

General Comments

Two commenters (the Institute of Transportation Engineers and the West Virginia Department of Transportation) noted that ISTEA mandated the use of Safety Management Systems, but the guidelines made little, if any, reference to their use. These commenters recommended that the agencies explain the relationship between the guidelines and Safety Management Systems.

These guidelines are meant to provide direction to state and community highway safety efforts which are supported with Section 402 grant funds. The Section 402 process in every state is an integral part of the state's Safety Management System.

To reduce crashes, ISTEA required that every State implement a *process* for managing highway safety by ensuring that safety improvement opportunities are considered and implemented on all highway systems and during all phases of programs/projects. Although each state has a unique approach to developing and implementing this SMS, the process required is similar to the Section 402 process. It includes problem identification and goal setting; data collection and analysis; identification of performance measures; and selection and evaluation of strategies.

The SMS differs from the 402 process in that its scope is broader. The process brings together new highway safety partners and resources, and provides for coordination among all those involved in highway safety, including engineers, enforcement officers, educators, motor carriers, medical personnel, state officials, and metropolitan planning organizations. It is intended that the process will assist decisionmakers in setting highway safety priorities for all safety elements (human, vehicle, and roadway), and in allocating a broad range of highway safety resources. Safety projects and programs identified through the SMS process may be included for funding in each state's Section 402 plan, Motor Carrier Safety Assistance Program State Enforcement Plan (SEP) and metropolitan and statewide transportation plans and improvement programs, as appropriate.

The Washington State Department of Health applauded the agencies for emphasizing the connection made by traffic safety professionals between traffic safety and good health. Washington State stressed the importance of informing the public about medical care cost savings that could result from safe traffic habits and of forming "partnerships" between traffic safety professionals and public health officials, hospitals and EMS/

trauma providers. In December 1994, NHTSA completed and distributed to the public a Model for Integrating Injury Control System Elements. The agencies have made a number of changes to the guidelines to incorporate elements of this Injury Control Model, which stress a systematic approach for preventing and controlling injuries on our nation's highways.

The Washington State Department of Health also recommended editorial changes regarding the use of the terms "crash," "accident," "impaired driving" and "drunk and drugged driving." Except where it was impracticable, such as when referencing Police Accident Reports or Drunk and Drugged Driving (3D) Awareness Week, these comments have been incorporated in the guidelines.

Addition of Three New Guidelines

Guideline #19: Speed Control

Historically, Speed Control has not been separately identified as a National Priority program area under 23 CFR 1204 or described in a separate guideline. It has, however, been an integral part of the Police Traffic Services program. Speed control initiatives have been supported under the Police Traffic Services priority program, under the guideline, and also through FHWA's Motor Carrier Safety Assistance Program (MCSAP) as part of an overall traffic enforcement program aimed specifically at commercial motor vehicles.

In accordance with ISTEA, on January 14, 1994, the agencies published in the **Federal Register** an NPRM proposing to designate Speed Control as a separate National Priority program area and a notice proposing to add a separate guideline on Speed Control. On December 13, 1994 (59 F.R. 64120), the agencies published a final rule designating Speed Control as a separate National Priority program area. In today's notice, the agencies are adding a separate guideline on Speed Control.

The agencies received 16 comments regarding the addition of new guideline 19. There was strong support from most respondents for establishing speed control as a separate guideline, consistent with the support expressed for its inclusion as a priority program area. Three commenters specifically welcomed the addition of the separate guideline. The Florida Department of Transportation thought the inclusion of the guideline would give uniform direction to the States for building effective programs. The Georgia Department of Public Safety and The Illinois State Police were pleased that

the area of speed control would now receive individualized attention.

In contrast, two commenters questioned the need to separate speed control from police traffic services and one commenter questioned the need for a speed control guideline. The Michigan Department of State Police believed that keeping these guidelines combined would lead to a more efficient use of shrinking police resources and better reflect the integrated belts, alcohol, and speed programs undertaken by many States. The West Virginia Division of Highways thought that public acceptance would likely be higher if speed control were part of a "well-reasoned and balanced" program, rather than a "stand-alone" effort. The California Highway Patrol (CHP) cited several NHTSA and FHWA publications, which it believes contain more useful information and are more widely distributed and easier to update than the guideline. In its view, highway safety personnel have access to numerous studies and publications concerning speed issues that contain more current information than the guideline.

Consistent with the view of most commenters, the agencies have retained the separate guideline. The issuance of the guideline is appropriate and necessary in light of the recent designation of Speed Control as a priority program area. The agencies do not believe that a separate guideline precludes the integration of programs or the efficient use of resources by the State. Nor do we think that it represents a "stand-alone" effort subject to public disfavor. Rather, it is one of many guidelines which, taken together, provide guidance to the States in the implementation of a comprehensive program. With respect to CHP's comment, the agencies recognize the existence of other sources of information concerning speed control, and freely encourage their use in addition to the information in the guideline.

The Institute of Transportation Engineers (ITE), the West Virginia Division of Highways, and CHP each stressed the importance of traffic engineering practices in the proper setting of speed limits. Emphasizing that speed limits should be "reasonable," West Virginia thought existing speed limits should be subjected to engineering study prior to funding speed enforcement programs, and recommended that the guideline contain a strong statement to that effect. CHP urged that training for traffic engineers include "Developing guidelines for setting speed limits; Establishing