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 indicted 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  *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.* |
| Part 3 | No | Yes | N/A | UDOT supports the proposed amendments to Part 3. Overall the proposed amendments provide a needed update to the MUTCD. Specific concerns are noted in the comments below. We have also highlighted changes that UDOT finds particularly helpful. |
| 3A.04 | No | Yes | N/A | The added definition for dotted lines is useful. However, UDOT uses dotted lines across the entries/exits to our access controlled HOT lanes. We believe this is the appropriate use of the dotted line (indicating a change in function in the lane line from access permitted to prohibited farther down), and would like to see this use identified in the definition. |
| 3A.04 | No | Yes | N/A | Page 337 line 29 (Redlined MUTCD) indicates that a normal width line shall be 6 inches for all roads with speed limits greater than 40 mph. UDOT agrees that wide lines have a positive safety benefit compared to the cost of the lines. However, as with many other agencies, UDOT is currently not funded to provide 6 inch stripe on roads over 40 mph. UDOT recommends that FHWA follow the NCUTCD recommendation for 6 inch stripe and require it for roads with both a speed limit of 55 mph or higher and over 6,000 AADT.  Note that UDOT estimates that the 6 inch striping requirement stated in the NPA will increase striping budget needs by roughly $8 million annually for state roads - a 1/3rd increase over our current proposed management plan. |
| 3A.04 | Yes | N/A | N/A | Page 337 Line 32 – Wide Line. This definition is a significant improvement over the existing MUTCD. Allowing for 10 inch rather than 12 inch Wide lines makes transitioning to 6 inch normal width line much easier. In particular, double wide line for HOV/HOT lanes, the slight reduction in width from 12 to 10 inches makes it much easier to fit the line to the available lane width. In addition, with grooved in striping, a 12” line requires two cutting passes, while 10 inch can be grooved in a single pass. |
| 3A.04 | No | Yes | N/A | Page 338 lines 1-5 (redlined version) The support statement “wide lines have been shown to be beneficial when applied in combination with horizontal alignment warning signs to enhance safety around curves and in locations with a history of run off the road crashes” This isn’t particularly helpful without more detail (what studies, specific circumstances, etc.) Note that since the wide lines are required already, the only reason this would be useful is to provide a reason to go against the requirements set forth in the NPA. |
| 3B.03 | No | No | Yes | Page 340 and 314 redline version: The sight distance descriptions are condensed versions of a couple of sight distance cases in the AASHTO Green Book, and the reference to the Green Book has been removed. The Green Book covers sight distance in much greater detail over a broader range of cases. We recommend that the MUTCD state the requirements striping based on sight distance, but leave the method for measuring in the Green Book and incorporate it by reference. |
| 3B.07 | NO | No | Yes | Page 345 marked up version. UDOT agrees with extending dotted white lines across freeway exit ramps (this is already our standard practice). However, in our experience, the dotted white lines on entrance ramps tend to discourage merging and result in vehicles stopping at the merge taper of the ramp. We recommend keeping the dotted line across the entrance ramp as an option rather than standard. This is also up to 1,000 extra feet of dotted line per entrance ramp.  In addition, we will note that when this became a standard rather than an option, much of the text became redundant information. This could be tightened up. |
| 3B.09 | No | No | Yes | 6” wide line was discussed in 3A.04 – why is there separate guidance here, and specifically for two-lane roads? We recommend the guidance of 55 mph and 6,000 AADT for 6” stripe as per the NCUTCD recommendations. |
| 3B.25 | No | No | Yes | Page 363: Chevron and Diagonal Markings in medians and gore areas are now recommended (guidance) in many areas where they were formerly optional. UDOT would prefer for these to remain optional. The addition of chevron and diagonal markings in the areas proposed would involve considerable expense to maintain, and most of these markings will require hand placement - which exposes workers to traffic. While we have seen strong anecdotal and analytical evidence in support of Chevron and Diagonal markings, we have not yet seen a study that demonstrates a quantified safety benefit for these markings. Therefore, we recommend that these markings remain optional until data exists to demonstrate that the benefits of Chevron and Diagonal markings exceed the costs. |
| 3B.31 | No | Yes | N/A | Figures 3B.28 and 3B.29 are referenced in the text, but not included in the figures file. |
| 3C.01 | No | Yes | N/A | Page 368 Line 4 (redlined): “Crosswalk markings shall be provided at non-intersection crosswalk locations”. This is undefined about who identifies the non-intersection crosswalk locations – is it the public agency having jurisdiction or any pedestrian who chooses to cross? That is, will the agency be required to mark crosswalks wherever crossings occur? UDOT recommends “Crosswalk markings shall be provided at non-intersection crosswalk locations identified by the public agency having jurisdiction”. |
| 3C.02 | No | Yes | N/A | Page 369 Line 34-35 (redlined version). UDOT agrees with the concepts presented, but multiple threat crashes could be defined. This is not terminology in common use in our experience. |
| 3D.06 | No | No | Yes | Page 376 Lines 23-26 “On two-lane approaches to circular intersections, where the left-hand lane on the approach is for left turns, and the right-hand lane contains an optional movement for through- and right-turns, lane use arrow pavement markings should not be used in the right-hand lane containing the optional  movement.” Why wouldn’t we have the option to communicate useful lane use information to drivers? The roundabout experts we talked to couldn’t think of any reason for this recommendation. |
| 3E.02 | No | Yes | N/A | Page 378 Line 26: insert “shall” between “direction” and “be” |
| Figures Comment | No | Yes | N/A | The figures sometimes give whether the markings shown are required, recommended or optional, but not always. For instance, the yield line in Figure 3E-5 and the purple pavement in Figure 3H-6 are both optional, but not marked as such. Other times optional features are labeled as optional. Is there any particular reason for not being consistent from figure to figure? |
| 3J.02 | No | Yes | N/A | Page 397 Lines 24-26 “The ends of islands first approached by traffic should be provided an approach-end treatment, or curb markings (see Section 3J.04), or both to guide vehicles into desired paths of travel along the island edge”. This wording is awkward. Is there a more direct way to say this in a more active voice? “An approach end treatment, curb markings (see Section 3J.04), or both should be provided to guide vehicles into the desired travel paths along the island edges.” |
| 3K.01 | No | Yes | N/A | Page 401 Line 14-16: this sentence confuses the terminology related to rumble strip vs. rumble stripe. Is a longitudinal rumble strip marking the same as a rumble stripe? |

**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 |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |