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June 5, 2006

U.S. Department of Transportation  
Dockets Management Facility  
Room PL-401  
400 Seventh Street, SW.  
Washington, DC 20590

DEPT OF TRANSPORTATION  
DOCKETS  
2006 JUN 12 A 11:03

RE: DOT DMS Docket Number 2006-24672 -3

Dear Docket Clerk:

Reference is made to Docket No. FHWA-2006-24672 requesting comments on proposed changes to the currently approved reporting requirements for the highway safety improvement program (HSIP). The Arkansas State Highway and Transportation Department (AHTD) offers the following comments regarding the proposed changes.

The existing requirements of the HSIP include reporting on the progress of the hazard elimination safety and the railway-highway crossing programs. In addition to the existing provisions under Title 23 USC, Sections 130 and 152, the proposed changes would require additional reports that include a 'five percent' report and a high-risk rural road program report.

As provided in the guidance by the Federal Highway Administration, the 'five percent' report will describe not less than five percent of the highway locations exhibiting the most severe safety needs. Currently, the AHTD identifies high crash rate locations by crash severity and implements projects as funds permit under the HSIP. Therefore, much of the information provided in the 'five percent' report appears to duplicate the existing HSIP report and it is unclear what direct benefit the new report would provide.

The proposed guidelines state that the 'five percent' report should include a list of identified safety locations, an estimate of potential remedies, costs, and impediments to implement the project, other than the costs, for each location. The cost to implement a project is always a primary consideration when selecting projects and in some cases may be the only reason to not implement a project. To eliminate cost from the report as an impediment is questionable.

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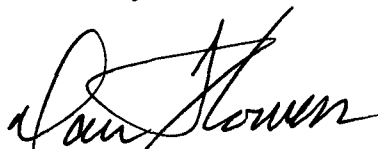
Guidance is also provided for the high-risk rural road program. Though the guidance shows this report should be included as a separate section of the HSIP report, the detailed information requested such as program implementation, methodology used to identify high-risk rural road projects, and cost effectiveness of projects suggest that it is a separate report.

The new requirements also state that crash data should be available for all public roads in order to identify those roads with the most severe safety needs. Since the ultimate goal of the HSIP is to achieve a significant reduction in fatal and serious injury crashes, roads where these type crashes occur should be the primary focus of the HSIP. In 2004 in Arkansas, over 83 percent of fatal/serious injury crashes occurred on the state system. Accordingly, this is where the majority of the safety needs are. Additionally, the collection and reporting of crash data off the highway system would be burdensome and cost prohibitive for the AHTD, especially in light of the benefits that would be provided by maintaining the non-highway data.

In essence, the new requirements of the HSIP are increasing the number of reports from two reports to four reports. As previously mentioned, the information in some of these reports are duplicative and appear to serve no useful purpose, other than more report writing for the states. The Federal Register listed an additional 300 burden hours to prepare these reports. At this time, when many states are trying to do more work with less people, these new reporting requirements place an undue burden on many. Again, we question the direct benefits that these unrealistic reporting requirements will have on achieving the overall goal of reducing fatal/serious injury crashes on the nation's road system.

If additional information is needed, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Flowers", written in a cursive style.

Dan Flowers  
Director of Highways  
and Transportation

c: Chief Engineer  
Assistant to the Director  
Assistant Chief Engineer - Planning  
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