Docket FHWA-2020-0001

Island County Public Works comment on the FHWA MUTCD revisions

Discussion of Proposed Amendments to Chapter 2A Signs—General

67. In Section 2B.21..... FHWA proposes changes to reinforce the stated understanding that other factors, in addition to the 85th-percentile speed, have a role in setting speed limits. FHWA retains reference to 85th-percentile speed as a factor that should be considered, particularly for freeways and expressways, as well as for rural highways, except those in urbanized locations within rural regions.FHWA also retains reference to the setting of speed zones in broad terms, thereby allowing agencies to establish detailed criteria based upon national guidance or based upon research, outside the MUTCD.

Island County (Is Co) supports the inclusion of added data points in engineering studies to determine setting appropriate speeds.

In addition to providing comment on this proposed change, FHWA also requests comment on the following additional recommendations of the NTSB report: (1) Removal of the 85th-percentile speed as a consideration in setting speed limits regardless of the type of roadway (this recommendation was based in part on the assumption that that the 85th-percentile speed can increase over time as a result of the posted speed limit);

Is Co does not support the removal of the 85th percentile speed as the consideration is removing a historical data point. Retain the 85th percentile data point, and use <u>alongside</u> the additional data points when determining the appropriate speed limit.

and (2) the requirement to use an expert system to validate a speed limit that has been determined through engineering study. Commenters are also requested to address likely outcomes if one or more of the other recommendations in the report, such as increased automated enforcement, were not implemented in conjunction with the speed-setting recommendations outlined in the report.

Adding recommendations/countermeasures when determining speed limit setting should not be addressed in this process, but offered as an addition to traffic safety, not speed setting.

Provide support on tools to assist practitioners, ensuring that these tools can be adjusted to fit agency characteristics, as urban roadways and rural roadways are significantly different in the data points that would benefit setting appropriate speeds on existing roadways.

FHWA also proposes to revise the Standard paragraph regarding County Route sign dimensions to require a minimum size of 24 x 24 inches for consistency with the minimum sizes for other Route signs.

Is Co could support the minimum size increase, if meeting the change in size at the time the existing sign's retro-reflectivity has failed testing.

FHWA also proposes to change the existing Guidance statement regarding the shape of wayfinding guide signs to a Standard to eliminate conflict with overall sign shape requirements

Would this requirement apply to existing signage?

Discussion of Proposed Amendments to Part 3—Pavement Markings

Discussion of Proposed Amendments Within Part 3—General

320. In Section 3A.04 (existing Section 3A.06) Functions, Widths, and Patterns of Longitudinal Pavement Markings, FHWA proposes to add Item E to the list of general functions of longitudinal lines to clarify the functions of dotted lane lines and dotted lines used as a lane line or edge line extensions.

In the list of widths and patterns of longitudinal lines, FHWA proposes to indicate that 6-inch wide lines are to be used for freeways, expressways, and ramps as well as for all other roadways with speed limits greater than 40 mph and that 4- to 6-inch wide lines are to be used for all other roadways. FHWA proposes this change to improve visibility and consistency on "high speed" facilities and based on research showing improved machine vision detectability.

Is Co does not support the increase in longitudinal lines; this would be a significant cost increase to local agencies.

FHWA also proposes to change the definition of a wide line to at least 8 inches in width if 4-inch or 5-inch normal lines are used, and at least 10 inches in width if 6-inch normal lines are used. This change is proposed to clarify the definition based on varying practices for "normal" width lines and to reduce the impact on agencies that use 6 inch lines as their "normal" width.

Is Co does not support the increase in longitudinal lines; this would be a significant cost increase to local agencies.

In addition, FHWA proposes to add a new Guidance statement regarding the width of the discernible space separating the parallel lines of a double line so that they can be recognized as a double line rather than two, separate disassociated single lines.

Is Co does not support the discernible space separating the parallel lines; this would be a significant cost increase to agencies. Not only in the cost of paint and beads with the line width increase, but also the need for increase in travel lanes, resulting in adding ROW in some cases.

329. In Section 3B.09 (existing Section 3B.06), FHWA proposes to add a Guidance recommending that edge lines on two-lane roadways should be at least 6 inches wide, regardless of the width of the normal line used on the roadway.

Is Co does not support the increase in longitudinal lines; this would be a significant cost increase to local agencies.

For those proposed changes without a compliance date, the analysis assumes that agencies would make traffic control devices comply with the proposed revisions at the end of the service life of a device.

Is Co supports the above.