

IOWA COUNTY ENGINEERS ASSOCIATION

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May 12, 2021

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

The Iowa County Engineers Association (ICEA) expresses its 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). We also appreciate that FHWA extended the comment period to allow our association members to review the proposed updates. The amendment to the MUTCD is overdue and our association hopes that FHWA will quickly review comments provided under the NPA and publish an updated manual. 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. The guidance of a new manual incorporating this new technology is greatly anticipated. We applaud the FHWA rule making efforts to date and hope that the agency will continue moving forward with the rulemaking effort.

Our association appreciates that the proposed rule is producing a manual formatted similarly to prior manuals. Engineers who have used the MUTCD in the course of their daily work will appreciate that the new manual has a look and feel like prior manuals. We support FHWA maintaining the format of the new manual.

ICEA is a member of NACE, which is a sponsoring organization of the NCUTCD. One of our state association members is a member of the NACE delegation to the NCUTCD. 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. ICEA is in full agreement with the NCUTCD response except as noted in section 2B.21, and we encourage FHWA to incorporate the NCUTCD comments on the NPA in the Final Rule

ICEA supports 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.

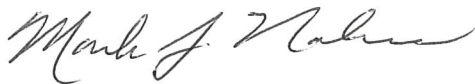
The Iowa County Engineers Association has concerns about the NPA rewrite of section 3A.04 of the manual regarding longitudinal lines. The language proposed in the NPA would require that all roads with a speed limit greater than 40 mph have 6" edge and centerline application, regardless of traffic count or road classification. Iowa has worked to improve safety along its roads and most counties provide a 4" edge and centerlines. These markings are provided regardless of classification as a major or minor collector, and regardless of traffic count. Most of our roads have markings applied at traffic counts below 400 vpd, a level much lower than the warranted 6000 vpd provided in the manual for the required application of such lines. 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 more material is placed on the pavement. Implementation of this Standard would impose the need for severe budgetary increases for many county roadway jurisdictions.

ICEA endorses the NCUTCD recommended text in Section 3A.04 of the MUTCD regarding longitudinal lines. We believe that the NCUTCD recommended text which defines 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 our jurisdictions can more readily comply, and we strongly recommend the inclusion of this language in the 11th edition of the MUTCD.

ICEA endorses the NPA language 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. Having this guidance within the manual is of continuing value to our association.

Thank you for your attention and consideration.

Respectfully,

A handwritten signature in cursive script, reading "Mark J. Nahra". The signature is written in dark ink and is positioned above the printed name and title.

Mark J. Nahra, P.E.
President, ICEA