CHAPTER 6E. FLAGGER CONTROL

Section 6E.01 Qualifications for Flaggers

Guidance:
Because flaggers are responsible for public safety and make the greatest number of contacts with the public of all highway workers, they should be trained in safe traffic control practices and public contact techniques. Flaggers should be able to satisfactorily demonstrate the following abilities:
A. Ability to receive and communicate specific instructions clearly, firmly, and courteously;
B. Ability to move and maneuver quickly in order to avoid danger from errant vehicles;
C. Ability to control signaling devices (such as paddles and flags) in order to provide clear and positive guidance to drivers approaching a TTC zone in frequently changing situations;
D. Ability to understand and apply safe traffic control practices, sometimes in stressful or emergency situations; and
E. Ability to recognize dangerous traffic situations and warn workers in sufficient time to avoid injury.

Standard:
Flaggers shall be trained in the proper fundamentals of flagging moving traffic before being assigned as flaggers. Signaling directions used by flaggers shall conform to Figure 6E-3. The training and instructions shall be based on this Manual and work site conditions and also include the following:
(1) flagger equipment which must be used,
(2) layout of the work zone and flagging station,
(3) methods to signal traffic to stop, proceed or slow down,
(4) methods of one-way traffic control,
(5) trainee demonstration of proper flagging methodology and operations,
(6) emergency vehicles traveling through the work zone,
(7) handling emergency situations,
(8) methods of dealing with hostile drivers,
(9) flagging procedures when a single flagger is used (when applicable).

Documentation of the training shall be maintained as required by Injury Illness and Prevention Program of the General Industry Safety Order in the California Code of Regulations (Title 8, Division 1, Chapter 4, Subchapter 7, Section 3203).

Support:
Refer to Construction Safety Order in the California Code of Regulations (Title 8, Division 1, Chapter 4, Subchapter 4, Article 11, Section 1599 - Flaggers) for flagger training. See Section 1A.11 for information regarding this publication.

Section 6E.02 High-Visibility Safety Apparel

Standard:
For daytime and nighttime activity, flaggers shall wear high-visibility safety apparel that meets the Performance Class 2 or 3 requirements of the ANSI/ISEA 107–2004 publication entitled “American National Standard for High-Visibility Apparel and Headwear” (see Section 1A.11), or equivalent revisions, and labeled as meeting the ANSI 107-2004, or equivalent revisions, standard performance for Class 2 or 3 risk exposure. The apparel background (outer) material color shall be fluorescent orange-red, fluorescent yellow-green, or a combination of the two as defined in the ANSI standard. The retroreflective material shall be orange, yellow, white, silver, yellow-green, or a fluorescent version of these colors, and shall be visible at a minimum distance of 1,000 feet. The retroreflective safety apparel shall be designed to clearly identify the wearer as a person.

Guidance:
For nighttime activity, high-visibility safety apparel that meets the Performance Class 3 requirements of the ANSI/ISEA 107–2004 publication entitled “American National Standard for High-Visibility Apparel and...
Headwear” (see Section 1A.11), or equivalent revisions, and labeled as meeting the ANSI 107-2004, or equivalent revisions, standard performance for Class 3 risk exposure should be considered for flagger wear.

Standard:
03 When uniformed law enforcement officers are used to direct traffic within a TTC zone, they shall wear high-visibility safety apparel as described in this Section.

Option:
04 In lieu of ANSI/ISEA 107-2004, or equivalent revisions apparel, law enforcement personnel within the TTC zone may wear high-visibility safety apparel that meets the performance requirements of the ANSI/ISEA 207-2006 publication entitled “American National Standard for High-Visibility Public Safety Vests” (see Section 1A.11), or equivalent revisions, and labeled as ANSI 207-2006, or equivalent revisions.

Section 6E.03 Hand-Signaling Devices

Guidance:
Standard:
01 The STOP/SLOW (R1-1/W20-8) paddle shall be the primary and preferred hand-signaling device because the STOP/SLOW paddle gives road users more positive guidance than red flags. Use of flags shall be limited to emergency situations.

Standard:
02 The STOP/SLOW paddle shall have an octagonal shape on a rigid handle. STOP/SLOW paddles shall be at least 18 inches wide with letters at least 6 inches high. The STOP (R1-1) face shall have white letters and a white border on a red or fluorescent red background. The SLOW (W20-8) face shall have black letters and a black border on an orange or fluorescent orange background. When used at night, the STOP/SLOW paddle shall be retroreflectorized.

02a The sign retroreflectivity shall be maintained at or above the minimum levels in Table 2A-3.

Guidance:
03 The STOP/SLOW paddle should be fabricated from light semi-rigid material. The bottom of the STOP/SLOW sign portion of the paddle should be a minimum of 6 feet above the pavement when mounted on a rigid staff.

Support:
04 The optimum method of displaying a STOP or SLOW message is to place the STOP/SLOW paddle on a rigid staff that is tall enough that when the end of the staff is resting on the ground, the message is high enough to be seen by approaching or stopped traffic.

Option:
04a The 24 x 24 inch size of the STOP/SLOW paddle may be used where greater emphasis is needed and speeds are 30 mph or more.

05 The STOP/SLOW paddle may be modified to improve conspicuity by incorporating either white or red flashing lights on the STOP face, and either white or yellow flashing lights on the SLOW face. The flashing lights may be arranged in any of the following patterns:
A. Two white or red lights, one centered vertically above and one centered vertically below the STOP legend; and/or two white or yellow lights, one centered vertically above and one centered vertically below the SLOW legend;
B. Two white or red lights, one centered horizontally on each side of the STOP legend; and/or two white or yellow lights, one centered horizontally on each side of the SLOW legend;
C. One white or red light centered below the STOP legend; and/or one white or yellow light centered below the SLOW legend;
D. A series of eight or more small white or red lights no larger than 1/4 inch in diameter along the outer edge of the paddle, arranged in an octagonal pattern at the eight corners of the border of the STOP face; and/ or a series of eight or more small white or yellow lights no larger than 1/4 inch in diameter along the outer edge of the paddle, arranged in a diamond pattern along the border of the SLOW face; or
E. A series of white lights forming the shapes of the letters in the legend.

Standard:
06 If flashing lights are used on the STOP face of the paddle, their colors shall be all white or all red. If flashing lights are used on the SLOW face of the paddle, their colors shall be all white or all yellow.
If more than eight flashing lights are used, the lights shall be arranged such that they clearly convey the octagonal shape of the STOP face of the paddle and/or the diamond shape of the SLOW face of the paddle.

If flashing lights are used on the STOP/SLOW paddle, the flash rate shall be at least 50, but not more than 60, flashes per minute.

Flags, when used (for emergency situations only), shall be red or fluorescent orange/red in color, shall be a minimum of 24 inches square, and shall be securely fastened to a staff that is approximately 36 inches in length.

Guidance:
The free edge of a flag should be weighted so the flag will hang vertically, even in heavy winds.

Standard:
When used at nighttime (for emergency situations only), flags shall be retroreflectorized red.

Option:
When flagging in an emergency situation at night in a non-illuminated flagger station, a flagger may use a traffic baton made of a flashlight with a red glow cone to supplement the STOP/SLOW paddle or flag.

Standard:
When a flashlight is used for flagging in an emergency situation at night in a non-illuminated flagger station, the flagger shall hold the flashlight in the left hand, shall hold the paddle or flag in the right hand as shown in Figure 6E-3, and shall use the flashlight in the following manner to control approaching road users:

A. To inform road users to stop, the flagger shall hold the flashlight with the left arm extended and pointed down toward the ground, and then shall slowly wave the flashlight in front of the body in a slow arc from left to right such that the arc reaches no farther than 45 degrees from vertical.

B. To inform road users to proceed, the flagger shall point the flashlight at the vehicle’s bumper, slowly aim the flashlight toward the open lane, then hold the flashlight in that position. The flagger shall not wave the flashlight.

C. To alert or slow traffic, the flagger shall point the flashlight toward oncoming traffic and quickly wave the flashlight in a figure eight motion.

Section 6E.04 Automated Flagger Assistance Devices

Support:
Automated Flagger Assistance Devices (AFADs) enable a flagger(s) to be positioned out of the lane of traffic and are used to control road users through temporary traffic control zones. These devices are designed to be remotely operated either by a single flagger at one end of the TTC zone or at a central location, or by separate flaggers near each device’s location.

There are two types of AFADs:
A. An AFAD (see Section 6E.05) that uses a remotely controlled STOP/SLOW sign on either a trailer or a movable cart system to alternately control right-of-way.

B. An AFAD (see Section 6E.06) that uses remotely controlled red and yellow lenses and a gate arm to alternately control right-of-way.

AFADs might be appropriate for short-term and intermediate-term activities (see Section 6G.02). Typical applications include TTC activities such as, but not limited to:
A. Bridge maintenance;
B. Haul road crossings; and
C. Pavement patching.

Standard:
AFADs shall only be used in situations where there is only one lane of approaching traffic in the direction to be controlled.

When used at night, the AFAD location shall be illuminated in accordance with Section 6E.08.

Guidance:
AFADs should not be used for long-term stationary work (see Section 6G.02).
Standard:
07 Because AFADs are not traffic control signals, they shall not be used as a substitute for or a replacement for a continuously operating temporary traffic control signal as described in Section 6F.84.
08 AFADs shall meet the crashworthy performance criteria contained in Section 6F.01.

Guidance:
09 If used, AFADs should be located in advance of one-lane, two-way tapers and downstream from the point where approaching traffic is to stop in response to the device.

Standard:
10 If used, AFADs shall be placed so that all of the signs and other items controlling traffic movement are readily visible to the driver of the initial approaching vehicle with advance warning signs alerting other approaching traffic to be prepared to stop.
11 If used, an AFAD shall be operated only by a flagger (see Section 6E.01) who has been trained on the operation of the AFAD. The flagger(s) operating the AFAD(s) shall not leave the AFAD(s) unattended at any time while the AFAD(s) is being used.
12 The use of AFADs shall conform to one of the following methods:
   A. An AFAD at each end of the TTC zone (Method 1), or
   B. An AFAD at one end of the TTC zone and a flagger at the opposite end (Method 2).
13 Except as provided in Paragraph 14, two flaggers shall be used when using either Method 1 or Method 2.

Option:
14 A single flagger may simultaneously operate two AFADs (Method 1) or may operate a single AFAD on one end of the TTC zone while being the flagger at the opposite end of the TTC zone (Method 2) if both of the following conditions are present:
   A. The flagger has an unobstructed view of the AFAD(s), and
   B. The flagger has an unobstructed view of approaching traffic in both directions.

Guidance:
15 When an AFAD is used, the advance warning signing should include a ROAD WORK AHEAD (W20-1) sign, a ONE LANE ROAD (W20-4) sign, and a BE PREPARED TO STOP (W3-4) sign.

Standard:
16 When the AFAD is not in use, the signs associated with the AFAD, both at the AFAD location and in advance, shall be removed or covered.

Guidance:
17 A State or local agency that elects to use AFADs should adopt a policy, based on engineering judgment, governing AFAD applications. The policy should also consider more detailed and/or more restrictive requirements for AFAD use, such as the following:
   A. Conditions applicable for the use of Method 1 and Method 2 AFAD operation,
   B. Volume criteria,
   C. Maximum distance between AFADs,
   D. Conflicting lenses/indications monitoring requirements,
   E. Fail safe procedures,
   F. Additional signing and pavement markings,
   G. Application consistency,
   H. Larger signs or lenses to increase visibility, and
   I. Use of backplates.

Section 6E.05 STOP/SLOW Automated Flagger Assistance Devices

Standard:
01 A STOP/SLOW Automated Flagger Assistance Device (AFAD) (see Section 6E.04) shall include a STOP/SLOW sign that alternately displays the STOP (R1-1) face and the SLOW (W20-8) face of a STOP/SLOW paddle (see Figure 6E-1).
02 The AFAD’s STOP/SLOW sign shall have an octagonal shape, shall be fabricated of rigid material, and shall be mounted with the bottom of the sign a minimum of 6 feet above the pavement on an
appropriate support. The size of the STOP/SLOW sign shall be at least 24 x 24 inches with letters at least 8 inches high. The background of the STOP face shall be red with white letters and border. The background of the SLOW face shall be diamond shaped and orange with black letters and border. Both faces of the STOP/SLOW sign shall be retroreflectorized.

03 The AFAD’s STOP/SLOW sign shall have a means to positively lock, engage, or otherwise maintain the sign assembly in a stable condition when set in the STOP or SLOW position.

04 The AFAD’s STOP/SLOW sign shall be supplemented with active conspicuity devices by incorporating either:

A. White or red flashing lights within the STOP face and white or yellow flashing lights within the SLOW face meeting the provisions contained in Section 6E.03; or

B. A Stop Beacon (see Section 4L.05) mounted a maximum of 24 inches above the STOP face and a Warning Beacon (see Section 4L.03) mounted a maximum of 24 inches above, below, or to the side of the SLOW face. The Stop Beacon shall not be flashed or illuminated when the SLOW face is displayed, and the Warning Beacon shall not be flashed or illuminated when the STOP face is displayed. Except for the mounting locations, the beacons shall comply with the provisions of Chapter 4L.

Option:

05 Type B warning light(s) (see Section 6F.83) may be used in lieu of the Warning Beacon during the display of the SLOW face of the AFAD’s STOP/SLOW sign.

Standard:

06 If Type B warning lights are used in lieu of a Warning Beacon, they shall flash continuously when the SLOW face is displayed and shall not be flashed or illuminated when the STOP face is displayed.

Option:

07 The faces of the AFAD’s STOP/SLOW sign may include louvers to improve the stability of the device in windy or other adverse environmental conditions.

Standard:

08 If louvers are used, the louvers shall be designed such that the full sign face is visible to approaching traffic at a distance of 50 feet or greater.

Guidance:

09 The STOP/SLOW AFAD should include a gate arm that descends to a down position across the approach lane of traffic when the STOP face is displayed and then ascends to an upright position when the SLOW face is displayed.

Option:

10 In lieu of a stationary STOP/SLOW sign with a separate gate arm, the STOP/SLOW sign may be attached to a mast arm that physically blocks the approach lane of traffic when the STOP face is displayed and then moves to a position that does not block the approach lane when the SLOW face is displayed.

Standard:

11 Gate arms, if used, shall be fully retroreflectorized on both sides, and shall have vertical alternating red and white stripes at 16-inch intervals measured horizontally as shown in Figure 8C-1. When the arm is in the down position blocking the approach lane:

A. The minimum vertical aspect of the arm and sheeting shall be 2 inches; and

B. The end of the arm shall reach at least to the center of the lane being controlled.

12 A WAIT ON STOP (R1-7) sign (see Figure 6E-1) shall be displayed to road users approaching the AFAD.

Option:

13 A GO ON SLOW (R1-8) sign (see Figure 6E-1) may also be displayed to road users approaching the AFAD.

Standard:

14 The GO ON SLOW sign, if used, and the WAIT ON STOP sign shall be positioned on the same support structure as the AFAD or immediately adjacent to the AFAD such that they are in the same direct line of view of approaching traffic as the sign faces of the AFAD. Both signs shall have black legends and borders on white backgrounds. Each of these signs shall be rectangular in shape and each shall be at least 24 x 30 inches in size with letters at least 6 inches high.

15 To inform road users to stop, the AFAD shall display the STOP face and the red or white lights, if used, within the STOP face shall flash or the Stop Beacon shall flash. To inform road users to proceed, the
AFAD shall display the SLOW face and the yellow or white lights, if used, within the SLOW face shall flash or the Warning Beacon or the Type B warning lights shall flash.

16 If STOP/SLOW AFADs are used to control traffic in a one-lane, two-way TTC zone, safeguards shall be incorporated to prevent the flagger(s) from simultaneously displaying the SLOW face at each end of the TTC zone. Additionally, the flagger(s) shall not display the AFAD’s SLOW face until all oncoming vehicles have cleared the one-lane portion of the TTC zone.

Section 6E.06 Red/Yellow Lens Automated Flagger Assistance Devices

Standard:

01 A Red/Yellow Lens Automated Flagger Assistance Device (AFAD) (see Section 6E.04) shall alternately display a steadily illuminated CIRCULAR RED lens and a flashing CIRCULAR YELLOW lens to control traffic without the need for a flagger in the immediate vicinity of the AFAD or on the roadway (see Figure 6E-2).

02 Red/Yellow Lens AFADs shall have at least one set of CIRCULAR RED and CIRCULAR YELLOW lenses that are 12 inches in diameter. Unless otherwise provided in this Section, the lenses and their arrangement, CIRCULAR RED on top and CIRCULAR YELLOW below, shall comply with the applicable provisions for traffic signal indications in Part 4. If the set of lenses is post-mounted, the bottom of the housing (including brackets) shall be at least 7 feet above the pavement. If the set of lenses is located over any portion of the highway that can be used by motor vehicles, the bottom of the housing (including brackets) shall be at least 15 feet above the pavement.

Option:

03 Additional sets of CIRCULAR RED and CIRCULAR YELLOW lenses, located over the roadway or on the left-hand side of the approach and operated in unison with the primary set, may be used to improve visibility and/or conspicuity of the AFAD.

Standard:

04 A Red/Yellow Lens AFAD shall include a gate arm that descends to a down position across the approach lane of traffic when the steady CIRCULAR RED lens is illuminated and then ascends to an upright position when the flashing CIRCULAR YELLOW lens is illuminated. The gate arm shall be fully retroreflectorized on both sides, and shall have vertical alternating red and white stripes at 16-inch intervals measured horizontally as shown in Figure 8C-1. When the arm is in the down position blocking the approach lane:

A. The minimum vertical aspect of the arm and sheeting shall be 2 inches; and

B. The end of the arm shall reach at least to the center of the lane being controlled.

05 A Stop Here On Red (R10-6 or R10-6a) sign (see Section 2B.53) shall be installed on the right-hand side of the approach at the point at which drivers are expected to stop when the steady CIRCULAR RED lens is illuminated (see Figure 6E-2).

06 To inform road users to stop, the AFAD shall display a steadily illuminated CIRCULAR RED lens and the gate arm shall be in the down position. To inform road users to proceed, the AFAD shall display a flashing CIRCULAR YELLOW lens and the gate arm shall be in the upright position.

07 If Red/Yellow Lens AFADs are used to control traffic in a one-lane, two-way TTC zone, safeguards shall be incorporated to prevent the flagger(s) from actuating a simultaneous display of a flashing CIRCULAR YELLOW lens at each end of the TTC zone. Additionally, the flagger shall not actuate the AFAD’s display of the flashing CIRCULAR YELLOW lens until all oncoming vehicles have cleared the one-lane portion of the TTC zone.

08 A change interval shall be provided as the transition between the display of the flashing CIRCULAR YELLOW indication and the display of the steady CIRCULAR RED indication. During the change interval, the CIRCULAR YELLOW lens shall be steadily illuminated. The gate arm shall remain in the upright position during the display of the steadily illuminated CIRCULAR YELLOW change interval.

09 A change interval shall not be provided between the display of the steady CIRCULAR RED indication and the display of the flashing CIRCULAR YELLOW indication.
Guidance:
10 The steadily illuminated CIRCULAR YELLOW change interval should have a duration of at least 5 seconds, unless a different duration, within the range of durations recommended by Section 4D.26, is justified by engineering judgment.

Section 6E.07 Flagger Procedures

Support:
01 The use of paddles and flags by flaggers is illustrated in Figure 6E-3.

Standard:
02 Flaggers shall use a STOP/SLOW paddle, a flag (for emergency situations only), or an Automated Flagger Assistance Device (AFAD) to control road users approaching a TTC zone. The use of hand movements alone without a paddle, flag, or AFAD to control road users shall be prohibited except for law enforcement personnel or emergency responders at incident scenes as described in Section 6I.01.

03 The following methods of signaling with paddles shall be used:
A. To stop road users, the flagger shall face road users and aim the STOP paddle face toward road users in a stationary position with the arm extended horizontally away from the body. The free arm shall be held with the palm of the hand above shoulder level toward approaching traffic.
B. To direct stopped road users to proceed, the flagger shall face road users with the SLOW paddle face aimed toward road users in a stationary position with the arm extended horizontally away from the body. The flagger shall motion with the free hand for road users to proceed.
C. To alert or slow traffic, the flagger shall face road users with the SLOW paddle face aimed toward road users in a stationary position with the arm extended horizontally away from the body.

Option:
04 To further alert or slow traffic, the flagger holding the SLOW paddle face toward road users may motion up and down with the free hand, palm down.

Standard:
05 The following methods of signaling with a flag (for emergency situations only) shall be used:
A. To stop road users, the flagger shall face road users and extend the flag staff horizontally across the road users’ lane in a stationary position so that the full area of the flag is visibly hanging below the staff. The free arm shall be held with the palm of the hand above shoulder level toward approaching traffic.
B. To direct stopped road users to proceed, the flagger shall face road users with the flag and arm lowered from the view of the road users, and shall motion with the free hand for road users to proceed. Flags shall not be used to signal road users to proceed.
C. To alert or slow traffic, the flagger shall face road users and slowly wave the flag in a sweeping motion of the extended arm from shoulder level to straight down without raising the arm above a horizontal position. The flagger shall keep the free hand down.

Guidance:
06 The flagger should stand either on the shoulder adjacent to the road user being controlled or in the closed lane prior to stopping road users. A flagger should only stand in the lane being used by moving road users after road users have stopped. The flagger should be clearly visible to the first approaching road user at all times. The flagger also should be visible to other road users. The flagger should be stationed sufficiently in advance of the workers to warn them (for example, with audible warning devices such as horns or whistles) of approaching danger by out-of-control vehicles. The flagger should stand alone, away from other workers, work vehicles, or equipment.

Option:
07 At spot lane closures where adequate sight distance is available for the reasonably safe handling of traffic, the use of one flagger may be sufficient.

Guidance:
08 When a single flagger is used, the flagger should be stationed on the shoulder opposite the spot lane closure or work space, or in a position where good visibility and traffic control can be maintained at all times.
Section 6E.08 Flagger Stations

Standard:

01 Flagger stations shall be located such that approaching road users will have sufficient distance to stop at an intended stopping point.

Option:

02 The distances shown in Table 6E-1, which provides information regarding the stopping sight distance as a function of speed, may be used for the location of a flagger station. These distances may be increased for downgrades (Table 6E-101(CA)) and other conditions that affect stopping distance.

Guidance:

03 Flagger stations should be located such that an errant vehicle has additional space to stop without entering the work space. The flagger should identify an escape route that can be used to avoid being struck by an errant vehicle.

Standard:

04 Except in emergency situations, flagger stations shall be preceded by an advance warning sign or signs.

Except in emergency situations, flagger stations shall be illuminated at night.

Support:

05 Refer to Construction Safety Orders in the California Code of Regulations (Title 8, Division 1, Chapter 4, Subchapter 4, Article 3, Section 1523 – Illumination and Section 1599 - Flaggers). See Section 1A.11 for information regarding this publication.
Figure 6E-1. Example of the Use of a STOP/SLOW Automated Flagger Assistance Device (AFAD)

Legend:
- Direction of travel
- Work space
- Channelizing device
- Sign
- AFAD with recommended gate
- Flashing beacon

Note: See Table 6H-3 for the values of the A, B, and C dimensions

Note: Shown as Method 1 with two AFADs
Figure 6E-2. Example of the Use of a Red/Yellow Lens Automated Flagger Assistance Device (AFAD)

Legend:
- Direction of travel
- Work space
- Channelizing device
- Sign
- AFAD with recommended gate
- Flashing beacon

Note: See Table 6H-3 for the values of A, B, and C dimensions

Note: Shown as Method 2 with one AFAD and a flagger
Figure 6E-3. Use of Hand-Signaling Devices by Flaggers

PREFERRED METHOD
STOP/SLOW Paddle

EMERGENCY SITUATIONS ONLY
Red Flag

18 inches MIN.

R1-1 STOP

24 inches

36 inches

TO STOP TRAFFIC

TO LET TRAFFIC PROCEED

TO ALERT AND SLOW TRAFFIC

W20-8 SLOW

W20-8 SLOW
### Table 6E-1. Stopping Sight Distance as a Function of Speed on Level Roads.
(Used as suggested longitudinal buffer space length or location for flagger station)

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<thead>
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<th>Speed (mph)</th>
<th>Distance</th>
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<td>115 feet</td>
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<td>25</td>
<td>155 feet</td>
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<td>30</td>
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</tr>
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<td>65</td>
<td>645 feet</td>
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<tr>
<td>70</td>
<td>730 feet</td>
</tr>
<tr>
<td>75</td>
<td>820 feet</td>
</tr>
</tbody>
</table>

* Post speed, off-peak 85th-percentile speed prior to work starting, or the anticipated operating speed in mph.

### Table 6E-101(CA). Stopping Sight Distance as a Function of Speed on Downgrades.
(Used as suggested longitudinal buffer space length or location for flagger station)

<table>
<thead>
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<th>Speed (mph)</th>
<th>% Downgrade (Buffer Space)</th>
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<td></td>
<td>-3% (feet)</td>
</tr>
<tr>
<td>20</td>
<td>116</td>
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<tr>
<td>25</td>
<td>158</td>
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