike symbols) or are not as legible. the double chevron marking is effective at demonstrating directionality and can improve driver looking behavior at intersections, particularly with 2-Way bike facilities. This topic needs further study – our internal observations have observed improved driver looking behavior at locations with the double chevron markings compared to those without.(p. 770, Lines 20-25).
9E.04	YES	N/A	N/A	NYCDOT agrees with 9E.04 as proposed in the NPA.
9E.05	N/A	N/A	YES	NYCDOT disagrees with 9E.05 as proposed in the NPA prohibiting bike lanes in circular intersections. Research has shown that while a standard bike lane is not appropriate for a circular intersection, the separated bicycle lane is. Separating cyclists on high volume, high-Speed and/or multilane roundabouts is safe and provides safe connectivity for a bike lane network while removing the conflicts of having bicycles merge with general traffic or bicycles merging with pedestrians onto the sidewalk or having to dismount. Language should allow for SBL that proceed around the circular intersection but any crossing of the approach and exit lanes shall be at least 20Ft from the edge of circular roadway, much like the crosswalk language at roundabouts. See also NCUTCD NPA proposal on 9E.05. One difference with this language is that the roundabout should allow the SBL. Proposed language is: a Support statement: Separated bicycle lanes allow bicyclists to navigate a circular intersection and its crossing points without a merge into traffic or pedestrian facilities or without dismounting and using a crosswalk at the intersection crossing point. This is beneficial at multi-lane and higher speed circular

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				intersections. An option statement that Separated bicycle lanes may be used in circular intersections. And a guidance statement that If used, bicycle crossings should be a minimum of 20 feet from the edge of the circulatory roadway.(p. 771).
9E.06	NO	YES	N/A	NYCDOT generally agrees with 9E.06 as proposed in the NPA but recommends to not require a break in the buffer lines for a buffered bike lane where there is parking? this is a more complicated design to implement and does not have a clear purpose. We have not seen any research to suggest or even heard of anecdotal evidence that drivers do not understand that they are able to cross the solid bike lane buffer lines if they intend to use an available on-Street parking space.(p. 771-772).
9E.06-9E.07	NO	YES	N/A	NYCDOT generally agrees with 9E.06-9E.07 as proposed in the NPA but recommends to add guidance for buffered bike lane or separated bike lane for speed greater than 35 mph and multilane. Similar to 9E.08.(p. 771-774).
9E.07	NO	YES	N/A	NYCDOT generally agrees with 9E.07 as proposed in the NPA but recommends to make directional arrows for two way separated bicycle lanes an option.(p. 773, Lines 23-24). Also to change standard to support regarding conflicting vehicle movements and turns and also adding guidance statement as-such: Support statement: Where two-way separated bicycle lanes are provided on one side of a roadway or in a center median, conflicting vehicle traffic at signalized intersections shall should be prohibited by signal indications to cross the two-way separated bicycle lane when bicycle traffic is allowed to proceed through the intersection. And a Guidance statement: Where left-turning traffic must yield to approaching traffic and cross the two-way separated bicycle lane, engineering judgement should be used to determine if the turn should be prohibited by signal indications to cross the two-way separated bicycle lane when bicycle traffic is allowed to proceed through the intersection.
Figure 9E-7	NO	YES	N/A	NYCDOT generally agrees with Figure 9E-7 as proposed in the NPA but recommends: <ul style="list-style-type: none"> • Evaluate the logic for the shift away from curb option as it seems cyclists are being put in harms way for to achieve better visibility for motorists. This logic would be in conflict with the dot's current offset crossing policy for low frequency turns. Line should be solid on the downstream, after intersection. • Add two way bike lane on 2 way street • Buffer space should be at least three times the width of normal or wide longitudinal line. Figure 9E-6. Change Figure B. Make the right-Most broken line from travel lane solid. Make the buffer-Side of bike lane line broken. .
9E.08	NO	YES	N/A	NYCDOT generally agrees with 9E.08 as proposed in the NPA but recommends to <ul style="list-style-type: none"> • Allow counter-Flow bike facilities where there is on-Street parking. There are many low-Speed corridors throughout the u.S. With this condition that could be used for a study but it's never come up as a safety hazard as far as we know.(p. 774, Lines 22-23). • Make one way sign an option.(p. 774, Line 29).

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Figure 9E-8	N/A	N/A	YES	NYCDOT disagrees with Figure 9E-8 as proposed in the NPA prohibiting a counterflow lane between traveling and parked cars.(p. 774, Lines 22-23).
9E.09	N/A	N/A	YES	NYCDOT disagrees with 9E.09 as proposed in the NPA changing the 35mph limit to 40mph.(p. 775, Lines 11-13).
9E.10	YES	N/A	N/A	NYCDOT agrees with 9E.10 as proposed in the NPA.
9E.11	NO	YES	N/A	NYCDOT generally agrees with 9E.11 as proposed in the NPA but recommends to add language to the text to state that the turn boxes should be in front of the bike facility that the turn box is directing the user towards and, if there is no bike facility on the receiving street, it should be in front of the right-Most cross-Street travel lane so that bicyclists can establish themselves in the lane without being passed by drivers queued up at the intersection.(p. 776-777).
9E.12	NO	YES	N/A	NYCDOT generally agrees with 9E.12 as proposed in the NPA but recommends to add language of these when bike lane changes sides. See 7th Avenue at 79th street in Brooklyn or for the beginning of counterflow lanes on opposite side of street.(p. 777-778).
9E.13	NO	YES	N/A	NYCDOT generally agrees with 9E.13 as proposed in the NPA but recommends to add full width detectable warnings.(p. 778, Line 40).
9E.14	YES	N/A	N/A	NYCDOT agrees with 9E.14 as proposed in the NPA.
9E.17	NO	YES	N/A	NYCDOT generally agrees with 9E.17 as proposed in the NPA but recommends to clarify this new-Raised devices section. It seems confusing to 9E.07 for SBL raised devices as it can be more than just tubular markings. In addition, mention other raised devices that can be used.(p. 779-780).
9G	NO	YES	N/A	NYCDOT generally agrees with 9G as proposed in the NPA but recommends to All of Chapter 9G including text and Figures for alternative intersections are missing. Cannot provide comment.(p. 781).
APPENDIX A1	YES	N/A	N/A	NYCDOT agrees with APPENDIX A1 as proposed in the NPA.

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
(EXAMPLE) FHWA-2020-0001-59	YES	N/A	