



# Department of Transportation

*Monroe County, New York*

Adam J. Bello  
*County Executive*

James R. Pond, P.E., PTOE  
*Director*

May 14, 2021

Ms. Stephanie Pollack  
Acting Administrator (HOA-1)  
Federal Highway Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

**RE: COMMENTS ON NOTICE OF PROPOSED AMENDMENT FOR PROPOSED  
11<sup>TH</sup> EDITION OF THE MANUAL ON UNIFORM TRAFFIC CONTROL  
DEVICES (MUTCD)**

Dear Acting Administrator Pollack:

I am writing to offer comments on the December 14, 2020 Notice of Proposed Amendment (NPA) to the MUTCD on behalf of the Monroe County Department of Transportation in Rochester, NY.

Our comments are divided into General and Specific comments, listed below:

**General Comments:**

1. It might be better to include the Definitions in the very beginning of Part 1, as many of the terms and abbreviations are used prior to Section 1C.02.
2. Should motor vehicles and bicycles be considered separate groups of target road users (Section 1A.03)? Bicycle provisions are often different than for motor vehicles.
3. Should emissions and/or environment be considered in the decision making process (Section 1C.02)?
4. It would be useful to include HAWK/PHB and RRFB in the defined acronyms (Section 1C.03) as they are discussed later in the manual.
5. Prevailing Speed should be specifically defined in the Definitions section. It is not clear exactly what prevailing speed is.
6. The minimum speed for not displaying circular yellow and circular green indications at tee intersections should be increased higher than 35mph. Wouldn't the use of green and yellow arrows conflict with concurrent pedestrian phases?
7. Would the MUTCD not apply to a railroad crossing of a privately owned subdivision street (Section 1B.01-C)? This should be clarified. Roadways within shopping centers and driving aisles in parking lots should also be clarified in this section.

### **Specific Comments:**

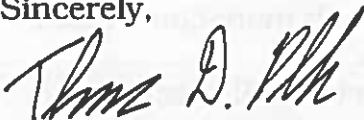
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1.	3	2	Define "duly authorized and qualified" as it relates to traffic control device activities. Also clarify what "traffic control device activities" includes. Does it include sign fabrication, installation, etc.?
2.	3	4	This statement is too broad. Need to specify what "appropriate levels of experience and expertise" are.
3.	6	13	This standard seems counter-intuitive to not refer to the latest guidance available.
4.	7	35	This needs clarification. Most railroads are privately owned, so if a railroad crosses a privately owned subdivision street, MUTCD rules do not apply?
5.	7	37	Clarification is needed between "roadways within shopping centers", as noted in line 20 above, and "driving aisles within parking areas" here.
6.	8	20	This is redundant; mentioned earlier in document.
7.	8	35	Will there be a compliance date for existing traffic control devices to be in compliance? See Table 18-1: not many requirements.
8.	8	40	This does not appear to address existing traffic control devices on a project that are not proposed to be replaced or relocated.
9.	10	38	Could not locate figure 18-1. Is it mislabeled as figure 1A-1?
10.	12	38	Could not locate figure 18-2. Is it mislabeled as figure 1A-2?
11.	16	6	Do not agree with definition of Alley as not providing for through traffic. All alleys in our area allow through traffic.
12.	16	18	Couldn't this also be for an EZ-Pass lane or other non-cash option lane?
13.	17	1	How is a "Busway" different from a bus lane?
14.	17	33	This should be expanded. "Available" is a pretty relative term. One could argue that a farmer's field is "available" to be used to regain control, but it is well out of the public right-of-way.
15.	18	23	This seems to indicate that colors other than white or textures are allowed in a marked crosswalk. Please clarify.
16.	18	33	Doesn't the design vehicle also need to consider vehicle weight, turning radius, etc., not just length?
17.	19	3	Could not locate figure 8B-8.
18.	22	43	Shouldn't it say: "see conflict monitor"?
19.	24	39	So a pedestrian can be on foot, in a wheelchair, on skates, or on a skateboard. What about scooters, and all of the other board type "vehicles" now available?
20.	25	7	Aren't the symbols allowed on street name signs called pictographs?
21.	26	2	Insert "only" between made and when.

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<b>22.</b>	29	33	The "parking areas, including driving aisles" is not clear.
<b>23.</b>	41	13	Replace "open" with "is opened".
<b>24.</b>	42	hdr	This Chapter header is missing on most chapters.
<b>25.</b>	45	21	It reads as though a bar code for inventory and retro-reflectivity management purposes is allowed on the front but not the back of a sign?
<b>26.</b>	57	3	The section reference is incorrect.
<b>27.</b>	65	9	This information seems to contradict the requirement that a roundabout should meet the warrants for a traffic signal?
<b>28.</b>	67	4	This statement allows for a very wide range of interpretation.
<b>29.</b>	68	26	If a stop sign is necessary even some of the time, wouldn't a stop sign be warranted?
<b>30.</b>	76	21	Clarify what a speed limit within a speed zone is.
<b>31.</b>	96	30	Why remove the left hand side reference, unless it's obvious where the 2 <sup>nd</sup> do not enter sign would go?
<b>32.</b>	105	10/14	Why are there references to parking signs being mounted at 90 degrees to the curb line when they are required to be mounted at 30 – 45 degrees to the curb line?
<b>33.</b>	133	19	Is this section TBD?
<b>34.</b>	136	24	This statement needs clarification. If used, the depth gauge sign would be on the right side of the bridge, which may not be the point where the water is deepest.
<b>35.</b>	148	48	Now you will need to refer to another reference as well as the MUTCD and any applicable State supplement to determine an advisory speed? This just makes it much more convoluted and difficult; potential for more errors.
<b>36.</b>	181	11	It is assumed that a double sided panel is still acceptable?
<b>37.</b>	181	28	This guidance seems to indicate that a standard street name sign and a memorialization street name sign cannot co-exist in the same location?
<b>38.</b>	337	29	This requirement has huge cost implications for local municipalities. Long line costs will increase significantly with a 50% increase in line width. Will there be some sort of an annual federal aid package to fund this increase?
<b>39.</b>	343	9	This does not make sense if the side streets are low volume residential streets when there may be multiple driveways on both sides that would be better served by a two way left turn lane.
<b>40.</b>	348	9	Again, this requirement to increase the edge line width by 50% has huge cost impacts to local municipalities. Will there be an annual federal aid package to pay for this requirement?
<b>41.</b>	368	4	Please elaborate. Does this mean that if ADA compliant ramps are installed away from an intersection, crosswalk markings must be installed, regardless of pedestrian volume, proximity to a pedestrian generator or destination?

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42.	369	4	This guidance seems to contradict the guidance in section 3C.01, but this makes more sense and is more logical.
43.	370	19	Should refer to "uncontrolled" crosswalks.
44.	372	30	This requirement seems to eliminate the high visibility crosswalks we use which are essentially a "ladder", identified by New York State DOT as a type "LS", and used at all uncontrolled crosswalks. We feel these should continue to be allowed.
45.	376	23	This guidance refers to left-hand turns at a roundabout, which are not allowed, by definition.
46.	388	13	Section refers to "guardrail". Isn't it now universally referred to as "guiderail"?
47.	389	25	This guidance seems to contradict that in lines 14 & 15 above.
48.	639	8	This is a huge addition. So a temporary ADA ramp and temporary markings must be installed regardless of the duration of the pedestrian detour or the pedestrian volume?
49.	675	5	Incomplete sentence.

We appreciate the opportunity to provide comments on this NPA. Should there be any questions regarding our comments, feel free to contact me at 585-753-7755.

Sincerely,



Thomas D. Polech, P.E., CPESC, CPSWQ  
Chief of Traffic Signal Engineering and Operations

TDP/tdp

Cc: J. Pond

B. Penwarden

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