



September 21, 2022

Ms. Stephanie Pollack
Acting Administrator, Federal Highway Administration
United States Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Subject: National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure (Docket No. FHWA-2021-0004)

Dear Acting Administrator Pollack:

The Association for Commuter Transportation (ACT) is pleased to provide comments on the Federal Highway Administration's (FHWA) Notice of Proposed Rulemaking on "National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure (Docket No. FHWA-2021-0004)," published in the Federal Register on July 15, 2022. ACT is the premier organization and leading advocate for commuter transportation and transportation demand management (TDM) professionals, with the mission to create an efficient multimodal transportation system by empowering the people, places, and organizations working to advance TDM in order to improve the quality of life of commuters, enhance the livability of communities, and stimulate economic activity.

On behalf of ACT's nearly 1,500 individual members at over 450 organizations, I offer our strong support for FHWA's efforts to implement greenhouse gas reduction performance measures. There is no debating the dire effects greenhouse gases have on our planet. According to an EPA report examining greenhouse gas emissions between 1990 and 2020, passenger vehicles accounted for nearly forty (40) percent of transportation activities' CO₂ emissions in the US in 2020.¹ The report found that the overall increase in CO₂ emissions from transportation activities between 1990 and 2020 was attributable to a variety of factors, including population growth, economic growth, urban sprawl, and low fuel prices.² If greenhouse gas emissions continue to increase climate models predict that the average temperature at the Earth's surface is likely to increase by up to 8.3 degrees Fahrenheit above 2011 to 2020 levels by the end of this century.³ This increase in temperature will lead to devastating environmental impacts, including increasing severe and damaging weather events, and adverse impacts on public health, including increases in respiratory illnesses and heart disease. All of these events will lead to a significantly diminished quality of life for all Americans unless change is enacted now.

We encourage the FHWA to think broader about the requirements for measuring greenhouse gas emissions beyond just mainline highways of the Interstate and non-Interstate National Highway System

¹ <https://www.epa.gov/system/files/documents/2022-04/us-ghg-inventory-2022-main-text.pdf> p. 43

² <https://www.epa.gov/system/files/documents/2022-04/us-ghg-inventory-2022-main-text.pdf> p. 43

³ <https://www.epa.gov/system/files/documents/2022-04/us-ghg-inventory-2022-main-text.pdf> p. 63



(NHS). Transportation related emissions are not limited solely to the National Highway System, but occur on all manner of roadways including highways, residential neighborhoods, and urban environments. A greenhouse gas reduction program must include benchmark targets that address transportation emissions on all roadways.

One of the most impactful ways to help reduce greenhouse gas emissions on roadways is through the introduction of TDM strategies. TDM policies should play a vital role in reducing the number of vehicles on the road and lowering greenhouse gas emissions. These strategies are designed to inform and encourage travelers to maximize the efficiency of a transportation system, leading to improved mobility, reduced congestion, and lower vehicle emissions. This includes approaches that use planning, programs, policies, marketing, communications, incentives, pricing, data, and technology such as transit, intercity passenger rail, bicycle and pedestrian infrastructure, electric vehicles, and e-mobility solutions. By including TDM strategies as part of the National Performance Management Measures, FHWA can give state DOTs and MPOs greater flexibility to enact greenhouse gas reduction plans that can be easily implemented and executed.

As an organization devoted to expanding transportation options to all commuters, we believe an effective emissions reduction plan must provide both viable incentives for compliance and enforceable penalties for failing to meet set targets. We urge the FHWA to consider allowing state DOTs and MPOs to reduce emission reduction targets if they enact specific TDM plans that will directly reduce vehicle miles traveled (VMT). Incentivizing states and MPOs to adopt TDM plans will provide the public in these communities with a greater number of transportation options compared to single-occupant vehicles. We also strongly encourage FHWA to require regions and MPOs that fail to meet reduction targets to implement and invest in TDM strategies aimed at reducing VMT.

The dramatic and potentially devastating effects of climate change, which are only exacerbated by transportation activities, are real and impact our communities in numerous ways. By enacting TDM strategies, our state DOTs and MPOs can take a robust step towards reducing greenhouse gas emissions from our roadways. ACT applauds FHWA's efforts to launch these greenhouse gas reduction performance measures. We offer our full support for this effort and stand ready to assist in any way possible.

Sincerely,

A handwritten signature in black ink, appearing to read "David Straus". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

David Straus
Executive Director