

January 13, 2006

J. Richard Capka
Acting Administrator
Federal Highway Administration
United States Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Capka,

The signatories below, which represent the interests of local elected and public works officials, has reviewed the Preview Guidance for the implementation of the Strategic Highway Safety Plans (SHSP). Safety is one of the primary concerns of our members, and local governments must play an active role implementing this new Federal legislation. As an interim guidance document, we believe the Preview document provides a very good basis for creating partnerships to ensure that the goals of the Highway Safety Improvement Program will be achieved. We hope you will consider the following comments as FHWA develops the next iteration of draft guidance. Our members believe these comments will strengthen the project and planning process and result in safer urban and rural communities.

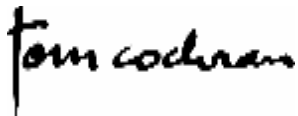
- 1) Because safety considerations are driven by the collection and analysis of data, project selection must be data-driven. SAFETEA-LU makes all public roads eligible to receive safety funding and therefore the most dangerous of these facilities (urban, suburban, rural, or otherwise) must be given funding priority. Ownership of facilities and location must be secondary to the analysis of data and the correlation of improvements to safety necessities.
- 2) Transportation planners at the state, regional and local levels must be required to be part of the SHSP process. The separation between safety and long and short range transportation planning (as required by Sections 134 and 135 of SAFETEA-LU) must be eliminated for this effort to succeed. The SHSP must be reflective of both the State Transportation Long Range Plan as well as the Metropolitan Planning Organization (MPO) Long Range Plan. Conversely both these planning processes must be consistent with the SHSP as well.
- 3) Derived from the long range planning process are short term Transportation Improvement Programs (TIPs). These TIPs reflect project needs identified through the planning process. They also reflect the priorities of local elected officials sitting on Councils of Government (COGs) and MPO boards and committees. Any safety projects in urban regions must be reflective of the TIP and the local project selection process.
- 4) Rural areas have a less formal structure than metropolitan areas. However, safety projects in the SHSP still must be prioritized based upon collected data and local decision-making. Therefore, rural projects in the SHSP should, when possible, be derived from local transportation plans such as those produced by rural planning organizations, county transportation departments, or municipal public works agencies.
- 5) The SHSP does not mandate performance measurement process for the States. FHWA, however, should develop clear and consistent performance measurements that are data-driven and measurable over time because such measurements will help highlight responsiveness to local concerns and direct resources to areas most in need.
- 6) The SHSP should be required to incorporate funds set aside for High Risk Rural Road Safety, a new funding category within the Highway Safety Improvement Program of SAFETEA-LU. High Risk Rural Road Safety funds should not be viewed as a "stand-alone

program.” Instead, projects eligible for these funds should be identified through the SHSP process. This coordinated approach will ensure that dangerous rural roads receive needed safety improvements. Additionally, it should be clearly stated in the guidance document that the High-Risk Rural Road Safety sub-allocation is a mandated minimal set aside and States are required, where the data demonstrates, to invest additional HSIP funds on roads functionally classified as rural major or minor collectors or rural local roads.

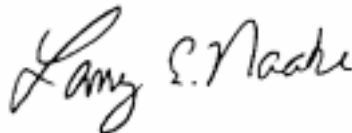
- 7) Clear definitions of “Consultation,” “Cooperation,” and “Coordination” must be included in the preview guidance.
- 8) FHWA should emphasize throughout its guidance that safety funds are to be directed toward projects that make the greatest impact on road safety conditions. Each state’s SHSP should ensure that available funds are directed toward projects that improve safety on the most dangerous roads. It is a misallocation of resources if safety funds are spent improving conditions on already safe roads.
- 9) Entities representing owners, planners, and operating agencies of non-State roads must be included in the development of the SHSP.

Thank you for taking time to review and consider these comments.

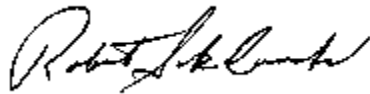
Sincerely,



Tom Cochran, Executive Director
United States Conference of Mayors



Larry Naake, Executive Director
National Association of Counties



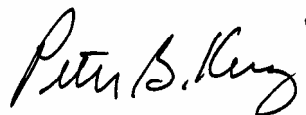
Robert Sokolowski, Executive Director
National Association of Regional Councils



Anthony R. Giancola, Executive Director
National Association of County Engineers



Donald J. Borut, Executive Director
National League of Cities



Peter B. King, Executive Director
American Public Works Association

Cc: Frederick G “Bud” Wright, FHWA Executive Director