DEPARTMENT OF TRANSPORTATION
OFFICE OF THE DIRECTOR
P.O. BOX 942873, MS-49
SACRAMENTO, CA 94273-0001
PHONE (916) 654-5266
FAX (916) 654-6608
TTY 711
www.dot.ca.gov

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June 30, 2014

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

RE: Docket No. FHWA-2013-0019
Federal Register Number: 2014-06681
Request for Comments: Highway Safety Improvement Program

To Whom It May Concern:

The California Department of Transportation respectfully submits the enclosed comments on the Highway Safety Improvement Program Notice of Proposed Rulemaking issued by the Federal Highway Administration on March 28, 2013.

Thank you for your consideration.

Sincerely,

MALCOLM DOUGHERTY
Director, California Department of Transportation

Enclosure

California Department of Transportation's Comments on the Federal Highway Administration's Notice of Proposed Rulemaking on the Highway Safety Improvement Program

June 30, 2014

1. The rulemaking will require substantial resources in both personnel and funding, as well as statewide coordination with Tribal governments and other state and local agencies, to address current data gaps and issues for local roadways.

2. The rulemaking will require states to incorporate implementation plans by July 2015 for collecting Model Inventory of Roadway Elements Fundamental Data Elements in their State's Traffic Records Strategic Plan. The California Department of Transportation (Caltrans) feels this is an overly aggressive schedule. More time is needed to coordinate a statewide implementation plan with other California agencies, such as the Office of Traffic Safety and California Highway Patrol, in addition to Tribal and local governments. The data must be linked to and be compatible with a statewide collision data system that can provide analysis and identify High Collision Concentration Locations for local roadways. Caltrans suggests that July of 2016 would be more feasible.

3. States are required to complete collection of Model Inventory of Roadway Elements Fundamental Data Elements on all public roads by the end of the fiscal year five years after the effective date of the finalized rulemaking. Caltrans again feels this is an overly aggressive schedule. Caltrans may not be able to meet the data collection on time, particularly for the local roadway system which contains over 140,000 miles of roadway. Again, as indicated above, the extensive coordination effort will take a substantial amount of time in all phases (development of plan, implementation of plan, and evaluation of plan). Caltrans believes that 10 years would be more appropriate.

4. Additional data elements will be required to collect support safety analysis. Approximately 90 percent of California's public roads are on the local roadway system, with the remaining 10 percent on the State Highway System. More than half of California's roadway fatalities (60 percent) occur on the local roadway system where significant data gaps exist, including lack of local roadway inventory data and exposure data such as roadway features, traffic volumes, and road miles. This data is needed to identify High Collision Concentration Locations on local roadways and for safety investigation and implementation of appropriate safety countermeasures to reduce fatalities and serious injuries. Addressing these data gaps will take significant time and financial resources at both the State and local levels. Significant resources, in both personnel and funding, and statewide interagency coordination

will be required. Support from the federal government, in the form of adequate funding, time, and flexibility, would be greatly appreciated.

5. Tribal safety data is supposed to be part of the Highway Safety Improvement Program, but a mention of tribal governments appears to be missing from this set of rules and governance. This oversight needs to be resolved and tribal governments need to be incorporated into the process.

6. A statewide collision data system is needed that can provide analysis, taking into account exposure, roadway type, and various roadway inventory elements, to identify High Collision Concentration Locations on local roadways for safety investigations. This will require collaboration and support by state and local agencies to link and make databases compatible, as well as to ensure accuracy and timeliness of data. Again, more time is needed than currently proposed.

7. The rulemaking estimates it would cost an average state $1,362,800 to complete Linear Referencing System and initial Model Inventory of Roadway Elements Fundamental Data Elements collection, including $66,000 for management and administrative costs and $225,000 annually for maintenance costs. The costs will likely be significantly higher for California because of the vast local roadway network and the significant data gaps on the local roadway system. However, even for an average state Caltrans believes the costs have been vastly underestimated.