



1707 L St. NW, Suite 250
Washington, DC 20036
202-207-3355

www.smartgrowthamerica.org/completestreets

**National Complete
Streets Coalition
Steering Committee**

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Washington State
Department of Transportation

The Honorable Anthony Foxx
Secretary
U.S. Department of Transportation
West Building, Room W12-140
1200 New Jersey Ave SE
Washington, DC 20590

August 10, 2016

Dear Secretary Foxx:

Communities across the United States have passed Complete Streets policies—more than 975 in total—all with the aim of making streets safer and more convenient for everyone regardless of age, race, ability, or how they choose to travel. We know these issues are a priority for you as well: The Mayor’s Challenge for Safer People, Safer Streets is a clear commitment to keeping people safe on all modes of travel. Your Ladders of Opportunity program is another outstanding example of your commitment to ensuring our travel transportation investments provide an equitable and accessible community for all Americans.

In light of your commitments to safety and opportunity, we are alarmed by the proposed rulemaking in Docket No. FHWA-2013-0054, which establishes performance measures for the National Highway System, freight movement on the Interstate system, congestion, and on-road mobile source emissions. As proposed, this rule would require states and metropolitan planning organizations (MPOs) to measure vehicle speed and reliability in seven ways but would not account for operational or investment priorities for other transportation users, including bicyclists and pedestrians.

The proposed rule’s overreliance on vehicle speed is out of step with federal statute, which requires states and MPOs to provide safe transportation options for all users of the National Highway System (see section 1404(a)(1)(A)(i) of the FAST Act). The proposed rule would also encourage states and MPOs to focus on removing vehicle delay in all communities, regardless of context. This would inevitably result in capacity expansion projects with higher posted speed limits even in communities where these options would be inappropriate. Wider roads and higher vehicle speeds undermine a community’s economic

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vitality, result in more dangerous conditions for all users – especially for people walking and biking – and support the creation of new barriers that restrict access to opportunity.

Therefore, we recommend that the final rule ensure all transportation users are provided safe and healthy access on our roadways by amending the National Highway System (NHS) performance measures and Congestion Mitigation and Air Quality Improvement program traffic congestion measures so that they assess all transportation users including people driving, walking, bicycling, or taking transit. Specifically, please address the following issues:

- Performance of the 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. Please add to your 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 reduces congestion. Please add to your final rule a measure to track the percentage of trips taken by walking, biking and transit.
- Overall, to reduce the complexity and burden of tracking the data for these measures, we would be supportive of 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.
- At its core, the goal of our transportation system is to provide safe and healthy access to essential destinations such as jobs, education, food, and health care. Yet, this proposed rule carries forward outdated planning that has focused our transportation investments solely on moving vehicles through a community rather than to a community, and without regard for the impacts to the community. Please add an accessibility performance measure to your final rule, with an implementation schedule.

As someone once said, "We measure what we treasure." We value transportation investments that keep people safe, encourage health, and support economic opportunity for everyone. We know you share these values. Please improve the proposed rule to reflect these issues. Thank you for all your work to deliver an equitable, healthy transportation system for the American people, and we look forward to working with you to

finalize this important program before the end of this Administration.

Sincerely,

A handwritten signature in blue ink that reads "Emiko Atherton". The signature is written in a cursive style with a light blue background behind the text.

Emiko Atherton,
Director, National Complete Streets Coalition

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