



Brian Carlson - 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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Comment

We understand that the new requirements in the proposed rulemaking for MAP 21 roads on the National Highway System (NHS) will require International Roughness Index (IRI), rutting, and faulting data to be collected to determine pavement condition. We do not believe that these are appropriate measures to be used on low speed urban roads.

In Vancouver, WA there are over 1,800 lane miles of which about 700 lane miles are arterials/collectors and 1,100 lane miles are local streets. We physically rate 100% of the roadway surface of all our streets every 2 years. We have been collecting this data for nearly 20 years to determine the condition of our streets. We use StreetSaver (pavement management software) which includes deterioration curves, decision trees, unit costs, street classifications, etc. for our pavement management system to determine condition scores, pavement treatment needs, annual programming, and long term system analyses and financial needs. We use the Pavement Condition Index (PCI) calculated by StreetSaver and other data to determine which streets need treatment and what the appropriate treatment is based upon the available funding. Our primary goal is to maximize the life of our street network with limited resources.

The City utilizes the pavement distresses of alligator cracking, transverse and longitudinal cracking, patching, utility patching, aging, and raveling to determine our PCI values using the methodology in the Pavement Surface Condition Field Rating Manual for Asphalt Pavements that was developed by local agencies and the Washington State Department of Transportation in 1999. These distresses are also in line and used with the MTC StreetSaver program by local agencies throughout the country. All jurisdictions that we are aware of which utilize a pavement management system use some sort of condition score based upon similar defects and do not use the IRI as a measure of their street systems condition. We all want to implement best practices, and we believe that we, and other local jurisdictions that are using pavement management systems are doing that.

Since part of the proposed MAP21 rule making requires any local agency street on the NHS system to collect and have IRI data and targets, this portion of the proposed rulemaking really needs to be looked at more closely. The IRI is appropriate for vehicles traveling at a high rate of speed such as freeways and highways. However, the IRI is not an appropriate condition assessment measure for streets with slower speeds and fixtures within the pavement such as utility manholes and valve cans that would affect the IRI ratings adversely to the point of making this data invalid. Our suggested recommendation is that if the posted speed is less than 50 MPH, then the IRI should not be used for the condition assessment of the streets. This is one of the reasons why, nationwide, local agencies do not collect IRI data since it isn't necessary, or needed, to operate with good pavement management practices on these types of streets. Instead, we should consider developing a standard for determining condition scores for local agencies that would also apply to NHS routes on local agency streets. Since many local agencies already utilize a condition scoring of 0-100 based on the primary defects of alligator cracking, longitudinal and transverse cracking, and patching, we should utilize these as a starting point for the standard.

In conclusion, based upon our experience, the proposed MAP21 rulemaking requiring IRI data to be collected for streets on the National Highway System (NHS) is not an appropriate criteria for measuring the condition of lower speed, local agency streets but should be applied to streets with a 50 mph or higher speed limit. Instead, an alternate condition scoring standard should be developed for local agency streets. Until this is resolved, we would request that these new proposed MAP21 requirements be put on hold.

Sincerely,

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