



October 13, 2022

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:

Thank you for proposing this rule to require states and regions to track emissions of greenhouse gases (GHGs) from surface transportation. We strongly support this proposal and encourage the Department of Transportation (DOT) to finalize it quickly.

The Florida Bicycle Association is a membership-based organization that is making Florida more bicycle-friendly. We mobilize volunteers and partners to make the Sunshine State better not only for people who *want* to bicycle, but also for people who *need* to bicycle. We do this work to improve public health, strengthen local economies, advance equity, and protect the environment.

Transportation is the largest source of GHG emissions in the United States, representing 27 percent of the nation's emissions in 2020.<sup>1</sup> 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 that don't exacerbate climate change such as bicycles, electric vehicles and public transportation options.

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."<sup>2</sup>

---

<sup>1</sup> "Sources of Greenhouse Gas Emissions," Environmental Protection Agency, 2022, <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>.

<sup>2</sup> "Issue Brief: Estimating the Greenhouse Gas Impact of Federal Infrastructure Investments in the IIJA," Georgetown Climate Center, December 2021, <https://www.georgetownclimate.org/articles/federal-infrastructure-investment-analysis.html>.

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. We support the proposed rule, which would empower state and local leaders to better connect their transportation decisions with climate goals.

As you work to finalize the rule, please also consider requiring that states and MPOs 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.<sup>3</sup> Limiting the rule to the NHS means that nearly half of the miles driven - and the associated GHG emissions - will remain unaccounted for.

To assist with the implementation of the rule, please provide technical support to states and MPOs to assist them in achieving their GHG reduction targets. For example, 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, please 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.

Thank you for taking this important step.

Sincerely,

[Original signed]

Kelly Morphy  
Executive Director  
Florida Bicycle Association

---

<sup>3</sup> Federal Highway Administration statistics, <https://www.fhwa.dot.gov/policyinformation/statistics/2020/hm18.cfm> and <https://www.fhwa.dot.gov/policyinformation/statistics/2020/vm3.cfm>.