



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Arizona Division  
December 16, 2019

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<http://www.fhwa.dot.gov/azdiv>

In Reply Refer to:  
(TRAP-39 – Functional Classification)  
2019 Statewide Functional Classification Rebalancing  
FHWA Approval

John S. Halikowski  
Director  
Arizona Department of Transportation  
206 South 17<sup>th</sup> Avenue  
Phoenix, AZ 85007

Attention: Greg Byres MD 310B

Dear Mr. Halikowski:

We have completed our review of the statewide functional classification rebalancing as requested in Mr. James Meyer's November 7, 2019 letter. The overall rebalancing effort involves 7,276 miles of changes as detailed in Mr Meyer's letter, excel spreadsheets and the online viewer tool. Extensive coordination occurred between the Arizona Department of Transportation and Metropolitan Planning Organizations and Councils of Government. Future functional classification change requests will be done through a new online application tool.

This letter constitutes our approval of this request. Our staff will need access accounts to AZGEO to check functional classification on Federal Aid projects. If you have any questions regarding this letter, please call Ed Stillings at (602) 382-8966.

Sincerely,

KARLA S. PETTY  
Division Administrator

By: Edward S. Stillings, P.E.  
Senior Transportation Planner

Enclosures

cc: Greg Byres, James Meyer, Patrick Whiteford, Bret Anderson

internal ec: EStillings, RTruely, AHansen, TDeitering, KUtley, SWebber, EChan, AHeier,  
ALirange, Jbrown, ASarhan, KPetty, TWhitfield, CMatty, JKing, RMoreno, VSouthern, FHWA  
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ESS/ 

James Meyer, GISP  
ADOT MPD Data Management  
206 S 17<sup>th</sup> Ave  
Phoenix, AZ 85007

November 7, 2019

Ed Stillings  
Federal Highway Administration  
4000 N Central Ave #1500  
Phoenix, AZ 85012

Dear Mr. Stillings,

Since September 2017, ADOT has been reviewing Arizona Federal Functional Classification (FFC) designations and recommending changes to more closely align Arizona classifications with the *2013 Highway Functional Classification Concepts, Criteria and Procedures* guidance. This process has included the following steps:

1. Reviewed FHWA FFC Concepts, Criteria and Procedures guidance
2. Manual review of AZ roadways (using aerial imagery) and identification of possible FFC upgrades/downgrades
3. Create and distributed Arizona specific guidance materials to support coordination with local agency partners
4. Coordinated extensively to receive and respond to input from local agency stakeholders
5. Currently submitting results of FFC rebalancing effort to FHWA

Final coordination with Local Planning Partners has been completed, with the last step in finishing approval through the MAG Committee process completed last week. Coordination with local agencies has proved helpful in considering local understanding of roadway function and in ensuring consistent application of the FFC criteria throughout the State. Over the course of the project, ADOT received more than 3,000 comments from over 100 agencies. This input resulted in over 1,700 miles of additional changes, after the initial review through inspection of aerial imagery. Comments received provided insight and justification to either make additional FFC changes or to reverse a change being recommended in favor of the existing classification. In many cases, comments required further discussion back and forth between ADOT and local agency staff to negotiate conflicting justifications for different recommendations.

In nearly all coordination with local agencies, a mutually agreed upon consensus was achieved. The only exception has been in coordination with the City of Tucson. While comments from them have been received, and in most cases applied, there were a few instances where preferences did not appear sufficiently consistent with decisions made elsewhere (very typical of coordination with other agencies) and we requested additional discussion and coordination. In not responding

further, it is assumed that the City is willing to concede to our judgment on these remaining few locations. In the few instances where small agencies did not participate in the review process, coordination regarding changes took place at the COG/MPO level, with final agreement on changes confirmed.






The following are some of the most relevant question or concerns received in coordinating with local agency staff:

- Many agencies resisted the extensive upgrade of Local roads to Urban Minor Collectors. In some few cases, concern was expressed regarding the potential increase in reporting requirements (traffic counting/pavement preservation).
- Some local agencies have preferred to regard FFC changes based on *future* roadway conditions rather than *current* conditions.
- Some local agencies have referred to their own internal roadway classification categories and definitions/criteria rather than the FHWA categories and criteria.
- A few instances occurred where concern was shown for the potential loss of Federal Aid eligibility due to FFC downgrades.
- Significant concern was expressed regarding changes to Principal Arterials and potential implications to the National Highway System.

Apart from questions regarding Principal Arterials, these concerns have been addressed effectively and clearly. In attempting to address questions on Principal Arterial, we have tried to understand and consider all possible implications, particularly to the NHS. Segment-specific justifications have been provided for Principal Arterial changes, and we are available to discuss any of these with you during your review. While Urban Principal Arterial mileage remains below the FHWA target ranges, these may be appropriate in an urban network well supported by a good Freeway system and Minor Arterial grid.

The overall FFC rebalancing effort has resulted in 7,276 miles of changes. The final addition or subtraction of roadway mileage in each category is shown in the following mileage summary table. Additional detail is available in review materials provided.

*FFC Mileage Change Results*

FFC	Miles
Principal Freeway	 17.20
Principal Other	 57.03
Minor Arterial	 811.50
Major Collector	 -15.18
Minor Collector	 3,484.08
Local	 -4,354.63

Ongoing maintenance of FFC change requests will be done in the future through a new online application on the AZGEO website (<https://azgeo.az.gov/adot/FunctionalClassification.aspx>). This will allow ADOT or other agencies to easily initiate future FFC change requests. When done using this tool, other appropriate stakeholders and stewards will be automatically notified of the request and will be prompted to review and respond through the application. Coordination and approvals will be documented as a discussion thread along with any files uploaded as part of the initial request or anywhere in the review process.

We are confident that this FFC rebalancing effort has resulted in a much more consistent and accurate FFC network. It is our hope that this result will translate to better planning and performance monitoring efforts, both with ADOT and with our local planning partners.

Sincerely,

James Meyer, GISP  
ADOT Data Analytics Manager & HPMS Coordinator

Enclosures:

1. Excel Workbook containing (a) list of all proposed FFC changes, (b) summaries of statewide mileage changes by FFC category, and (c) summary of coordination efforts with local agencies.
2. Excel Workbook containing justification for requested changes to Principal Arterials.
3. PowerPoint presentation overview of the FFC rebalancing effort

Target max-min mileage percent	Rural Urban	1% - 2% 1% - 2%	0% - 2% 0% - 2%	2% - 5% 4% - 5%	3% - 7% 7% - 12%	10% - 17% 7% - 13%	5% - 13% 7% - 13%	66% - 74% 67% - 76%	Miles Rur	Miles Urb	Miles Total % of State
Functional System	Rur/ Urb?	Interstate Miles %	Expressway Miles %	Princ Arterial Miles %	Minor Arterial Miles %	Major Collector Miles %	Minor Collector Miles %	Local Miles %	Miles Rur	Miles Urb	Miles Total % of State
<b>Current</b>	Rural	920.95	17.60	1,262.21	1,417.68	4,263.17	1,892.71	30,626.09	40,400.40		80%
	Urban	248.16	214.58	865.44	2,611.90	1,959.29	223.34	20,258.59	26,381.30		40%
<b>Grand Total</b>		1,169.11	232.19	2,127.65	4,029.57	6,222.46	2,116.04	50,884.67	66,781.70		
<b>Proposed</b>	Rural	920.95	19.25	1,313.93	2,314.00	3,414.21	2,940.09	29,477.97	40,400.40		60%
	Urban	248.16	230.14	870.75	2,566.25	2,804.33	2,652.70	17,038.97	26,381.30		40%
<b>Grand Total</b>		1,169.11	249.39	2,184.68	4,850.25	6,218.54	5,592.79	46,516.94	66,781.70		

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**Underlimit**  
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