

DEPARTMENT OF TRANSPORTATION

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May 29, 2015

U.S. Department of Transportation
Docket Management Facility
1200 New Jersey Ave. SE, W12-140
Washington, DC 20590-0001

RE: Docket Number: FHWA-2013-0052
Federal Register Number: 2125-AF57
Asset Management Plan

To Whom It May Concern:

The California Department of Transportation respectfully submits the attached comments on the Asset Management Plan Notice of Proposed Rulemaking issued by the Federal Highway Administration on February 20, 2015.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Malcolm Dougherty".

MALCOLM DOUGHERTY
Director

Enclosure

California Department of Transportation's Comments on the Federal Highway Administration's Notice of Proposed Rulemaking on Asset Management Plans

1. This proposed rule asks the states to minimize cost, minimize risk, and maximize condition. These objectives can often be competing against each other for available funding. The proposed rule also uses the term "optimal strategy." With respect to the three objectives, please provide a more precise definition of what an "optimal strategy" is in this context.
2. Native American tribes in California have indicated a desire to provide input during the development of the proposed Asset Management Plans. The California Department of Transportation (Caltrans) believes that there are benefits from working with our external partners on the Asset Management Plans. Communications with external transportation partners should be encouraged in the final rule.
3. In Section 515.005, Caltrans requests the addition of a definition for "Financial Plan" as used in this proposed rule.
4. In Section 515.007(a)(2), The proposed rule calls for agencies to, "establish a process for conducting life-cycle cost analysis for an asset class or asset sub-groups at the network level". Please clarify in the final rule if the intent is for programmatic benefit cost analysis of feasible actions over the life of the asset.
5. In Section 515.007(5b) the proposed rule makes a specific call for the states to use bridge and pavement management systems with certain capabilities. Caltrans requests that the rule be amended to indicate that federal funding sources may be used to fund such systems and the collection of data required to drive them.
6. In Section 515.009(d)(8)(f) three possible scenarios are defined for the investment strategies in this section: (1) sustain condition, (2) improve condition, and (3) make progress toward a goal. The final rule should clarify if the intent is to provide goal constrained or fiscally constrained investment strategies. In other words, should the investment strategies focus on making the best use of available funds or the funding necessary to achieve a desired performance level? If the intent is to define fiscally constrained strategies, then provisions would need to be added to recognize all potential condition outcomes including levels below the established baseline. Caltrans also requests that clarification be made between the strategies of "improve" and "make progress toward goals."
7. Section 515.013(a) describes the implementation schedules. The proposed rule states that the plan deadline is not later than one year after the effective date of the final rule. Caltrans requests that the implementation schedule be extended to a period of two years after the final rule is made.