Update on AASHTO Comments: National-level Pavement and Bridge Measures & Risk-Based Asset Management Plan NPRMs

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Overview

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## Schedule Update (4/2015)

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BACKGROUND
MAP-21 Policy Areas

- Performance Measures
- Performance Plans
- Target Setting
- Making Progress
- Sanctions
- Reporting
SCOPM Activities

- Develop Recommendations on National-level Performance Measures
- Develop Recommendations on Target Setting and Reporting
- Explore Communication Options
1. **There is a Difference**—National-level performance measures are not necessarily the same performance measures State DOTs will use for planning and programming of transportation projects and funding.

2. **Specificity and Simplicity**—National-level performance measures should follow the SMART and KISS principles:
   - SMART: Specific, Measurable, Attainable, Realistic, Timely
   - KISS: Keep it Short and Simple

3. **Possession is 9/10ths of the Law**—National-level performance measures should focus on areas and assets that States DOTs have control over.
4. **Reduce and Re-use**—The initial set of national-level performance measures should build upon existing performance measures, management practices, data sets and reporting processes.

5. **Ever Forward**—National-level measures should be forward thinking to allow continued improvement over time.

6. **Communicate, Communicate, Communicate, Communicate**—Messaging the impact and meaning of the national-level measures to the public and other audiences is vital to the success of this initiative.
• Provide maximum flexibility
• Focus on what matters: the right outcome
• Align targets with system ownership and funding levels
• Base target setting on longer term trend data
• Coordinate target setting through a continuing, cooperative and comprehensive process
• Tell the story: performance is more than just a number
• Avoid unachievable targets or the “one size fits all” approach
• Allow for appropriate timeliness for target achievement
• Guard against unintended consequences
• Complement flexibility in target setting with transparency and accountability
• Allow flexibility for DOTs and MPOs to use risk-based target setting approach
AASHTO REVIEW PROCESS
AASHTO Review Process

• Joint Workgroup:
  – SCOPM
  – SCOBS
  – Pavements:
  – Others interested AASHTO members

• Two Phase Approach
  – Phase 1—Develop AASHTO comments by Day 45
    • States have the opportunity to provide initial thoughts and comments on first draft.
  – Phase 2—States finalize their comments by Day 90
    • AASHTO encourages **ALL** State DOTs to submit comments
AASHTO Comments:
National-level Pavement/Bridge Measures
FHWA-2013-0053
1. **Use More Appropriate Measure Approaches and Thresholds**
   - FHWA should make consistent the NBI items used to categorize a bridge as Good, Fair, Poor and Structurally Deficient
     - Do not use Waterway Adequacy (67) and Structural Adequacy (71)
     - “Structurally Deficient” should be defined as a rating of 3 or less for NBI Items 58, 59, 60, and 62
   - FHWA must clearly indicate in the rule a transition plan to the use of element level ratings for bridge condition

2. **Confirm State DOT Discretion in Target Setting and Reporting**
   - The proposed rule should include specific language stating that target levels may call for improving, constant, or declining condition
   - State DOTs should be able to adjust targets annually if critical assumptions underlying performance targets have changed sufficiently to affect target values
   - Evaluate only the three required statewide targets for bridge and pavement condition
3. Methodology for Determining Significant Progress
   – Significant progress has been made if the State DOT:
     • achieves or exceeds its targets when the targets are the same as or lower than the baseline condition; or
     • when the improvement is simply better than the baseline condition.
   – Insert additional language to account for unforeseen events

4. Use Terms So a Better and More Accurate Story About Infrastructure is Told
   – Do not use the term “structurally deficient”
     • Comment within the rulemaking process
     • Legislative fix as well

5. Do Not Hold States Accountable for Assets They Do Not Control
   – Exclude non-State DOT assets in the assessment of making significant progress towards target achievement
   – Set up a separate process for federally-controlled assets
6. Cost to Implement the Bridge and Pavement Requirements
   – Primarily pavement-related
   – State DOTs need to be involved in the design of the reporting template

7. Do Not Force State DOTs to Implement a Worst-First Approach
   – Evaluate the effects (intended and unintended consequences) of the national-level performance measures, targets and minimum condition levels

8. Develop a Realistic Implementation Timeframe
   – Institute a single effective date
     • If not, develop a better implementation phase-in period
   – Have a single reporting date for all data

9. HPMS and NBIS are Important But Were Not Developed to be Regulatory Documents
   – FHWA should preclude itself by rule from making changes to the HPMS or NBIS without first providing notice and opportunity for comment.
   – Use all English units of measure to eliminate the Metric/English rounding errors
Asset Management Plans
FHWA-2013-0052

1. Cost to Implement the Transportation Asset Management Plan Requirements
2. Make Consistent the Assets Required in 23 CFR 490 and 23 CFR 515
3. Make Clear How State DOTs are to Link the Transportation Asset Management Plans with Other Planning Documents
4. Ensure the Prerogative of State DOTs to Select Projects
5. Encourage State DOTs to Include Other Asset Classes in the Asset Management Plans
6. Keep the Evaluation of Emergency Induced Damage Simple
7. Clarify the Terminology Used Throughout the Rule
Next Steps

• National-level Pavement and Bridge Rule
  − State DOTs PLEASE submit your comments!
  − Comments are due May 8, 2015
  − Docket Number: FHWA-2013-0053

• Asset Management Plan Rule
  − State DOTs PLEASE submit your comments!
  − Comments are due May 29, 2015
  − Docket Number: FHWA-2013-0052