




Steve Townsen - Comments

This is a Comment on the **Federal Highway Administration (FHWA)** Proposed Rule: **National Performance Management Measures: Assessing Pavement Condition for the National Highway Performance Program and Bridge Condition for the National Highway Performance Program**

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Due May 8 2015, at 11:59 PM ET

ID: FHWA-2013-0053-0082

Tracking Number: 1jz-8i2e-k6jw

Document Information

Date Posted:

Apr 6, 2015

RIN:

2125-AF53

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Comment

We understand that new requirements for MAP 21 funding for roads on the National Highway System (NHS) will require International Ride Index (IRI) data. We do not believe that is an appropriate measure to be used on urban roads.

In Portland, Oregon we have about 4800 lane miles of which about 3000 lane miles are local streets and 1800 lane miles are collector/arterials. We physically rate in the field our collector/arterials every 2 years and locals every 5 years. We have a robust pavement management system utilizing StreetSaver (pavement management software) which includes deterioration curves, treatment rules, costs, which streets are on bus routes, etc. We have set goals for the conditions of our streets and we run 10 year scenarios to see how we are doing versus our goals. We use the Pavement Condition Index (PCI) calculated by StreetSaver and other data to determine which streets need treatment and what the appropriate the treatment is based upon the \$\$ available to maximize our return on investment. All jurisdictions we are aware utilizing asset management for pavement use some sort of Pavement Condition Index (PCI) based upon measured cracks (transverse, longitudinal, aligating, etc), rutting, utility cuts, etc. We want to implement best practices and we believe that we and other local jurisdictions that have a robust pavement management system are doing that. We have a very good pavement management system and in addition we are very active in the Northwest Pavement Management Association (NWPMA).

As part of MAP21 we understand that for any project on the NHS system in order to be eligible for funding local jurisdictions would have to have IRI data and targets. IRI data is appropriate for freeways/highways with vehicles traveling at a high rate of speed. It is not appropriate for urban level streets traveling at slower speeds. We'd argue that if the posted speed is less than 50 MPH that IRI is not an appropriate measure for the condition of the streets. That is why nationwide that local jurisdictions do not collect IRI data because it isn't necessary or needed to perform good pavement management on

these types of streets.

Based upon our experience, I believe that these requirements for IRI data for MAP21 streets on the National Highway System (NHS) to be eligible for funds is an inappropriate criteria. We would be happy to be part of that discussion to change the criteria so that is more useful and appropriate for roads in an urban environment.

Sincerely,

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