



# MassCommute

MASSACHUSETTS TRANSPORTATION MANAGEMENT ASSOCIATION COUNCIL

## MEMBERS

- 128 Business Council, Inc.
- A Better City TMA
- Allston Brighton TMA
- Charles River TMA
- CommuteWorks/MASCO, Inc.
- Junction TMO
- Merrimack Valley TMA
- MetroWest/495 TMA
- Middlesex3 TMA
- Neponset Valley TMA
- North Shore TMA
- Seaport TMA
- TranSComm

## MassCommute

c/o Northeast Transit  
Planning & Management  
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August 18<sup>th</sup>, 2016

**Re: Docket 2013-0054: National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program**

On behalf of MassCommute, a coalition of thirteen Transportation Management Associations (TMAs) in Massachusetts, **I am writing to respectfully express our opposition to the proposed rule as it is currently constructed.** The TMAs of MassCommute collectively represent over 300 businesses and employers with more than 300,000 employees in 45 municipalities across the Commonwealth and it is our mission to reduce traffic congestion, improve air quality and increase opportunities for economic development through innovative transportation solutions.

**Specifically, MassCommute opposes the sole use of “Travel Time Reliability” & “Hours of Excessive Delay” as the only metric to describe system performance and congestion.** We believe that per-person throughput (PPT) and/or average vehicle occupancy (AVO) should be incorporated as metric.

As organizations working directly with commuters in both urban and suburban locations, we recognize the impacts that commuting inflicts on people’s lives- personally, physically and professionally. We understand that ultimately transportation is important for what it does, not for what it is, and that when we focus too much on the roads and vehicles themselves rather than on the people who rely on them, we end up with a transportation system that serves only the needs of cars, not people. Cars are never late to pick up kids from daycare. Vehicles aren’t late to meetings. **Performance measures should focus on the people that use the transportation system rather than the vehicles they use.** Unfortunately, the metrics identified by this rule are vehicle focused and our transportation should be focused on moving people.

The measures put forth by this proposed rule will determine not only how state DOTs shape their transportation planning and decision making but how States prioritize their spending of billions of dollars in transportation investments. They are simply too important to get wrong. In this era of rapidly evolving technologies and innovative business models, **these metrics should serve to advance rather than hinder these innovations and leverage them in ways that unleash rather than halt their potential.** As currently proposed, the metrics focus only on the outdated model of getting X amount of vehicles through a point in Y amount of time which blatantly ignores this opportunity to reshape and reinvest in our transportation system.

MassCommute believes that PPT should be integrated into this rule and that the proposed rule include a way to phase in PPT. Specifically, this rule should allow the use of existing surveys (such as the American Community Survey) and other best practices over the next several years to gain a baseline of regional AVO. During that period, USDOT should work to identify, create, and incorporate more technology based methods of measuring AVO and PPT along corridors.

Finally, MassCommute has additional concerns about the rule as constructed, specifically: **Missing Data (page 266)** –MassCommute strongly disagrees with the proposal to allow States to utilize the posted speed limit for missing segments. This will drastically skew data gathering if even just one 5-min bin does not have data. MassCommute recommends FHWA require States to use the average of the segment before and after a missing segment for an open data segment



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or two consecutive open data segments. Provided the strong statement of the ‘readily available’ nature of this data set, there should never be a case in which more than two data segments are empty. However, if there were to be an instance where three data consecutive data segments were empty, that section should be considered null and reported as such.

**Speeds below 2 MPH** – On page 270, FHWA says that speeds below 2 MPH should be excluded from the calculation. MassCommute objects to this. We recognize the intent to eliminate statistical anomaly’s, but States and MPOs should not be able to blindly exclude such data sets. Prior to excluding such data sets, States and MPOs should consult other data and information to verify that the data set was in fact an anomaly and not the actual state of congestion.

**LOTTR Target Threshold** – MassCommute believes that the threshold for a reliable segment is too low and should be raised to 1.25 (compared to existing level of 1.5) of expected travel time. Under the current proposal, a 1 mile segment with a speed limit of 60 MPH would be considered reliable if it took 50 seconds to transverse. Extrapolate that over a 60 mile segment and you would be ten minutes behind expected pace. Most of the commuting public would consider being ten minutes late as a state of ‘unreliable’.

**The CMAQ is flawed in many ways specifically:**

- **The metric is vehicle focused** – ‘hours of excessive delay’ is a vehicle based formula that would drastically change the focus of the CMAQ program.
- **Does not account for trips not taken and trips on transit/alternative modes** – The metric ‘hours of excessive delay’ does not account for trips deferred, or those trips taken on transit, bike/pedestrian, carpool, or other alternative form.
- **Similar Concerns with Measuring Congestion Metric as concerns with subpart E** – Like subpart E, MassCommute has concerns with the congestion metric and how it is measured. Referring to our comments on subpart E, we have concerns with the unequal weight of segments, how missing segments are handled, and how segments are selected.
- **15/35 MPH baselines** – The baseline reliable speed for Non-interstate NHS and Interstate NHS is laughable and needs to be dramatically adjusted to reflect posted speed-limits or 55 MPH for Interstate MPH and no less than 35 MPH for Non-Interstate NHS roads.

MassCommute is also very supportive of including CO2 as a measure. Please do not hesitate to contact either of us to discuss this further.

Respectfully,

Julia Prange Wallerice, Executive Director

Jeff Bennett, Managing Director

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