

November 2, 2017

Docket Management Facility
US Department of Transportation
1200 New Jersey Ave SE, Room W12-140
Washington, DC 20590-0001

Re: Re: Docket Number FHWA-2017-0025

To the US Department of Transportation:

Thank you for the opportunity to submit comments to the US Department of Transportation (DOT) on the Federal Highway Administration's (FHWA) Docket Number FHWA-2017 -0025, published in the Federal Register on October 5, 2017. The Association for Pedestrian and Bicycling Professionals opposes the decision to repeal the performance measure related to greenhouse gas emissions.

The Association for Pedestrian and Bicycling Professionals (APBP) is a nonprofit, nonpartisan association which represents individuals including engineers, planners, and others employed in the active transportation field. APBP supports efforts to build a multi-modal transportation system which offers healthy, efficient transportation choices to all Americans.

APBP believes that measuring GHG emissions both falls within the performance measure statute in MAP-21, and is imperative to building a sustainable transportation system in the future. The Moving Ahead for Progress in the 21st Century Transportation Act of 2012 (MAP-21), gave the US DOT the authority to set a GHG emissions performance measures under US Code 23 Section 150 (c)(5)(B), which specifically states the performance measures should measure on-road emissions. Measuring GHG also is within keeping of the goals Congress set forth in US Code 150(b) which include environmental sustainability.

Pollution from cars and trucks is a threat to the safety and health of our communities, and GHG emissions contribute to climate change. The transportation sector accounts for at least 30 percent of GHG emissions, and according to the FHWA website "On-road vehicles also have been a major contributor to the net change in U.S. GHG emissions, especially between 1990 and 2005 when on-road GHGs increased by 37 percent compared with 11 percent for all other sources across the U.S. economy."

Measuring GHG emissions now is important to the US leading on transportation and storm mitigation innovation into the future. If this rule is repealed the US will not know exactly what we're producing GHGs, it will be much more difficult to target high emission areas. While APBP acknowledges the concern that this rule could require additional efforts by state DOTs and MPOs, the Federal Highway Administration has already done significant work to help states and metropolitan planning organizations measure GHG emissions. Tools developed by FHWA for States and MPOs include: a tool to measure emissions for projects, a handbook for incorporating GHG into planning, and a tool to model many inputs and policy scenarios to support strategic transportation and visioning, including GHG emissions reduction alternatives.

APBP believes that a performance measure requiring states and MPOs to measure GHG emissions from the transportation system is both within the purview of the DOT, and an important step to creating a healthy, sustainable transportation system. Innovation on GHG emission reduction is already underway and repealing this rule is a step backwards from innovation and progress.

Thank you again for the opportunity to submit comments on this important ruling. Please feel free to contact Caron Whitaker, Policy Specialist at 202-215-3908 or caron@clwconsulting.net if you have any questions regarding these comments.

Sincerely,

Association of Pedestrian and Bicycling Professionals