

Michael W. Hancock, P.E., President
Secretary, Kentucky Transportation Cabinet

Bud Wright, Executive Director



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January 29, 2014

Docket Operations
U.S. Department of Transportation
West Building, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Docket No. FTA-2013-0043

To the Federal Transit Administration:

The American Association of State Highway and Transportation Officials (AASHTO) is pleased to provide comments on FTA's "Notice of Request for Revision of a Currently Approved Information Collection" Notice of Request for Comments, published in the Federal Register on November 22, 2013. Representing all 50 states, the District of Columbia, and Puerto Rico, AASHTO serves as a liaison between state departments of transportation and the federal government.

State Departments of Transportation (State DOTs) and their metropolitan planning organization (MPOs) partners invest considerable time and resources in transportation planning, so this is a topic of significant importance to us. The AASHTO member State DOTs are diverse in terms of size, populations served, and systems covered, and the collective burden hours will likely vary between a state such as Florida versus Montana. However, we believe the estimated annual burden hours of the transportation planning programs on respondents as contained in the Notice is understated and misleading for many of the State DOTs.

The Estimated Annual Burden of 8017 hours documented in the Notice is too low. This estimate is equal to approximately three full time employees. In Michigan, they estimated that 8,000 person hours were used in one year on the long-range plan update let alone updating other documents and plans. In states such as Florida, one of their MPOs provided an estimate of 15,608 hours for their area, nearly double the estimate provided in the Notice. Moreover, the estimate did not include required interagency consultation and involvement of federally specified stakeholder groups—each of which takes considerable time.

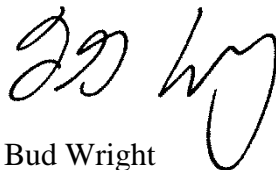
In light of the above, we request that the Federal Transit Administration Federal Highway Administration acknowledge that the total annual burden hours in states will likely vary significantly and will often times be significantly more than the estimate of 8017 hours per respondent. Such an acknowledgement would be a meaningful recognition of the great demands

on state and regional transportation organizations—which is one reason why state flexibility in the implementation of federal policy is so vitally important and compelling.

Of even greater concern to us is that the information from this sample is to be used as the basis for estimating the annual compliance burden for the forthcoming Notice of Proposed Rulemaking that the Federal Transit Administration and the Federal Highway Administration will be issuing next month. That NPRM will be used to implement changes in the metropolitan and statewide and nonmetropolitan transportation planning programs as a result of the Moving Ahead for Progress in the 21st Century Act (MAP-21). The new performance management requirements of MAP-21 will impact transportation planning for states and MPOs, but MAP-21's promise of greater flexibility and improved project delivery should be kept in order that any new requirements are balanced.

We remain hopeful that the regulations that do emerge will add value, empower and reflect partnership rather than regulatory burden and cost with limited value-adding benefit. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bud Wright', with a stylized flourish at the end.

Bud Wright
Executive Director
AASHTO

A handwritten signature in black ink, appearing to read 'Mike Hancock', with a large, decorative flourish at the end.

Mike Hancock
Secretary, Kentucky Transportation Cabinet
President, AASHTO
Chair, AASHTO Standing Committee on Planning