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DIRECTOR'S MESSAGE

**MARY RIDGEWAY,
HEPR OFFICE DIRECTOR**



U.S. Department of Transportation

Federal Highway Administration

I could never have imagined several months ago, when I sat down to write my message to all of you, that I would be writing to a workforce teleworking daily and living under some of the most challenging times any of us have experienced. I certainly hope this newsletter finds all of you and your families healthy and adjusting to this new normal. The good news is, we work for a great agency that was prepared for maximum telework, allowing us to continue to do our jobs and provide for our families, so I feel very blessed in that regard.

Thanks to the advance efforts of our IT folks, making the adjustment to full-time work from home, at least for me, has been pretty seamless. Sure, I miss my two large monitors, but I've adapted and believe I've managed to remain fully productive. The MS Teams platform has been instrumental in keeping all of us in touch, and I hope you all are getting more comfortable with it. I know one thing; the video option has definitely had an effect on my choice of clothes!

We have managed to do a great job in continuing to move the program forward, but the virus has taken its toll on some of our activities. The Discipline Seminar we had been working on for the summer of 2021 has been postponed to 2022. These seminars are such a great opportunity for networking and learning, especially for our newer Realty Specialists, but we will be working with the Resource Center to help provide training during the interim.

We were able to hold peer exchanges earlier in the year on Federal Land Transfers, and GIS use for ROW Estimates, and we plan to hold more in the future since they went over so well. We're also planning to hold some mini, virtual peer exchanges while our travel is on hold. From reading your questions sent out to all Realty Specialists (which I really appreciate by the

way), we think we have plenty of topics, so watch for those, and let us know if you have any special topics we should consider.

The Realty Discipline SharePoint site was migrated into the MS TEAMS platform in late May, and we continue to work on it to make sure it contains the information you need and that everyone has access. I have to thank Marshall Wainright and Maggie Duncan-Augustt for their colossal effort to make sure all our material transferred to the new site. My goal for the new site is that it will be the “go-to” for information as well as communication. Please don’t hesitate to send me any ideas you have on how we can improve the site to meet your needs.

The AASHTO Committee on Right of Way, Utilities & Outdoor Advertising Control Conference (CRUO) has also been affected by the pandemic, with this year’s conference being cancelled. An abbreviated, virtual version took place the week of June 22.

This newsletter brings you updates on several of our research activities.

This newsletter brings you updates on several of our research activities. Thanks go out to all the States that participated in the Waiver Valuations by Federal, State and Local Public Agencies (LPAs) survey and to those of you who helped us pilot the new blended Appraisal course, which took place this past winter. We continue to work on the blended Relocation course and will again be seeking volunteers to attend that pilot when it is ready.

I also want to thank everyone who sat in on our listening sessions for the proposed rulemaking on 49 CFR 24. You all had great questions and comments that we are taking into consideration as we consider final rulemaking. Please read the article here on the current status of the rulemaking to learn more. This edition has much to offer, including articles on alternative uses of the ROW and Broadband.

In closing, I want to welcome our new Realty Specialists to the family and encourage you to reach out to any of us and make use of the vast knowledge network that exists within our agency. I hope you enjoy the newsletter and stay safe during these challenging times. Be kind to each other and remember that we will get through this together because Realty Rocks.

FOCUS ON

HEADQUARTERS

NOTICE OF PROPOSED RULEMAKING FOR 49 CFR PART 24 AND ITS PROGRAM IMPACT: Latest on the Uniform Act Rulemaking

After the publication of the 49 CFR part 24 final rule in 2005, FHWA’s Office of Real Estate Services (HEPR) began a comprehensive effort to identify how implementation of the Uniform Act might be further



Figure 1: Entrance to the U.S. Department of Transportation Headquarters in Washington, D.C. (Source: FHWA)

improved through updates and changes in the 49 CFR

Part 24 regulation. HEPR considered comments received during the 2005 rulemaking and listening sessions, elicited input from Federal and State stakeholders, conducted research and pilot projects and co-sponsored national symposiums on Uniform Act implementation issues. Over the years HEPR also solicited input on potential issues and solutions from its Federal Uniform Act partners. In addition, The Moving Ahead for Progress in the 21st Century Act (MAP-21) also made several statutory additions and changes to the Uniform Act.

The primary focus of the various efforts was to identify opportunities to streamline processes to better meet current Uniform Act implementation needs, understand stakeholder experiences implementing different aspects of the regulation and eliminate duplicative and outdated regulatory language in the 2005 rule. Beginning in 2012, and culminating in 2018, HEPR held working group meetings with representatives of the Federal Agencies subject to the Uniform Act. The meetings included a section by section review of the regulation, consideration of comments received during the 2005 rulemaking process, review of listening session comments and consideration of research findings and feedback stakeholders had received from their partners and customers. The early review by the working group led to a compilation of potential changes to the rule. The results of the efforts that began in 2005 and the working group's efforts confirmed that regulatory changes could help reduce administrative burdens and improve the Government's service to individuals and businesses affected by Federal or federally assisted projects and programs.

Over a series of several working group meetings a draft rulemaking was developed, refined and revised based on proposed edits and comments of the working group. When the working group meetings concluded, HEPR worked internally to finalize the draft rulemaking and continued to elicit comments from the Federal agencies.

The 49 CFR Part 24 Notice of Proposed Rulemaking (NPRM) was published on December 18, 2019. The NPRM allowed for 90 days of public review and comment on the proposed rulemaking. During the 90-day public comment period, HEPR conducted six listening sessions in order to summarize the proposed changes, subpart-by-subpart, and to solicit public input on how the proposed rule might affect them. More than 400 people from FHWA Division Offices and Federal partner agencies attended the sessions.



Figure 2: Scales of Justice (Source: 123RF/Inimal Graphic)

The public comment period for the NPRM closed on March 17, 2020, with over 100 comments. Initial indications suggest that the comments are generally supportive of the proposed changes, and HEPR is optimistic those requesting revisions can be addressed efficiently. Currently, the Office of Real Estate Services (HEPR) staff are working to prepare responses to the comments. HEPR plans to share the completed responses with its Federal partners in early summer 2020 for discussion and then wrap up the process of additional coordination.

For more information, contact Melissa Corder at Melissa.Corder@dot.gov.

FOCUS ON THE

FIELD

BROADBAND

On June 14, 2012, an Executive Order was signed to facilitate the deployment of broadband on Federal lands, buildings, rights of way (ROW), federally-assisted highways and tribal lands. This Executive Order led to the creation of an interagency working group composed of representatives from various Federal agencies involved in decisions related to access to Federal property and highway ROW. The working group's goal is to reduce barriers to the expansion of broadband services in underserved communities.

Broadband access is essential to the Nation's global competitiveness in the 21st century, driving job creation, promoting innovation, and expanding markets for American businesses. While broadband infrastructure has been deployed in a vast majority of communities across the country, many areas still lack adequate access to this crucial resource. For these areas, decisions on access to Federal property and rights of way can be essential to the deployment of both wired and wireless broadband infrastructure. The ever-increasing need for wireless infrastructure and the recent advancement of communication technology has challenged State Departments of Transportation (State DOT) and Local Public Agencies (LPA) as they try to balance highway safety, operations, and aesthetics with accommodating current and future innovations in the ROW.

Section 645 of Title 23, Code of Federal Regulations (CFR), broadly defines a utility as a privately, publicly, or cooperatively owned line, facility, or system for producing, transmitting, or distributing communications, cable television, power, and more, while also recognizing that accommodations must be consistent with Federal, State, and local laws and regulations. Occupancy of the ROW pursuant to Part 645 may be precluded if the State law definition of "utility" is more restrictive and excludes the type of facility proposed by an applicant. If the applicant does not qualify as or is not considered a utility under the State law definition, the applicant may request to occupy the ROW under the ROW Use Agreement provisions in 23 CFR 710.405.

FHWA has determined that the use of highway ROW to accommodate utilities is in the public interest. To preserve the operational safety and functional aesthetic quality of the highway facility, State DOTs and LPAs must ensure that:

- The design, location, and manner in which utilities use and occupy the ROW conforms to the clear roadside policies for the highway involved and otherwise provides for a safe traveling environment;
- New above ground installations, where permitted, are located as far from the traveled way as possible, preferably along the ROW line;
- No new above ground installations are located within the established clear zone of the highway unless a determination has been made by the State DOT or LPA that placement underground is not feasible or is unreasonably costly and there are no feasible alternate locations;
- If above ground installations must be in the clear zone, appropriate counter measures to reduce hazards shall be used, such as breakaway features, the use of impact attenuation devices, or shielding.

State DOTs and other grantees of Federal funds are required to control the use of real property acquired for a project in which Federal-aid funds participated in any phase of the project. Any

non-highway use of ROW requires a ROW Use Agreement and approval by FHWA. The FHWA must determine that such occupancy, use, or reservation is in the public interest; is consistent with the continued use, operation, maintenance, and safety of the facility; and does not impair the highway or interfere with the free and safe flow of traffic. Except for Interstate highways, FHWA may assign its determination and approval responsibilities to the State DOT in their Stewardship/Oversight Agreement.

State DOTs are taking many different approaches to facilitate the deployment of broadband. Ohio, for example, has taken a thoughtful and deliberative approach. Ohio Department of Transportation (ODOT) officials surveyed many states across the country to learn lessons and best practices from others. Ohio created an Office of Broadband and published this [Broadband Strategy](#). This strategy lays a framework for establishing a leadership position for Ohio in broadband deployment and utilization. Ohio does not intend to own the network. Instead, Ohio must be a partner at coordinating new or existing high-speed internet expansion efforts. Going forward, Ohio plans to finalize an official broadband policy for deployment across the state. One of ODOT's key lessons learned is that there is no one-size-fits-all solution. Rather, it is important for each state to find a strategy and approach that works for their unique needs.

For more information, contact Maggie Duncan-Augustt at Maggie.Duncan-Augustt@dot.gov or Julie Johnston at julie.johnston@dot.gov.

UNUSUAL RIGHT-OF-WAY ACQUISITIONS AND RELOCATIONS: CEMETERIES AND GRAVESITES

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act, or URA), 49 CFR part 24, provides important protections and assistance for people affected by the acquisition of real property for Federal or Federally-funded projects. Congress enacted the law to ensure that people whose real property is acquired, or who are relocated as a direct result of projects receiving Federal funds, are treated fairly and equitably and receive assistance in relocating from the property they occupy.

The types and numbers of properties acquired for Federal or Federally-funded projects vary from project to project. A property type that is rarely acquired, but presents unique challenges when an acquisition and relocation is necessary, is cemetery property. Acquisition of cemetery properties and relocation of remains from gravesites is relatively infrequent compared to other properties acquired on projects. Practitioners typically try to design their projects to avoid cemeteries and gravesites given the sensitive nature of these locations. Sometimes, however, these sites are unavoidable and/or initially unknown due to limited boundary records that would identify the extent of cemeteries.

In fact, determining cemetery and gravesite boundaries is often one of the more difficult aspects of these acquisitions and relocations for two reasons. First, at the site level, a fence line, which may encompass the site, does not always represent the property boundary. Secondly, at the individual plot level, headstone markers do not always indicate where remains are actually located. Due to shifts in the ground, which sometimes causes "spillover," a headstone may have shifted as well. Generally, staff employed by the cemetery or a cemetery consultant, for which there are few, can help address the first issue by working with realty specialists to identify the correct cemetery limits. The latter challenge may require an archaeologist who can survey the site in order to identify how ground movements may have affected the position of things that are buried.

Cemetery property acquisition can be further complicated by the fact that cemetery ownerships

differ and be challenging to determine. In some states, landowners cannot own cemeteries or gravesites, and thus the sites are all publicly owned. In other states, private cemetery ownership may be possible, but land owners may not be able to sell the land, as acquisition may need to proceed through a Trust that oversees the site. It is also possible that each cemetery plot is deeded separately, thereby requiring significant research to identify and contact the appropriate owner(s).

The challenges and issues related to ownership can manifest in the relocation phase too. It is sometimes difficult to identify who is responsible for the remains that must be relocated. For example, the next of kin may have been identified and located, but they may not have legal authority over the remains and the responsibility rest with the executor of the estate. In another example, a cemetery may contain the remains of wards of the state, such as former prisoners or those who have no family members, thus changing the parties who might traditionally negotiate about the remains. In other cases, there may not be headstones, making it difficult to know where gravesites are, or headstones may not have findable remains, potentially complicating the relocation.

Even when the correct point of contact *is* identified, there is always the underlying reality that relocating remains can be very personal to families and descendants. They may also want to be involved in finding a comparable site for reinternment, which may feel like another funeral to them. People have different religious beliefs and cultural observations, which in context, must be acknowledged. All of these issues make cemetery and gravesite acquisition and relocation very challenging but interesting.

Insights from Experience

- **Determine early during Project Development if gravesite acquisition and relocation will be required.**
- **Always maintain compassion** for the families involved with gravesite if an alternative alignment cannot be found and the acquisition and relocation is unavoidable.
- **Identify the cemetery protection program points of contact early.** Most states' have cemetery preservation programs that employ historians who can help realty specialists navigate cemetery property and genealogy records. Such programs are usually found within the Attorney General's Office.
- **Having experienced professionals who can help an agency research cemetery history is critical.** Practitioners can also work with a cemetery consultant, as necessary, to understand state-specific laws.

For more information, contact Tawana Kelly at tawana.kelly@dot.gov.

RESEARCH

INITIATIVES

INCORPORATING GIS INTO ROW COST ESTIMATIONS

One of the main goals when carrying out capital improvement projects is to minimize uncertainty around project costs. Right-of-way (ROW) is an important element in developing project cost. ROW cost estimates are dependent on the accuracy and reliability of information pertaining to a project's location and geospatial bounds. These estimates are sensitive to

changes in ROW lines, where small variations can potentially alter estimates by millions of dollars. Geospatial information systems (GIS) tools and resources can be used to improve the accuracy of these measurements, thereby improving the reliability of developed ROW cost estimates. Capitalizing on this opportunity, the Federal Highway Administration (FHWA) Office of Real Estate Services (HEPR) set out to identify and develop tools and resources to help transportation agencies create more accurate ROW cost estimates. HEPR thereby sponsored the following efforts:

- Development of the ROW cost estimation calculator;
- Convening of a GIS and ROW Cost Estimation Peer Exchange; and
- Creation of a ROW Cost Estimation and the Application of GIS Guide and Demonstration report.

GIS-based ROW Cost Estimation Calculator

The first tool developed by HEPR was the ROW calculator. This is an excel-based tool built on the findings of FHWA and National Cooperative Highway Research Program (NCHRP) reports and existing State Department of Transportation (DOT) ROW cost estimation practices.¹ The calculator provides instructions and guidance explaining each entry field, and the functionality for auto-calculating ROW costs based on user inputs. In the latest version, the calculator includes data entry fields for variables such as the number of acquisitions, relocations, and condemnations anticipated, as well as, contingencies and inflation rates.

GIS and ROW Cost Estimation Peer Exchange

Building on the efforts of this ROW calculator, HEPR set out to identify other methods for improving ROW cost estimation, including investigating the use of GIS. To identify existing practices and potential uses of GIS in ROW cost estimation, HEPR funded a GIS and ROW cost estimation peer exchange in February 2020 that convened 28 GIS and realty specialists from 4 State DOTs, FHWA and the USDOT Volpe Center. Peer exchange participants shared agency perspectives and best practices on ROW estimation and the use of GIS. Participants discussed potential projects and other work that might be accomplished to advance the use of GIS for cost estimating. They also provided feedback on HEPR's existing GIS-based ROW cost estimation efforts. The group provided detailed information on specific key information necessary for accurate ROW cost estimates, sources of data, and areas for potential collaboration among State DOTs. Along with the need for improved communication, one of the main outcomes of the peer exchange was the recommendation to develop a ranking system to help identify parcels or alignments with specific factors that would benefit from early realty engagement to help planners develop a more accurate preliminary cost estimate. For example, estimating ROW costs for alignments containing parcels with driveways or parking lots may be more complicated due to access implications or changes in available parking spaces impacting business functionality and lease agreements. The idea of the ranking system is to identify and rank parcels with attributes that are typically complicated, risky, and/or have high costs so planners can identify instances in which engaging realty groups with more experience and knowledge would be most beneficial to develop more accurate preliminary cost estimates.

ROW Cost Estimation and the Application of GIS Guide and Demonstration Report

Prior to the Peer Exchange, HEPR asked the John A. Volpe National Transportation Systems Center (Volpe Center) to build on existing research assessing the current state of the practice for ROW and GIS applications. The Volpe Center would also develop a report including a step-by-step demonstration on how to apply GIS in this context. HEPR's goal has been to understand how GIS is used in the ROW cost estimation process, how it can serve as a tool to

¹ FHWA report "Major Project Program Cost Estimating Guidance"; FHWA and Cambridge Systematics, "ROW Cost Estimation Processes—State of the Practice"; NCHRP Report 625 "Procedures Guide for ROW Cost Estimation and Cost Management"; and 6 State DOTs (CA, VA, GA, FL, OH, and unidentified)

improve the process, and the challenges and limitations agencies face for incorporating GIS in this process. The report and demonstration provide information and examples that may be useful to States seeking tools and resources to improve preliminary ROW cost estimates, or that are interested in incorporating GIS into this process, but do not represent tools and resources that FHWA is requiring them to use.

The Volpe Center project team used three data sources to support this effort. First, the project team conducted a document review of publicly available reports focused on tools and methods used for ROW cost estimation throughout transportation project delivery, and the benefits and challenges of a standard electronic ROW cost estimation calculator.^{2, 3, 4} Second, the project team interviewed State DOT GIS and ROW specialists from four States with varying degrees of practical experience using GIS in their ROW cost estimation processes. Each participant discussed their roles and experiences with geospatial data during the ROW cost estimation process.⁵ The project team used each data source to develop the first version of the report. The report summarized findings from background research, provided a high-level resource for using GIS at a State DOT for ROW cost estimation, and included a step-by-step demonstration of this process. The first version of the report served as a starting point for the peer exchange discussions. The third data source was the peer exchange discussions on potential improvements that could be made to the report.

Next Steps

The second version of the Guide and Demonstration report is being developed and incorporates feedback, comments, and updates based on discussions from the peer exchange and recommendations from the participants. The ultimate goal for this effort is to provide a proof of concept to show how GIS can be a useful analysis tool for transportation agencies as part of a decision tree for making better ROW cost estimations in support of the multifaceted process of selecting preferred alignments.

For more information, contact Peter Clark at peter.clark@dot.gov.

² FHWA report "Major Project Program Cost Estimating Guidance" (2007)

https://www.fhwa.dot.gov/majorprojects/cost_estimating/major_project_cost_guidance.pdf

³ NCHRP Report 625 "Procedures Guide or Right-of-Way Cost Estimation and Cost Management" (2009)

<http://www.trb.org/Publications/Blurbs/162271.aspx>

⁴ Cambridge Systematics Report "Right-of-Way Cost Estimation Processes— State of the Practice" (2019)

⁵ CA, AK, MD, and MN

ENVIRONMENTAL JUSTICE

[Executive Order 12898](#) (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) directs each Federal agency to make achieving environmental justice (EJ) part of its mission. The [USDOT EJ Order 5610.2\(a\)](#) and [USDOT EJ Strategy](#) provide directives and guidance on how the [principles of EJ](#) should be integrated in Departmental programs, policies, and activities.

EJ at FHWA means identifying and addressing disproportionately high and adverse effects of the agency's programs, policies, and activities on minority populations and low-income populations to achieve an equitable distribution of benefits and burdens. FHWA provides a regulatory framework to address EJ with [FHWA EJ Order 6640.23A](#) and guidance during the NEPA process through its [Memorandum on EJ and NEPA](#). The [FHWA EJ Reference Guide](#) is an excellent resource designed to help FHWA staff consider EJ concerns, issues, and challenges throughout the decision-making process.



Figure 3: Stack of books with a quill pen and ink
(Source: 123RF/TatianaEpifanova)

Planning, Environment, and Realty are all connected and often intersect at EJ. EJ concerns are often brought to the forefront when property acquisition, relocation, property management, and/or billboard issues are part of a transportation project or activity. It is essential to treat all populations fairly during transportation decision making, and EJ populations are no exception. Early coordination with FHWA Realty staff can help ensure that EJ concerns are considered throughout the right of way decision-making process. Meaningful public involvement should start during the planning phase, and this coordination continues during the NEPA stage to determine the distinct EJ populations who will be affected by a project. Early coordination is essential because Realty can help agency staff determine appropriate mitigation measures when there are disproportionately high and adverse effects on EJ communities.

EJ is an important consideration during right-of-way (ROW) and real property acquisition because ROW activities are linked to (and often run concurrently with) other phases of project development. Realty practitioners should seek to understand impacts on minority communities and low-income communities, and communicate the concerns and issues with others working on other aspects of the project development process. The [FHWA EJ Reference Guide](#) also includes helpful information on EJ considerations during the ROW process (p. 51).

A thorough EJ analysis documents the presence of and potential impacts to EJ populations during a project's preliminary design phase, specifically during the corridor selection process by agency ROW personnel. This will allow the agency to identify potential options for mitigation of project impacts to EJ populations. ROW practitioners should make every effort to ensure that relocation options for residential displaced persons address needs for continued access to special needs services, employment, public transportation, schools, child care, medical facilities, and other professional or community services they currently use. Continued access should include the mode of transportation used by displaced persons to these locations. Nonresidential displaced persons may need advisory services for replacement sites that will be viable for their customer base, and accessible for their employees.

Additional EJ Resources:

Articles/Publications:

- In 2016, FHWA published an [EJ article](#) in its *Public Roads Magazine* that offers an extensive history and overview of the role of EJ in transportation projects. Other FHWA EJ publications and resources are available on [FHWA's EJ website](#).
- EJ Coordination Groups:
 - [Federal Interagency Working Group on Environmental Justice \(EJ IWG\)](#) facilitates the active involvement of all Federal agencies to implement [Executive Order 12898](#).
 - The DOT EJ Working Group serves as a forum for coordination to better integrate EJ in the Department's programs, policies, and activities.
 - The [FHWA EJ Implementation Working Group](#) is an intra-agency work group that coordinates FHWA EJ activities by building awareness of existing EJ-related programs within FHWA, enhances EJ coordination within FHWA and other DOT Operating Administrations, and improves practitioner understanding of EJ policies.
 - The [AASHTO EJ Community of Practice](#) is a forum for State departments of transportation and metropolitan planning organization (MPO) practitioners to hold regular discussions regarding EJ emerging issues, and analyze the state of the practice and its implementation.
- Online EJ Trainings and Webinar Recordings:
 - National Highway Institute Course on the [Fundamentals of Environmental Justice](#)
 - [AASHTO Center for Excellence \(CEE\)](#) has held several webinars on EJ analysis. In January, 2020, CEE hosted a webinar on AASHTO's Census Transportation Planning Products Program (CTPP), a State DOT-funded, cooperative program that produces special tabulations of American Community Survey (ACS) data that have enhanced value for transportation planning, analysis, and strategic direction. The webinar featured information on how CTPP data can be used in EJ Analysis. A recording of the webinar can be found [here](#).

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STAFF

CHANGES

Chineme Ijeabunwu – Maryland Division & DC Division

Chineme Ijeabunwu is the new Right-of-Way Program Manager for FHWA's District of Columbia and Maryland Division. Prior to joining the team, she was the Real Property Manager leading the Right-of-Way Division of MDOT State Highway Administration's Public-Private-Partnership I495/I270 77-mile lane expansion. She holds a Bachelor of Arts degree in psychology and a Master's Degree in journalism from the University of Maryland College Park.



Figure 4: Chineme Ijeabunwu
(Source: FHWA)

Abbi Ginsberg – Minnesota Division

Abbi Ginsberg is a Transportation Engineer/ROW Specialist in the Minnesota Division. Throughout her career, she has held various positions as highway engineer, hydraulics engineer, and bridge engineer. Abbi has a Bachelor of Science degree in civil engineering from Iowa State University and a Master of Science degree in water resources engineering from University of Minnesota.



*Figure 5: Abbi Ginsberg
(Source: FHWA)*

Dimas Prasetya – Indiana Division

Dimas Prasetya graduated with a civil engineering degree from Washington State University and was a transportation engineer at the Indiana Division office before taking over as Realty Specialist from Coleen Smith after her retirement in January. Dimas is also responsible for the utility and railroad program in the Indiana Division office.



*Figure 6: Dimas Prasetya
(Source: FHWA)*

Ruth Hepfer – Michigan Division

Ruth Hepfer came to FHWA in 1998 with a Bachelor of Science in civil engineering from Michigan State University. Over the past 20 years she worked as an area engineer for FHWA Michigan Division office. In 2018, she began working in the Realty and Environment program areas.



*Figure 7 Ruth Hepfer
(Source: FHWA)*

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