



U.S. Department
of Transportation

**Federal Highway
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

September 1, 2004

Refer to: HOTO-1

Mr. Lap Thong Hoang
State Traffic Operations Engineer
Florida Department of Transportation
605 Suwannee Street, MS 36
Tallahassee, FL 32399-0450

Dear Mr. Hoang:

Thank you for your August 17 email message, requesting an interpretation of Section 3E.01 of the Manual on Uniform Traffic Control Devices (MUTCD) regarding the use retroreflective colored pavement. Specifically, you asked whether colored pavement located between the transverse white lines of a crosswalk constitutes a traffic control device if it is retroreflective.

Section 3E.01 in Chapter 3E (Colored Pavements) contains text pertinent to this issue, including the following:

- "Support: When used for guidance or regulation of traffic, colored pavements are traffic control devices. Colored pavements also are sometimes used to supplement other traffic control devices."
- "Support: Colored pavement located between crosswalk lines to emphasize the presence of the crosswalk is not considered to be a traffic control device."
- "Guidance: Colors that degrade the contrast of white crosswalk lines, or that might be mistaken by road users as a traffic control application, should not be used for colored pavement located between crosswalk lines."

Additionally, the Federal Highway Administration (FHWA) issued Official Interpretation number 3-152 (I) "Colored Pavements Within Crosswalks" in December 2001 that stated, in part: "Because of their use predominantly for aesthetics and because they have no demonstrated viability in guiding or regulating traffic, for the purposes of Section 3E.01 colored pavement areas used in conjunction with marked crosswalks are not considered as being used as a traffic control device."

Section 3E.01 clearly states that the color of the pavement surface within the crosswalk should not degrade the contrast of the white crosswalk lines nor be potentially mistaken by road users as a traffic control application (i.e., to guide or regulate traffic.) Although some pavement surfaces might possibly be made retroreflective for decorative purposes, the stated purpose mentioned in the manufacturer's letter included with your message is to emphasize the crosswalk at night.



Such usage of retroreflective colored pavement would not be consistent with interpretation 3-152 (I) nor with the intent of text in MUTCD Section 3E.01. Also, there is no research we are aware of that documents any effectiveness and/or disbenefits of such a retroreflective pavement surface treatment.

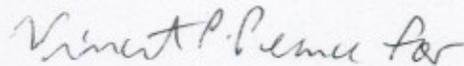
Accordingly, it is our interpretation that colored pavement surfaces inside crosswalk lines are considered to be a traffic control device if they are retroreflective. However, there is no defined application in the MUTCD at present other than as stated in the Standard of Section 3E.01:

- "Standard: Colored pavements used as traffic control devices shall be limited to the following colors and applications:
 - A. Yellow shall be used only for flush or raised median islands separating traffic flows in opposite directions.
 - B. White shall be used for delineation on shoulders, and for flushed or raised channelizing islands where traffic passes on both sides in the same general direction."

In conclusion, any proposed use of retroreflective colored pavement surfaces between crosswalk lines would be considered non-compliant with the MUTCD. The proposing jurisdiction would need to request FHWA experimentation approval in accordance with Section 1A.10, including a plan to evaluate the effects.

Thank you for writing on this subject. If you have any questions, please call Mr. Scott W. Wainwright of our staff at 202-366-0857. Please note that we have assigned your request the following official interpretation number and title: "3-169 (I)—Section 3B.19 Retroreflective Colored Pavement." Please refer to this number in any future correspondence.

Sincerely yours,



Regina S. McElroy
Director, Office of Transportation
Operations