



TRANSMITTED ELECTRONICALLY

October 7, 2022

Stephanie Pollack
Acting Administrator, Federal Highway Administration
Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

SUBJECT: National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure. Docket No: FHWA-2021-0004. Regulatory Identifier Number: 2125-AF99

Dear Acting Administrator Pollack,

Thank you for the opportunity to comment on the proposal to add a greenhouse gas (GHG) emissions reduction target to the federal Transportation Performance Management program. The California Association of Councils of Governments (CALCOG) serves the regional agencies responsible for transportation planning and project delivery across California, including Metropolitan Planning Organizations (MPOs), Regional Transportation Planning Agencies (RTPAs), and County Transportation Commissions.

Concurrence with Our Partners

We have read and concur with the point made jointly by the California Department of Transportation and the California Air Board that aim to assure that California's existing framework is consistent with the federal rule. California established statewide targets for total GHG emissions reductions through successive actions in 2006 (Assembly Bill 32) and 2016 (Senate Bill 32). Additionally, Senate Bill 375 (2008) required MPOs to regularly produce strategic plans that would reduce per-capita GHG emissions from passenger transportation by the year 2035 through a combination of housing and transportation strategies. The proposed federal rule should not inadvertently exclude these efforts from the type of allowable actions needed to accord with a new federal standard. Aligning the proposed GHG reduction targets will reinforce a GHG performance monitoring paradigm has been used for over a decade to guide policy and investment decisions in the state's 18 MPOs.





In addition, we concur with the request from the Metropolitan Transportation Commission (MTC), Sacramento Area Council of Governments (SACOG), San Diego Association of Governments (SANDAG), and Southern California Association of Governments (SCAG) to allow a per capita metric. The California experience has demonstrated the value of utilizing a per-capita emissions metrics for GHG performance monitoring and target-setting. In particular, measuring per-capita emissions at the regional level has been beneficial as each region's population, housing, and job growth rates vary, with some regions growing much faster than others. This is important because population and housing growth rates could skew total GHG emissions performance. In the future, if federal highway funding programs are tied to GHG emissions reduction performance, a per capita metric will provide a more apples-to-apples comparison across regions.

Support Context Sensitive GHG Analysis

We support that the proposed rule gives flexibility to State DOTs and MPOs to, "set targets that are appropriate for their communities and that work for their respective climate change and other policy priorities." This allows each region to address its unique circumstances. It is also why the incorporation of a GHG metric into California's regional transportation process works. MPOs need the flexibility to assess performance that consider the impacts of many impacts for which they cannot control (e.g., population growth rates, local land use decisions, goods movement needs, and fuel prices).

Further flexibility could be provided by allowing MPOs to use a range of approaches to calculate the GHG metric. For efficiency, FHWA and State DOTs should consider accepting (without additional approvals needed) any regional data, models, and methodologies that is already used to measure GHG for purposes of air quality conformity modeling or other GHG performance measures (like Senate Bill 375 in California). Allowing this flexibility is in line with existing practices established by FHWA and State DOTs. Specifically, guidelines for MPO's Regional Transportation Plan development require specific performance measures, but do not dictate specifically what data, models, and methodologies to use.

Finally, goods movement is one area that needs additional consideration and flexibility in the target setting. Goods tend to travel across regions and even state lines often. Quantifying these trips and emissions within a single region will be difficult and could lead to inaccurate or incomplete GHG assessments.

Thank you again for considering of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Tendick".

Jennifer Tendick
CALCOG Director of Planning Policy