



City of Gilroy

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April 3, 2015

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

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:

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

Below, we voice some of our comments on the proposed rulemaking being considered by the FHWA as referenced above.

Pavement Condition:

The City of Gilroy 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 California, local jurisdictions own and maintain most of the arterials and collector roadways in addition to the residential streets. The City of Gilroy, as do most cities in the state, has goals in place that strive to maintain a minimum average PCI. We have had this goal in place for many years. The state is generally responsible for the higher speed facilities (namely highways, freeways, and interstates).

There are important local implications of the federal proposed rule. We respect FHWA's struggles and careful consideration in proposing a single performance measurement for pavement; however the adoption of the International Roughness Index (IRI) is a measure that results 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. With federal transportation legislation over the years, there has been devolution of responsibilities where there is an accepted premise that one size doesn't fit all and that decisions are best made at the local level with broad guidance from the Federal government. It is in this context that we submit our comments.

Our comments are broadly centered around 3 main points:

- 1) IRI is appropriate for highway facilities but is not appropriate for arterials, which make sizable share (approximately 36%) of the NHS in California under MAP-21. We have outlined a number of reasons why using IRI as a key component of MAP-21 pavement condition performance measures raises concerns for local jurisdictions:
 - The selected measure should be applicable to the facility for an accurate measurement of performance; adoption of the IRI appears to be based on data availability and less on appropriateness to facility. IRI measures the functional property of a pavement, whereas the measure we are currently using, PCI, is primarily a structural condition measurement. The City of Gilroy has also developed pavement treatments largely based on the PCI. A rating of "good" or "poor" based on the IRI would not be very useful to the city. The measurement of functionality, or ride quality, is important for facilities with high speed travel; however, not as significant for the lower speeds that typically occur on arterial roadways.
 - An outcome of applying IRI to local roads is that it would encourage a shift away from preventive preservation treatments to costlier rehabilitation and reconstruction projects, and an overall decline in average pavement condition. IRI is a reactive measure when applied to local streets and if used as an asset management tool, may lead to "worst first" maintenance strategies that are not as cost-effective. Pavement condition index (PCI) is a more proactive measure as it identifies pavement distresses before they affect ride quality.
 - The City of Gilroy currently uses PCI for measuring road condition and does not collect IRI data. In order to meet the federal requirements, we would either need to collect IRI data or convert PCI scores to IRI using questionable methodologies. Furthermore, less than 5% of the roads in California are part of the NHS and collection strategies on less than 5% of the roads should not drive the asset management approach for the rest of the system.

To address this issue, we suggest adopting a select list of certified and widely-used alternative pavement condition measures with an accompanying standardized definition of the scoring equivalency to good, fair, and poor that would be accepted, in addition to the IRI. This would enable States to make accurate and comparable assessments of the pavement system.

- 2) The formula for calculating performance is based on IRI, cracking, and rutting/faulting. As with IRI, the performance assessment formulas for highway-type facilities and arterials should also be varied based on appropriateness to the facility. The pattern of roadway deterioration and wear and tear is different for highway and arterials. On arterials, cracking can be derived from factors such as utility trenches and may be very different from the cracking that occurs on highways.

- 3) Funding for data collection is left to the states and regions. Caltrans has been collecting IRI data for California's NHS. However, without a clear requirement for data collection, this responsibility will likely fall to local agencies in the future. This would create many issues for the local jurisdictions since we have an established process for using PCI for all roads. Collecting IRI data for a subset of the roads in the region would be an added cost, added effort and duplicative of existing data collection for a measurement that is not appropriate or meaningful for local roadways.

Bridge Condition:

The proposed rule also addresses minimum levels for condition of bridges. The two measures for bridge condition is "good" or "poor". Yet, the minimum level for condition of NHS bridges is based on the condition of the bridge deck area. Although the condition of a bridge deck can be an indicator of overall bridge condition, it does not address potentially significant structural deficiencies. The City of Gilroy feels that it would make more sense to have an overall rating of a bridge using the various factors already collected by Caltrans in their annual bridge inspection process, and develop a minimum level for condition of bridges based on that composite number.

Sincerely,



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