



National Association of  
City Transportation Officials

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

Re: Docket No. FHWA-2021-0004

Dear Secretary Buttigieg:

On behalf of the National Association of City Transportation Officials (NACTO), we thank you for proposing this rule to require states and regions to track emissions of greenhouse gases (GHGs) from surface transportation. NACTO has long called for such a measure, to better understand the climate impacts of transportation projects and decisions. Our 92 member cities and transit agencies are at the forefront of implementing transit and active transportation projects to enable low-carbon travel. Creating a national GHG performance measure and consistent measurement system are critical steps towards decarbonizing the transportation sector.

NACTO strongly supports this proposal and encourages the Department of Transportation (DOT) to finalize it quickly, with the modifications suggested below.

Transportation is the largest source of GHG emissions in the United States, representing 27 percent of the nation’s emissions in 2020. More than half of these emissions come from passenger cars, light-duty trucks (including SUVs and minivans), and medium- and heavy-duty trucks. Protecting road infrastructure from the effects of climate change warrants improved plans and preparations for the future by our transportation agencies, including investments in transportation solutions which don’t exacerbate climate change such as electric vehicles and public transportation options.

There is no time to waste as record amounts of federal taxpayer funds are already flowing to grantees from the Infrastructure Investment and Jobs Act (IIJA). The Georgetown Climate Center summed up the stakes in a recent issue brief: “IIJA could be an important part of the U.S. response to climate change. Or it could lead to more greenhouse gas pollution than the trajectory we are currently on. Where the actual outcome falls within that range will depend on the decisions made by state, federal, and local governments about how to spend the money made available by IIJA.”

Now is the time to require federal grantees to measure and manage GHG emissions from transportation plans and programs. Only by tracking these emissions can we begin to understand and address the long-term impact that transportation investments are having on our communities and our climate. The proposed rule would empower state and local leaders to better connect their transportation decisions with climate goals.

While we support the intention of the proposed rule, we believe it would be strengthened by making the following modifications:

- States and MPOs should be required to track emissions from travel on all roads and set targets for reducing them, not just those on the National Highway System. The NHS represents only about 5 percent of total US roadways, and just over 50 percent of vehicle miles traveled. Limiting the rule to the NHS means that nearly half of the miles driven - and the associated GHG emissions - will remain unaccounted for.
- States and MPOs should be required to take specific actions if they fail to meet the targets they set, such as committing to use their federal funding only for emission-reducing projects until the target is met. Alternatively, incentives could be provided for those states and regions that meet their targets, such as providing extra points in competitive grant programs.
- Both states and MPOs should be required to report every two years on the GHG performance metric, rather than limiting MPO reporting to every four years as proposed. MPOs have a great deal of influence on transportation investment decisions in metropolitan areas and should be as transparent as states in this regard. Moreover, both states and MPOs should be required to set 8- and 20-year targets for emissions reduction in addition to 2- and 4-year targets, to provide greater visibility and accountability for long-term plans.

Once the rule is finalized, DOT should commit to providing technical support to states and MPOs to assist them in achieving their GHG reduction targets. For example, DOT should provide tools and best practices for modeling the emissions impacts of various types of projects, to ensure that state and local transportation planners have the information they need to select emissions-reducing projects. In addition, DOT should commit to publishing regular reports on states' and MPOs' progress toward their targets. Accessible, user-friendly data will help state and regional policymakers and other stakeholders assess the impact of transportation decisions on emissions and adjust policies and programs if needed.

Adopting a national GHG performance measure is a necessary and long-overdue action. Twenty-four states are already measuring GHG emissions from their transportation plans. This commonsense practice can and should be required nationwide. We ask you to incorporate the recommendations above and issue a final rule without delay.

Sincerely,



Corinne Kisner  
NACTO Executive Director