



June 30, 2014

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**RE: Notice of Proposed Rulemaking
Federal Highway Administration
Docket No. FHWA-2013-0019
Highway Safety Improvement Program**

To Whom It May Concern:

The California State Association of Counties (CSAC) is the voice of California's 58 counties before the state and federal governments. Cities and counties in California own and maintain approximately 140,000 miles of roadways-- about 80% of the state's centerline road mileage. Safety issues are critical for local agencies in California, as 60% fatalities occur on local facilities, despite the fact that these facilities carry a proportionately lower share of total vehicle miles traveled. Furthermore, the rate of fatalities in non-urbanized areas in California is nearly four times as high as in urbanized areas. Accordingly, CSAC supports a data-driven approach to improving highway safety on all public roads that focus on performance. We appreciate the opportunity to provide the following comments of the Notice of Proposed Rulemaking for the Highway Safety Improvement Program (HSIP).

Policy

CSAC supports the policy requirements that HSIP funds be used for projects to advance safety that have the greatest potential to reduce fatalities and serious injuries. Moreover, CSAC supports the assessment by the Federal Highways Administration to the extent that states have programmed other federal funds provided for non-infrastructure safety projects prior to approving the use of HSIP funding for non-infrastructure programs.

CSAC has concerns with the policy that safety improvements that are provided as part of a broader Federal-aid project should be funded from the same source as the broader project. While we support the principal that safety should be considered in all federal aid projects, there may be circumstances when a smaller agency would need to use HSIP funding in addition to other funding sources in order to deliver a complete project. The rules should acknowledge that there are circumstances when HSIP could be used to supplement a project that might not otherwise be delivered.

Planning

CSAC supports the requirements that states consult with safety stakeholders in the HSIP planning process, analyze and use regional and local safety data, address safety problems and opportunities for all public roads and all road users, and demonstrate mutual consultation among partners in the development of transportation safety plans. We suggest enumerating that local government agencies with responsibility for public roadways be listed as stakeholder group which should be consulted in the planning process.

Implementation

While CSAC supports a data-driven approach to safety planning, we have concerns regarding the timeframe and cost for the collection of the Model Inventory of Roadway Data Elements (MIRE) Fundamental Data Elements (FDE). The rulemaking should clarify the funding sources available to plan and implement the collection of this data, which, for many of the FDEs on local roadways, are not currently included in the State of California's collision system. The aggressive deadline for completing the plan and collection of these elements should also consider the breadth of California's local system and the significant collaboration that will be necessary to complete this requirement.

Reporting

CSAC supports the reporting requirements to describe how HSIP funds are administered in the state and the methodology used to develop the program of projects to implement HSIP on all public roadways. We further support the requirement that general highway safety trends shall also be presented by functional classification and roadway ownership. CSAC would support amending the rule to strengthen this requirement in light of the disproportionately high rate of fatalities on local roadways in California.

Thank you for the opportunity to provide these comments. Please feel free to contact me at (916) 327-7500 ext. 566 or kbuss@counties.org with any questions about CSAC's comments.

Sincerely,



Kiana Buss
Legislative Representative