



National Association of County & City Health Officials

The National Connection for Local Public Health

August 19, 2016

The Honorable Anthony Foxx
Secretary, U.S. Department of Transportation
Docket Operations
M-30, West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Docket Number: FHWA-2013-0054, Proposed Rule on 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 Secretary Foxx:

On behalf of the National Association for City and County Health Officials (NACCHO), I am writing to provide comment on the Department of Transportation's proposed rule on national performance measures. NACCHO is the voice of the 2,800 local health departments across the country. These city, county, metropolitan, district, and tribal departments work every day to protect and promote health and well-being for all people in their communities. NACCHO greatly appreciates your leadership on ensuring that transportation options are safe and accessible to everyone.

NACCHO recommends that proposed national performance measures for system performance should be strengthened by accounting for all aspects of accessible transportation, including walking and biking. Local health departments develop policies and create environments that make it easier for people to be healthy and safe, including encouraging active transportation as a way for people to improve their health.

Physical activity is a fundamental building block for good health, and has been shown to reduce risks of stroke, high blood pressure, diabetes, some cancers, and depression, among other benefits. Unfortunately, the majority of Americans are not getting enough physical activity. Walking and bicycling help children and adults to get the recommended amounts of daily physical activity. People who walk regularly are twice as likely to meet physical activity guidelines, and children who walk and bike to school get more physical activity and have lower body mass index (BMI). Street design is a significant factor, and the way our streets are designed can either support or hinder active transportation and physical activity, including people with disabilities. People living in communities with options for walking or rolling, biking and transit exercise more and are less likely to be overweight than those who live in car-oriented communities. Unfortunately, this proposed rule forces states and cities to measure only one aspect of transportation—cars and vehicle speeds—which will undercut the ability of people to be more physically active and create greater traffic safety dangers for people walking and bicycling.

For the working poor, transportation costs make up nearly one-third of their income due to lack of affordable transportation options. Our population is also expected to grow by 70 million people by 2045, with cities having to absorb much greater populations and thus transportation needs. Communities all across the country are adding bicycling, walking and transit options; implementing Complete Streets policies and Safe Routes to School initiatives; and seeking to improve safety for everyone—including through increasingly popular Vision



Zero initiatives. Changes are needed to the proposed rule to support these efforts to create affordable transportation options and safe, healthy and economically viable cities and towns. In addition, prioritizing vehicle speeds makes it significantly more dangerous for people walking and bicycling.

In this proposed rule, seven of the eight proposed measures effectively count the same thing: the speed of cars or trucks and congestion of roads—either by focusing on speed or trip time. The measures completely fail to count in any way people who walk, bicycle or take transit—even though these modes also reduce congestion and improve the performance of the road network.

We urge you to make significant changes to the proposed measures so the final rule matches your vision for a multi-modal, accessible transportation system. Specifically, please address the following issues:

- Performance of the National Highway System (NHS): The current proposed measures focus on travel time for vehicles, even though a significant portion of NHS roads are designed to carry cars, transit, bicyclists and pedestrians. NACCHO recommends adding to the final rule a measure of reliability for people using the NHS system to bike, walk or access transit. For these people, reliability is measured by safety and accessibility.
- Traffic congestion: The measures for this section again focus on vehicle speeds and trip delays, even though shifting trips from cars to other transportation mode also eases congestion. Please add to your final rule a measure to track the percentage of trips taken by walking or rolling, biking and transit.
- Overall, to reduce the complexity and burden of tracking the data for these measures, we would support reducing the number of duplicative measures on vehicle speed and travel time in order to add measures that better capture our multi-modal transportation system.
- Accessibility and design: The current performance measures are lacking any measure of the ability of individuals, particularly low-income, transportation-disadvantaged individuals, to access their homes, jobs, school, and other key destinations using multiple modes of transportation. It is recommended that the design of the entire roadway incorporates all users, including pedestrians of all ages and abilities, bicyclists, and public transportation vehicles and riders. Please add an accessibility performance measure to your final rule, with an implementation schedule. Such an accessibility measure would complement, but not be a substitute for, an improved NHS measure that addressed all modes.
- On-road mobile source emissions: We support the way the proposed rule measures the air quality impact of Congestion Mitigation and Air Quality (CMAQ) projects. However, we encourage you to add a greenhouse gas emission measure into the final rule that measures reduced emissions from cars and avoided emissions from shifting car trips to cleaner transportation modes like walking, bicycling and energy-efficient transit.

Thank you for your consideration of these comments. NACCHO looks forward to a final rule that will better capture the impacts of our transportation system on people who use all modes of transportation, rather than just on cars and roads.

Sincerely,



LaMar Hasbrouck, MD, MPH
Executive Director