

#	CA MUTCD 2026 Part 7 Public Comment Submitted	SME WG Review - Discussions & Recommendation	CA MUTCD Part/Topic Owner and/or SME WG Lead Comments & Response	Resolution of Public Comment (CTCDC Agenda Item Proposal)
1	<p>Section 7A.02, p.1: The current Guidance states that bicycles should only be considered in school route plans "if students biking to and from school are not allowed to use the sidewalks along the pedestrian route." But bicyclists have different needs from pedestrians, and even where they are legally allowed to use the sidewalk, that is generally not the safest or more comfortable course for either bicyclists or pedestrians. Bicycling is a common mode of transportation for school children. The Guidance should be amended to recommend including bicycle planning in all school route plans.</p>	<p>10/1/24: Disagree. As per Section 7A.01 Paragraph #01 Support statement, "Part 7 sets forth basic principles and prescribes standards ... for the special pedestrian conditions in school areas." Part 7 is specific to special pedestrian conditions, and as a default, it does not include considerations for bicycle use in school route plans. Part 7 is focused on pedestrians (adults, students and children), it does not include traffic control devices related to bicycle operation, except for the narrow condition cited in comment. Section 7A.02, Paragraph #03 Guidance statement "recommends" the inclusion of considerations for bicycle use only for the specific condition when bicyclists are not allowed to use the sidewalks along the pedestrian route. Part 9 covers signs and pavement markings specifically related to bicycle operation on roadways, separated bikeways, and shared-use paths per Section 9A.01 Paragraph #01 Support statement.</p> <p>Inclusion of "Guidance" statement, recommending the inclusion of considerations for bicycle use in school route plans, resulting in default practice to expand school route plans to include bicycle use, may not be applicable for all schools and school route plans. The need for bicycle planning can vary depending on the location specific conditions for schools, and may not be needed for all schools. For example, in certain urban areas, students are not allowed to use bicycles due to safety and operational concerns. Engineers, exercising engineering judgment when evaluating the needs of pedestrians in school areas can determine the need to include considerations for bicycle use for any specific school based on local conditions, if needed, and use Part 9 traffic control devices.</p> <p>SME WG members recommendation and preference was to adopt the National MUTCD text and not add additional recommendations or requirements, as it keeps the focus of Part 7 on the needs of pedestrians and pedestrian considerations.</p> <p>No action needed.</p>	<p>10/1/24: Florenca Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/1/24: No action needed.</p>
2	<p>Section 7A.02, p.1: Both Guidance and Support statements emphasize "taking advantage of existing traffic controls" as the guiding principle of school route planning, and state that students may be required to go out of their way to use existing controls. In contrast, nowhere is there a Standard, Guidance or Support statement explaining that safety should be the central principle of school route planning.</p> <p>NACTO recommends a maximum crosswalk spacing of 200 ft in most contexts; if adults cannot be expected to walk more than 100 ft out of their way to a crosswalk, it makes no sense to expect that children - who are physically smaller and have less impulse control - will walk significantly out of their way to a supposedly safe crossing.</p> <p>Guidance and Support statements should be amended to state clearly that safety, not the use of existing traffic controls, should be the central organizing principle of school route planning, and that school route planners should expect children to take the most direct route available under most circumstances, and plan accordingly.</p>	<p>10/1/24: Disagree. The purpose of the entire CA MUTCD is to promote highway safety, as per Section 1A.01 Paragraph #01 Support statement, "The purpose of traffic control devices, as well as the principles for their use, is to promote highway safety..." , which applies to the entire manual. CA MUTCD is limited in its application to only traffic control devices, as per Section 1A.02 Paragraph #01. As per Section 7A.02, "Part 7 sets forth basic principles and prescribes standards for the design, application, installation, and maintenance of all traffic control devices (including signs, signals, and markings) and other controls (including adult crossing guards) for the special pedestrian conditions in school areas." School route plans include road user safety considerations which include all aspects of safety and aren't limited to only traffic control devices. Part 7 is specific to traffic control devices (signs, signals, and markings) and adult crossing guards. Revising the Guidance and Support statements to state "...safety, not the use of existing traffic control devices, should be the central principle of school route planning ..." would not be appropriate, nor needed, for inclusion in Part 7 or specifically in Section 7A.02, as for traffic control devices it is covered by Section 1A.02 and non-traffic control device aspects of safety, it lacks authority for inclusion.</p> <p>SME WG members recommendation and preference was to adopt the National MUTCD text and not revise it, as safety is included in school route plans and the recommended change does not provide anything specific that needs to be changed in school route plans for Part 7 needs.</p> <p>No action needed.</p>	<p>10/1/24: Florenca Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/1/24: No action needed.</p>
3	<p><i>(I am combining the comments from my colleague Mr. Walter Okitsu at WOkitsu@hwlochner.com).</i> 7A.02/Page 11 "Engineering and traffic studies will determine the appropriate measures to be developed at school crossings." This statement or similar wording has appeared in the California MUTCD since at least 2006. It implies that a study of some type, presumably a document that is kept on file, must be conducted for school crossings. Rarely is a study necessary. Furthermore, the term "engineering and traffic studies" is not defined anywhere in either the California or the Federal MUTCD, although confusingly it sounds similar to the Engineering & Traffic Surveys that are defined in California statute. This statement should be amended or deleted.</p>	<p>10/1/24: Agree. All agencies may or may not conduct engineering and traffic studies. Also agree that the text "Engineering and traffic studies" could be confused with "Engineering and traffic surveys".</p> <p>SME WG members recommendation and preference was to revise text to alleviate confusion.</p> <p>Action: Revise Section 7A.02 Paragraph #11 text "Engineering and traffic studies will determine ..." to "Engineering studies determine the appropriate measures developed at school crossings".</p>	<p>10/1/24: Florenca Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>Action: Revise Section 7A.02 Paragraph #11 text "Engineering and traffic studies will determine ..." to "Engineering studies determine the appropriate measures developed at school crossings".</p>	<p>10/1/24: Action: Revise Section 7A.02 Paragraph #11 text "Engineering and traffic studies will determine ..." to "Engineering studies determine the appropriate measures developed at school crossings".</p>
4	<p>Section 7A.02 Page # 2 Comment: In sentence #3 it qualifies the circumstances under which bicycle travel should be considered but it does not need any qualifiers- bicycle travel simply should be considered and shouldn't be encouraged on sidewalk as current language does. Additionally "pedestrian routes" may be different from bicycle routes and the two should not be condensed unless it makes sense for each mode to use the same routes.</p>	<p>10/1/24: Disagree. As per Section 7A.01 Paragraph #01 Support statement, "Part 7 sets forth basic principles and prescribes standards ... for the special pedestrian conditions in school areas." Part 7 is specific to special pedestrian conditions, and as a default, it does not include considerations for bicycle travel in school route plans. Part 7 is focused on pedestrians (adults, students and children), it does not include traffic control devices related to bicycle operation, except for the narrow condition cited in Section 7A.02, Paragraph #03 Guidance statement, which "recommends" the inclusion of considerations for bicycle use only for the specific condition when bicyclists are not allowed to use the sidewalks along the pedestrian route. Part 9 covers signs and pavement markings specifically related to bicycle operation on roadways, separated bikeways, and shared-use paths per Section 9A.01 Paragraph #01 Support statement.</p> <p>Inclusion of "Guidance" statement, recommending the inclusion of considerations for bicycle use in school route plans, resulting in default practice to expand school route plans to include bicycle use, may not be applicable for all schools and school route plans. The need for bicycle planning can vary depending on the location specific conditions for schools, and may not be needed for all schools. For example, in certain urban areas, students are not allowed to use bicycles due to safety and operational concerns. Engineers, exercising engineering judgment when evaluating the needs of pedestrians in school areas can determine the need to include considerations for bicycle use for any specific school based on local conditions, if needed, and use Part 9 traffic control devices.</p> <p>SME WG members recommendation and preference was to adopt the National MUTCD text and not add additional recommendations or requirements, as it keeps the focus of Part 7 on the needs of pedestrians and pedestrian considerations.</p> <p>No action needed.</p>	<p>10/1/24: Florenca Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/1/24: No action needed.</p>

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<p>5 Section 7A.02 Page # 2 Comment: In sentence 8 it states that "School walk routes should be planned to take advantage of existing traffic controls." and while this may be fine in theory walk routes should reflect the desire lines of pedestrians and be done to minimize walk length and exposure to vehicle traffic both in roadway and potential conflicts that may arise from needing to cross multiple driveways.</p>	<p>10/1/24: Disagree. The purpose of the entire CA MUTCD is to promote highway safety, as per Section 1A.01 Paragraph #01 Support statement, "<i>The purpose of traffic control devices, as well as the principles for their use, is to promote highway safety...</i>" , which applies to the entire manual. CA MUTCD is limited in its application to only traffic control devices, as per Section 1A.02 Paragraph #01. As per Section 7A.02, "<i>Part 7 sets forth basic principles and prescribes standards for the design, application, installation, and maintenance of all traffic control devices (including signs, signals, and markings) and other controls (including adult crossing guards) for the special pedestrian conditions in school areas.</i>" Revising section text to address comments on "<i>desire lines</i>" and "<i>minimize walk lengths</i>" may not be appropriate due to the potential of conflict with the overall safety of pedestrians in school route planning.</p> <p>SME WG members recommendation and preference was to not revise section text.</p> <p>No action needed.</p>	<p>10/1/24: Florencia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/1/24: No action needed.</p>
<p>6 Section: 7A.02 Page Number: 2 Comment: Sentence 8 offers an important point that should definitely be included in route planning. However, planning routes solely based on the criterion of existing traffic control could lead inexperienced people on bikes into sub-optimal traffic conditions unnecessarily and extend a route to a degree that could persuade less experienced and less committed people on bikes to NOT make the trip on bicycle in the first place. When planning a route to school, priority should be given to those routes that are more direct and comfortable, and, yes, location of existing traffic control should also be a factor but probably a subordinate one.</p>	<p>10/1/24: Disagree. The purpose of the entire CA MUTCD is to promote highway safety, as per Section 1A.01 Paragraph #01 Support statement, "<i>The purpose of traffic control devices, as well as the principles for their use, is to promote highway safety...</i>" , which applies to the entire manual. CA MUTCD is limited in its application to only traffic control devices, as per Section 1A.02 Paragraph #01. As per Section 7A.02, "<i>Part 7 sets forth basic principles and prescribes standards for the design, application, installation, and maintenance of all traffic control devices (including signs, signals, and markings) and other controls (including adult crossing guards) for the special pedestrian conditions in school areas.</i>" Revising section text to address comment that "<i>...priority should be given to those routes that are more direct and comfortable...</i>" may not be appropriate due to the potential of conflict with the overall safety of pedestrians in school route planning.</p> <p>SME WG members recommendation and preference was to not revise section text.</p> <p>No action needed.</p>	<p>10/1/24: Florencia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/1/24: No action needed.</p>
<p>7 In Figure 7B-2 and in following figures for school sign placement, the signs are placed upside down making them hard to read. We get that's because they are facing SB traffic. The sign in the figure next to the road is clear enough to convey that.</p>	<p>10/1/24: Disagree. CA MUTCD is using the National MUTCD figures, which show the signs oriented from the approach direction perspective (up, down, right and left), in the interest of national uniformity and substantial conformance with the NMUTCD 2023.</p> <p>SME WG members recommendation and preference was to not revise figures for sign orientation per comment.</p> <p>No action needed.</p>	<p>10/1/24: Florencia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/1/24: No action needed.</p>
<p>8 <i>(I am combining the comments from my colleague Mr. Walter Okitsu at WOkitsu@hwlochner.com)</i> 7B.02, page 02A Adding the CA-specific designations A through E to School Assemblies, although intended to better differentiate among sign assemblies with similar sounding titles, is an unnecessary complication. They incorrectly imply the assemblies in California are different from the Federal assemblies. The CA MUTCD 2026 is an opportunity to eliminate the A through E designations.</p>	<p>10/1/24: Disagree. CA School Assemblies (A thru E) were developed to consolidate the use of signs and plaques for specific configurations and ensure the same widths while reducing the space between individual signs and plaques, facilitate ease in ordering the signs, simplifying sign contract items and to improve the ease in referencing them in policy text sections of CA MUTCD and sort out the application and requirements of various CVC sections. Eliminating these school assemblies would result in losing some of these advantages, cause confusion in the application of school area signage and potential incorrect application per CVC requirements.</p> <p>Pending "substantial conformance" check: SME WG review and discussion did bring up the issue that the use of CA School Assemblies in some cases precluded the use of other plaques shown in Figures and allowed for use in school areas. This issue will be pursued with FHWA CA Division for determination of "substantial conformance" finding and based on outcome, it may result in a change on this recommendation.</p> <p>SME WG members recommendation and preference was to not eliminate the CA School Assemblies.</p> <p>No action needed. Pending "substantial conformance" check.</p>	<p>10/1/24: Florencia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed. Pending "substantial conformance" check.</p>	<p>10/1/24: No action needed. Pending "substantial conformance" check.</p>
<p>9 <i>(I am combining the comments from my colleague Mr. Walter Okitsu at WOkitsu@hwlochner.com)</i> Figure 7B-1 Sign combinations SW24-1(CA), SW24-2(CA), SW24-3(CA), and SR4-1(CA) should be footnoted to indicate that they can be used throughout Part 7 to replace the assemblies of individual component signs providing the same message. Similar footnotes can be used in the other (CA) figures in Part 7, simplifying the figures. Sometimes an agency would like to use separate components if those are available and a combination sign is not. Furthermore, Table 7B-1(CA) only lists the sign combinations for School Assemblies A through D, implying that the individual component signs cannot be used. A footnote about the availability of the sign combinations should be added to Table 7B-1(CA).</p>	<p>10/2/24: Disagree on footnote for CA school assemblies. Proposed revisions shown for CA MUTCD 2026 Figure 7B-1 clearly indicate each assembly with an "OR" next to the same individual signs that form the CA assembly, which allows them to be used throughout Part 7 and in all figures either as individual sign/plaque components or as CA assembly, when the sign configurations are exactly the same. When choosing other sign/plaque components that do not match the CA sign assemblies, then they can be chosen as individual components to form the appropriate school assemblies, which will differ from CA assemblies, although are allowed, if needed.</p> <p>Disagree on footnote for Table 7B-1(CA). The individual sign combinations are available and included in Table 7B-1, which includes National MUTCD signs and sign codes adopted for use in CA. These individual signs (nor footnote) are not needed in Table 7B-1(CA), as it is specific to CA created sign sign assemblies.</p> <p>Pending "substantial conformance" check: SME WG review and discussion did bring up the issue that the use of CA School Assemblies in some cases precluded the use of other plaques shown in Figures and allowed for use in school areas. This issue will be pursued with FHWA CA Division for determination of "substantial conformance" finding and based on outcome, it may result in a change affecting this recommendation.</p> <p>SME WG members recommendation agreed, that footnotes were not needed for Figure 7B-1 or Table 7B-1(CA).</p> <p>No action needed. Pending "substantial conformance" check.</p>	<p>10/2/24: Florencia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed. Pending "substantial conformance" check.</p>	<p>10/2/24: No action needed. Pending "substantial conformance" check.</p>

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10	Section 7C.01, pp.1-2: There is currently Guidance that "diagonal or longitudinal markings [i.e., high-visibility design] should be used...at an uncontrolled crossing location," and an Option that such high-visibility markings "may be used" at any location. Given the research showing the increased rate of driver yielding behavior at high-visibility crosswalks, and in order to ensure pedestrian safety, the Guidance should become a Standard and the Option should become Guidance. In other words, high-visibility crosswalks should be required at uncontrolled crossings and strongly recommended at all crossing locations.	<p>10/2/24: Disagree. As per Section 7C.01 Paragraphs #10 & #11 Guidance and Option statements, they recommend the use of diagonal or longitudinal markings for marked crosswalks at uncontrolled crossing locations and optional at other locations. Currently, engineers have the flexibility in exercising engineering judgment based on their experience and knowledge to determine the appropriate type of markings needed at crosswalks. Changing this Guidance to Standard and Option to Guidance, respectively, would result in default practice for all crosswalk markings and a required practice at uncontrolled crosswalks, removing the flexibility available to engineers to select the appropriate markings. Further, requiring/recommending diagonal/longitudinal markings at all crosswalk locations not only will it diminish their significance, it may not be needed at all locations, especially when the pedestrian and traffic volumes are light and sight distance and illumination are adequate, forcing agencies to unnecessarily use these diagonal/longitudinal markings. Reference to research is vague, and if there was a specific need driven by research then FHWA would have addressed this change in NMUTCD 2023 for national uniformity in its application.</p> <p>SME WG members recommendation was to not revise these Guidance and Option statements, current policy allows the use of diagonal and longitudinal markings without requiring them to allow exercising of engineering judgment.</p> <p>No action needed.</p>	<p>10/2/24: Florescia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>No action needed.</p>	<p>10/2/24: No action needed.</p>
11	CA MUTCD 2026 Initial Draft, Part 7, Chapter 7D, Section 7D.01, paragraph #08, bullet #2 & bullet #4, this text should not be "bulletinized" as they are not conditions, only #1, #3, #5 & #6 are conditions. Compare with CA MUTCD 2014 Revision 8 text, it appears that this may have been done inadvertently and is an error. Correction is needed. <i>(Came across this actual error, while reviewing and trying to test the submitting of comments. - Johnny)</i>	<p>10/2/24: Agree. Upon comparison with current CA MUTCD 2014R8 Section 7D.01, agree that this is an error. In Paragraph #08, bullets #2 and #4, the numbering of these sentences will be deleted and the list numbering restored to match current CA MUTCD 2014R8.</p> <p>SME WG members recommendation was to revise text to address the error.</p> <p>ACTION: Remove numbering of bullets #2 & #4 in CA MUTCD 2026 Section 7D.01 Paragraph #08 and renumber the list to match current CA MUTCD 2014R8.</p>	<p>10/2/24: Florescia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>ACTION: Remove numbering of bullets #2 & #4 in CA MUTCD 2026 Section 7D.01 Paragraph #08 and renumber the list to match current CA MUTCD 2014R8.</p>	<p>10/2/24: ACTION: Remove numbering of bullets #2 & #4 in CA MUTCD 2026 Section 7D.01 Paragraph #08 and renumber the list to match current CA MUTCD 2014R8.</p>
12	Section 7D.01, p.1: The "Criteria for Adult Crossing Guards" Support statement and Option list minimum numbers of school pedestrians at a given location as a sort of informal crossing guard "warrant." These numbers appear to be arbitrary, and would require that a significant number of school pedestrians brave a potentially dangerous crossing first, before a crossing guard is considered. The vehicle volumes recommended also appear to be arbitrary and make no mention of local conditions which may affect pedestrian safety. Although these are not Standards or Guidance, they are written in a similar manner, and will no doubt be interpreted in that way by many practitioners. The Support and Option should be amended to remove reference to specific numbers of pedestrians or vehicles and allow local judgement and consideration of local conditions, goals and experiences.	<p>10/2/24: Agree. Upon review and research of this criteria for adult crossing guards, it was found to have been included in the 1971 version of the Traffic Manual (dated 7/19/1971) as Chapter 10 titled "School Crossing Protection", Section 10-08.2 titled "Warrants for Assignment of Adult Crossing Guards". Hence, as per the comment, it is based on the warrant text in Traffic Manual. All values included in this criteria are unchanged and have been carried over into future versions of the Traffic Manual and CA MUTCD through the current CA MUTCD 2014R8. The source for these values, other than this specific Traffic Manual reference, aren't available and couldn't be found.</p> <p>Upon further review of ITE's "Traffic Control Devices Handbook", which augments the National MUTCD, Chapter 12 titled "Traffic Control for School Areas" and specifically Sections 12.2.3 "Vehicular Speed and Volume Data", 12.2.4 "Pedestrian Volume and Gap Data" and 12.4.2 "Supervised Crossing" among other sections, there was no similar criteria, data or values that would support the use of this criteria.</p> <p>SME WG members recommendation was to agree with comment and delete specific criteria and values in Section 7D.01 Paragraphs #07 and #08.</p> <p>ACTION: In Section 7D.01, Paragraph #07, delete text "...and at least 40 school pedestrians for each of any two hours (not necessarily consecutive) daily use the crossing..."</p> <p>ACTION: In Section 7D.01, Paragraph #08, revise the bulleted list as follows: 1. At uncontrolled crossings. 2. At stop sign-controlled crossings. 3. At traffic signal-controlled crossings. 4. At pedestrian hybrid beacon controlled crossings</p>	<p>10/2/24: Florescia Allenger, CA MUTCD Part 7 Owner - Agreed with SME WG review and recommendations.</p> <p>ACTION: In Section 7D.01, Paragraph #07, delete text "...and at least 40 school pedestrians for each of any two hours (not necessarily consecutive) daily use the crossing..."</p> <p>ACTION: In Section 7D.01, Paragraph #08, revise the bulleted list as follows: 1. At uncontrolled crossings. 2. At stop sign-controlled crossings. 3. At traffic signal-controlled crossings. 4. At pedestrian hybrid beacon controlled crossings</p>	<p>10/2/24: ACTION: In Section 7D.01, Paragraph #07, delete text "...and at least 40 school pedestrians for each of any two hours (not necessarily consecutive) daily use the crossing..."</p> <p>ACTION: In Section 7D.01, Paragraph #08, revise the bulleted list as follows: 1. At uncontrolled crossings. 2. At stop sign-controlled crossings. 3. At traffic signal-controlled crossings. 4. At pedestrian hybrid beacon controlled crossings</p>