

December 22, 2020

U.S. Department of Transportation
Dockets Operations, M-30
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Federal Docket No. FHWA-2019-0030, Design Standards for Highways Notice of Proposed Rulemaking, Request for Comments

The American Association of State Highway and Transportation Officials (AASHTO) writes to offer our response to the Federal Highway Administration's (FHWA) notice and request for comment regarding the Design Standards for Highways (Docket No. FHWA-2019-0030).

AASHTO is a nonprofit, nonpartisan association representing the State transportation departments (State DOTs) in the 50 States, the District of Columbia, and Puerto Rico. AASHTO represents all five transportation modes: air, highways, public transportation, rail, and water. AASHTO's primary goal is to foster the development, operation, and maintenance of an integrated national transportation system.

These comments were developed with the assistance of the AASHTO Committee on Design and the AASHTO Committee on Bridges and Structures.

Section 625.2

AASHTO supports the additional flexibility that would be allowed by granting states the ability to develop and use specific resurfacing, restoration, and rehabilitation (RRR) standards on Interstates and other freeways. This will allow states to continue to ensure the safety of the traveling public using a variety of tools now available while allocating funds in a responsible manner.

Section 625.3(f)(2)

AASHTO supports the addition of a programmatic exception to allow states to use more recent editions of design standards before a final rule change incorporating those editions has been made. This will allow states to incorporate the latest editions into their designs sooner than they are able to now.

Section 625.4(b)

In the March 2020 comments submitted for National Bridge Inspection Standards NPRM (Federal Docket No. FHWA-2017-0047), AASHTO recommended that the *Manual for Bridge Evaluation* and the *Manual for Bridge Element Inspection* be removed from their current location in Section 650.317 and added to this section. We again recommend this

change. Section 625 is updated more frequently than Section 650 and relocating these two references would allow for states to use the most current edition earlier.

Section 625.5(b)(9)

AASHTO supports the addition of *AWS D1.1/D1.1M Structural Welding Code – Steel* to the list of acceptable design standards. We recommend the addition of language stating that if there is a conflict between D1.1 or D1.4 and the *AASHTO/AWS D1.5M/D1.5 Bridge Welding Code* that the *Bridge Welding Code* take precedence.

Section 625.5(d)(1)

AASHTO requests that the contact information be changed to “American Association of State Highway and Transportation Officials (AASHTO), 555 12th Street NW, Suite 1000, Washington, DC 20004, 1-800-231-3475, <https://store.transportation.org>.”

AASHTO greatly appreciates the opportunity to provide comments on the draft rule. If you have any questions on these comments and recommendations, please contact Ms. Patricia Bush, P.E., at 202-624-8181 or pbush@aaashto.org.

Sincerely,

A handwritten signature in blue ink that reads "Victoria F. Sheehan". The signature is written in a cursive style with a large initial "V".

Victoria F. Sheehan
President, American Association of State Highway and Transportation Officials
Commissioner, New Hampshire Department of Transportation