

My comments on FHWA Docket No. FHWA-2004-18309 are as follows:

I agree with the proposal to update the regulation and require the use of TNM 2.5 (or most recent revision thereof) for traffic noise modeling.

I do not agree that the reference to a noise measurement report should be removed from the regulation. Many state and local agencies mandate the use of the FHWA noise report methodology (FHWA-DP-45-1R) in their regulations because they lack expertise, personnel resources, and/or funds to create their own equivalent or suitable methodology guidance document. These important local regulations would essentially become moot if the reference to the federal guidance document were to be removed from 23 CFR 772. I recommend that instead of totally removing the reference it should be updated with reference to the replacement guidance document FHWA-PD-96-046 with a statement that the new report replaces the previous one for purposes of FHWA guidance in implementing 23 CFR 772.

I further recommend that the revised 23 CFR 772 contain specific reference to the periodic issuance by FHWA of comprehensive interpretive policy relating to highway noise and 23 CFR 772, the most recent being the "Highway Traffic Noise Guidance and Policies and Written Noise Policies" Memorandum dated June 12, 1995.

Respectfully submitted,

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