

April 27, 2015

Ms. Francine Shaw-Whitson  
Federal Highway Administration  
1200 New Jersey Ave. SE  
Washington, DC 20590

Dear Ms. Shaw-Whitson:

Thank you for the opportunity to comment on the notice of proposed rulemaking (NPRM) entitled *National Performance Management Measures; Assessing Pavement Condition for the National Highway Performance Program and Bridge Condition for the National Highway Performance Program* (RIN 2125-AF53; Docket ID FHWA-2013-0053).

SEMCOG, the Southeast Michigan Council of Governments, is the largest Metropolitan Planning Organization (MPO) in the State of Michigan. As such, the SEMCOG region contains a large proportion of the National Highway System (NHS) within the state. We support the use of performance measures to help determine the appropriate mix of fixes to assets on the NHS that will result in maximizing asset life in the most cost-efficient possible way. We will continue to work closely with our partners at the Michigan Department of Transportation (MDOT) to align our NHS pavement and bridge performance measures as closely as possible with the State's. The following are SEMCOG's specific comments on this NPRM.

#### ***Establishment of Performance Targets and Reporting of Performance Targets***

The establishment of performance targets (490.105) and reporting of targets (490.107) for MPOs follow strict timing deadlines based on the timing of the adoption of the final version of this proposed rule. MPOs already have established timelines for planning purposes, including the development of transportation improvement programs (TIP) and long-range metropolitan transportation plans. We would ask for flexibility in the timing of reporting of pavement and bridge targets and subsequent measures based on established timelines for the development of TIPs and metropolitan transportation plans, rather than an arbitrary deadline based on the passage of this rule.

#### ***Use and Analysis of New Data***

There is a lot of new and unfamiliar data that must be processed and reported on in a short period of time. Current HPMS rules allow for sampling of the road network. This NPRM required all Interstate mainlines be rated each direction, each year over relatively short 1/10 mile segments. Non-Interstate NHS routes must be rated in 1/10 mile segments over a two-year period. The requirement that the data be processed and reported on in a shortened timeframe may be burdensome and costly, especially as state DOTs and MPOs adjust to collecting and analyzing new sets of data in new timeframes.

Additionally, collecting data on the Interstate and non-Interstate NHS produces an additional burden on the state DOT. We suggest collecting road condition data on all National Highway System roads,

including the Interstate system, over a two-year period. This will produce consistent data, and still be aligned with the reporting periods for state DOTs and MPOs.

***Minimal Condition Requirements and Target Setting***

SEMCOG, as an MPO, works with MDOT and local road agencies to collect HPMS data. With additional (and unfamiliar) data requirements—cracking, faulting, and rutting, as well as roughness data, we will find it difficult to meet the accelerated timelines for collecting the data. In addition, we have no current surrogates for cracking, faulting, and rutting on locally-owned segments of the NHS. With no surrogates for the new measures, we feel it will be difficult to analyze the data and establish targets (jointly with MDOT) to determine if we meet minimum condition requirements for roads. The NPRM assumes that we will be able to work with MDOT and finish the reporting within a year. In fact, the reporting time will be much less than a year, especially in the first year. Even though MPOs are not required to report until the fourth year, we feel it is important that there be flexibility as our reporting partners (i.e., state DOTs) have a much tighter reporting requirement.

***Cost of Maintaining Interstate Pavements to Proposed Standards***

While SEMCOG supports pavement performance measures on the NHS, we are concerned with the impact of maintaining all Interstate pavements to the proposed standards on the remainder of the NHS. It is possible that the condition of the remainder of the NHS will deteriorate as a result of maintaining the proposed standard on the Interstate system due to the lack of adequate funding.

***Lack of Coordination in Implementation of Performance Measures***

We believe that a piecemeal approach is being used to develop the performance measures. This approach makes it difficult to identify the total system performance requirements, the complete data needs, and costs, both to collect the required data and to program and implement projects to address the performance measures.

***Link between Performance Measures and Available Funding***

When the performance measures inevitably demonstrate that keeping the NHS in good condition will take far more resources than are currently available, will a relationship between addressing the performance measures be established with funding made available by the Congress? What are the prospects, both for additional funding to collect needed data and for implementing projects?

The core concepts expressed in the Pavement and Bridge NPRM are sound. Working closely with state departments of transportation and MPOs, we are confident that the final rule can provide a workable basis for asset management into the future. If you have any questions regarding these comments, please contact Edward Hug of my office at (313) 324-3335 or at [hug@semcog.org](mailto:hug@semcog.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Carmine Palombo". The signature is fluid and cursive, with a large initial "C" and "P".

Carmine Palombo, PE  
Deputy Executive Director