

## **National Capital Region Transportation Planning Board**

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**D R A F T**  
**Item #6**

April 5, 2013

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

Dear Secretary LaHood,

The National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the Metropolitan Washington Area, greatly appreciates your efforts and those of USDOT staff to provide opportunities for input and consultation on the development of transportation performance measures and targets required under the Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21) legislation, which became effective on October 1, 2012. The TPB looks forward to working closely with the USDOT and our state and transit agency partners in the implementation of this new performance-based approach to transportation decision-making.

MAP-21 calls upon MPOs like the TPB to provide for a performance-based approach within their metropolitan planning processes. Larger MPOs with over one million people are required to develop a performance plan under the Congestion Mitigation and Air Quality Improvement (CMAQ) Program that includes “an area baseline level for traffic congestion and on-road mobile source emissions for which the area is in non attainment or maintenance”, describes progress in achieving performance targets for emission and traffic congestion

reduction, and describes how projects funded under the CMAQ program contribute to achieving these targets. In developing an approach to addressing these responsibilities under the CMAQ program, the TPB is very interested in participating in the consultation process with USDOT on how performance measures and targets are to be established for mobile source emissions and traffic congestion.

With regard to mobile source emissions, the TPB is hopeful that the USDOT will develop performance measures that are consistent with the existing air quality conformity requirements under the Clean Air Act Amendments of 1990. The TPB already devotes substantial resources on an ongoing basis to the development of mobile source emissions estimates for the Washington region, and to their use in the development of air quality plans and determinations of conformity to these plans under regulations promulgated by the Environmental Protection Agency (EPA). Building on performance measures already established under the EPA requirements would ensure consistency between MAP-21 and CAAA provisions, and minimize the need for additional technical and policy analyses under MAP-21.

With regard to traffic congestion, the TPB suggests that USDOT focus on the development of measures that are meaningful and easily understood by the general public, can be quantified using data that is readily available to MPOs throughout the country, and can be disaggregated by location and time-of-day within MPO areas to permit target-setting by MPOs that is responsive to locally-established goals for the transportation system. While traffic congestion reduction may be an important goal for certain locations and time periods, the benefits and costs of traffic congestion strategies must be assessed with all of the goals of the transportation system in mind. In some locations, for example, some increase in traffic

congestion may be desirable in order to achieve goals related to concentrated mixed used development and increased use of pedestrian and bicycle facilities.

Thank you for considering these comments on the development of MAP-21 performance measure and target-setting procedures. Please feel free to contact me at [Scott.York@loudoun.gov](mailto:Scott.York@loudoun.gov) or Ronald Kirby, Director of Transportation Planning for the TPB at [rkirby@mwecog.org](mailto:rkirby@mwecog.org) , if we could provide any additional information.

Sincerely,

Scott York  
Chairman  
National Capital Region  
Transportation Planning Board