

October 1, 2012

U.S. Department of Transportation
Dockets Management Facility
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Docket No. FHWA-2012-0075, Draft Program Comment for Common Post-1945 Concrete and Steel Bridges

On behalf of the 5,000 members of the American Road and Transportation Builders Association (ARTBA), I respectfully offer comments on the Federal Highway Administration's (FHWA) Draft Program Comment for Common Post-1945 Concrete and Steel Bridges.

ARTBA's membership includes public agencies and private firms and organizations that own, plan, design, supply and construct transportation projects throughout the country. Our industry generates more than \$380 billion annually in U.S. economic activity and sustains more than 3.3 million American jobs.

ARTBA's public sector members adopt, approve, or fund transportation plans, programs, or projects, while ARTBA's private sector members plan, design, construct and provide supplies for these federal transportation improvement projects, including bridge projects. This document represents the collective views of our 5,000 member companies and organizations.

ARTBA supports FHWA's Draft Program Comment to distinguish "common bridge types" constructed after 1945 from those that have value for historic preservation. We agree that placing all bridges under a common category rather than mandatory individual reviews will help to reduce unnecessary delay in bridge reconstruction and rehabilitation projects.

FHWA's proposal is similar to activities undertaken shortly after the passage of the last surface transportation program reauthorization bill, the "Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users" (SAFETEA-LU). SAFETEA-LU directed FHWA to promulgate and enact regulations that would similarly exempt common elements of the Interstate Highway System (IHS) with "little value for preservation" from onerous regulatory requirements. FHWA, in turn, took an inventory of the IHS and identifies those portions which had significant historical value, allowing projects on the large remaining portion of the IHS to proceed in a more efficient manner.

Just as ARTBA agreed with FHWA's approach to the IHS in response to SAFETEA-LU, We support FHWA's Draft Program Comment regarding post-1945 concrete and steel bridges. FHWA's approach recognizes while there will certainly be instances where active steps to



preserve historical portions of the bridges will be necessary, the majority of bridge improvements in this class will not affect anything of historical significance.

ARTBA looks forward to continuing to work with FHWA to reduce excessive project delivery times while applying historic preservation regulations in a responsible and effective manner.

Sincerely,

A handwritten signature in black ink that reads "T. Peter Ruane". The signature is written in a cursive style with a large, stylized initial "T".

T. Peter Ruane
President & C.E.O