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Associated Governments

May 6, 2015

U.S. Department of Transportation
Dockets Management Facility
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Southern California Association of Governments Comments on the Notice of Proposed Rulemaking: Assessing Pavement and Bridge Conditions for the National Highway Performance Program (NHPP)

On behalf of the Southern California Association of Governments (SCAG), I would like to thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM): Assessing Pavement and Bridge Conditions for the National Highway Performance Program (NHPP) that was released on January 5, 2015.

SCAG supports FHWA's efforts towards improving our nation's highway pavement and bridge conditions, and also supports the process proposed in this NPRM towards maintaining the condition of our nation's highway infrastructure assets in a state of good repair. We also believe that the six proposed performance measures proposed as part of the NPRM are in line with the national transportation goals as set forth under the Moving Ahead for Progress in the 21st Century Act (MAP-21).

At the same time, SCAG has a few concerns as to the timing and other specific elements of the proposed rules that we believe will strengthen the proposed rules and facilitate its implementation. The following are our key comments and recommendations.

1. The NPRM proposes minimum threshold levels for two performance measures – percentage of pavements on the Interstate System in poor condition (<5%) and percentage of NHS Bridges classified as in poor condition (<10%). Given the minimum threshold levels, Interstate System pavement conditions within the SCAG region already exceeds the 5% threshold, while NHS bridge conditions also likely exceed the 10% threshold for bridges. Without additional funding, it is likely that these targets will not be attained. **SCAG recommends that the final rules allow adequate flexibility to the regions so that each region can set its own targets that are ambitious but achievable based on its own unique set of environment and circumstances.**
2. The NPRM establishes a schedule for setting targets and for reporting on performance to FHWA. The timeline for establishing targets is based on a 4-year performance period, with short-term targets at 2-year and 4-year intervals. SCAG believes this is too short of a time interval to establish targets of this nature to demonstrate progress in a meaningful way. **SCAG recommends that the time horizon be set longer, at least 10 years, to allow for meaningful measurement of progress.**
3. As part of the NPRM, set penalties will be incurred upon state DOTs for non-compliance, which in turn may have an impact on statewide funding sources.



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The repercussions of such could reduce funding for local priorities within the region and could jeopardize the delivery of crucial projects towards improving overall mobility. **SCAG recommends that penalties should not be implemented without additional funding to ensure that local priorities are maintained.**

4. The NPRM proposes for State DOTs and MPOs to coordinate towards establishing consistent targets towards a shared vision on expectations for future condition/performance through a jointly owned target establishment process. However, it is not clear how this coordination will take place. **SCAG recommends that clear provisions be provided outlining the exact coordination process between State DOTs and MPOs towards the establishment of performance targets.**
5. The NPRM proposes that the International Roughness Index (IRI), a current Highway Performance Monitoring System (HPMS) measure, be used to assess pavement conditions. While IRI is available for our state highways, most of our local jurisdictions only collect Pavement Condition Index (PCI) data on our local roads. **The final NPRM should consider allowing the flexibility of using either metric to assess and monitor roadway pavement conditions.**

Once again, I would like to thank you for your efforts towards enhancing the conditions of our roadways and for this opportunity to offer our comments. I believe that FHWA understands the challenges that MPOs face with regards to the concerns as outlined above, and hope that you will take these recommendations into consideration. With your continued help, I look forward to fully supporting our collective national and regional goals towards maintaining the viability of our nation's highway infrastructure.

Sincerely,

HASAN IKHRATA
Executive Director

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