



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

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November 17, 2025

Docket Management Facility
U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001
Submitted electronically at: www.regulations.gov

Subject: Federal Highway Administration; Agency Information Collection Activities: Request for Comments for a New Information Collection; Site Assessment Report—Detailed Damage Inspection Report (DDIR) [Docket No.: FHWA-2025-0169]

To Whom It May Concern:

The Virginia Department of Transportation (VDOT) appreciates the opportunity to provide comments to the Federal Highway Administration (FHWA) in response to its Notice published in the *Federal Register* on September 16, 2025, regarding "Agency Information Collection Activities: Request for Comments for a New Information Collection; Detailed Damage Inspection Report (DDIR)". VDOT's comments are as follows:

Whether the Proposed Collection is Necessary for the FHWA's Performance:

The current DDIR collects a large amount of data, which is at times repetitive, and consists of information which often results in many points of potential inconsistency between the state Departments of Transportation (state DOTs) and FHWA. FHWA could operate much more efficiently if Emergency Relief (ER) funding was made available following a disaster based on observed damage. The National Aeronautics and Space Administration's (NASA's) Disasters Response Coordination System could provide FHWA and state DOTs needed imagery of disaster impacted areas. A formula for dollars required to recover damaged infrastructure could be used to quickly estimate and deliver funds to State DOTs to perform the work. Actual costs could be communicated to FHWA on completion of projects to close out the disaster and reconcile costs.

FHWA's performance metrics should be based on the flexibility to assist state DOTs in project delivery and recovery. The purpose of the Emergency Relief funding is to facilitate the traveling public's access to the damaged assets quickly. State DOTs spend time on ensuring all the correct paperwork (e.g., pictures, contracts, right-of-way documents, etc.) is available for FHWA's

approval. The current timing of and funding resources for the collection of the required paperwork sometimes outweighs the benefit of the emergency relief funding received.

Accuracy of the Estimated Burdens

VDOT recommends that FHWA factor in additional time in calculating the estimate of the actual burden per assessment. FHWA's estimated burden of 2 hours per each assessment significantly underestimates the actual burden. FHWA's estimate of the number of hours spent per DDIR appears to only include office time spent gathering previously collected data. However, data collection in the field is required to complete a DDIR, and travel times alone are often an hour or more between individual sites, which would greatly increase the estimated burden. FHWA should include an estimate of the time spent to collect data and documentation for the DDIR. The public burden estimates should be based on median time per DDIR for years in which a DDIR was completed; not averages or medians which include years when no DDIR was completed. In VDOT's experience, documentation for each DDIR (site) requires between 20 to 24 hours per assessment. For example, VDOT's experience for the 68 DDIRs related to the Helene storm has been that it took over 1,632 hours (204 days) to complete the 68 DDIRs.

Ways to Enhance the Quality, Usefulness, and Clarity of the Collected Information

VDOT recommends that FHWA use a GIS-based DDIR and provide the tool to the states to allow for quick, accurate, and complete data collection, verification, and sharing with FHWA. The goal would be to use one tool nationwide for collections, review, and sharing and to upload additional substantiating documentation in one standard solution.

VDOT recommends that FHWA implement one standard national review process for DDIRs.

VDOT recommends that FHWA regularly assist state DOTs in the DDIR (site) process, which includes procurement and collecting data after a storm requiring state DOT action, to assist FHWA in better understanding the difficulties and time commitments experienced by state DOTs in collecting the required data.

To assist with the DDIR (site) process, FHWA should consider creating an Emergency Relief program toolkit. The Emergency Relief toolkit should include a federally eligible contract that can be used by states to advertise in advance and/or during an emergency. FHWA should consider a standard MOA to define the responsibilities of the FHWA division office and state DOT as well as the requirements for the Emergency Relief program.

FHWA should consider combining DDIRs in geographical areas to limit the number of DDIRs (sites). Currently, FHWA may combine DDIRs (sites) within a one-mile radius. FHWA should consider combining by logical areas determined by state DOTs. This action would allow a more coordinated process and minimize redundancy of documentation. For example, currently, VDOT's Bristol District has 68 DDIRs for Helene. The district has duplicate contractors for over 44 DDIRs (sites) as well as the same programmatic environmental document for all 68 DDIRs (sites). By adopting VDOT's recommendation, VDOT and FHWA could reduce the time and resources spent on 68 DDIRs and could instead concentrate on gathering the appropriate

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documents for the one DDIR. Several of the documents within the 68 DDIRs were duplicates (e.g., same contracts, environmental documents, etc).

FHWA's emergency relief application, Policy Information Data Portal (PIDP), records the event, the related event DDIRs and required documentation, and is user friendly. However, VDOT recommends several features be updated/enhanced to relieve the burden on state DOTs:

- Increase the time the state DOT has to enter information into the application before it logs the user out. The upload process has a lag time due to issues with timing out. As a result, uploaded documents may not upload in time and will require the user to reload the document;
- Allow state DOTs to delete DDIRs (sites) after they are created in the PIDP before being submitted to FHWA, and provide the ability to change DDIR naming in the PIDP once created so the state DOT would not have to enter in a new DDIR;
- Allow state DOTs to submit multiple sites at one time for FHWA signature. Currently, each site has to be submitted with justification for signature individually.
- Allow state DOTs to upload documentation related to multiple DDIRs at one time instead of requiring that the same documentation be individually uploaded for each DDIR.

How FHWA Could Minimize the Burden

FHWA should assist state DOTs by providing guidance related to completion of permanent repairs at the same time as emergency repairs, if applicable. Both 23 CFR 668.109(a)(2) and the FHWA Emergency Relief manual (see p.22 of *FHWA Emergency Relief Manual (Federal-Aid Highways)*, updated May 31, 2013, at <https://www.fhwa.dot.gov/reports/erm/er.pdf>) specifically state this item as part of the eligibility requirements for the Emergency Relief funding. FHWA's guidance would have assisted VDOT in streamlining the federal approval process, if VDOT were made aware of the guidance upfront.

In order to further reduce the administrative burden on state DOTs, VDOT recommends that FHWA should only require an audit of a sample of sites and documentation for DDIRs, as opposed to current FHWA practice of auditing every single DDIR. FHWA treats each DDIR as a separate project but requires all audits of these separate projects instead of using a process that is aligned with the state DOT's normal oversight process.

Thank you for providing VDOT with the opportunity to submit comments on this matter. If you have any questions concerning VDOT's comments, please do not hesitate to contact Jennifer Ahlin, Asset Management Division Administrator, at (804) 786-6581.

Regards,



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Commissioner of Highways