STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
COMMISSIONER'S OFFICE
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WILL REID P.E.
COMMISSIONER

BILL LEE
GOVERNOR

July 30, 2026

Boday Borres
Acting Division Administrator
Federal Highway Administration
404 BNA Drive
Building 200, Suite 508
Nashville, TN 37217

Re: Submission of ***Updated*** 2026 TAMP Consistency Determination Report

Dear Ms. Borres,

In accordance with 23 CFR Part 515.13 (b) (3), the Tennessee Department of Transportation (TDOT) is pleased to present the enclosed submittal of our ***Updated*** Transportation Asset Management Plan (TAMP) Consistency Determination for fiscal year 2026.

If you have any questions regarding this consistency determination, please contact Justin Underwood at 615-253-8813 or by email at Justin.Underwood@tn.gov.

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Sincerely,

Will Reid, P.E.
Commissioner

WR/ch

enclosure

cc: Jacinda Russell, Nathan Marshall, Kevonte Poole (FHWA)
Preston Elliott, Natalie Krysztof, Joe Deering, Lori Lange, Delaine Linville, Shane Hester, Chad Schulhauser, Brian Egan, James D. Kelley, Jamie Waller, Justin Underwood, Ted Kniazewycz, Kenitha Reed, Matt Meservy, Julie J. Carmean, Steve Allen, Josh Brown, Gwen Whittaker, Heather Purdy, Danny Oliver, Jay Norris, Jason Baker, Chris Harris, Rebecca Hayworth, Brian Hurst, John Kahle, Cary Martin, Amy Wilhite, Beth Emmons, Amanda Snowden (TDOT)

CONSISTENCY DETERMINATION

Allotment Amounts:

June 1, 2025 – May 31, 2026

Comparing to Budgets from:

TAMP Version 2025.2.0

What is Consistency Determination?

TDOT strongly believes in operating as an open and transparent governmental body. TDOT's Transportation Asset Management Plan (TAMP) exemplifies TDOT's commitment to plan, design, build, maintain, and manage one of the best transportation systems in the nation. This effort is rooted in our Mission, Vision, and Values. The annual consistency determination is TDOT's proof that it is managing the state's NHS pavement and bridge assets in accordance with a strategic plan to be as efficient and effective as possible with federal and state dollars and achieve Tennessee's performance goals and objectives.

Mission:

Provide a safe and reliable transportation system that supports economic growth and quality of life.

Vision:

A commitment to excellence in managing and improving the state's transportation system, promoting the success of our employees, and strengthening the trust of our customers.

Values:

- Stewardship
- Integrity
- Safety
- Consistency
- Development
- Innovation
- Collaboration
- Family

What are the MAP-21 and Final Rule requirements?

Consistency requirements are identified in 23 CFR Part 515.13 (b) (2) as follows: *Annual determination of consistency under 23 U.S.C. 119(e)(5). Not later than August 31, 2019, and not later than July 31 in each year thereafter, FHWA will notify the State DOT whether the State DOT has developed and implemented an asset management plan consistent with 23 U.S.C. 119. The notice will be in writing and, in the case of a negative determination, will specify the deficiencies the State DOT needs to address. In making the annual consistency determination, the FHWA will consider the most recent asset management plan submitted by the State DOT, as well as any documentation submitted by the State DOT to demonstrate implementation of the plan. The FHWA determination is only as to the consistency of the State DOT asset management plan and State DOT implementation of that plan with applicable requirements and is not an approval or disapproval of strategies or other decisions* *contained in the plan. With respect to any assets the State DOT may elect to include in its plan in addition to NHS pavement and bridge assets, the FHWA consistency determination will consider only whether the State DOT has complied with [§ 515.9(l)](#) with respect to such discretionary assets.*

(1) Plan development. The FHWA will review the State DOT's asset management plan to ensure that it was developed with certified processes, includes the required content, and is consistent with other applicable requirements in this part.

(2) Plan implementation. The State DOT must demonstrate implementation of an asset management plan that meets the requirements of 23 U.S.C. 119 and this part. Each State DOT may determine the most suitable approach for demonstrating implementation of its asset management plan, so long as the information is current, documented, and verifiable. The submission must show the State DOT is using the investment strategies in its plan to make progress toward achievement of its targets for asset condition and performance of the NHS and to support progress toward the national goals identified in 23 U.S.C. 150(b). The State DOT must submit its implementation documentation not less than 30 days prior to the deadline for the FHWA consistency determination.

(i) FHWA considers the best evidence of plan implementation to be that, for the 12 months preceding the consistency determination, the State DOT funding allocations are reasonably consistent with the investment strategies in the State DOT's asset management plan. This demonstration takes into account the alignment between the actual and planned levels of investment for various work types (i.e., initial construction, maintenance, preservation, rehabilitation and reconstruction).

(ii) FHWA may find a State DOT has implemented its asset management plan even if the State has deviated from the investment strategies included in the asset management plan, if the State DOT shows the deviation was necessary due to extenuating circumstances beyond the State DOT's reasonable control.

Is the TDOT TAMP Compliant with Current Federal Requirements?

In November 2022, the Federal government passed the Bipartisan Infrastructure Law (BIL), which modified 23 USC 119 to require the life cycle cost and risk management analyses used to develop the TAMP to consider extreme weather and resilience (23 USC 119(e)(4)(D)). TDOT's current TAMP (version 2025.2.0) has been certified by FHWA as compliant with all TAMP requirements including this new requirement.

What is TDOT's Process for Documenting Consistency?

TDOT will submit to FHWA a summary of how the agency's annual investment strategy of planned allocations, as documented in TDOT's TAMP Version 2025.2.0, is in alignment and reasonably consistent with actual investment amounts during the 12-month period from June 1, 2025 to May 31, 2026, as agreed to by TDOT and the FHWA Tennessee Division during the meeting on February 26, 2020. This 12-month period allows TDOT additional time to extract the actual investment amounts and prepare the consistency determination report before the deadline. Should the amounts significantly deviate, TDOT will provide justification for the deviation. The 12-month TAMP Budget amounts and the Actual Investment amounts for the five work types, as defined by FHWA (Maintenance, Preservation, Rehabilitation, Construction, and Reconstruction), are compared in Table D-1. Budget amounts for the FHWA work type, Construction, are not presented in the table for both bridges and pavement. This is because new construction of bridge and pavement assets are beyond the scope of asset management investment strategies that focus on the state of good repair for bridge and pavement networks. Similarly, budget amounts for the Reconstruction work type are also not included for pavement in the table since pavement reconstruction locations are typically initiated through system enhancement and expansion projects rather than through the management of the pavement network state of good repair.

Table D-1 also provides explanations for any significant differences between the TAMP budgets, actual budgets, and actual investments. Crosswalks between TDOT's treatment types and the FHWA work types are presented in Table D-2. The planned TAMP investments for pavements and bridges are presented in Tables D-3 and D-4, respectively.

TDOT has continued the implementation of the new Project Delivery Network (PDN) software known as TDOT 360 which includes the enhanced data query that was developed in PPRM. This query is structured so that details on bridge obligations included in pavement projects can be identified more easily. This allowed the pavement and bridge obligation adjustments to be calculated within the tabulation spreadsheet, reducing manual adjustments previously required. Additional enhancements are being evaluated to further streamline the data preparation process for future efforts.

How is TDOT's Process Changing?

Several years ago TDOT initiated significant changes to its project delivery process and its organizational structure through the Integrated Program Delivery (IPD) and Empowering People, Influencing Culture (EPIC) initiatives. Together they create a team-based approach to project delivery by putting a matrix organization into place allowing teams to work more easily across disciplines. Additionally, the Project Delivery Network (PDN) software is currently being implemented as a replacement for the PPRM software in order to provide consistency, reliability, efficiency, and transparency throughout the project delivery process.

Recent changes in funding allocations are enhancing TDOT's project prioritization, selection, and delivery processes. Governor Lee's FY26 budget provided a general fund transfer of approximately $1 billion to the DOT. This funding provides a comprehensive approach to addressing the state's increasing critical challenges to infrastructure including: significant investments in major urban and rural congestion, accelerating *Improving Manufacturing, Public Roads, and Opportunities for a Vibrant Economy* (IMPROVE) Act projects, increasing investments in infrastructure maintenance required to meet the demands of increasing costs, and leveraging local participation on projects that connect state highways to local communities.

Over the past fiscal year, the Bridge Program has revised how repair, rehabilitation, and preservation projects are initiated. These changes are intended to strengthen programmatic planning while improving transparency and efficiency across the bridge program. One significant revision was to limit access to the creation of new-start projects within these categories resulting in a shortfall in bridge obligations for FY26. These funds will be available for rollover into the FY27 bridge program. As program development procedures continue to be refined, these funds are expected to be fully utilized for future bridge programming within these project categories.

TDOT has also made a commitment to include a status update on risk mitigation strategies in future consistency determination reports. In 2026, TDOT is revisiting the risk register included in the approved TAMP, coordinating with identified points of contact to track mitigation activities, and evaluating progress being made to reduce or eliminate identified risks.

In 2025 TDOT accelerated the update of its TAMP document to reflect the organizational changes and process changes that are being implemented as a result of the EPIC and IPD.

Table D-1

Fiscal Year 2026	Bridges									Pavement								
	Budget ($M)				Actual Investment ($M)			Grand Difference (Total Investment - Adjusted Budget) ($M)	Investment Footnotes	Budget ($M)				Actual Investment ($M)			Grand Difference (Total - Adjusted Budget) ($M)	Investment Footnotes
Work Type	FY2026 TAMP Budget ($M) * From 2025 TAMP	FY2026 Adjusted Budget ($M)	Budget Difference (TAMP - Adjusted) ($M)	Budget Footnotes	NHS	Non-NHS	Total			FY2026 TAMP Budget ($M) * From 2025 TAMP	FY2026 Adjusted Budget ($M)	Budget Difference (TAMP - Adjusted) ($M)	Budget Footnotes	NHS	Non-NHS	Total		
Preservation	24.00	24.00	**0.00**	***B1***	10.31	3.98	14.29	**-9.71**	***B6***	345.00	476.55	**131.55**	***P1***	316.57	143.66	460.23	**-16.32**	***P6***
Rehabilitation	68.00	71.00	**3.00**	***B2***	59.44	6.89	66.34	**-4.66**	***B7***	42.00	110.95	**68.95**	***P2***	66.15	46.15	112.30	**1.35**	***P7***
Reconstruction	85.00	86.00	**1.00**	***B3***	185.22	141.33	326.55	**240.55**	***B8***	N/A	N/A	**N/A**	***P3***	N/A	N/A	N/A	**N/A**	***P8***
Construction	N/A	N/A	**N/A**	***B4***	N/A	N/A	N/A	**N/A**	***B9***	N/A	N/A	**N/A**	***P4***	N/A	N/A	N/A	**N/A**	***P9***
Maintenance	4.00	3.84	**-0.16**	***B5***	2.47	2.12	4.59	**0.75**	***B10***	28.00	43.47	**15.47**	***P5***	30.80	14.15	44.95	**1.48**	***P10***
Total	181.00	184.84	3.84		257.45	154.32	411.77	226.93		415.00	630.97	215.97		413.52	203.96	617.48	(13.49)	

Bridge Footnotes:

B1	**Bridge Preservation Budget:** The budget for bridge preservation of $24M is a subset of our bridge rehabilitation budget of $95M. The target is to allocate 25% of our total bridge rehabilitation budget for preservation of our larger assets. If funds are not specifically spent on this type of stand-alone project, the funds are used on preservation efforts inside of other rehabilitation projects.
B2	**Bridge Rehabilitation Budget:** The budget for bridge rehabilitation in FY26 was approved at $95M, which includes $24M for Preservation listed above. The additional $3M above the original TAMP budget amount is primarily due to the Department's change in priorities and increasing funding for State of Good Repair for our bridge assets.
B3	**Bridge Reconstruction Budget:** No footnote.
B4	**Bridge Construction Budget:** New bridge construction is primarily programmed as a part of larger scale capital projects rather than being part of TDOT's State of Good Repair project selection. Therefore, TDOT has elected to omit budgets for bridge construction from our 2025 BIL-Compliant TAMP and subsequently in our 2026 Annual TAMP Consistency Determination. TDOT has redefined the process for prioritization of projects to be included in the 10-Year Program of Projects with new criteria used to distribute the additional $3.3B general fund transfer. This new process is outlined in TDOT's 2025 TAMP update which was approved on November 4, 2025.
B5	**Bridge Maintenance Budget:** No footnote.
B6	**Bridge Preservation Investment**: Enhancements to the bridge project initiation process over the last year temporarily resulted in fewer new-starts than anticipated. Additionally, bridge rehabilitation and preservation work are often combined into a single project, but the current methodology for tracking funding only allows one work-type designation per project. Projects with both rehabilitation and preservation work are assigned the rehabilitation work type. This also contributed to the $9.71M shortfall in preservation obligations for FY26. These funds will be available for rollover to the FY27 bridge preservation program. TDOT is developing a process to distinguish bridge rehab work from bridge preservation work. Since it is not currently finalized, and FY2027 obligations are already underway, TDOT would prefer to implement it at the beginning of the 2028 fiscal year to support the 2028 consistency determination.
B7	**Bridge Rehabilitation Investment:** Enhancements to the bridge project initiation process over the last year temporarily resulted in fewer new-starts than anticipated. This contributed to the $4.66M shortfall in bridge rehabilitation obligations from the actual FY26 budget. However, the shortfall decreases to $1.66M when compared to the TAMP budget estimate for FY26. These funds will be available for rollover to the FY27 bridge rehabilitation program.
B8	**Bridge Reconstruction Investment:** Bridge reconstruction obligations exceeded the actual FY 26 budget by $240.55M. This additional funding included $151.6M of Transportation Modernization Act funds, $13.1M in General Fund Transfer funds, $74.6M of legislative funding initiatives, and $2.1M in April 2025 severe weather recovery project funds.
B9	**Bridge Construction Investment:** New bridge construction is primarily programmed as a part of larger scale capital projects rather than being part of TDOT's State of Good Repair project selection. Therefore, TDOT has elected to omit budgets for bridge construction from our 2025 TAMP and subsequently in our 2026 Annual TAMP Consistency Determination. TDOT has redefined the process for prioritization of projects to be included in the 10-Year Program of Projects with new criteria used to distribute available funding. This new process is outlined in TDOT's 2025 TAMP update which was approved on November 4, 2025.
B10	**Bridge Maintenance Investment:** Includes $4.39M in routine bridge maintenance. TDOT's Maintenance Management System (MMS) is unable to distinguish between NHS and Non-NHS obligations at this time. A new MMS is anticipated to be implemented by TDOT within the next 18 to 24 months. Until that is complete, TDOT will assume that all bridge maintenance expenses on interstates plus 36% of bridge maintenance expenses on state routes is on the NHS. This corresponds to the percentage of state route bridges which are on the NHS (36%). Non-NHS bridge maintenance will be assumed to be 64% of state route expenses.

Pavement Footnotes:

P1	**Pavement Preservation Budget:** The budget for pavement preservation in FY26 was approved at $476.55M excluding the $750K for State Parks which fall outside the scope of the TAMP. This is $131.55M higher than the TAMP budget amount of $345M, which is primarily due to a $109M one time increase in the General Fund transfer for FY26, along with an additional recurring $16M of 451 state funds. Additionally $25M of state pavement funding allocated for engineering was not included in the TAMP budget but is included in the FY26 obligation totals.
P2	**Pavement Rehabilitation Budget:** The TAMP budget of $42M was exceeded by $68.95M. This was primarily due to a one-time General Fund transfer of $50M for binder rehab projects. Additionally, the target for the pavement rehabilitation budget is to allocate 10% of the total available pavement budget to rehabilitation. The funding increases to the total pavement budget noted in footnote P1 resulted in additional allocations to the rehabilitation budget through the 10% distribution goal.
P3	**Pavement Reconstruction Budget:** With few rare exceptions, pavement reconstruction is primarily programmed as a part of larger scale capital projects rather than being part of TDOT's State of Good Repair project selection. Therefore, TDOT has elected to omit budgets for pavement reconstruction from our 2025 BIL-Compliant TAMP and subsequently in our 2026 Annual TAMP Consistency Determination. TDOT has redefined the process for prioritization of projects to be included in the 10-Year Program of Projects with new criteria used to distribute the additional $3.3B general fund transfer. This new process is outlined in TDOT's approved 2025 TAMP.
P4	**Pavement Construction Budget:** New pavement construction is primarily programmed as a part of larger scale capital projects rather than being part of TDOT's State of Good Repair project selection. Therefore, TDOT has elected to omit budgets for pavement construction from our 2025 BIL-Compliant TAMP and subsequently in our 2026 Annual TAMP Consistency Determination. TDOT has redefined the process for prioritization of projects to be included in the 10-Year Program of Projects with new criteria used to distribute the additional $3.3B general fund transfer. This new process is outlined in TDOT's approved 2025 TAMP.
P5	**Pavement Maintenance Budget:** The $6M maintenance budget in the 2025 TAMP was incorrect and should have been shown as $28M shown here. The adjusted budget includes a $1.13M increase in routine maintenance, $9.74M for contract on-call concrete pavement repairs, and $4.6M for contract on-call asphalt pavement pothole repairs. $17M of the routine maintenance budget was provided for emergency in-house and in-place paving.
P6	**Pavement Preservation Investment:** Pavement preservation obligations fell short of the Actual FY26 budget by $16.41M (3.4%). Several projects were moved from the FY26 program to FY27. Despite the shortfall, the FY26 obligations exceed the TAMP budget estimate for FY26 by $115.14M.
P7	**Pavement Rehabilitation Investment:** No footnote.
P8	**Pavement Reconstruction Investment:** Pavement reconstruction is generally not included in TDOT's state of good repair program but is instead addressed through large-scale capital projects. Therefore, TDOT has elected to omit budgets and investments for these types of projects in our 2025 TAMP and subsequently in the 2026 annual consistency report. TDOT has developed a new prioritization matrix used to rank projects for inclusion in the fiscally-constrained 10-Year Program, and this new process is outlined in TDOT's approved 2025 TAMP. Note: TDOT invested a total of $404.33M in pavement reconstruction work, $308.97M of which was on the NHS. $8.9M of the pavement reconstruction obligations were related to damage caused by Hurricane Helene.
P9	**Pavement Construction Investment:** New pavement construction is generally not included in TDOT's state of good repair program but is instead addressed through large-scale capital projects. Therefore, TDOT has elected to omit budgets and investments for these types of projects in our 2025 TAMP and subsequently in the 2026 annual consistency report. TDOT has developed a new prioritization matrix used to rank projects for inclusion in the fiscally-constrained 10-Year Program, and this new process is outlined in TDOT's 2025 TAMP update which was approved on November 4, 2025. Note: TDOT invested a total of $409.24M in new pavement construction, $154.27M of which was on the NHS.
P10	**Pavement Maintenance Investment:** Includes $12.387M in routine pavement maintenance and $12.893M in emergency paving on the NHS, as well as $9.207M in routine maintenance and $8.739M in emergency paving on Non-NHS State Routes. Also includes 100% of $1.378M in on-call pothole patching contracts attributed to the NHS, while 50% of $8.285M in on-call concrete pavement repair contracts will be distributed to the NHS and 50% to Non-NHS State Routes. TDOT's Maintenance Management System (MMS) is unable to distinguish between NHS and Non-NHS obligations at this time. A new MMS is anticipated to be implemented by TDOT within the next 18 to 24 months. Until that is complete, TDOT will assume that 100% of pavement maintenance expenses on the interstate system plus 50% of pavement maintenance expenses on state routes are on the NHS. This corresponds to the percentage of state route pavement which is on the NHS (50%). Non-NHS State Route pavement maintenance will be assumed to comprise the other 50% of state route pavement expenses.

This Consistency Determination document will be updated and posted on TDOT's website annually. It will also be referenced in the appendix of each version of TDOT's TAMP using the appropriate URL web address. Accompanying the 2026 Consistency Determination document is a link to the spreadsheet that was used to compile the actual investment data from PPRM (shown below). Below are links to the documents on TDOT's website.

TAMP Consistency Determination Document:

- https://www.tn.gov/content/dam/tn/tdot/maintenance/asset-management-office-/tamp/2026_TAMP-Consistency_Determination_Report_v1.1 Final.pdf

TAMP Consistency Determination Spreadsheet:

- https://www.tn.gov/tdot/maintenance/asset-management-office/transportation-assetmanagement-plan.html/2026_TAMP-Consistency_Determination_Data.xlsx

Table D-2: Crosswalk Between TDOT Treatment Types and FHWA Work Types

FHWA Work Types	TDOT Pavement Treatments	TDOT Bridge Treatments
Preservation	**Preservation Activities, including:** • Thin asphalt overlay (1.5 in. or less) • Microsurfacing • Chip seals • Cape seals • Crack sealing • Concrete joint sealing • Mill and fill asphalt overlays (1.5 in. or less)	**Preservation Activities, including:** • Repainting structural steel • Sweeping • Deck repairs • Deck waterproofing • Deck epoxy overlay • Polymer modified concrete deck overlay • Cleaning and resealing expansion joints • Scour Prevention (1)
Rehabilitation	**Rehabilitation Activities, including:** • Full-depth patching • Repair/replacing concrete slabs • Cold in-place Recycling and Overlay • Hot-in-place recycling with 1.25 in. overlay • Thick asphalt overlay (2 to 4 in.)	**Rehabilitation Activities, including:** • Replacement of expansion joints • Concrete spall repairs • Structural steel repairs • Scour repairs (2) • Bearing replacement
Reconstruction	**Reconstruction Activities, including:** • Rubblization and overlay of concrete pavement • Full-depth replacement of asphalt pavement	**Reconstruction Activities, including:** • Bridge replacement • Bridge widening
Construction	**Construction Activities, including:** • Highway widening • Highway realignments • New highway construction	**Construction Activities, including:** • New bridge construction
Maintenance	**Maintenance Activities, including:** • Shallow patching skin patching • Partial-depth patching • Repair concrete corner breaks • Concrete joint repair • Other thin patching	**Maintenance Activities, including:** • Filling potholes in deck • Minor structure repair • Major structure repair • Cleaning structure

1 – Shown as a rehabilitation treatment in the 2025 TAMP. Revised here to a preservation treatment consistent with TDOT practices.
2 – Revised "Scour Prevention" shown in 2025 TAMP to "Scour Repair" consistent with TDOT practices.

Table D-3: TDOT 10-Year Estimated Budget for Pavements by Work Type (Dollars in Millions) (Source: 2025 TAMP Table 7-3)

Year	Construction	Reconstruction	Rehabilitation	Preservation	Maintenance	Total
2025	N/A	N/A	$41	$336	$6	$383
2026	N/A	N/A	$42	$345	$6	$393
2027	N/A	N/A	$43	$354	$6	$403
2028	N/A	N/A	$44	$365	$6	$415
2029	N/A	N/A	$46	$375	$6	$427
2030	N/A	N/A	$47	$387	$6	$440
2031	N/A	N/A	$48	$398	$6	$452
2032	N/A	N/A	$50	$410	$6	$466
2033	N/A	N/A	$51	$422	$6	$479
2034	N/A	N/A	$53	$435	$6	$494
Total	N/A	N/A	$465	$3,827	$60	$4,352

Table D-4: TDOT 10-Year Estimated Bridge Management Budget by Work Type (Dollars in Millions) (Source: 2025 TAMP Table 7-4)

Year	Construction	Reconstruction	Rehabilitation	Preservation	Maintenance	Total
2025	N/A	$102	$46	$13	$4	$165
2026	N/A	$85	$68	$24	$4	$181
2027	N/A	$85	$68	$24	$4	$181
2028	N/A	$85	$68	$24	$4	$181
2029	N/A	$85	$68	$24	$4	$181
2030	N/A	$85	$68	$24	$4	$181
2031	N/A	$85	$68	$24	$4	$181
2032	N/A	$85	$68	$24	$4	$181
2033	N/A	$85	$68	$24	$4	$181
2034	N/A	$85	$68	$24	$4	$181
Total	N/A	$867	$658	$229	$40	$1,794