




U.S. Department
of Transportation

**Federal Highway
Administration**

Memorandum

ACTION: Official Interpretation of MUTCD

Date: April 27, 2005


Regina S. McElroy
Director, Office of Transportation
Operations

Reply to: HOTO-
Attn. of:

To:

Mr. John Rohlf
Division Administrator (HDA-SD)
Pierre, South Dakota

This is in reply to an April 18 email message from Ms. Sharon Johnson of your staff to Mr. Scott Wainwright of our staff, requesting an official interpretation of the Manual on Uniform Traffic Control Devices (MUTCD). Ms. Johnson requested an interpretation regarding the requirements to either remove or cover the traffic signal heads during non-operational periods at certain locations where the traffic control signals are only operated for 1 to 2 weeks each year during the Sturgis Annual Motorcycle Rally.

Specifically, Ms. Johnson asked whether such signals are considered temporary signals and thus subject to the requirements for removal of signal heads covered in Sections 4D.20 and 4B.02, or whether the 50 to 51 weeks of the year during which the signals are not operated are considered a "seasonal shutdown" and thus subject to text in Section 4D.01 allowing the signal heads to be covered rather than removed.

Section 4D.01 states, "When a traffic control signal is not in operation, such as before it is placed in service, during seasonal shutdowns, or when it is not desirable to operate the traffic control signal, the signal faces shall be covered, turned, or taken down to clearly indicate that the traffic control signal is not in operation."

This phrase "during seasonal shutdowns" in Section 4D.01 is intended to address a condition where a permanent traffic signal, warranted by "normal" traffic conditions present on an average day (as stated in Section 4C.01 regarding signal warrants) is turned off or otherwise made non-operational during a particular season when its operation is not justified. Most often, seasonal shutdown is used in some communities where tourist activities are a major factor in the local economy for most but not all of the year. In such communities, during most of the year vehicular and pedestrian volumes are sufficient to warrant the permanent signalization but there may be an annual period of a few weeks or months when tourist activity is much lower, to the point that signalized operation is not necessary and seasonal shutdown would reduce delays for



local residents. Seasonal shutdown might also be applied in cases where a permanent signal justified by traffic associated with a major traffic generator such as a large factory is shutdown for a period of a few weeks in the summer when the factory closes to allow all employees to take vacation at the same time.

A temporary traffic control signal is defined in Section 4D.20, which states, "A temporary traffic control signal shall be defined as a traffic control signal that is installed for a limited time period." The support information in Section 4D.20 indicates that temporary traffic control signals are for specific purposes and cites some examples, such as in temporary traffic control zones. However, there is no intention that the use of temporary traffic control signals be limited only to temporary traffic control zones (work zones, incidents, etc.). The decision by a jurisdiction on where and for what period of time to install a temporary traffic control signal is governed by the guidance in Section 4D.20 that states, "A temporary traffic control signal should be used only if engineering judgment indicates that installing the signal will improve the overall safety and/or operation of the location."

In consideration of these provisions of the MUTCD, it is our interpretation that traffic control signals installed for the purpose of providing safe and reasonable traffic control during only a short time period and not justified for operation during the remainder of the year, such as those operated just for the Sturgis Annual Motorcycle Rally, are properly considered temporary traffic control signals and subject to the provisions of Section 4D.20. That section recommends that temporary traffic control signals should not be operated for more than 30 days at a time, and mandates that if the time period between operations is more than 5 working days, the temporary traffic control signal shall be removed. In Section 4B.02, which covers signal removal, an option is provided to leave the poles and cables in place after removing the signal heads.

If you have any questions, please call Mr. Wainwright at 202-366-0857 or email him at scott.wainwright@fhwa.dot.gov. Please note that we have assigned your request the following official interpretation number and title: "4-288(I)—Temporary Signal versus Seasonal Shutdown." Please refer to this number in any future correspondence on this matter.

cc: Mr. Roger Wentz, ATSSA

Wainwright, Scott

From: Johnson, Sharon
Sent: Monday, April 18, 2005 10:00 AM
To: Wainwright, Scott
Subject: RE: Temporary Traffic Signals

I totally agree with what you have said. My draft letter to Mr. Staton basically says the same thing. Unfortunately, I will need an official interpretation because he will not be satisfied without it. Anything you can forward would be appreciated.

Thanks

Sharon

-----Original Message-----

From: Wainwright, Scott
Sent: Monday, April 18, 2005 8:54 AM
To: Johnson, Sharon
Cc: Kalla, Hari
Subject: RE: Temporary Traffic Signals

Hi, Sharon:

Mr. Staton does correctly identify that there are different requirements for temporary signals versus seasonal shutdowns. But there really is no category of signal called a "seasonal signal". The seasonal shutdown referred to in 4D.01 is, I believe, more of a case of a permanent signal warranted by "normal" traffic conditions for the majority of the year that is "shut down" during one particular season because the traffic volumes drop way below warrant values during that season. One example might be a South Carolina or Georgia beach resort city, where there is a 2-3 month period each year when volumes really drop off due to the weather being too chilly to draw many tourists, but during the other 9-10 months it's a very busy place. In such conditions, the jurisdiction might find it safe and reasonable to "shut down" certain signals for the 2-3 month period each year, to reduce delays for their local residents.

I don't see the Sturgis situation as a "seasonal shutdown" condition. It's a situation that exists only for a very short time and is not the "normal" condition that would warrant a permanent signal. I do think the signals installed for the Sturgis condition are "temporary signals" in the intent of the MUTCD.

Keep in mind this isn't a formal Official Interpretation per Section 1A.10. If you think that is needed, let me know and I can prepare one.

Scott

-----Original Message-----

From: Johnson, Sharon
Sent: Friday, April 15, 2005 12:36 PM
To: Wainwright, Scott
Subject: FW: Temporary Traffic Signals

Scott,

Here's the response I got from the regional traffic engineer. Can you give me any more input that I could use to answer Mr. Staton's email. I do want to make you aware of the fact that his views are not shared by all in the

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SDDOT.

Thanks.

Sharon

-----Original Message-----

From: Daniel.Staton@state.sd.us [mailto:Daniel.Staton@state.sd.us]

Sent: Thursday, April 14, 2005 5:42 PM

To: Johnson, Sharon

Cc: Dean.VanDeWiele@state.sd.us; Dan.Martell@state.sd.us; Daniel.Staton@state.sd.us; Todd.Seaman@state.sd.us; Hoelscher, Marc; Joel.Gengler@state.sd.us; Joel.Jundt@state.sd.us

Subject: RE: Temporary Traffic Signals

Thank you for the additional comments/excerpts on this topic. We got started with this topic long ago thru an effort to get SD DOT personnel out of the roadway. We have utilized department staff for Flagging operations each year at Annual Sturgis Motorcycle Rally. Their exposure to very heavy traffic is of critical concern. We are in search of any alternate form of traffic control that would result in staff not having to be placed within the roadway. It is unnecessary hazardous duty for those involved. The point/question resulting from this, was my question to you regarding the lack of any significant recognition within the MUTCD of Seasonal Traffic Signals and their operational parameters. There is no question that the MUTCD gives adequate detail & parameters regarding determination of signalization needs at a given site where traffic volumes are fairly constant over time (typical Permanent Traffic Signal installation). There is also adequate detail & parameters regarding signalization needs at construction/incident sites (Temporary Traffic Control Signals).

There is one location within section 4 of the MUTCD where there is brief reference to seasonal signals. The following is an excerpt from section **4D.01**

Standard:

When a traffic control signal is not in operation, such as before it is placed in service, during seasonal shutdowns, or when it is not desirable to operate the traffic control signal, the signal faces shall be covered, turned, or taken down to clearly indicate that the traffic control signal is not in operation.

Herein there is recognition that there are those locations where seasonal shutdown of operating signal systems is appropriate and may occur. It does clarify that during non-use the signal faces should be covered, turned, or taken down. Unfortunately there is no OTHER detail within this section of the MUTCD to establish the operational parameters for Seasonal Traffic Signals.

Yes, we recognize the detail you refer to regarding Temporary Traffic Control Signals. In my view none of that section pertains to the Seasonal Traffic Signal issue. The following excerpt is found within section **4D.20**

Guidance:

A temporary traffic control signal should be used only if engineering judgment indicates that installing the signal will improve the overall safety and/or operation of the location. The use of temporary traffic control signals by a work crew on a regular basis in their work area should be subject to the approval of the jurisdiction having authority over the roadway.

A temporary traffic control signal should not operate longer than 30 days unless associated with a longer-term temporary traffic control zone project.

The final reference in all of above talks about the Temporary Traffic Control Zone. The following is an excerpt from MUTCD section 1.A.13 item 85

Temporary Traffic Control Zone-an area of a highway where road user conditions are changed because of a work zone or incident by the use of temporary traffic control devices, flaggers, uniformed law enforcement officers, or other authorized personnel.

The definition noted above explains that Temporary Traffic Control Zone is that which results from work within the highway or from an incident. Our issue of Seasonal Traffic Signals fits neither of these categories, thus Temporary Traffic Control Signals and the related verbiage has nothing to do with the topic at hand.

Our interpretation is that these locations do not fall neatly into either Permanent or Temporary Traffic Signal

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sections, but rather a category not yet recognized - Seasonal Traffic Signal. You did recently make reference to limited phone conversations with FHWA staff in DC regarding these issues. You indicated that they made mention of North Dakota DOT asking similar questions relative Seasonal Traffic Signals and the lack of clarity. Would you please pass along our strong desire that the MUTCD Traffic Signal Section be expanded to include more detailed information regarding Seasonal Traffic Signals. We remain convinced that we are correct in our position that signalization at select locations is most appropriate. Continuing to place Flagger within the roadway for traffic control during the exceptional heavy traffic periods typical of the Annual Motorcycle Rally is an unnecessary liability exposure. Too much is at stake.

We look forward to your response.

-----Original Message-----

From: Johnson, Sharon [mailto:Sharon.Johnson@fhwa.dot.gov]

Sent: Wednesday, April 13, 2005 12:48 PM

To: Dan Staton (E-mail); Joel Jundt (E-mail); Todd Seaman (E-mail)

Cc: Dean VanDeWiele (E-mail); Dan Martell (E-mail); Hoelscher, Marc; Joel Gengler (E-mail)

Subject: Temporary Traffic Signals

I'd like to reiterate a statement I made earlier to Joel and Dan Staton concerning temporary traffic signals. I had said that I personally do not like to see these signals utilized for one or two weeks during the year and the remainder of the time they are bagged/covered. The MUTCD does support my position. Please refer to Section 4D-20, page 4D-20 in the MUTCD.

Section 4D.20 Temporary Traffic Control Signals

Standard:

A temporary traffic control signal shall be defined as a traffic control signal that is installed for a limited time period. A portable traffic control signal shall be defined as a temporary traffic control signal that is designed so that it can be easily transported and reused at different locations.

Support:

A temporary traffic control signal is generally installed using methods that minimize the costs of installation, relocation, and/or removal. Typical temporary traffic control signals are for specific purposes, such as for one-lane, two-way facilities in temporary traffic control zones (see [Chapter 4G](#)), for a haul-road intersection, or for access to a site that will have a permanent access point developed at another location in the near future.

Standard:

Advance signing shall be used when employing a temporary traffic control signal.

A temporary traffic control signal shall:

- A. Meet the physical display and operational requirements of a conventional traffic control signal.**
- B. Be removed when no longer needed.**
- C. Be placed in the flashing mode when not being used if it will be operated in the steady mode within 5 working days; otherwise, it shall be removed.**
- D. Be placed in the flashing mode during periods when it is not desirable to operate the signal, or the signal heads shall be covered, turned, or taken down to indicate that the signal is not in operation.**

Guidance:

A temporary traffic control signal should be used only if engineering judgment indicates that installing the signal will improve the overall safety and/or operation of the location. The use of temporary traffic control signals by a work crew on a regular basis in their work area should be subject to the approval of the jurisdiction having authority over the roadway.

A temporary traffic control signal should not operate longer than 30 days unless associated with a longer-term temporary traffic control zone project.

For use of temporary traffic control signals in temporary traffic control zones, reference should be made to

Section 6F.80 <http://mutcd.fhwa.dot.gov/HTM/2003r1/part6/part6f4.htm>.

Leaving inoperable traffic signal heads up in the field is doing a disservice to the traveling public and cause safety concerns. The MUTCD is clear that temporary signals should not be operated for more than 30 days at a time, and if the time period between operations is more than 5 working days, the temporary signal SHALL be "removed". Leaving the bagged traffic signal heads up would be similar to leaving traffic control signs up that no longer apply. We just don't do it. When you read Section 4B.02 concerning signal removal, note that the option exists to leave the poles and cables in place after removing the signal heads. So, during the periods between special events, the city/state would take down the traffic signal heads (including ped signals) but could leave the other signal equipment in place. Removal of the heads makes it pretty clear to road users that the location is not signalized and that signals only operate there during major events. Besides the safety concerns, they tend to be an eye sore, especially in an area as scenic as the Black Hills. I would recommend the Rapid City Region reconsider their past practice of bagging temporary traffic signals and discontinue the practice in the future.

Sharon Johnson
Safety and Traffic Engineer
FHWA-South Dakota Division
116 E. Dakota Ave.
Pierre, SD 57501

Phone: (605) 224-7326 ext. 3041