

Nicole R. Nason, Administrator
Federal Highway Administration
U.S Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Subject: **FHWA Docket No. FHWA-2020-0001**
National Standards for Traffic Control Devices

The Association of Oregon Counties (AOC) in coordination with the Oregon Association of County Engineers and Surveyors (OACES) is joining the Oregon Department of Transportation in requesting an extension of the docket period from 90 days to 180 days for the Notice of Proposed Amendment (NPA) for the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD).

AOC and OACES, representing all 36 counties in Oregon, is working collaboratively with ODOT, the Oregon Traffic Control Devices Committee (OTCDC), and other local governments to review the proposed updates to the draft MUTCD. With 32,830 miles under county jurisdiction (39%), including 3,439 bridges and approximately 26,000 culverts, county road officials are often called upon for technical expertise when it comes to traffic control and management. The MUTCD is an essential resource for local road departments to effectively maintain the local road system, and it is critical that they are allowed adequate time to review the proposed changes to ensure they are achievable at the local level.

The docket period, which was released 11 days before Christmas, allows for 90 days to review and comment on 784 pages of proposed changes. It is not feasible for local authorities to allocate enough time to properly review the proposed language within that period given the limited staff capacity of small local governments, especially during the COVID-19 pandemic, where local authorities are working diligently to keep departments afloat despite social distancing requirements.

For these reasons, AOC and OACES joins ODOT in requesting the docket period be extended from 90 to 180 days for the subject NPA, to ensure an accurate and thorough review of the material by your local partners.

Sincerely,



Brian Worley
Director, AOC County Road Program



Mike Bezner
President, Oregon Association of County Engineers and Surveyors