



## Woodbury County Secondary Roads Department

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May 14, 2021

Docket Management Facility  
Federal Highway Administration  
US Department of Transportation  
1200 New Jersey Ave S.E.  
West Building, Ground Floor  
Washington, DC 20590

RE: Docket Number: FHWA-2020-0001-0179, National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways; Revision

I am wanting to express my appreciation to the Federal Highway Administration (FHWA) for publishing a Notice of Proposed Amendments (NPA) for a new edition of the Manual on Uniform Traffic Control Devices (MUTCD). The amendment to the MUTCD is overdue and I hope that FHWA will quickly review comments provided under the NPA and publish an updated manual. Having participated in the review of the NPA with the NCUTCD as an associate member the National Association of County Engineers (NACE), I appreciate that FHWA extended the comment period to allow a thorough review the proposed updates. Many changes in technology and in vehicle adaptation have occurred since the publication of the 2009 manual that affect the application of traffic control devices that can only be covered in an updated manual.

Having reviewed the proposed amendment, I am pleased to see that the format of the prior manuals is continuing into the latest edition. Having used the current and prior manuals in the course of my daily work, I appreciate that the new manual has a look and feel like prior manuals. I support FHWA maintaining the current manual format in the new manual.

As noted above, I am a member of NACE, which is a sponsoring organization of the NCUTCD. I serve as a member of the NACE NCUTCD delegation and I was fortunate to be able to participate in the review of the manual. A full delegation of NACE members on the NCUTCD Council was present and participated in all the votes to develop the NCUTCD response to the docket for this rulemaking. I am in full agreement with the NCUTCD response except as noted in section 2B.21, and I encourage FHWA to incorporate the NCUTCD comments on the NPA in the Final Rule

I support the removal of the Low Volume Road section, Part 5 of the 2009 manual as much of this information was duplicative and covered in other relevant sections of the manual.

I want to emphasize that I have concerns about the NPA rewrite of section 3A.04 of the manual regarding longitudinal lines. The language proposed in the NPA would require that all roads with a speed limit greater than 40 mph have 6" edge and centerline application, regardless of traffic count or road classification. As an Iowa county engineer, I have worked to improve safety on the roads I manage and have consistently endorsed and applied 4" edge lines to my county roads to provide additional safety and positive guidance for road users. My counties have consistently applied these markings regardless of highway classification and traffic count. Most of the roads I administer have traffic counts below 1,000 vpd, with many below 400 vpd. This is a level much lower than the warranted 6,000 vpd traffic count warranted in the current and proposed manual for the required application of edge lines.

My county bids pavement markings by the gallon applied. Increasing the line width from 4" to 6" requires an additional 50% more material. Most of our suppliers are suggesting that our average contract costs will increase by at least 50% as additional labor will be required, along with additional material, as wider lines are placed on the pavement. Here at Woodbury County, the increased cost of 6" edge lines would equal the cost of one full time employee and would impose the need for difficult budgetary adjustments for my county if the wider line is mandated on all roads with speed limits above 40 mph. I may be forced the review of whether my county can afford to apply edge lines on roads where they are not required by warrant.

I endorse the NCUTCD recommended text in Section 3A.04 of the MUTCD regarding longitudinal lines. This language was approved by NCUTCD Council in January 2020 and again during the NPA review. I believe that the NCUTCD recommended text which provides that a normal width line shall be 6 inches for all roadways with speed limits greater than 50 mph and an ADT of 6,000 vehicles per day or greater as a Standard that my jurisdiction can readily comply with, and I strongly recommend the inclusion of this language in the 11th edition of the MUTCD.

Counter to the NCUTCD recommended language, I endorse the original NPA language proposed in section 2B.21. The guidance and standard statements in this section summarize the methodology we have used for establishing speed limits on our road system. I would like to see the continuation language using the 85 percentile speeds in consideration of setting speed limits on roads. The guidance and standard language within the manual as proposed by the NPA is of continuing value to my county as we deal with the contentious issues of reviewing and setting speed limits on county highways. The MUTCD is considered an authoritative practice manual in dealing with speed limits.

Thank you for your attention and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Mark J. Nahra". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark J. Nahra, P.E.  
Woodbury County Engineer