



November 1, 2017

The Honorable Elaine Chao
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-2017-0025-0007, National Performance Management Measures: Assessing Performance of National Highway System, Freight Movement on Interstate System, and Congestion Mitigation and Air Quality Improvement Program

Dear Secretary Chao:

The Safe Routes to School National Partnership is a national non-profit that advances policy change and catalyzes support for healthy, active communities, starting with walking and bicycling to school. We are dedicated to creating livable, sustainable communities where all people can be healthy and physically active.

We urge you not to repeal the requirement that state DOTs and MPOs assess and set performance targets around on-road mobile source emissions, i.e. greenhouse gas (GHG) emissions.

The proposed action indicates that this change will save \$11 million over 9 years – which is approximately \$1 million per year. Dividing that cost among the 50 state DOTs and MPOs means the savings per agency will be negligible.

Yet, we are experiencing exponential costs due to the impacts of stronger hurricanes, tropical storms, massive wildfires—which are a result of climate change—on our transportation systems. Roads are being destroyed and must be rebuilt, and the flow of transportation that is vital to our economy is disrupted.

Transportation is the single largest contributor of greenhouse gas emissions. It is simply irresponsible not to maintain a basic measure and accountability for managing these emissions within the transportation sector.

Eleven million dollars over nine years is a small price to pay to simply measure and set goals around the reduction of our reliance on GHG-emitting transportation options. This includes both reducing tailpipe emissions as well as shifting people from reliance on cars to less polluting transit, biking and walking trips.

Thank you for your consideration of these comments. If you have any questions, please contact Margo Pedroso, Deputy Director, at margo@saferoutespartnership.org or 301-292-1043.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cass', followed by a long horizontal flourish.

Cass Isidro
Executive Director