

March 30, 2015

Mr. Gregory G. Nadeau
Acting Administrator, Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: Docket No. FHWA-2013-0053

Dear Mr. Nadeau:

The Georgia Department of Transportation appreciates the opportunity to comment on Federal Highway Administration's (FHWA) NPRM; Assessing Pavement Condition for the National Highway Performance Program and Bridge Condition for the National Highway Performance Program. Georgia DOT supports the principles of performance management and its contribution to providing an effective transportation system for our traveling public. The implementation of Performance Management will require time, flexibility and collaboration in order to achieve a meaningful result.

Georgia DOT is in general agreement with the comments provided by AASHTO in representation of the State DOTs. We believe that national performance measures can be implemented in a way that provides a safer and more efficient transportation system without imposing undue regulatory burdens on the State DOTs. In addition, we offer specific comments and concerns as follows.

• **Assessing Pavement Condition**

~ Georgia DOT is in agreement with the two performance metrics proposed by FHWA to assess pavement condition.

• **Pavement Data Requirements**

~ Georgia DOT disagrees with the proposed requirement to gather IRI data in two directions as opposed to one direction as currently required. Considering that there is often a 50/50 split in traffic distribution, collecting IRI data in one direction provides an accurate representation for both directions of travel. This change will require the use of limited resources for a minimal return on the investment.

~ GDOT has concerns regarding the requirement for full extent collection of Cracking, Rutting and Faulting data. The Department proposes that this remain a sample collection requirement as it is currently performed. Limited resources that are not projected to increase in the future may result in reduced efforts in other areas of data collection and reporting. While every effort has been and will continue to be provided to support all Federal data collection and reporting requirements, the Department asks for consideration of resource limitations.

- ~ Any increase or expansion of the current data collection requirements will be problematic due to increased resource requirements. The cost to the Department could be between \$400,000 and \$500,000 annually.
- ~ The Department utilizes video log technology to collect pavement data. It is questionable as to whether the technology will be available to capture crack mapping or faulting as proposed by any means other than manual observation. This could result in the assessment of a penalty without the means to make an accurate determination of the pavement condition.
- ~ The proposed modifications in data collection will impact the collection of various other elements beyond IRI and Cracking/Rutting and Faulting. Consideration should be given to the impact on other data elements. Increased reporting requirements without increased resources may result in overall data quality degradation.

- **Pavement Condition Thresholds**

- ~ FHWA should clarify the need and purpose of MPOs setting individual pavement targets. MPOs should be encouraged within the NPRM to set targets in conjunction with the DOT that support regional and statewide goals.
- ~ FHWA should define the method for calculating Cracking, Rutting and Faulting including differentiation of surface types.
- ~ The minimum poor condition threshold is set at 5%. GDOT recommends that this be increased to 7-10%.
- ~ FHWA should clarify whether or not bridges are to be included in the IRI assessment.

- **Calculation of Pavement Measures**

- ~ As currently proposed, IRI, cracking, rutting and faulting are evaluated as equal conditions. Cracking, rutting and faulting have a higher impact on overall condition than IRI. Consideration should be given to weighing the more important conditions.

- **Pavement Minimum Condition Penalties**

- ~ The method of collection in millimeters is contradictory to GDOT's current business practices and likely other states as well. FHWA should consider allowing flexibility in the reporting and determination of penalties.
- ~ Please clarify whether or not bridge approaches are to be removed from the calculation of pavement condition.
- ~ The imposing of penalties would require diversion of funds to address maintenance concerns. However, this could have an impact on resources for needed capacity or safety projects. The penalties as proposed should only be implemented after states have an opportunity to implement and evaluate corrective actions on their own and at minimum, after two full evaluation periods have elapsed.

- **Assessing Bridge Condition**

- ~ Georgia DOT is in agreement with the two performance metrics proposed by FHWA to assess bridge condition.
- ~ The elements recommended for assessment as well as the definition of good, fair, and poor are consistent with current rating requirements.

- **Bridge Data requirements**

- ~ GDOT requests that FHWA consider returning to the April 1st date for submission of data to NBI. Meeting the March 15th date as proposed would result in changes to business practices and would require additional resources.
- ~ To assure that there is no duplicity in reporting bridge condition data, GDOT requests that no changes are made to the current process used for reporting condition data on bridges that cross state lines. The proposed section included in the NPRM should be removed allowing the reporting for border bridges to fall to the state that currently maintains them. As written, the NPRM would place FHWA in the position of referee between states should two states submit differing condition assessments on the same bridge.

- **Bridge Condition Rating**

- ~ GDOT supports the 10% bridge minimum as currently proposed.
- ~ FHWA should clarify within the rule the difference between “Poor” and “Structurally Deficient”. Also, clarify whether the condition rating and penalty are based on Structural Deficiency or a Poor rating.
- ~ The Federal government owns/maintains several bridges within Georgia. Please clarify within the rule, if the reporting guidelines and requirements will be consistent for the federally owned structures. GDOT suggests that Federal agencies submit their own data and be held responsible for the condition of their bridges.
- ~ Regarding the following comment:

“The calculation of the performance measures for assessing bridge condition provides flexibility to accommodate **future changes** such as the use of element level data.”

Clarify within the rule the time that States would be allowed to implement any future FHWA changes. How much advance warning would States and MPO’s receive prior to revising the measures? Could future changes be implemented without going through the NPRM process?

- **Targets/Reporting and Significant Progress**

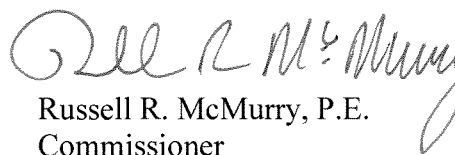
- ~ There are routinely areas where pavement data cannot be collected such as roadway sections under construction or recently overlaid. In addition, there are times when the most recent data for a segment of road or a bridge could be considered dated. As currently proposed missing or dated data would be

classified as “poor” data. This could impact the pavement performance results while not accurately reflecting current pavement conditions. FHWA should clarify how these data issues will be resolved.

- ~ FHWA should allow State DOTs to utilize default values for common situations.
- ~ FHWA should further clarify the need and purpose of MPOs setting individual bridge targets. MPOs should be encouraged to set targets in conjunction with the DOT that support regional and statewide goals.
- ~ FHWA anticipates this rule to be effective no later than October 1, 2015. This would require changes to the calendar year 2016 bridge TAPE submittal which will be a challenge for GDOT and other states.
- FHWA considered nine principles in this NPRM and encourages comments on the extent to which this approach to performance measures, set forth in this NPRM, supports the following principles: Provide for a National Focus, Minimize the Number of Measures, Ensure for Consistency, Phase in Requirements, Increase Accountability and Transparency, Consider Risk, Understand that Priorities Differ, Recognize Fiscal Constraint and Provide for Flexibility.
 - ~ GDOT agrees that the methodology proposed in this NPRM is consistent with many of the nine principles considered by FHWA. However, there is limited flexibility in the setting of the minimum conditions. GDOT encourages FHWA to consider the financial constraint and burden that this rule could impose on the states. Limited funding could prevent targets and minimums from being achievable and imposing the penalties as proposed could result in worsening of other assets with minimal improvement to Bridge or Pavement conditions.
- The FHWA technical assistance will include activities such as conducting national research studies, developing analytical modeling tools, identifying and promoting best practices, preparing guidance materials, and developing data quality assurance tools. The FHWA encourages comments on how it can help maximize opportunities for successful implementation.
 - ~ GDOT values any tools and guidance offered by FHWA. However, it is important that the tools are relevant and offer immediate benefit to the states.
- The FHWA is seeking comments on the approach for establishing optional additional targets for urbanized areas and the non-urbanized area. The FHWA would also like comments on any other flexibility it could provide to or identify for State DOTs related to the voluntary establishment of additional targets. Some examples include: Providing options for establishing different additional targets throughout the State, particularly for the States’ non-urbanized area; and expanding the boundaries that can be used in establishing additional targets (e.g., metropolitan planning area boundaries, city limit boundaries, etc.).
 - ~ GDOT believes that there is adequate flexibility in setting targets that will allow differentiation between urban and rural areas. However, this flexibility should be extended to the minimums.
- FHWA requests comments on whether a 0.1 mile uniform section length is appropriate for both the Interstate System and non-Interstate NHS reporting of pavement condition.

- ~ GDOT has concerns regarding this issue and questions the ability of our state and others to report this information in compliance with this condition. Georgia DOT recommends that this requirement be removed from the proposed rule.
- The FHWA encourages comments on the appropriateness of the proposed pavement condition rating threshold criteria and any alternative levels that would be appropriate for network level condition assessment. (TABLE 5)
 - ~ GDOT believes the pavement condition minimum threshold should be increased to 7-10%. This will set an achievable target for states while maintaining adequate and acceptable National Highway System performance for the traveling public.
- The FHWA encourages comments on alternative methods for addressing missing or invalid data that would provide for an accurate assessment of network level conditions.
 - ~ GDOT makes every effort to ensure the most accurate data is provided in the HPMS annual report per the required deadlines. However, there are routinely areas where pavement data cannot be collected such as roadway sections under construction or recently overlaid. In addition, there are times when the most recent data collected for a segment of road or a bridge could be considered dated. As currently proposed missing or dated data would be classified as “poor” data; impacting pavement performance results while not accurately reflecting current pavement conditions. FHWA should allow states to note why the data is missing or dated and to omit it from use when determining bridge or pavement condition.
- The FHWA evaluated lane-mile distribution of the Interstate System pavement conditions among different traffic volumes, climatic conditions, and terrain types. Consequently, the data suggested that there is no evidence to conclude that there are significant differences in percent lane-miles of the Interstate System in Poor pavement condition among the Interstate System pavement sections in these various areas. FHWA seeks comments on the need to establish different thresholds for geographic regions.
 - ~ Just as FHWA has considered varying the targets for different areas of the State i.e. urban vs. rural, they should also consider varying conditions throughout the country when setting minimum thresholds. A range may be a more appropriate method for addressing this issue.

Sincerely,


Russell R. McMurry, P.E.
Commissioner

RRM:ATA:crm

cc: Meg B. Pirkle, P.E., Chief Engineer

Angela T. Alexander, Director of Organizational Performance Management