

Gary Thomas 2013 President

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## **GOVERNMENT AFFAIRS DIVISION**

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

## Dear Secretary LaHood:

The one million members of the National Association of REALTORS® believe that communities function best, and at their safest, when street designs are appropriate for their locations and functions. To this end, NAR supports Complete Streets policies that provide street designs that are appropriate for each situation and benefit all users including motorists, transit users, pedestrians, and bicyclists. For this reason, NAR urges the U.S. Department of Transportation (DOT) to modify its current policy and recognize three Area Types – Rural, Suburban and Urbanized – for street design.

Currently, DOT policy follows the American Association of State Highway and Transportation Officials (AASHTO) "Green Book" policy that defines two Area Types—Rural and Urbanized. The AASHTO definition of an Urbanized Area is applicable to both urban and suburban locales, which means that its design policies for Urbanized Areas are inappropriately skewed toward suburban standards.

The adoption of three distinct Area Types—Rural, Suburban and Urbanized—would provide design standards that are most appropriate for each type of area, since it would prevent the application of suburban street design parameters to street designs in urban areas, where lower speeds and smaller dimensions are more appropriate. We encourage DOT to adopt this policy change under its authority without reference to AASHTO or other third-party organizations and publications.

Thank you for your efforts in advancing federal transportation policies that provide for safe, convenient, and efficient transportation infrastructure that enhances communities, supports property values, and mitigates the effects of traffic congestion that accompanies growth. We look forward to working with you on this and future transportation initiatives.

Sincerely,

Gary Thomas

2013 President, National Association of REALTORS®

cc: Beth Osborne, Deputy Assistant Secretary for Policy, U.S. Department of Transportation

John Norquist, President and CEO, Congress for the New Urbanism

