

The Honorable Ray LaHood
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

October 26, 2012

Dear Secretary LaHood:

Thank you for your continuing commitment to improve our nation's transportation system, provide more affordable travel options and create new jobs through robust and multimodal infrastructure investment. We are encouraged that the recently passed Moving Ahead for Progress in the 21st Century (MAP-21) lays the framework for a performance-based transportation program. As the U.S. Department of Transportation works to implement MAP-21, the undersigned organizations want to help ensure that the program will support a 21st century transportation system that is safe, healthy, and equitable while providing local communities the flexibility to address their own unique transportation challenges with the following performance measure recommendations.

Poor NHS measures will lead to poor investments and outcomes

When drivers consider the performance of the roadways they drive on daily, their primary concern is how long it takes to get to their destination. The expanded designation for the National Highway System (NHS) represents the network of key roadways that people use to go to work, shop, and visit friends. Any measure of performance for these roads should measure both how fast and how far people have to drive on average – because these are the two factors that most directly influence how long it takes to get anywhere.

We are concerned about any measure—like the "travel time index" (TTI)—that does not account for both of those factors because it would penalize communities that have made local decisions to shorten commute times by keeping employment centers and housing close together. Such regions often clock slower traffic speeds, resulting in a worse TTI, despite shorter commute times. If we measure NHS performance solely with TTI, regions will be discouraged from shortening trips and creating communities that tend to provide a variety of transportation options and promote healthy activities like biking and walking. Every region faces unique challenges, and we need the flexibility to choose between mobility (i.e., traffic speed) and proximity in an appropriate balance and evaluate performance using a measure that accounts for drivers' actual experience on the roads.

Improve highway safety for everyone

We truly appreciate your efforts to make our transportation system safer; we know that one of your top priorities is improving our safety among all transportation modes. Thankfully, driving has become safer on average over the last decade, but unfortunately this trend is not true for other types of travel. The percentage of traffic fatalities among bicyclists and pedestrians has increased from 12% in 2008 to 15% in 2011, with seniors, children, rural residents, African-Americans and Latinos disproportionately represented. In developing performance measures for highway safety, U.S. DOT should include separate measures for each mode to ensure that safety is accurately measured for all road users, whether they are drivers, transit users, pedestrians or bicyclists. Moreover, U.S. DOT should strongly encourage uniform reporting of

age, income, and race/ethnicity data so that disproportionate impacts by age, race and income are better understood and more proactively addressed.

Second, infrastructure that makes a road safe can vary by transportation mode. For example, widening lanes can help drivers move faster, but can cause safety hazards for bicyclists and for pedestrians crossing the street. As U.S. DOT develops the requirements for the strategic highway safety plans it should recognize the distinct differences in improving safety for drivers versus travelers who are biking or walking. Third, dangerous locations for pedestrians are not always single intersections; there are often stretches of a given road that are particularly unsafe. Therefore, “location” should encompass corridors in addition to intersections because conflict points for non-motorized road users often exist over stretches of a corridor. Finally, other aspects of the requirements should be similarly tailored: model roadway elements should consider the degree to which a roadway accommodates all users as well as account for the relative danger different road users face by considering the crash rate for non-motorized travel. This will help states more accurately and effectively prioritize spending and ensure safety for all users.

Congestion mitigation—measure people not just traffic

Any measure of congestion should evaluate the system’s ability to effectively move people rather than solely traffic. Frequently, congestion metrics focus on vehicle delay, which can measure current system conditions. However, it is also important to evaluate the degree to which a region has effectively managed congestion by promoting carpooling, public transportation, vanpools, biking, and walking. One of the measures developed for congestion mitigation should be the “number of people moved per travel lane.”

In many urban and suburban areas, expansion of existing highways is either financially unfeasible or there simply is not space for additional lanes. Our recommended measure would help ensure that those areas are not penalized for congestion reduction efforts that move more users but do not increase vehicle capacity. For example, the HOV lanes on I-395 in Virginia move 3,800 people per hour while the general lanes move only 2,200 people. In general, surface streets on which there have been efforts to move more people in the same space carry between 11,000 and 14,000 people per travel lane, while ones without these efforts often carry between 7,500 and 8,500 people per travel lane. These mitigation efforts should be considered in the congestion performance measure to ensure that CMAQ funding continues to be used to support projects that improve air quality and move people more efficiently.

Look at the whole picture—local traffic on the Interstate

MAP-21’s freight performance measure is supposed to gauge the movement of goods on the Interstate highway system. How can we adequately measure freight movement on our Interstates without accounting for all the traffic filling lanes for trips to work, school or the grocery store?

Many key Interstates are used for far more than just long-distance goods movement; they serve a dual purpose of moving both goods and people. And many people regularly drive on the Interstate even for short, local trips. In fact, in many regions the Interstates are clogged with local traffic each day. This happens, in part, because the local transportation network – roads, transit, etc. – is not performing efficiently and has become disconnected, which leaves the Interstate as the only viable option in many places.

One of the freight performance measures should be the percentage of local trips made on the Interstates. This will help determine whether the best solution to improve goods movement is simply to increase Interstate capacity or to improve the regional/local transportation network so people are not forced to use the Interstate for shorter trips.

Improve transparency and accountability

MAP-21 gives states greater flexibility over how they use their transportation funds. But with greater flexibility comes a need for greater accountability. The key to a performance-based system is transparency, but how can the public understand the performance targets set by states without information on the way that money is being spent?

In the past, reporting has fallen short. For example, U.S. DOT has been required under previous authorizations to annually release the “104 report,” which provides basic information about state spending. However, almost 30 percent of total highway funding was left uncategorized and the latest available report is from 2009. How and where was that money spent?

U.S. DOT must take steps to make the information it has more readily available to the public. An easy first step to improve this current reporting process is to eliminate the “other” category and make past reports available. Also, over the next year we look forward to U.S. DOT making its Financial Management Information Systems available to the public as required by MAP-21 (section 1503(c)). This will allow for more accurate tracking of how states spend their transportation dollars and support more data-driven decisions that can promote economic efficiency, public health, and social equity.

Thank you very much for considering our suggestions as you work on guidance and rules to implement MAP-21.

Sincerely,

AARP
Alliance for Biking & Walking
America Bikes
America Walks
American Public Health Association
American Society of Landscape Architects
Association for Commuter Transportation
Association of Pedestrian and Bicycle Professionals
Association of Programs for Rural Independent Living
Center for Rural Strategies
Congress for the New Urbanism
Conservation Law Foundation
Enterprise Community Partners
Environmental and Energy Study Institute
Institute for Transportation & Development Policy
League of American Bicyclists
LOCUS: Responsible Real Estate Developers and Investors
National Association of City Transportation Officials
National Association of County and City Health Officials
National Association of Railroad Passengers

National Complete Streets Coalition
National Congress of American Indians
National Council of La Raza
National Council on Independent Living
Natural Resources Defense Council
The Partnership for Working Families
PolicyLink
Rails-to-Trails Conservancy
Safe Routes to School National Partnership
Sierra Club
Southern Environmental Law Center
Transportation for America
Trust for America's Health
ULI—the Urban Land Institute
US High Speed Rail Association
U.S. Public Interest Research Group
Wider Opportunities for Women