



December 7, 2012

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

Dear Secretary LaHood:

Since the passage of MAP-21, the Association of Metropolitan Planning Organizations (AMPO) and the American Association of State Highway and Transportation Officials (AASHTO) have worked closely together while forming recommendations to USDOT on the development of performance measures and standards called for under the new law. We support many of AASHTO's recommendations, and we will continue to coordinate with our state partners. We particularly support AASHTO's emphasis on simple, direct, and "SMART" performance measures that are based primarily upon already available, high quality data, and that may be communicated readily to decision-makers and the interested public.

Some of AASHTO's specific measures and procedures we share broad agreement on follow.

First, we support the use of delay for measuring congestion, but prefer the use of travel time inputs rather than speeds, since speeds are ratios and cannot be averaged without the use of harmonic means.

Second, we support an 80th Percentile Planning Time Index for measuring reliability, rather than a Buffer Time Index or other measures. It is important to recognize, however, that the index values that are obtained will be quite sensitive to the lengths of the defined "corridor segments."

Third, we support AASHTO's "let the data drive the segments" proposal regarding spatial reporting on congestion and freight bottlenecks, rather than employing concepts like "key corridors" or "sub-state geographies." These concepts may obscure or dilute important location and time specific disaggregation needed for meaningful analysis and target-setting.

We agree with AASHTO that high quality HPMS and private sector speed data should be made available to states and MPOs using federal standards and resources. We also agree that USDOT has an important role in ensuring data quality.

Performance measurement reports should not be required more frequently or sooner than data sources allow. Safety data may require two or more years to be finalized, for example, and the federal Freight Analysis Framework (FAF) data sets are updated every five years.

We would also like to highlight certain considerations that are unique to MPOs and their transportation planning role in metropolitan areas.

MPOs recognize that multiple scenarios may need to be developed as part of their metropolitan transportation plans that include performance measures. Additionally, they will incorporate national goals established by the Secretary. Section 134 (h) (1) lists eight goals that are specific to individual metropolitan regions, such as economic vitality and security. An individual metropolitan area may create locally-developed measures to address these eight goals. Such measures may be concerned, for example, with roadways that are neither Interstate nor NHS (the roadways specified in MAP-21 for state interest), but are critical to meeting the goals of the metropolitan area for local reasons.

Many metropolitan areas are already subject to extensive federal air quality planning and conformity requirements. Measurements chosen for on-road mobile source emissions should be consistent with existing requirements. Metropolitan areas that are not classified as nonattainment or maintenance under the Clean Air Act should not have to establish on-road emission reduction targets. In general, performance measures developed under MAP-21 should utilize geographies that are consistent with other geographies already required. For example, MPOs should have the option to report on the entire MPO membership geography rather than just the urbanized area.

Unlike states and public transportation providers, MPOs are uniquely required to adhere to a financial constraint in metropolitan long-range plans. Under the new "Performance-Based Approach" defined in Section 134 (h) (2) on Metropolitan Transportation Planning, MPOs are required to provide for a performance-based approach supporting national goals. MPOs are also required to select performance targets in coordination, to the maximum extent practicable, with the relevant states and providers of public transportation. Due to the metropolitan transportation plan financial constraint requirements, MPOs may take a different perspective than those agencies. Under MAP-21, MPOs are required to integrate goals, objectives, performance measures, and targets described in other state and public transportation plans. MPOs will have to assess and balance the targets in context of the overall goals and financial capabilities of their individual metropolitan areas.

The development of performance measures and standards will build upon and support the continuation of current federal requirements for MPOs. Our members fully support the establishment of performance measures and the use of targets to evaluate investments in the transportation system, and look forward to continuing our work with you on the implementation of this important policy. Please feel free to contact me at 202.624.3680 or dhardy@ampo.org.

Sincerely,

A handwritten signature in black ink, appearing to read "D Hardy". The signature is fluid and cursive, with the first letter "D" being particularly large and stylized.

DeLania Hardy, Executive Director
Association of Metropolitan Planning Organizations