



October 12, 2012

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

Dear Secretary LaHood:

Thank you for your commitment to making our nation’s transportation system one that provides people more choices, is sustainable, and fosters economic development. The Metropolitan Planning Council (MPC) was encouraged that for the first time ever Moving Ahead for Progress in the 21st Century (MAP-21) requires the establishment of national goals, performance measures, and accountability in planning and funding transportation investments. MPC has long supported a performance-based strategy that makes targeted investments that advance coordinated regional goals and a strong national vision that outlines clear priorities for our transportation system.

As the U.S. Dept. of Transportation (DOT) works to implement MAP-21, we offer some suggestions to help ensure that the program will be safer and give communities the flexibility to address unique transportation challenges.

Bad measures will lead to poor investments and outcomes

Performance of the National Highway System (NHS) should measure the impact on users: The amount of time it takes to get to a destination. It has been suggested that the “Travel Time Index” (TTI) be used to measure NHS performance. That is a poor choice because TTI focuses on speed, not distance, so regions, such as Chicago, that have made strategic policy reforms to incentivize denser and transit-oriented developments and employers to offer employer-assisted housing programs to encourage their employees to buy or rent near transit and result in shorter, more sustainable commutes are penalized.

For example, Charlotte has high average driving speeds, so it gets a low TTI. With slower average driving speeds, Chicago scores higher, leading one to believe that Chicago is worse than Charlotte for driving times. However, drivers in Charlotte spend much more time in their cars – nearly 50 percent more time each day – because they drive much farther. Using TTI as a measure would end up rewarding places that have encouraged sprawl and focused on overbuilding road capacity. Instead, criteria should include both how fast and how far people must drive on average, two factors that most directly influence how long it takes to get from point A to B. The policy should not be about how many roads a region can build, it should reward regions that build a transportation network that limits distance traveled, promotes mobility options, and creates accessible communities.

Measure movement of people instead of vehicles

When measuring congestion it makes more sense to measure "number of people moved per travel lane," which more accurately reflects how a network effectively moves people, not just vehicles. This evaluates the degree to which a region has mitigated congestion by promoting carpooling, Bus Rapid Transit or bus on shoulder, vanpools, biking and walking, all factors that allow more people to move on a corridor.

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Consider local traffic on the interstate when measuring freight

Many key Interstates are used for far more than just long-distance goods movement; they are jammed full of local car traffic each day because people do not have transportation choices such as transit. Freight performance measures should take into account the percentage of local trips made on the interstates. This will help determine whether the best solution to improving freight movement is simply more interstate capacity *or* improving the regional/local transportation network so people aren't forced to use the interstate for those trips to the grocery store. Taking cars off the road improves the remaining capacity for freight.

Improve transparency and accountability.

MAP-21 gives states greater flexibility over how they use their transportation funds. But with greater flexibility comes a need for greater accountability. The key to a performance-based system is transparency – how can the public understand the performance targets set by states without information on the way that money is being spent?

In the past, reporting has fallen short. For example, DOT has been required under previous authorizations to annually make available a report that details basic information about state spending - the "104 report." Almost 30 percent of total highway funding was left uncategorized and the latest available report is from 2009. How and where was that money spent?

DOT must take steps to make the information it has more readily available to the public. An easy first step is improving this current reporting process to eliminate the "other" category and making reports prior to 2009 available. Also, over the next year we look forward to DOT making its Financial Management Information Systems available to public as required by MAP-21 (section 1502(c)).

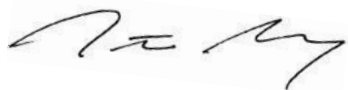
Moving forward

Regrettably in the final authorization there is no formal role for transit agencies, metropolitan planning organizations, or local governments to work with state departments of transportation to develop metrics, no metrics that promote jobs and housing near transit, measure economic development, no required scenario planning, and no financial penalties tied to poor performance.

Further, one of the greatest strength of the Transportation Infrastructure Finance and Innovation Act (TIFIA), its strong project selection criteria, was eliminated. TIFIA loans should be given only to the most innovative, nationally or regional significant projects that foster sustainability and promote economic competitiveness. Doling out TIFIA funds on a first-come, first-served basis instead of through a competitive process creates a race. Because the only requirement is ability to repay, the new process favors straightforward road projects because the application can come together more quickly. Transit and more sustainably integrated projects that may be better for the congestion mitigation and economic vitality of a region may lose out because of slow development time.

Precisely because there is a limited supply of federal dollars, we must evaluate potential investments based on their ability to reduce hours spent in traffic, curb emissions, connect affordable homes and jobs, and promote economic competitiveness. The criteria should be about whether each investment gets us closer to our goals.

Thank you very much for considering our suggestions as you work on guidance and rules to implement MAP-21.



Peter Skosey
Vice President

CC: Illinois Congressional Delegation

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