



April 3, 2017

Mr. Charles A. Zelle
Commissioner
Minnesota Department of Transportation
395 John Ireland Boulevard
Transportation Building, MS-100
St. Paul, MN 55155-1899

Dear Mr. Zelle:

I write on behalf of the American Traffic Safety Services Association (ATSSA) to urge that Minnesota incorporate its Sign Management Program into its Asset Management Plans as mandated by the Moving Ahead for Progress in the 21st Century Act (MAP-21) and incorporated at 23 CFR 515 and 667.

On October 24, 2016, a Final Rule was published in the *Federal Register* regarding “Asset Management Plans and Periodic Evaluations of Facilities Repeatedly Requiring Repair and Reconstruction Due to Emergency Events.” This Final Rule implemented requirements established by MAP-21 that states develop and implement risk-based asset management plans for the National Highway System. The rule establishes the minimum standards each state DOT must use in developing and operating bridge and pavement management systems. Initial asset management plans must be submitted by April 30, 2018.

The rule specifically allows states to *voluntarily include* assets other than NHS pavements and bridges in its plan. In commenting on the proposed rule, AASHTO and some state DOTs noted that requiring the states to apply the full asset management requirements to voluntary inclusions would discourage them from doing so. In response, FHWA revised the Final Rule to relax the requirements for voluntary inclusions. Section 515.9(l) states that “If the State DOT elects to include other NHS infrastructure assets or other public road assets in its asset management plan, the state at a minimum shall address the following, *using a level of efforts consistent with the State DOT’s needs and resources: (emphasis added)*. The section goes on to list the new minimum requirements.

Previously, the Federal Highway Administration (FHWA), established a rule regarding minimum levels of retroreflectivity for signs as well as requirements that states develop sign management programs. This requirement can be found as follows: December 21, 2007; Department of Transportation, Federal Highway Administration, 23 CFR Part 655, FHWA Docket No. FHWA – 2003 – 15149 National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Maintaining Traffic Sign Retroreflectivity.

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Compliance dates of this Final Rule were amended by way of May 14, 2012; Department of Transportation, Federal Highway Administration, 23 CFR Part 655, FHWA Docket No. FHWA-2010-0159, National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision.

It would seem that the multiple reporting requirements placed on state DOTs could be more easily managed if states were to incorporate their Sign Management Programs into an overall Asset Management Plan. We hope that Minnesota DOT will consider doing so.

Thank you for your time, attention and consideration of this recommendation.

Sincerely,



Roger A. Wentz
President & CEO