

November 13, 2017

U.S. Department of Transportation
Office of the Under Secretary for Policy
Attn: Strategic Plan Comments
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: US Department of Transportation Draft Strategic Plan for FY 2018-2022

To the US Department of Transportation:

The American Association of State Highway and Transportation Officials (AASHTO) welcomes the opportunity to submit comments to the US Department of Transportation (USDOT) in response to its request for public input on its draft FY 2018-2022 Strategic Plan.

AASHTO is a nonprofit, nonpartisan association representing the state transportation departments (state DOTs) in the 50 states, the District of Columbia, and Puerto Rico. We represent our member departments with respect to all transportation modes. Our primary goal is to foster the development, operation, and maintenance of an integrated national transportation system. AASHTO maintains a very strong partnership with the USDOT, its modal administrations, and other federal agencies to operate, maintain, and improve the nation's transportation system.

Given both challenges and opportunities that we face in maintaining and modernizing our nation's transportation infrastructure in light of funding constraints, technological innovation, and evolving nature of governmental roles, we applaud USDOT's effort to seek broad-based input on its Strategic Plan. Far beyond meeting the basic requirement of the GPRA Modernization Act of 2010 to align strategic planning with the beginning of each new term of an Administration, the USDOT Strategic Plan has the potential to serve as our entire industry's four-year blueprint for an uncertain but exciting future ahead.

AASHTO supports the four global strategic goals proposed by USDOT, and offers the following general comments for each goal.

Safety: Reduce Transportation-Related Fatalities and Serious Injuries Across the Transportation System

State DOTs remain fully committed to improving safety for each and every transportation mode. There has been considerable progress in recent decades, though increase in highway fatalities and injuries in the last two years raises significant concerns. Ensuring a strong federal role—both

from funding and technical support perspectives—will be key in order to resume the downward trajectory.

Continued implementation of recent surface transportation authorizations such as the Moving Ahead for Progress in the 21st Century Act (MAP-21) and the Fixing America’s Surface Transportation Act (FAST Act) in a way that provides states with an increased ability to plan and implement multidisciplinary safety programs will make a significant and positive difference. Put another way, a more flexible program that is less targeted to specific safety activities would improve states’ abilities to develop programs that best suit their individual needs.

Because of the multidisciplinary approaches necessary for addressing safety concerns and the multiple federal funding sources used in state safety programs, flexibility remains critical in enabling states to develop and implement the most effective programs possible.

Infrastructure: Invest in Infrastructure to Ensure Mobility and Accessibility and to Stimulate Economic Growth, Productivity and Competitiveness for American Workers and Businesses

After decades of adding layers of legislative and regulatory oversight for transportation, MAP-21 and the FAST Act have instituted major programmatic and policy reforms. AASHTO recognizes that we can continue the momentum by making further efficiency and effectiveness gains on transportation program and project delivery while continuing the state DOTs’ responsible stewardship of taxpayer resources and both human and natural environments.

To identify specific improvements in how surface transportation projects are delivered, AASHTO developed an Inventory of Potential Administrative and Legislative Improvements for Surface Transportation Program Investment and Project Delivery. To help answer the question, “What are the legislative and regulatory barriers in your state that keep the federal program from functioning more effectively and efficiently?” this resource developed by practitioners and leaders at state DOTs was relayed to USDOT in July 2017. AASHTO’s partnership with the Trump Administration on this effort has been extremely robust and productive. As part of the Strategic Plan, we ask USDOT to make sure that environmental and public policy outcomes are at least maintained or further enhanced through regulatory reform.

When it comes to funding critical investments, state DOTs appreciate the ability to speed up the delivery of much-needed transportation improvements thanks to federally-supported financing and procurement tools ranging from tax-exempt bonds, TIFIA credit assistance, state infrastructure banks, and public-private partnerships, among others. However, while there are opportunities to expand private participation in the delivery of transportation infrastructure projects, it should be recognized that most transportation projects do not generate a revenue stream sufficient to attract private sector interest and therefore require federal support in the form of direct funding rather than financing incentives that encourage borrowing or utilizing private capital.

States are answering the call on raising transportation revenues, as signified by successful enactment of transportation funding packages in 31 states since 2012. AASHTO firmly believes

that the best way for the federal government to lead is to augment already-substantial state and local transportation investment—which compose 75 percent of all highway and transit expenditures—by building on the FAST Act program structure and ensuring long-term, sustainable federal funding from the Highway Trust Fund, with robust formula-based direct funding to address the growing highway and transit backlog.

Innovation: Lead in the Development and Deployment of Innovative Practices and Technologies that Improve the Safety and Performance of the Nation’s Transportation System

Transportation system in the US has now reached an inflection point that is as significant as when the engine was merged with the horse and buggy; today it is the merger of technology with the pedestrian, bicycle, car, truck, trains, boats, planes, and beyond. This will change the way we move goods, services, and people on our surface and air transportation system.

Governments will need to build, redesign, and adapt roads, highways, and bridges to the autonomous and connected vehicle. Traditional investments include providing better lighting, consistent roadway design, better signage; these investments are especially needed on rural roads. Spectrum for vehicle-to-infrastructure systems using Dedicated Short Range Communications needs to be preserved, and rural broadband expanded. The National Highway Traffic Safety Administration also must move forward with industry on the proposal to establish a Federal Motor Vehicle Safety Standard for vehicle-to-vehicle communications (V2V). Cooperative V2V and vehicle-to-infrastructure (V2I) safety systems are needed to support fully automated vehicles, supported by robust research and deployment. Institutional capacity and workforce skills will need to be upgraded to operate, maintain and secure new smart roads and intelligent vehicles

AASHTO agrees with USDOT’s assessment of promising potential when it comes to the use of drones, or Unmanned Aircraft Systems (UAS). AASHTO last year identified at least 17 state DOTs conducting research regarding the use of the UAS. The aircraft have assisted state DOTs with bridge inspections, accident clearance, surveying and identifying, monitoring and mitigating risks posed by landslides, rockslides and flooding.

In this increasingly technology-infused future, data will serve as the new asset that can dramatically enhance public safety, improve mobility, enhance program and operational efficiency, and create jobs. It is important now more than ever, that we build upon the longstanding relationships between federal, state, and local governments to ensure our transportation system is not a bottleneck of continued innovation, but an indispensable catalyst.

Accountability: Serve the Nation with Reduced Regulatory Burden and Greater Efficiency, Effectiveness and Accountability

One of the policy hallmarks of MAP-21 in 2012 was the introduction of a performance-based federal surface transportation program. Once fully implemented, this framework will transform the Federal-aid Highway Program and provide a means to the most efficient investment of federal funds. This is done by refocusing on national transportation goals, increasing the

accountability and transparency of the federal-aid highway program, and improving program decision making through performance-based planning and project decision-making.

AASHTO strongly agrees with USDOT's assessment that national surface transportation performance measures and outcome-based regulatory structures in other modes offer the prospect of increasing the focus on maintaining a state of good repair. Beyond the MAP-21 measures, state DOTs have been leading the way in the adoption of individual measures in specific areas, and each state's experience will continue to inform the national performance framework going forward.

AASHTO believes that these measures can be implemented in a manner that advances a safer and more efficient transportation system without imposing undue regulatory burdens on States. Though there have been some recognized challenges in the effort to fully implement a performance-based federal program, state DOTs look forward to continue working with USDOT to successfully implement and evaluate these key measures.

Specific Comments

In addition to aforementioned general remarks, the following are AASHTO's specific comments on the draft Strategic Plan:

- Page 12: Under "Strategies" section, add "Funding Sustainability: In order to restore the investment confidence of state and local partners traditionally founded upon the stability of federal funding, provide leadership in identifying potential revenue mechanisms to sustainably support the Highway Trust Fund and the Airport and Airways Trust Fund for the long term."
- Page 13: Under "Leverage Funding" paragraph, add "including multimodal transportation programs and projects" after "incentivize State and local funding, and support private investment in transportation infrastructure."
- Page 16: Under "Rural" paragraph, add "and community-based wellness centers, particularly for persons with disabilities, older adults and persons of lower income" after "The DOT will prioritize policies and programs connecting rural communities to economic opportunities."

We appreciate the opportunity to provide these comments and look forward to working with USDOT to forge consensus on this important Strategic Plan to guide the next four years. If you would like to further discuss, please contact Joung Lee, AASHTO's Policy Director, at 202-624-5818 or jlee@ashto.org.

Sincerely,



John Schroer
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