



Seattle City Council

August 8, 2016

The Honorable Anthony Foxx
Secretary
U.S. Department of Transportation
1200 New Jersey Ave Avenue SE
Washington, DC 20590

RE: docket number FHWA-2013-0054

Dear Secretary Foxx:

The Seattle City Council appreciates the opportunity to comment on the U.S. DOT's proposed national performance measures for the National Highway System (NHS), freight movements on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program (CMAQ). We strongly support the shift towards a performance-based transportation system; however we are concerned that the proposed rule focuses exclusively on the movement of private property – cars and trucks – and ignores other modes of transportation that are critical in moving people and goods and reducing our greenhouse gas emissions. In addition, we hope that the proposed rule would include provisions to measure and address disparities in transportation access, mobility, and affordability for vulnerable groups – including low-income, communities of color, and those with disabilities.

In combination with other elected officials across the country and Transportation for America, the Seattle City Council endorses the following recommendations into the final rule:

- Prioritizing the movement of people and goods, rather than vehicles,
- Removing duplicative vehicle speed performance measures that hinder safety efforts,
- Measuring all users of the National Highway System, including transit and ridesharing options, and not just those traveling in single occupancy vehicles (SOVs),
- Providing a timeline for U.S. DOT to implement an accessibility performance measure that prioritizes access to destinations, a crucial measure for disadvantaged populations,
- Incorporating a greenhouse gas performance measure to enforce and track specific emissions targets that implement regional, state, or national greenhouse gas emission policies, and
- Including a plan for U.S. DOT to improve data sets to incorporate accurate roadway volumes, strategies to develop and implement safe and accessible multimodal networks, accessibility, and trip origin and destination – disaggregated by race and socio-economic status.

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As one of the fastest growing cities in the nation in terms of population and employment, Seattle has made a concerted effort to provide multiple transportation options for our residents, workers and visitors. Our Comprehensive Plan recognizes our limited street right-of-way and seeks to promote safe and convenient access and travel for all users – pedestrians, bicyclists, transit riders, and people of all abilities, as well as freight and motor vehicle drivers. Over the last two years Seattle voters have approved approximately \$1.2 billion in transit and multi-modal investments because our residents understand that these investments encourage active living and promote affordable transportation options. These investments provide for safer streets through smart street design and traffic calming, and provide equitable access for vulnerable communities.

Additionally, Seattle was able to reduce the proportion of drive-alone trips into downtown Seattle from 50 to 31 percent over the course of 14 years, making it possible to add tens of thousands of jobs downtown while keeping car trips into downtown more or less the same. 27,857 jobs were added in downtown Seattle just from 2010 to 2013. Making that kind of expansion without choking downtown with traffic would not have been possible without expanding transit and making it work for more people.

Multi-modal investments are also an important strategy for reducing greenhouse gas emissions. Through Seattle's Climate Action Plan, our goal as a city is to become carbon neutral by 2050. As the transportation sector accounts for just over 65 percent of Seattle's greenhouse gas emissions, failing to incorporate multi-modal investments into performance measures will hinder the progress we are building to become an even greener Emerald City. To that end, including a carbon emission performance standard in the proposed congestion and air quality measure must be part of the solution.

We appreciate the opportunity to comment on this rule and support the move to a performance-based transportation system. We appreciate your leadership and share your goals of building an efficient, transportation system that connects, rather than divides communities, and of minimizing environmental impacts.

Sincerely,



Council President Bruce Harrell


Councilmember Tim Burgess
Councilmember Lisa Herbold
Councilmember Debora Juarez

Councilmember Sally Bagshaw


Councilmember M. Lorena González
Councilmember Rob Johnson
Councilmember Mike O'Brien
Councilmember Kshama Sawant

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