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TABLE OF CONTENTS

OBJECTIVES ...............................................................................................................................2

SCOPE ..........................................................................................................................................2

BACKGROUND ..........................................................................................................................3

SUMMARY ..................................................................................................................................7

CONCLUSION .............................................................................................................................8

EXHIBIT A – MARCO ISLAND EXECUTIVE AIRPORT – PHOTOGRAPHS FROM FDOT PAVEMENT EVALUATION REPORT ..........................................................................9

EXHIBIT B – IMMOKALEE REGIONAL AIRPORT – PHOTOGRAPHS FROM FDOT PAVEMENT EVALUATION REPORT ...........................................................15

EXHIBIT C – CHARTS .............................................................................................................23

The files and draft versions of audit reports remain confidential and protected from public records requests during an active audit under Nicolai v. Baldwin (Aug. 28, 1998 DCA of FL, 5th District) and Florida Statute 119.0713. Work-papers supporting the observations noted within this report will become public record and can be made available upon request once the final audit report has been issued.
The draft audit report 2014-1 was reviewed with the Department on November 22, 2013.

Objectives

The objectives of the review were to determine if: 1) Federal Aviation Administration (FAA) grant applications were in compliance with grant assurances and 2) the underlying information submitted to the FAA was accurate and complete with regard to the two FAA grant applications (Immokalee Regional Airport Grant Agreement #3-12-0031-008-2013 and Marco Island Executive Airport Grant Agreement #3-12-0142-010-2013) for runway rehabilitation at the Immokalee Regional Airport and the Marco Island Executive Airport.

Scope

The review consisted of, but was not limited to the following tasks:

- Review of pre-grant application for Immokalee Regional Airport runway rehabilitation project;
- Review of pre-grant application for Marco Island Executive Airport runway rehabilitation project;
- Review of grant application for Immokalee Regional Airport runway rehabilitation project;
- Review of grant application for Marco Island Executive Airport runway rehabilitation project;
- Review of County Manager’s after-the-fact approval memorandum for the Immokalee Regional Airport and Marco Island Executive Airport runway rehabilitation projects;
- Review of FAA corrected grant application for Immokalee Regional Airport runway rehabilitation project;
- Review of FAA grant agreement 3-12-0031-008-2013 for Immokalee Regional Airport runway rehabilitation project;
- Review of FDOT joint participation agreement AR519 for Immokalee Regional Airport runway rehabilitation project;
- Review of FAA grant agreement 3-12-0142-010-2013 for Marco Island Executive Airport runway and apron rehabilitation project;
- Review of FDOT joint participation agreement AR513 for Marco Island Executive Airport runway and apron rehabilitation project;
- Review of applicable Advisory Circulars including but not limited to Guidelines and Procedures for Maintenance of Airport Pavements;
- Review of applicable Board of County Commissioner / Collier County Airport Authority meeting agendas, supporting documentation, recaps, and minutes;
- Review of applicable Federal Regulations, Executive Orders, FAA Grant Assurances, Florida Statutes, State of Florida Guidance, BCC Records including Collier County Ordinances and Resolutions, Collier County Land Development Code (LDC) and Collier County - County Manager’s Agency Administrative Practices and Procedures Manual;
- Review of Inter-local Ingress/Egress Agreement (dated January 17, 1996) including First Amendment (dated August 28, 2000) for Marco Island Executive Airport;
- Review of Memorandum of Understanding (dated September 11, 2001) for Marco Island Executive Airport;
- Review of County Bid No. 13-6124 submittals for Immokalee Airport Runway Construction 9/27;
- Review of Collier County Land Development Code and Zoning Maps;
- Review of audit work-papers from Audit Report 2012-1 and Audit Report 2012-2;
- Review of Florida Fish and Wildlife Conservation Commission Gopher Tortoise Incidental Take Permit #COL-36 for the Immokalee Regional Airport
- Review of Florida Department of Environmental Protection Permit #11-0129042-002 including extension;
- Review of U.S. Army Corps of Engineers Permit #SAJ-1997-2362 (IP-HWB) including request for extension;
- Review of the Florida Department of Transportation Aviation Office Pavement Evaluation Reports for the Immokalee Regional Airport and the Marco Island Executive Airport;
- Review of 2009 Airport Master Plan for Marco Island Executive Airport;
- Review of 2009 Airport Master Plan for Immokalee Regional Airport; and
- Interviews with County Staff.
The review of the Federal Aviation Administration (FAA) grant applications (Immokalee Regional Airport Grant Agreement #3-12-0031-008-2013 and Marco Island Executive Airport Grant Agreement #3-12-0142-010-2013) for runway rehabilitation for the Immokalee Regional Airport and the Marco Island Executive Airport was completed based on the request of the Board of County Commissioners (BCC), acting as the Collier County Airport Authority (CCAA).

As a result of CCAA concerns regarding the information submitted, at a regular meeting held on September 24, 2013 (agenda item 14.A.3 and 14.A.4), the CCAA unanimously approved and requested the Clerk’s Office to conduct a review of the grant applications and underlying supporting information.

The FAA grant assurances number 11 require a “Pavement Preventive Maintenance”. The assurance applies to projects approved after January 1, 1995, for the replacement or reconstruction of pavement at the airport. The assurance certifies that the airport has implemented an effective airport pavement maintenance management program and assures that the airport will use a program for the useful life of any pavement constructed, reconstructed, or repaired with Federal financial assistance. The airport must provide reports of the pavement condition and pavement management programs.

The State of Florida Department of Transportation Aviation Office (FDOT) created and implemented the Statewide Airfield Pavement Management Program in 1992. The program was created to plan, schedule, and design the maintenance and rehabilitation activities necessary for the airfield pavement on Florida public airports to allow the airports to operate efficiently, economically, and without excessive down time. The program uses the Pavement Management System (PMS) which is a broad function that uses pavement evaluation and pavement performance trends as the basis for planning, programming, financing, and maintaining a pavement system. Pavement evaluation is completed to make determinations of condition, serviceability, and the best corrective action for pavement. The FDOT’s minimum service level for pavement is 75 for runways, 60 for aprons, and 65 for taxiways (Reference Exhibit C – FDOT Minimum Service Level for PCI page 24). Runways, aprons, and taxiways with a PCI less than 40 are recommended for reconstruction to resolve pavement distress (Reference Exhibit C – FDOT Maintenance and Rehabilitation Activities page 25).

**IMMOKALEE REGIONAL AIRPORT – RUNWAY REHABILITATION**

In March 2011, FDOT completed a review of the Immokalee Regional Airport runways evaluating the pavement under the Florida Statewide Pavement Program. The FDOT’s minimum service level for pavement is 75 for runways, 60 for aprons, and 65 for taxiways. In May 2011, the pavement evaluation report indicated the overall area-weighted average Pavement Condition Index (PCI) for the Immokalee Regional Airport was 36, which represents a “very poor” overall network condition. Runway 9/27 had an area weighted PCI of 27. Taxiway Alpha (Taxiway A) had an area weighted PCI of 25, which is considered “serious”. Taxiway Bravo (Taxiway B) had an area weighted PCI of 30. Taxiway Bravo 1 (Taxiway B-1) had an area weighted average PCI of 30. The area weighted PCI ratings of “very poor” and “serious” are below the FDOT minimum service level standards. Based on results from the review, FDOT requires action to be taken for all areas with a “very poor” or “serious” area weighted PCI rating.

The FDOT pavement evaluation report indicated asphalt concrete on Runway 9/27 exhibited distress from climate and age with 72% of the network considered “very poor”. The Asphalt Concrete pavement distresses include: weathering, raveling, longitudinal and transverse cracking, and block cracking distress (common based on age). The Portland Cement Concrete pavement distresses include: corner breaks, LTD cracking, joint seal damage, scaling/map cracking, shrinkage cracks, and joint and corner spalling (associated with climate and age).

The FDOT pavement evaluation report indicated asphalt concrete on Runway 9/27 exhibited low and medium severity block cracking along with medium severity weathering and raveling. Portland Cement Concrete pavement distresses consisted of corner breaks, LTD cracking, joint seal damage, scaling / map cracking, shrinkage cracks, and joint and corner spalling.
On February 1, 2013, the Executive Airport Director signed and submitted a project pre-application to the FAA requesting grant funding (letter of credit method, as required by the FAA) for runway rehabilitation for the Immokalee Regional Airport. The pre-application based construction costs on the engineer’s estimates, but indicated when the formal grant application is submitted, it will be based on bids, as required by the FAA. The estimated funding for the project is as follows: Federal (FAA grant) $8,550,000.00; State (FDOT grant) $475,000.00; and Applicant (County match) $475,000.00 for a total of $9,500,000.00.

The pre-application indicates the project for runway rehabilitation is needed for safety reasons because the current runway surface for Runway 9/27 is rated as being in “very poor condition” (Pavement Condition Index rating of 27) by the Florida Department of Transportation Aviation Office. Additional safety items are being included in the grant such as upgrading the airfield lighting system, improving drainage, and providing emergency power backup. The work to be completed under the grant is further elaborated upon in the grant application submitted to the FAA on August 13, 2013.

On August 13, 2013, the County Manager signed the grant application and the Executive Airport Director submitted the grant application to the FAA for the construction phase for runway rehabilitation at the Immokalee Regional Airport. The base bid includes the reconstruction / rehabilitation of Runway 9/27, the extension of Taxiway B to the new threshold of Runway 27, construction of Taxiway B-1 to the threshold of Runway 9, installation of runway edge and threshold lighting, mandatory signage, new homerun cables and regulator for Runway 9/27 lighting circuit, improvements to the runway safety area, minor grading, and drainage improvements. The application included three additive alternatives: 1) Runway Decoupling - the relocation of the threshold of Runway 18, the construction of Taxiway A-2 connectors, and the removal of existing concrete pavement at intersection of Runways 9 and 18 and portions of Taxiways A and B (minimum improvements to acquire decoupling of the runways); 2) construction of Taxiway B-2, grading, drainage improvements for the airfield, runway identification lights (REILs) and precision approach path indicator (PAPIs) for both approaches to Runway 9/27, edge lighting, signage for Taxiways A-2, B, B-1, B-2, and B-3, new segmented circle and wind cones, new homerun cables in conduit, new electrical vault, and new back-up generator; 3) Blast Pads - blast pads at both ends of Runway 9/27 and hold pads on Taxiways B and B-1.

Included in the base bid were a 75 foot wide runway and a 100 foot wide runway. The cost of the additional 25 feet has been excluded from eligible expenditures because it exceeds the FAA standard of 75 feet for similar airports. Soil cement injection, which is not approved by the FAA, has been excluded from the grant request. The expenditures that are ineligible for FAA grant funding are incorporated into the Florida Department of Transportation (FDOT) grant funding for a total of $558,992.00. The estimated funding for the project is as follows: Federal (FAA grant) $6,754,362.00; State (FDOT grant) $1,022,633.00; and Applicant (County match) $286,844.00 for a total of $8,063,839.00. The proposed project dates for the base bid and alternatives have a start date of October 15, 2013 and a completion date of September 1, 2014.

On August 26, 2013, the County Manager submitted a revised grant application to the FAA for the Immokalee runway rehabilitation project to revise the estimated funding. The revised estimated funding is as follows: Federal (FAA grant) $6,754,362.00; State (FDOT grant) $1,022,633.00; and Applicant (County match) $286,844.00 for a total of $8,063,839.00. The proposed project dates have a start date of October 1, 2013 and a completion date in August 2014.

On September 24, 2013, the Collier County Airport Authority entered into a grant agreement (Number 3-12-0031-008-2013) with the FAA for the construction phase to rehabilitate Runway 9/27 at the Immokalee Regional Airport for a maximum of $6,754,362.00 / 90% of the allowable costs incurred for the project.

On October 22, 2013, the Collier County Airport Authority approved entering into a joint participation agreement (Number AR519) with the FDOT for the construction to rehabilitate Runway 9/27 at the Immokalee Regional Airport for a maximum of $134,000.00 leaving the County match as $1,175,477.00.
The executive summary (BCC Meeting October 22, 2013 Agenda Item 14.A.3) indicates the FAA funding is $6,754,262.00, when the FDOT project budget and FAA grant agreement is $6,754,362.00. The executive summary appears to contain a $100.00 error. The FDOT joint participation agreement’s project budget indicates the County match is $1,175,476.00 which is $1.00 less than the FAA grant agreement requirement and the budget amendment. Information in the grant agreements, executive summaries, and budget amendments should be consistent and properly validated prior to providing the information to the BCC for approval.

**MARCO ISLAND EXECUTIVE AIRPORT – RUNWAY REHABILITATION**

The Marco Island Executive Airport consists of a single runway (Runway 17/35). With the exception of one ramp connector that is Portland Cement Concrete, all of the pavement at the airport is Asphalt Concrete.

In March 2011, FDOT completed a review of the Marco Island Executive Airport runways, aprons, and taxiways evaluating the pavement under the Florida Statewide Pavement Program. The FDOT’s minimum service level for pavement is 75 for runways, 60 for aprons, and 65 for taxiways. In May 2011, the pavement evaluation report indicated the overall area-weighted average Pavement Condition Index (PCI) for the Marco Island Executive Airport was 40, which represents a “very poor” overall network condition. Runway 17/35 had an area weighted PCI of 31, which is considered “very poor”. Taxiway Connector (Taxiway B) had an area weighted PCI of 21, which is considered “serious”. North Apron had an area weighted PCI of 56, which is considered “fair”. North West Apron had an area weighted average PCI of 67, which is considered “fair”. The area weighted PCI ratings of “very poor” and “serious” are below the FDOT minimum service level standards. Based on results from the review, FDOT requires action to be taken for all areas with a “very poor” or “serious” area weighted PCI rating.

The FDOT pavement evaluation report indicated the overall Marco Island Executive Airport network exhibited distress from climate and age with 59% of the network considered “very poor”. The Asphalt Concrete pavement distresses include: weathering, raveling, longitudinal and transverse cracking, and block cracking distress (common based on age).

The FDOT pavement evaluation report indicated asphalt concrete on Runway 17/35 exhibited low and medium severity longitudinal and transverse cracking along with medium severity weathering, medium severity raveling, and medium severity block cracking. The apron section exhibited low and medium severity block cracking along with medium severity weathering and raveling.

The Marco Island Executive Airport project sketch for runway rehabilitation and apron rehabilitation is within the projects approved in the Memorandum of Understanding on September 11, 2001. The areas of construction are within the limits of development and do not appear to expand into the vegetation management plan areas.

On February 1, 2013, the Executive Airport Director signed and submitted a project pre-application to the FAA requesting grant funding (letter of credit method, as required by the FAA) for runway rehabilitation for the Marco Island Executive Airport. The pre-application based construction costs on the engineer’s estimates, but indicated when the formal grant application is submitted, it will be based on bids, as required by the FAA. The estimated funding for the project is as follows: Federal (FAA grant) $6,435,000.00; State (FDOT grant) $357,500.00; and Applicant (County match) $357,500.00 for a total of $7,150,000.00.

The pre-application indicates the project for runway rehabilitation is needed for safety reasons because the current runway surface for Runway 17/35 is rated as being in “very poor condition” (Pavement Condition Index rating of 27) by the Florida Department of Transportation Aviation Office. Additional safety items are being included in the grant such as reconstruction/rehabilitation of the existing aircraft apron, construction of run-up pad on the Taxiway approaching Runway 17/35, installation of new runway edge / threshold lighting, runway identification lights (REILs) for both approaches, vault modification, electrical backup generator, relocate and replace rotating beacon, relocate segmented circle/wind cone, grade runway safety area, adjust precision approach path indicators for Runway 35 (PAPIs). The work to be completed under the grant is further elaborated upon in the grant application submitted to the FAA on August 12, 2013.
On August 13, 2013, the County Manager signed the grant application and the Executive Airport Director submitted a grant application to the FAA for the construction phase for runway rehabilitation at the Marco Island Executive Airport. The base bid includes the reconstruction / rehabilitation of Runway 17/35 (FDOT rating: very poor) including lighting, marking, fill, and grading with the runway safety area; the rehabilitation of Taxiway B (FDOT rating: serious); rehabilitation of the first 100 feet of the apron adjacent to the runway; and drainage improvements. The application included three additive alternatives: 1) Apron Rehabilitation - rehabilitation of the remaining apron, new segmented circle / wind cone, backup generator for the electrical vault, and a new rotating beacon with pole; 2) East Fill and Grade - Apron Rehabilitation - filling and grading within the runway object free area on the east side of the runway; 3) West Clearing, Grubbing, and Fill - clearing and grubbing of the area west of the apron (approximately five acres), fill, grading, and fencing.

The estimated funding for the project is as follows: Federal (FAA grant) $5,649,916.00; State (FDOT grant) $313,884.00; and Applicant (County match) $313,884.00 for a total of $6,277,684.00. The proposed project dates for the base bid and alternatives have a start date of October 1, 2013 and a completion date of July 15, 2014.

On September 24, 2013, the Collier County Airport Authority entered into a grant agreement (Number 3-12-0142-010-2013) with the FAA for the construction phase to rehabilitate Runway 17/35 and apron at the Marco Island Executive Airport for a maximum of $5,649,916.00 / 90% of the allowable costs incurred for the project.

On October 22, 2013, the Collier County Airport Authority approved entering into a joint participation agreement (Number AR519) with the FDOT for the construction phase to rehabilitate Runway 17/35 and apron at the Marco Island Executive Airport for a maximum of $178,750.00 leaving the County match as $449,018.00.
Internal Audit reviewed the FAA grants and supporting documentation for the Immokalee Regional Airport and Marco Island Executive Airport runway rehabilitation projects. No adverse observations were noted during the review for the Immokalee Regional Airport or the Marco Island Executive Airport runway rehabilitation projects. It appears the grant application and supporting documentation was properly and accurately reported to the FAA when applying for the grant funding.

The grant applications submitted to the FAA were based upon the Florida Department of Transportation Aviation Office Pavement Evaluation Reports indicating rehabilitation for the runways was necessary based on low pavement condition index ratings. It appears the underlying information provided to the FAA for the Immokalee Regional Airport and the Marco Island Executive Airport runway rehabilitation projects was accurate and met the FAA requirements for grant applications.

The Immokalee Regional Airport runway rehabilitation project needs to obtain a Site Development Plan (SDP) permit. The County is working to obtain the necessary permitting. Commencement of construction cannot occur until the SDP is obtained.

The Marco Island Executive Airport’s U.S. Army Corps of Engineers permit expires on November 24, 2013, which will be prior to the completion of construction. A letter requesting the extension of the permit was submitted to the U.S. Army Corps of Engineers on August 7, 2013. Commencement of construction should not occur until an extension is received to ensure compliance with the grant assurances, attestations, and agreements.

The executive summary (BCC Meeting October 22, 2013 Agenda Item 14.A.3) for the Immokalee Regional Airport indicates the FAA funding is $6,754,262.00, when the FDOT project budget and FAA grant agreement is $6,754,362.00. The executive summary appears to contain a $100.00 error. The FDOT joint participation agreement’s project budget indicates the County match is $1,175,476.00 which is $1.00 less than the FAA grant agreement requirement and the budget amendment. Information in the grant agreements, executive summaries, and budget amendments should be consistent and properly validated prior to providing the information to the BCC for approval.

All requirements of the grant applications, assurances, and agreements should be complied with prior to soliciting grant funding and entering into grant agreements for construction projects or disclosed in the grant application to ensure grant funding is not jeopardized.

Failure to comply with FAA or FDOT requirements may: result in audit findings, jeopardize current and future grant funding; result in disbarment from receiving grant funding, require repayment of grant funds, result in termination of the grant, impact future grant awards, and/or result in liability for damages for misrepresentation.

If construction commences prior to the permitting concerns being resolved, the Clerk may not have legal authority to pay the contractor.
The grant applications submitted to the FAA were based upon the Florida Department of Transportation Aviation Office Pavement Evaluation Reports indicating rehabilitation for the runways was necessary based on low pavement condition index ratings indicating the projects are necessary to meet the FAA grant assurance requirements for the pavement maintenance management program.

It appears the underlying information provided to the FAA for the Immokalee Regional Airport and Marco Island Executive Airport runway rehabilitation projects was accurate and met the FAA requirements for grant applications.

The Immokalee Regional Airport runway rehabilitation project needs to obtain a Site Development Plan (SDP) permit. The County is working to obtain the necessary permitting. Commencement of construction should not occur until the SDP is obtained.

The Marco Island Executive Airport’s U.S. Army Corps of Engineers permit expires on November 24, 2013, which will be prior to the completion of construction. A letter requesting the extension of the permit was submitted to the U.S. Army Corps of Engineers on August 7, 2013. Commencement of construction cannot occur until an extension is received to ensure compliance with the grant assurances, attestations, and agreements.

The Immokalee Regional Airport rehabilitation project information for the FAA grant agreement and FDOT joint participation agreement contains inconsistent information. The executive summary (BCC Meeting October 22, 2013 Agenda Item 14.A.3) for the Immokalee Regional Airport indicates the FAA funding is $6,754,262.00, when the FDOT project budget and FAA grant agreement is $6,754,362.00. The executive summary appears to contain a $100.00 error. The FDOT joint participation agreement’s project budget indicates the County match is $1,175,476.00 which is $1.00 less than the FAA grant agreement requirement and the budget amendment. Information submitted to the BCC for approval and to grantor agencies should be consistent and properly validated prior to submission.

The FAA grant assurances prohibit cost plus percentage of cost methods for contracting. It appears the grant agreement allows for either lump sum contracts or time and material contracts. It appears either method of payment may be used for the construction contract, so long as the method is consistent with the approved schedule of values.

Audits do not relieve management of their responsibilities. It is the responsibility of County management to understand and implement the proper procedural controls in order to reduce and limit the risk of fraud, error, and misappropriation of County assets. Internal Audit may recommend improvements in audit reports, but ultimately it is the duty and decision of County management to formulate processes and controls that ensure compliance with Federal regulation, State statute, County ordinance, and County policies.

Recommendations:

- An SDP should be obtained by the Immokalee Regional Airport prior to entering contracts and/or the commencement of construction.
- The U.S. Army Corps of Engineers permit for the Marco Island Executive Airport should be renewed (expires in November 2013) prior to entering contracts and/or the commencement of construction.
- Any changes to the schedule of values should be approved by the grantor agency prior to entering into an agreement with the contractor and/or at any time during the term of the grant agreements.
- When the County applies for multiple grants and/or enters grant agreements for a project, the information contained in the applications and agreements should be consistent and properly validated.
- The County should submit a revised executive summary to the BCC to approve the revisions for errors for the official record.

Internal Audit Comments:

Internal Audit acknowledges the cooperation, assistance, and quick responses from County staff. The assistance and quick response provided by the departments greatly assisted in the audit process for review of the FAA grant applications, grant assurances, and underlying information submitted.
Exhibit A
Marco Island Executive Airport
FDOT Pavement Evaluation Report – May 2011
Runway 17-35, Section 6110, Sample Unit 130 – Medium severity (43) Block Cracking, medium severity (52) Weathering and Raveling
Runway 17-35, Section 6110, Sample Unit 145 – Medium severity (43) Block Cracking, medium severity (52) Weathering and Raveling

Runway 17-35, Section 6110, Sample Unit 145 – Medium severity (43) Block Cracking, medium severity (52) Weathering and Raveling
Apron, Section 4205, Sample Unit 257 – Low and medium severity (43) Block Cracking, low severity (52) Weathering and Raveling

Taxiway Connector, Section 105, Sample Unit 100 – Low severity (63) LTD Cracking, medium severity (86) Patch, low severity (70) Scaling/Map Cracking, medium severity (72) Shattered Slabs, (73) Shrinkage Cracks, low severity (74) Joint Spalling
Exhibit B
Runway 18-36, Section 6123, Sample Unit 392 – Low, medium and high severity (62) Corner Break, (63) LTD Cracking, (65) Joint Seal Damage, (70) Scaling/Map Cracking, (72) Shattered Slabs, (73) Shrinkage Cracks, (74) Joint Spalling, (75) Corner Spalling
Runway 18-36, Section 6115, Sample Unit 383 – Medium severity (43) Block Cracking, medium severity (48) Longitudinal and Transverse Cracking, medium severity (52) Weathering and Raveling
Taxiway A-1, Section 210, Sample Unit 201 – Medium severity (43) Block Cracking, medium severity (50) Patch, medium severity (52) Weathering and Raveling

Taxiway A-1, Section 210, Sample Unit 201 – Medium severity (43) Block Cracking, medium severity (50) Patch, medium severity (52) Weathering and Raveling
Apron, Section 4210, Sample Unit 203 – Low severity (40) Longitudinal and Transverse Cracking, low severity (50) Patch, low severity (52) Weathering and Raveling
Exhibit C
FAA Pavement Life Cycle

Source: FAA/AC 150/5380-7A “Airport Pavement Management Program”  
*Modified to reflect current construction costs.

FDOT Minimum Service Level for PCI

<table>
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<th>Minimum PCI</th>
<th>Runway</th>
<th>Taxiway</th>
<th>Apron</th>
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<tr>
<td></td>
<td>75</td>
<td>65</td>
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### Pavement Condition Index (PCI) Rating Scale

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<th>Condition Rating</th>
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<tr>
<td>86 – 100</td>
<td>Good</td>
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<tr>
<td>71 – 85</td>
<td>Satisfactory</td>
</tr>
<tr>
<td>56 – 70</td>
<td>Fair</td>
</tr>
<tr>
<td>41 – 55</td>
<td>Poor</td>
</tr>
<tr>
<td>26 – 40</td>
<td>Very Poor</td>
</tr>
<tr>
<td>11 – 25</td>
<td>Serious</td>
</tr>
<tr>
<td>0 – 10</td>
<td>Failed</td>
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### FDOT Maintenance and Rehabilitation Activities

<table>
<thead>
<tr>
<th>Activity</th>
<th>PCI Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance Crack Sealing and Full-Depth Patching</td>
<td>80 and 90</td>
</tr>
<tr>
<td>Rehabilitation Mill and Overlay (AC) or Concrete Pavement Restoration (PCC)</td>
<td>40 to 79</td>
</tr>
<tr>
<td>Reconstruction</td>
<td>39 and less</td>
</tr>
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