



August 20, 2016

Honorable Gregory Nadeau, Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

RE: Docket No. FHWA-2013-0054

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

Dear Administrator Nadeau:

The American Highway Users Alliance (the Highway Users) is a non-profit organization made up of more than 300 companies, trade associations, safety advocacy groups, and motoring clubs. Our members represent millions of road users from the truck, bus, auto, RV, and motorcycling modes, as well as others committed to safe and efficient highway transportation. These users pay the bulk of the taxes and fees that fund that Highway Trust Fund.

The Highway Users is party to a multi-organizational filing in this docket regarding the question of whether to add a CO₂ or other greenhouse gas performance metric to the final rule. We urge your serious consideration of that filing.

We take this opportunity to comment on a different issue raised by the proposed rule in this docket, the establishment of national metrics for assessing traffic congestion, including freight reliability on the NHS, using the National Performance Management Research Data Set (NPMRDS).

Background on the Highway Users' Involvement with Performance Management

The Highway Users worked closely with Congress during the drafting of MAP-21 and the FAST Act in support of the establishment of reasonable, flexible performance measures on issues of critical national importance. Our goal, and we believe Congressional intent, was to clearly show how the use of measurement in key areas of federal concern would help taxpayers understand the value of the federally-aided, state-administered highway program. We also believe that measurement of progress toward key national transportation goals can help inform taxpayers why "devolving" or terminating the federal-aid/state-administered program would represent bad policy.

When we first began advocating for a performance based program, controversy over a 2005 legislative earmark had seemingly reduced some public support for the federal-aid highway

program. We believed it was a critical time to focus on getting more funding directly apportioned to the States and also to consider how adding performance-based features could re-establish trust with the taxpayers. A goal of our advocacy efforts was to illustrate publicly that federally-funded, state-driven plans and project selections are developed with the taxpayer's interests in mind, and projects funded with federal-aid are intended to solve important transportation problems of national and/or regional concerns, such as safety, congestion relief, freight reliability, and asset management. In most cases, we felt State DOTs were doing a good job but that measurement would help to illustrate the good work being done.

Accordingly, the Highway Users supported the MAP-21 provisions establishing performance metrics which, we felt, struck a reasonable balance of authority between State DOTs and FHWA. We were pleased that more onerous proposals suggested by some groups that would have increased federal control over state and local planning authority were not included in legislation.

Vehicular Congestion Relief Is an Important Measure

The Highway Users strongly supports the measurement and targeted reduction of traffic congestion and truck travel-time reliability. Our most recent bottleneck study ([Unclogging America's Arteries 2015](#)) available on our website (www.highways.org) used a similar approach to congestion analysis (NPMRDS) as proposed by FHWA in the draft rule. We urge FHWA, before finalizing rules in this docket, to consider State DOTs needs as to training, flexibility, weather and work zone congestion, and exemptions for rural areas, but we remain strongly supportive of FHWA efforts to ensure that a real-time, measure for congestion using current technology shines a light on road segments experiencing consistent, frequent delays.

We uncovered startling results in our bottleneck study when we analyzed just the 30 worst traffic bottlenecks and the benefits over twenty years associated with relieving these jams. The following summarizes the benefits:

- **Savings of \$39 billion due to time savings,**
- **Savings of 830 million gallons of fuel,**
- **Reduction of over 17 billion pounds of greenhouse gas emissions (CO₂), and**
- **Prevention of 211,000 vehicle crashes**

In addition to the Highway Users study, we note that FHWA's own studies from the Highway Statistics series and Conditions & Performance reports show significantly increased congestion in recent decades and skyrocketing societal costs associated with increased congestion. Other studies, such as the annual Texas Transportation Institute Urban Mobility report, have also examined the tremendous public costs associated with traffic congestion.

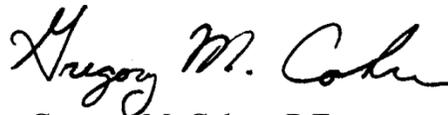
We are aware that a minority of Members of Congress and a few advocacy groups have complained that FHWA should not simply consider vehicle congestion for a traffic congestion performance metric. While we support looking at "people-miles of travel" and do not oppose a review of congestion for non-vehicle modes where appropriate, it would be ludicrous to not look at vehicle congestion as the critical problem that Congress intended for FHWA to address.

As DOT's own Bureau of Transportation Statistics has recently reported in the 2016 Pocket Guide to Transportation, highway-vehicle modes (car, bus, truck, and motorcycle) make up 4.3 trillion passenger miles traveled (PMT) – about 98-99% of the total people-miles traveled in the United States (excluding air travel). To subvert the intent of Congress, which clearly called for measurement of “traffic congestion” in the final rule, in order to promote other far less widely supported policy goals would be a travesty. We urge FHWA to stay the course and focus on vehicle congestion in the final rulemaking. It is absolutely critical to our economy, air quality, and quality-of-life that States and Metropolitan Planning Organizations actually measure traffic congestion and take thoughtful steps to reduce it.

Similarly, we note that trucks carry the vast majority of tons and value of freight in the United States. A final rule that measures freight reliability on the highway network should use the latest affordable technology to assess truck bottlenecks. We believe finalizing this rule with robust real-time truck traffic delay analysis that takes into account State DOT implementation concerns, would be of tremendous value to consumers, the freight community, and the public at large.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Gregory M. Cohen". The signature is written in a cursive, flowing style.

Gregory M. Cohen, P.E.
President & CEO