



National Capital Region  
**Transportation Planning Board**

November XX, 2017

The Honorable **Paul Trombino III**  
Administrator  
Federal Highway Administration (FHWA)  
U.S. Department of Transportation (USDOT)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Subject: Comments on the National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and the Congestion Mitigation and Air Quality Improvement Program [Docket No. FHWA-2017-0025]**

Dear Administrator Trombino,

The National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the Metropolitan Washington Area, appreciates your efforts and those of FHWA staff to provide opportunities for commenting on the National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and the Congestion Mitigation and Air Quality Improvement Program. Our comments on the Notice of Proposed Rulemaking (NPRM) to repeal the Greenhouse Gas (GHG) measure are provided for your consideration below.

The TPB supports retaining the currently enacted GHG measure. The TPB believes that this rule is a good start that aids in increasing the accountability and transparency of the Federal-aid highway program and provides a framework to support improved investment decision making through a focus on performance outcomes for key national transportation goals.

The TPB works closely with the Metropolitan Washington Council of Governments (MWCOC), the region's partnership hub for local governments. MWCOC has set aspirational goals for reducing the region's emissions of greenhouse gases (GHG) through 2050, starting with the National Capital Region Climate Change Report in 2008. The TPB has endorsed these goals (Resolution 10-2015) and also works closely with other regional policy boards, including the Metropolitan Washington Air Quality Committee (MWAQC) and Climate, Energy, and Environment Policy Committee (CEEPC). These regional bodies affirmed these goals in 2014 and established a Multi-Sector Working Group to work on plans to reduce greenhouse gases. Efforts continue among all sectors, including the transportation sector, to develop and implement action plans to reduce greenhouse gases. Plans and actions to reduce GHG are therefore an important objective of the TPB and forecasting GHG emissions is integral to our region's metropolitan transportation planning. These efforts will be well complemented by the currently enacted federal rule establishing Percent Change in Tailpipe Carbon Dioxide Emissions on the National Highway System (also known as the GHG measure) as a performance measure under the FAST Act's Performance Management system.

### Questions from the NPRM

1. Whether data are available to more directly measure GHG emissions effects of NHS projects undertaken by States or MPOs.
2. Whether the data used to calculate the measure are precise enough to meet the needs of a performance based approach.
3. Whether the measure provides meaningful utility for assessment of environmental performance of the NHS by States and MPOs.
4. Information or data that would justify the utility of this measure relative to the increased burden on States and MPOs to report this information.
5. Input from States and MPOs on the potential costs imposed by the addition of this measure.

#### **Question 1. Whether data are available to more directly measure GHG emissions effects of NHS projects undertaken by States or MPOs.**

The TPB currently forecasts the mobile source GHG emissions of the region's transportation network represented on the regional travel demand model as a by-product of its air quality conformity determination process. These emissions estimates are developed using EPA's Motor Vehicle Emissions Simulator (MOVES) model. The resulting measures of total and per capita mobile source greenhouse gas emissions have been part of the TPB's long range plan performance analysis for several years, and are considered by the board in its approval of the long range metropolitan transportation plan.

The national performance management measure of measuring GHG emissions by calculating tailpipe CO<sub>2</sub> emissions on just the National Highway System (NHS), would produce an estimates that would be a subset of the regional GHG emissions estimates and generated from a different set of data. However, the results should be comparable in direction and magnitude.

The final rule notes that there are many different methods of estimating GHG emissions and that some methods require more detailed and NHS specific data. The TPB has not, at this time, identified all of the desired data to more directly measure or calculate GHG emissions on just the NHS system. The TPB, however, has access to data that could be used to estimate changes in GHG emissions using other simplified methods outlined in the final rule. However, the use of a performance measure that is nationally comparable among States and MPOs that receive federal CMAQ funds is a desirable goal for performance-driven decision-making, and it is recommended that the FHWA establish a common basis for such comparable performance measurement of GHG emissions.

#### **Question 2. Whether the data used to calculate the measure are precise enough to meet the needs of a performance based approach.**

The national performance management measures, in general, must apply throughout the United States to provide information and comparability. Traffic operations in general can be influenced by local conditions, and in this the GHG measure is similar to many of the other national performance management measures. Accordingly, the data would appear to be precise enough to provide valuable information to decision-makers.

In addition, the TPB endorses the concept of performance management as a process, in which data is used to inform decision-making, rather than performance measurement focused on the data.

Accordingly, measures which inform performance management decision-making are preferable. Such measures need to accurately reflect any changes made in inputs, so that output follows input and enables outcome based decision-making. A focus solely on precision is not as important to the performance based approach. Additionally, the techniques and costs for gathering travel data continues to evolve and so will the ability of the data to better reflect local conditions.

**Question 3. Whether the measure provides meaningful utility for assessment of environmental performance of the NHS by States and MPOs.**

The NHS is a very important part of a region's transportation network and this is particularly true in the TPB's planning area. The TPB's member jurisdictions invest considerable amount of funds on its NHS system. The TPB's planning area is currently in non-attainment of the federal Ozone NAAQS and a recipient of federal CMAQ funds. These funds are invested to affect travel and reduce emissions. With a considerable amount of the region's travel happening on the NHS it is important to be able to assess environmental performance of the NHS. Additionally, given the importance the TPB and other regional policy boards place on GHG emissions reductions, the tailpipe emissions measure would be a very useful measure to inform the region's investments with regard to the environmental improvements. While the TPB will continue to use its regional systemwide GHG emissions estimates measure in regional planning, having the federal GHG measure as a commonly defined and available GHG performance measure across the nation would provide useful comparative information for the TPB.

**Question 4. Information or data that would justify the utility of this measure relative to the increased burden on States and MPOs to report this information.**

Having a commonly defined and available GHG performance measure across the nation would provide useful comparative information for the TPB. Accordingly, the TPB endorses the establishment of common, national data definition, collection, forecasting, and reporting, to enable comparative analysis and informed decision-making. There are no penalties or impacts from the national performance management measures for MPOs (or for the States except in potential allocation of safety and preservations funds), a principle which the TPB heartily endorses. However, the benefit of information on GHG emissions is important to many MPOs and States, and furthers the performance-driven planning process. Given the TPB's long range planning activities as a Travel Management Area (TMA) and a non-attainment area together with its proactive work on GHG emissions, the TPB does not view the additional work to implement the GHG as a considerable burden.

**Question 5. Input from States and MPOs on the potential costs imposed by the addition of this measure.**

As noted above as a TMA and a non-attainment area the TPB currently deploys considerable resources to comply with all of the federal and state planning regulations. The TPB's current work activities does include estimating GHG emissions. Given the interest of the members of the TPB, MWCOG, and other regional policy boards in GHG reductions, it is anticipated that this MPO will continue its GHG emissions work for the region regardless of whether this performance measure is part of the required national performance measures. Accordingly, there would be limited costs imposed by this useful GHG measure.

Mr. Paul Trombino III  
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In summary: The TPB recognizes the importance of the performance provisions of MAP-21 and the FAST Act as set forth in the May 2016 final rule on Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). We welcome the move towards a performance-driven, outcome based approach to transportation planning. The TPB supports retaining the currently enacted GHG measure and believes that this rule aids in increasing the accountability and transparency of the Federal-aid highway program and provides a framework to support improved investment decision making through a focus on performance outcomes for key national transportation goals.

Please feel free to contact the TPB's staff Director, Mr. Kanathur Srikanth at [ksrikanth@mwkog.org](mailto:ksrikanth@mwkog.org) or 202-962-3257 if there is any additional information or support that the TPB can provide in the development and implementation of the performance-based planning and programming regulations.

Sincerely,

Bridget Donnell Newton  
Chair, National Capital Region  
Transportation Planning Board