



Association for Commuter Transportation Response to FHWA-2017-0025

National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program

Below are the Comments to Federal Highway Administration (FHWA) Docket 2017-0025 submitted on behalf of the members of the Association for Commuter Transportation (ACT):

The Association for Commuter Transportation supports the Federal requirement, codified by multiple transportation authorizations, that transportation projects subsidized by the federal government account for climate change pollution, as such, we oppose the proposed rule which would eliminate the 'Greenhouse Gas (GHG) Performance Measure.' We offer the following comments for your consideration:

These measures are too important to get wrong. As management guru Peter Drucker said, "Management is doing things right. Leadership is doing the right things." Transportation accounts for the largest portion of greenhouse gas measures. USDOT has the opportunity and the mandate to lead. If the GHG measure is eliminated, it will cause a policy bias that thwarts efforts to improve air quality, reduce congestion and create an efficient transportation system. As clearly stated in the final rule on national performance measures:

"State DOTs would be expected to use the information and data generated as a result of the new regulations to better inform their transportation planning and performance decision making."

This point underscores the importance of getting the metrics and the measures correct. These measures are not just a way to describe the current state of the national highway system, it is a guidebook for States to determine how to spend billions of dollars investing in our transportation system and achieving goals related to increasing mobility options, developing sustainable communities and addressing climate change. The Association for Commuter Transportation believes that States and local governments should consider and account for greenhouse gas emissions as part of their planning process and project/program evaluation and execution.

Eliminating the GHG rule will reverse progress that is being made. Over the past several years, technology, new stakeholders, and intriguing business models have begun to reshape the landscape of our transportation system. The 21st century transportation system is interconnected and focuses on efficiencies. These new technologies and business models will greatly reshape our transportation system, yet the proposed elimination of a GHG metrics will return policies and practices from the last century and run counter to the agenda of progress that DOT has helped lead. Billions of dollars are being invested by both the public and private sector to make advancements in vehicle technologies, freight movement, and mobility. Eliminating a GHG metric ignores these potential advancements to reduce emissions and risks further progress.

ACT is grateful for the opportunity to submit these comments. If you have any questions, please contact Jason Pavluchuk (Pavluchuk@actweb.org) at 202-285-6414.