



CITY of NAPA

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April 27, 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 Napa appreciates the opportunity to comment on Federal Highway Administration (FHWA)'s proposed rule on National Performance Management Measures for Pavement and Bridge Conditions.

In California, local jurisdictions own and maintain most of the collector and arterial roadways as well as the residential streets. The state is generally responsible for the higher speed facilities, namely highways and interstates. Less than 5% of the total road system in California is part of the National Highway System (NHS) under MAP-21, and of the portion that is considered NHS, approximately 36% of those facilities are designated arterials and are under local control and maintenance.

The Metropolitan Transportation Commission (MTC) is the designated Metropolitan Planning Organization for the San Francisco Bay Area which has been practicing pavement management in its region for over 30 years. MTC requires that local jurisdictions in the Bay Area 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. All of the jurisdictions within the MTC region have adopted the same pavement condition metric to assess its roadways, the Pavement Condition Index (PCI). Local jurisdictions use MTC's pavement management software (StreetSaver) to assist with their in-house pavement management program in which the PCI's calculated by StreetSaver and other data are utilized to determine which streets need

treatment and what the appropriate treatment is based upon the budget available to maximize our return on investment.

The City of Napa is located within the MTC region and has approximately 465 lane miles of paved streets that it is responsible for the repair and maintenance of. Approximately 290 of those lane miles are local streets and 175 are collector and arterial roadways. Like the rest of the jurisdictions in the MTC region, the City of Napa currently collects information by performing annual street surveys to determine the PCI for its roadways.

Pavement Condition:

There are important local implications of the federally proposed rule on National Performance Management Measures for Pavement and Bridge Conditions. 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 a devolution of responsibilities, resulting in 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 the following comments:

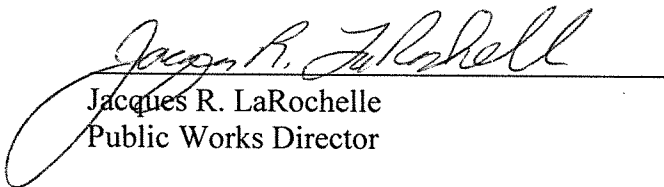
- 1) IRI is an appropriate measure for high-speed highway and freeway facilities, but it is not an appropriate measure for lower speed rural highway and arterial roadways. Arterial roadways make up a sizeable share (approximately 36%) of the National Highway System. IRI measures the functional property of a pavement, whereas the measure we are currently using, PCI, is primarily a structural condition measurement. The measurement of functionality, or ride quality, is important for facilities with high speed travel; however, not very significant for the lower speeds that typically occur on arterial roadways. Additionally, 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.
- 2) 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. 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. PCI is a more proactive measure as it identifies pavement distresses before they affect ride quality.
- 3) Requiring IRI to be used on all NHS roadways would place a financial burden on local jurisdictions. 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.

To address the above stated issues, 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.

Again, thank you for the opportunity to provide comments on the Federal Highway Administration (FHWA)'s proposed rule on national Performance Management Measures for Pavement and Bridge Conditions.

Sincerely,



Jacques R. LaRoche
Public Works Director