

**Proposed Rule: MAP-21 Pavement and Bridge Conditions
Mid-America Regional Council Comments**

Federal Highway Administration

Docket No. FHWA-2013-0053

National Performance Management Measures; Assessing Pavement Condition for the National Highway Performance Program and Bridge Condition for the National Highway Performance Program

23 CFR Part 490

General Comments

- Page 338, 3rd column – We support the acknowledgement by FHWA that local transportation priorities can and will be taken into consideration during the process of establishing targets. Furthermore, we support the understanding that State DOTs and MPOs may elect to establish targets that represent a decline in pavement or bridge system conditions.

Subpart A: General Information

490.101 Definitions

- The distinction between the definitions of “metric” and “measure” is appreciated.

490.105 Establishment of Performance Targets

- We support the language that encourages State DOTs and MPOs to coordinate target setting with neighboring states and MPOs “to the extent practicable”. FHWA is encouraged to offer guidance and share best practices on this type of coordination among neighboring states and MPOs.
- If State DOTs choose to establish condition targets for urbanized areas, the rule should encourage coordination with the corresponding MPO(s).
- We support the proposed language in 490.105(f)(4) that allows MPOs two options in setting targets. FHWA policies and guidance need to clearly state that MPOs committing to quantifiable targets for their metropolitan planning area are NOT required to re-establish targets when the corresponding State DOT adjusts its target as allowed under 490.105(e)(6) and 490.107(b)(2).

490.107 Reporting on Performance Targets

- We support the proposal that MPOs document the manner in which they report their established targets within the Metropolitan Planning Agreement, and that established targets are reported to State DOTs.
- We support using the Metropolitan Transportation Plan to report information on baseline condition/performance and the progress towards the achievement of MPO targets.

490.109 Assessing Significant Progress towards Achieving the Performance Targets for the NHPP

- We support the definition of “significant” progress towards achievement of condition targets.

490.111 Incorporation by Reference

- We support the incorporation by reference of: the HPMS Field Manual to codify the data requirements for measures; 10 AASHTO standards to codify the method and/or device used to collect data for the metrics; and the “Recording and Coding Guide for the Structure Inventory

and Appraisal of the Nation's Bridges" which contains all of the NBI items listed in Subpart D. The use of widely accepted standards and calculation methods will facilitate the establishment of targets and monitoring of progress towards their achievement.

Subpart C: NHPP Measures for Assessing Pavement Condition

490.309 Data Requirements

- We support the statement that "Beginning in 2018, State DOTs would be required to collect data on the full extent of non-Interstate NHS to calculate the 4 metrics." Federal performance management requirements should not impose additional data collection responsibilities upon local governments.