

DEPARTMENT OF  
TRANSPORTATION  
DOCKET OPERATIONS



April 2, 2015

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Acting Administrator Gregory G. Nadeau  
c/o Docket Operations  
U.S. Department of Transportation  
M-30, West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue SE.,  
Washington, DC 20590

Frank X. Doyle  
Mayor

Erin Tollini  
Vice Mayor

Jim Fraser  
Councilmember

Alice Fredericks  
Councilmember

Emmett O'Donnell  
Councilmember

RE: FHWA Docket Number FHWA-2013-0053, National Performance Management Measures; Assessing Pavement Condition for the National Highway Performance Program and Bridge Condition for the National Highway Performance Program

Dear Acting Administrator Nadeau:

Margaret A. Curran  
Town Manager

The Town of Tiburon appreciates the opportunity to comment on Federal Highway Administration (FHWA)'s proposed rule on National Performance Management Measures for Pavement and Bridge Conditions.

The Town of Tiburon is a small town with a population of 9,100 people and about 33 centerline miles of roads. Parts of the town date from the 1800's with narrow winding roads. The town is mostly hilly build on hillsides of 30% slope.

The Town of Tiburon is part of the Metropolitan Transportation Commission (MTC) region in the San Francisco Bay Area. In the MTC region, all the jurisdictions have adopted the same pavement condition metric, the Pavement Condition Index (PCI). The MTC region has been practicing pavement management for over 30 years, and local jurisdictions in the Bay Area must have a certified pavement management program in place in order to be eligible to receive regionally allocated funds for local street and road maintenance and rehabilitation.

In summary we are strongly opposed to the change away from PCI to International Roughness Index (IRI). The adoption of the International Roughness Index (IRI) is a measure that would result in inaccurate performance assessments for local facilities.

We are concerned that the benefit of having a single nationwide standard comes at the expense of local jurisdictions. IRI is not an appropriate measure for local roadways and the introduction of an additional layer of performance measurement on top of local jurisdictions' existing methods injects unnecessary expense and creates confusion that can only hinder asset management efforts at the local level.

Over the past several years using appropriate pavement management and maintenance techniques we have seen our PCI increase from 65 to 73.

Using IRI on local roads like Tiburon would encourage, perhaps even force, a shift away from preventive preservation treatments to costlier rehabilitation and reconstruction projects. If used as an asset management tool, it necessarily leads away from such treatments as slurry seals and toward "worst first" maintenance strategies that waste taxpayer monies. Pavement condition index (PCI) is a more proactive measure and better measure for the maintenance of local roads. For those of us who can remember, the Army Corps of Engineers developed PAVER many years ago as a way of prioritizing maintenance and managing pavement assets. This type of asset management, using PCI and developed by the Federal Government, is more appropriate for local roads than is the IRI developed by FHWA for freeways.

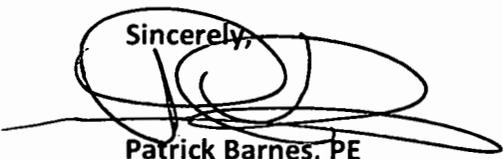
Everyone wants a freeway that is smooth and rides well. Perhaps that philosophy could be extended to local roads, but we believe that there are three problems with this extension:

1. Lower speeds make smoothness less of a concern.
2. One large complaint in every municipality is speeding. Frankly, a little roughness on low speed roads helps reduce speeding
3. Smoothness is not the best indicator of remaining life. A newly patched and slurried road might be a bit rough but it is in good condition.
4. Road deterioration patterns and causes are different on local roads than freeways.

Under the current proposal, small municipalities would incur additional expenses to fund the data collection for this change. While Caltrans has been collecting IRI data for California's NHS, this responsibility will likely fall to local agencies for local roads. There are two problems with this:

1. It will suck money away from actual pavement maintenance into additional paperwork.
2. This effort would be in addition to the useful tool of PCI ratings. Even collecting IRI data for a subset of the roads in the region would be an added cost and added effort for a measurement that is not appropriate or meaningful for local roadways.

Sincerely,



Patrick Barnes, PE

Director of Public works/Town Engineer  
Town of Tiburon