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To: Wisconsin Metropolitan Planning Organizations

Subject: 2022-2025 Performance Period Targets for the National Performance Management Measures
Third Performance Rule (PM3) – 23 CFR Part 490

Pursuant to the regulations promulgated by the U.S. Department of Transportation Federal Highway Administration, the Wisconsin Department of Transportation (WisDOT) has established statewide targets for the federal performance measures intended to assess performance of the National Highway System, freight movement on the Intestate System and Congestion Mitigation and Air Quality (CMAQ) Improvement Program. WisDOT and the Southeastern Wisconsin Regional Planning Commission (SEWRPC) collectively agreed to unified targets for the Peak Hour Excessive Delay (PHED) measure and the Non-Single Occupancy Vehicles (Non-SOV) measure for the Milwaukee urbanized area. The 2023 and 2025 targets for the six performance measures are identified in Exhibit A.

Comments for FHWA on the PM3 Rule Calculations

While the reliability measures may be useful for describing reliability of individual urban areas or individual states, these measures are not practical to use for inter-state comparisons. The following reliability metric calculations use the "normal" or 50th percentile travel time in the denominator. Comparisons should not be drawn between states with greater prevalence of recurring congestion with "normal" travel times that are significantly higher than free-flow travel times, and states with "normal" travel times that are close to the posted or free-flow speed.

The reliability measures are based on the following metrics:

- **Travel Reliability Metric**: $Level\ of\ Travel\ Time\ Reliability\ (LOTTR) = \dfrac{80th\ percentile\ travel\ time}{50th\ percentile\ travel\ time}$

- **Freight Reliability Metric**: $Truck\ Travel\ Time\ Reliability\ (TTTR) = \dfrac{95th\ percentile\ travel\ time}{50th\ percentile\ travel\ time}$

These reliability metrics do not allow for meaningful comparison between states because urbanized areas with higher levels of recurring congestion may have 50th percentile travel times well above the free-flow travel times, while other urbanized areas with lower levels of recurring congestion have 50th percentile speeds that are closer to the free-flow travel times. For example, it is difficult to compare two 10-mile freeway corridors with a posted speed of 60 mph, when one route has an 80th and 50th percentile travel times of 20 minutes (30 mph) and 10 minutes (60 mph) respectively, while the other route with higher levels of recurring congestion has 80th and 50th percentile travel times of 30 minutes (20 mph) and 15 minutes (40 mph) respectively. While the reliability measures show that these two routes have the same reliability index, the route with the lower 50th percentile travel time has significantly better traffic flow and throughput. For these reasons, these reliability measures should not be used to make simple comparisons between states.

Exhibit A

Wisconsin Department of Transportation Targets	Baseline	2-Year Targets (2023)	4-Year Targets (2025)
Travel Reliability			
1) Percent of person-miles traveled that are reliable on the Interstate	96.4%	92.5%	93.0%
2) Percent of person-miles traveled that are reliable on the Non-Interstate NHS	93.9%	91.0%	89.5%
Freight Reliability			
3) Truck Travel Time Reliability Index on the Interstate	1.20	1.30	1.30
Peak Hour Excessive Delay			
4) Annual Hours of Peak Hour Excessive Delay per Capita in the Milwaukee Urbanized Area	5.7 Hours per capita	8.6 Hours per capita	8.4 Hours per capita
Non-Single Occupancy Vehicles			
5) Percent of Non-SOV Travel in the Milwaukee Urbanized Area	21.6%	20.5%	20.5%
Emission Reductions			
6) Total Emissions Reductions in nonattainment or maintenance areas for: • PM2.5 • NOx • VOC	8.276 kg 75.659 kg 18.941 kg	3.962 kg 22.767 kg 8.848 kg	8.100 kg 78.915 kg 18.318 kg