

C Bojidar Yanev - Comments

This is a Comment on the **Federal Highway Administration (FHWA)**
Proposed Rule: **National Performance Management Measures:
Assessing Pavement Conditions and Bridge Conditions for the
National Highway Performance Program**

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Comment

1. Discussion of & 490.409 Calculation of NPM Measures for Assessing Bridge Condition refers to the existing NBIS and the rating system 9 - 0. In the meanwhile FHWA is adopting the AASHTO element level inspection with ratings 1 -4. Thus the proposed performance measures are obsolete on arrival.
2. The AASHTO system, while element - level is not span - specific. Thus, even if updated to element level inspections, NBI will not reflect the complexity of the multi-span bridges.
3. Traffic counts on the bridges may be an important variable quantifying their performance and useful life expectancy.
4. There is no reference to biennial inspections as the primary source of bridge-related information. In the meanwhile risk-based scheduling at varying intervals of up to 6 years is proposed at the discretion of the owner. Rather one could keep the biennial inspection interval fixed, but vary the inspection scope. This would be highly appropriate in large structures with components of very different exposure to aggressive influences.