

Comments on to the Federal Register
23 CFR Part 924
FHWA Docket No. FHWA-2008-0009
RIN 2125-AF25
Highway Safety Improvement Program

Overview

In general, the Michigan Department of Transportation (MDOT) supports the proposed language. The changes principally address changes in the various laws.

924.3 Page 22097 – Definitions: Highway Safety Improvement Project – means a project described in the State Strategic Highway Safety Plan (SHSP) that corrects or improves a hazardous road location or feature, or addresses a highway safety problem.

In Michigan, our SHSP does not address the project level. Perhaps a more general wording would be “targeted treatments addressing the focus areas identified in the SHSP.”

924.5 Page 22098 – As a matter policy, “States shall first consider whether the activity maximizes opportunities to advance safety by addressing locations and treatments with the highest potential for future crash reduction. States shall fund safety projects or activities that are most likely to reduce the number of, or potential for, fatalities and serious injuries.” Only recently have MDOT processes begun to be adapted to meet this mandate.

924.5c Page 22098 – The FHWA proposes to add paragraph (C) to clarify improvements to safety features routinely provided as part of broader Federal-aid projects should be funded by the same source as the broader project. States should integrate safety elements into all roadway projects, regardless of the funding source. This would impact how MDOT does safety funded improvements in conjunction with Road and Bridge projects. MDOT practice is not consistent with this. In many of our projects, safety funds are used to address safety problems.

924.7 Page 22098 – The wording requiring a data driven SHSP is a good thing. In Michigan, we are already doing this.

We do have the process in place to review and update the SHSP.

Our SHSP covers all roads in the state and did involve local officials in the development.

924.9 Page 22098 – HSIP planning shall incorporate . . .

924.9(1) – We do not have processes in place to collect and maintain some of the data specified in this section.

924.9(2) – At this time, we have no process defined to improve or advance our safety data collection capabilities.

924.9(3) – We do have the capability to analyze what data we have to develop an HSIP that identifies safety improvement projects on the basis of crash experience or crash potential and establish the relative severity of those locations.

924.15 Page 22100 – Why is the reporting period the previous July through June 30? This gives states two months to prepare and does not coincide with most states' fiscal years, nor that of FHWA. Recommend changing this to the previous fiscal year.

There are references in the NPA to giving priority to low cost in addition to proven countermeasures. In practice, it is very difficult to do low cost treatment projects using federal funding. These types of improvements tend to be more effectively implemented through non-competitive bidding. However, the use of federal funds must be competitively bid.

General Comments

Implementing the changes in the HSIP would be a good opportunity for MDOT to review existing HSIP documentation to ensure the five main elements in Section 924.9 Planning (pages 22098 – 22099) are incorporated.