

# TPM Greenhouse Gas emissions rule changes

## WSDOT, MPOs collaborate to set initial target for new National Highway System GHG measure

The Federal Highway Administration (FHWA) proposed the Transportation Performance Management (TPM) Greenhouse Gas (GHG) emissions rule on July 15, 2022. This rule added transportation related GHG reduction as a new National Highway System (NHS) performance measure. The final rule implementing the GHG measure was published in the Federal Register (88 FR 85364) on December 7, 2023. The table below shows the changes made from the proposed to final rule.

Washington State Department of Transportation (WSDOT), in collaboration with Metropolitan Planning Organizations (MPOs), finalized its initial declining four-year TPM target for GHG emissions.

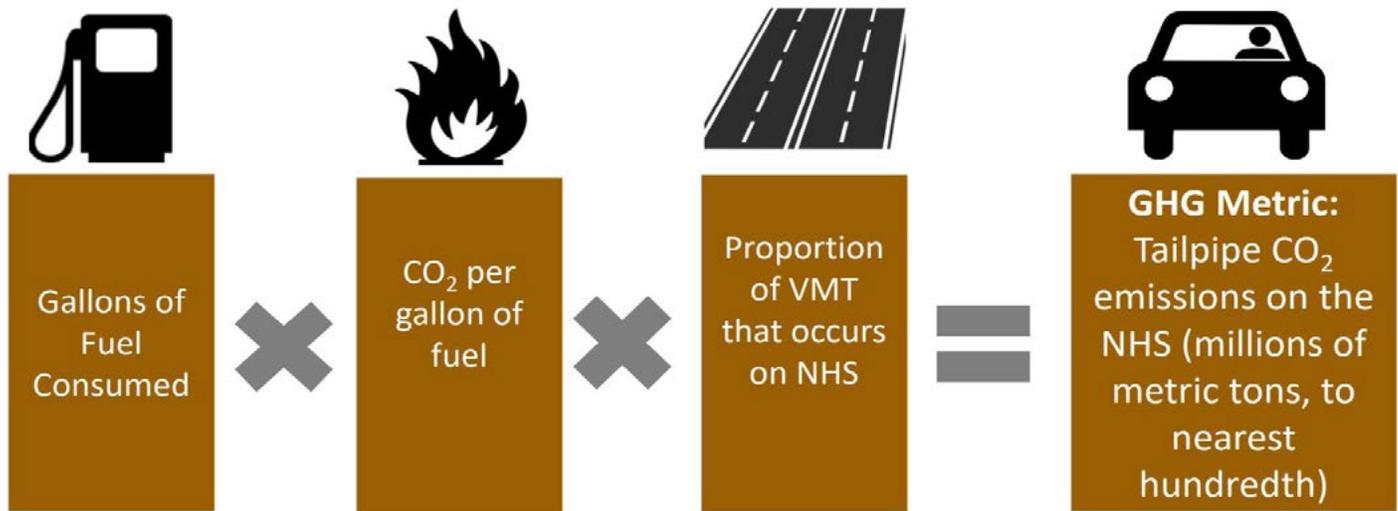
The initial declining 4-year target (with the performance period starting January 1, 2022) is due to the Federal Highway Administration by February 1, 2024.

The 4-year target for the 2022-2025 Baseline Performance Period is based on the Washington State Legislature's (GHG) limits calling for the state to reduce emissions to the following:

- 1990 levels by 2020
- 45% below 1990 levels by 2030
- 70% below 1990 levels by 2040
- 95% below 1990 levels by 2050 (net zero)

### Highlights of what changed

NPRM Proposed	Final rule establishes
Reference year defined as 2021	Reference year defined as 2022
Targets required to align with the administration's net-zero targets	Requirement removed
State DOT initial targets due October 1, 2022	State DOT initial targets due no later than February 1, 2024
Annual total vehicle miles traveled (VMT) needed to calculate the GHG measure shall come from HPMS as of August 15, for the prior calendar year	<b>For biennial reporting:</b> Annual vehicle miles traveled (VMT) needed to calculate the GHG measure shall come from the <b>best available data</b> that represents the prior calendar year and is consistent, to the maximum extent practicable, with data submitted to the Highway Performance Monitoring System (HPMS). State DOTs will also report individual values used to calculate the metric and provide a description of the data source(s) used for VMT. <b>For significant progress determination:</b> Annual VMT data shall come from HPMS as of <b>November 30</b> , for the prior calendar year.
State DOT and MPOs to report tailpipe CO <sub>2</sub> emissions on the NHS (the metric) <i>and</i> tailpipe CO <sub>2</sub> emissions on all public roads	State DOTs and MPOs are required to report tailpipe CO <sub>2</sub> emissions on the NHS
State DOTs to report tailpipe CO <sub>2</sub> emissions for the two calendar years preceding each biennial report	State DOTs will report tailpipe CO <sub>2</sub> emissions on the NHS for the single calendar year preceding each biennial report, along with the information used in the calculation
MPOs and State DOTs to mutually agree upon a method for calculating the metric	MPOs required to report a description of their metric calculation method(s). When that method is not one of the ones specified in 23 CFR 490.511(d), the MPO will include information demonstrating the method(s) has valid and useful results for measuring transportation related CO <sub>2</sub> .



**Data requirements to determine the GHG metric for biennial reporting include:**

1. Annual total gallons of fuel consumed by fuel type (gasoline and diesel, and special fuels) based on fuel sales data for the calendar year. This data is available through [Fuels and Financial Analysis System Highways \(Fuels & FASH\)](#).
2. CO<sub>2</sub> emissions factors per volume of fuel. These emission factors are supplied by FHWA and posted on the [administration's website](#) by August 15 of each reporting year.
3. VMT estimates are from best available data that represent the calendar year and are consistent—to the maximum extent practicable—with data submitted to HPMS. The reference year will use

2022 HPMS data, which was released November 30, 2023.

**Setting performance targets**

**State DOTs:**

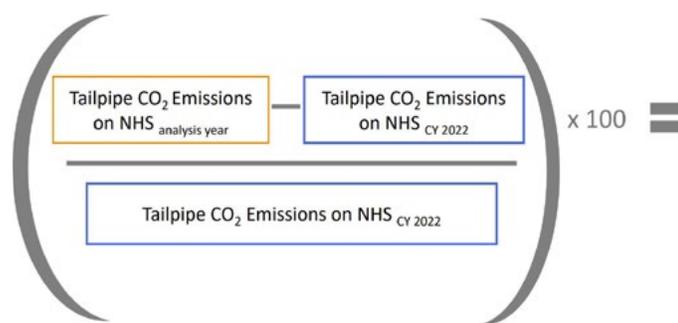
- Establish **declining** 2-year (starting in 2026) and 4-year statewide targets to reduce CO<sub>2</sub> emissions on the NHS

**MPOS:**

- Establish **declining** 4-year target to reduce CO<sub>2</sub> emissions on the NHS within the metropolitan planning area (MPA)
- Have the option to commit to support the State DOT target or establish a unique quantifiable target
- Establish target no later than 180 days after State DOT target establishment

**MPOs in urbanized areas with multiple MPOs:**

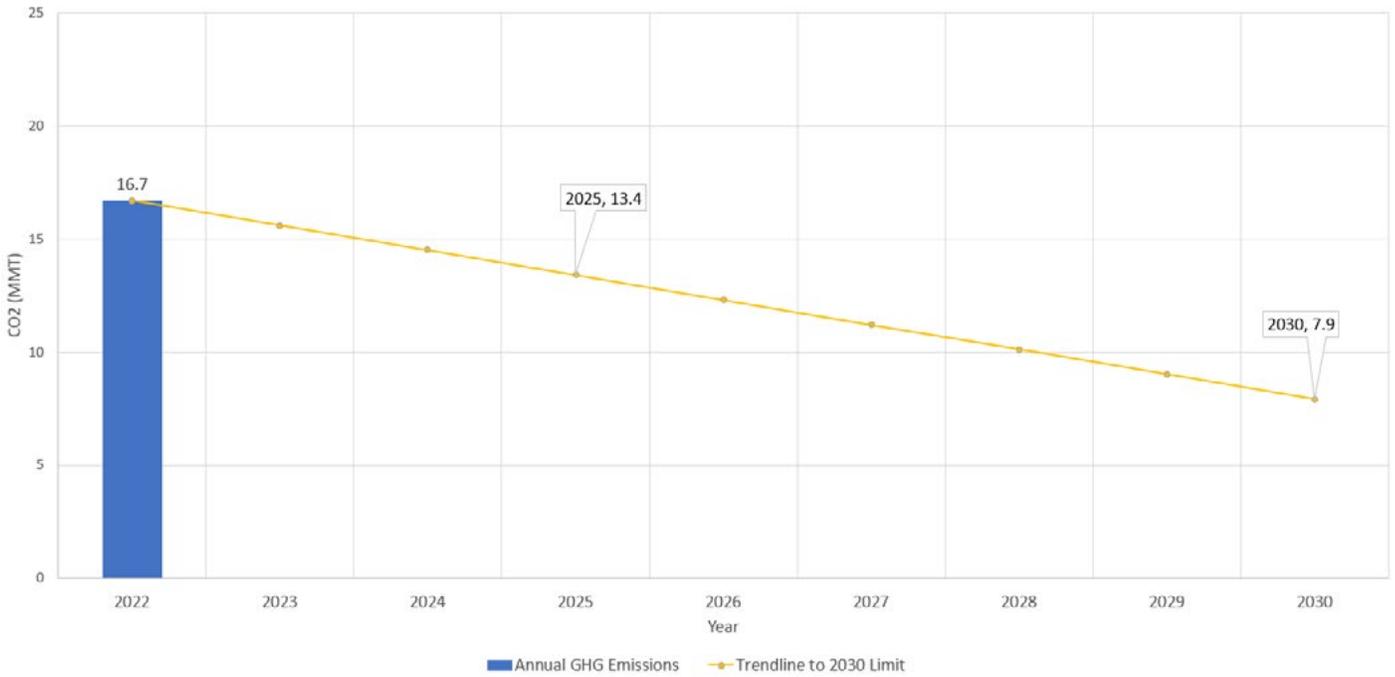
- Establish a joint **declining** 4-year target to reduce CO<sub>2</sub> emissions on the NHS within the urbanized area (UZA)
  - This must be a single quantifiable target (cannot adopt State DOT target)
  - Is in addition to each MPO's MPA target
- Establish target no later than 180 days after State DOT target establishment



**Percentage change in tailpipe CO<sub>2</sub> emissions on the NHS compared to CY2022**

# Target trendline

2022-2025 target: -19.8%



In 1990, CO<sub>2</sub> emissions on the NHS in Washington state were 14.4 MMT. In accordance with the greenhouse gas emission limits, Washington aims to reduce emissions on the NHS by 45% below 1990 levels by 2030 (7.9 MMT).

Washington's 2025 target represents the emission levels on the glidepath to 2030 limits from current 2022 levels of 16.7 MMT to 13.4 MMT in 2025. This change in emissions is a 19.8% reduction during the 2022-2025 performance period.

## Baseline Performance Period Report

- 2-year and 4-year targets
- Basis for those targets
- Performance at the baseline
- GHG metric and the values used to calculate the metric for the calendar year preceding the reporting year, and a description of data sources used for VMT information

## Mid Performance Period Progress Report

- Performance at the 2-year point
- GHG metric and the values used to calculate the metric for the calendar year preceding the reporting year, and a description of data sources used for the VMT information
- Progress toward achieving 2-year performance target
- Significant progress and target achievement discussion
- Adjusted 4-year target (optional)
- Extenuating circumstances (optional)

## Full Performance Period Progress Report

- Performance at the 4-year point
- GHG metric and the values used to calculate the metric for the calendar year preceding the reporting year and a description of data sources used for the VMT information
- Progress toward achieving 4-year performance target
- Significant progress and target achievement discussion
- Extenuating circumstances (optional)

## Significant progress determination

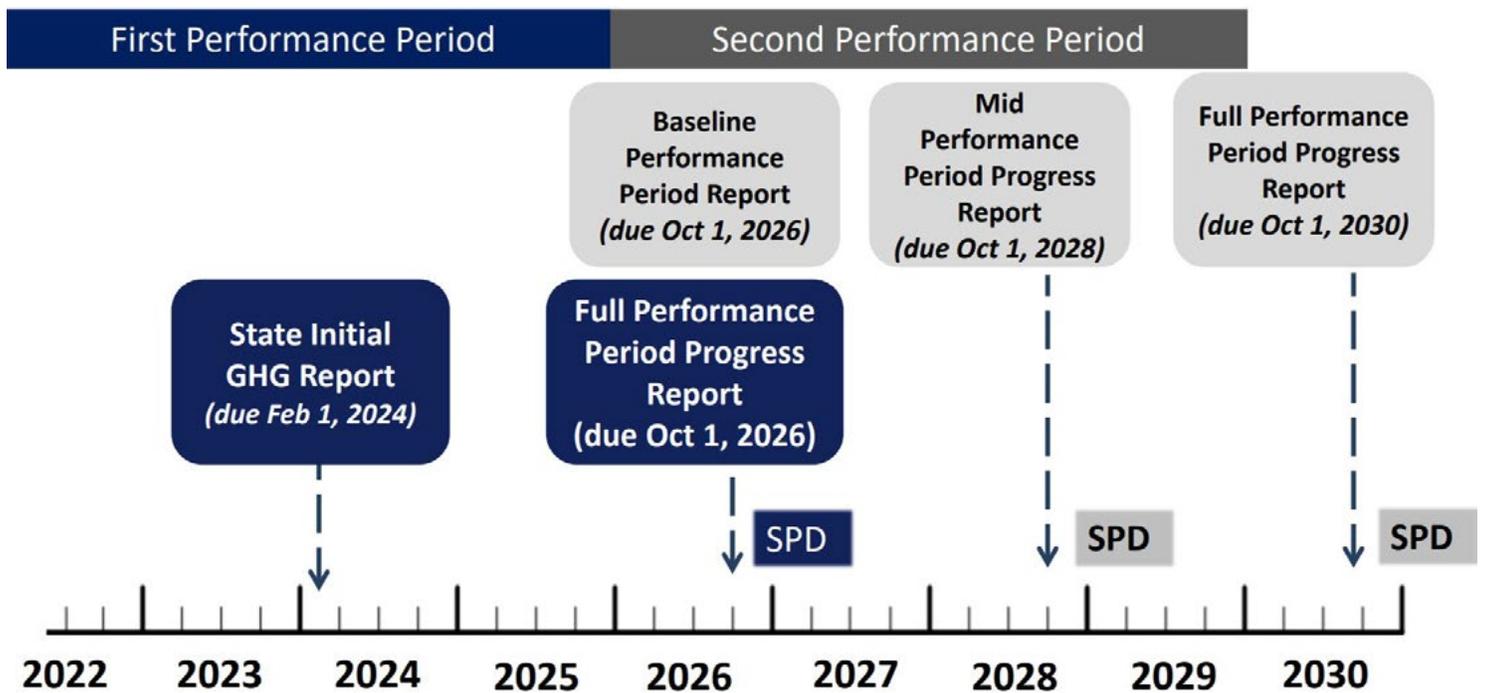
If significant progress is not made for the proposed GHG measure, State DOTs must document the actions they will take to achieve their targets in the future.

For the **first performance period only**, there will be no significant progress determinations (SPD) made for the Mid Performance Period Progress Report. Instead, the first significant progress determination for the State Initial GHG Report (due February 1, 2024) will occur for the Full Performance Period Progress Report (due October 1, 2026).

### Timeline for MPOs

Feb. 1, 2024	State initial GHG first target due
July 30, 2024	MPO initial 4-year targets due
Oct. 1, 2026	State Baseline Performance Period Report and Full Performance Period Progress Report due
March 30, 2027	MPO 4-year targets due
Oct. 1, 2030	State Full Performance Period Report due
March 30, 2031	MPO 4-year targets due

Note: MPOs are not required to report targets after the State Mid Performance Period Progress Report (Oct. 1, 2028)



### For more information:

GHG Emissions: Lindsay Taylor, Transportation Planning Specialist at (206) 440-4549, [lindsay.taylor@wsdot.wa.gov](mailto:lindsay.taylor@wsdot.wa.gov).

**Title VI Notice to Public:** It is the Washington State Department of Transportation's (WSDOT) policy to assure that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise discriminated against under any of its programs and activities. Any person who believes his/her Title VI protection has been violated, may file a complaint with WSDOT's Office of Equity and Civil Rights (OECR). For additional information regarding Title VI complaint procedures and/or information regarding our non-discrimination obligations, please contact OECR's Title VI Coordinator at (360) 705-7090. **Americans with Disabilities Act (ADA) Information:** This material can be made available in an alternate format by emailing the Office of Equity and Civil Rights at [wsdotada@wsdot.wa.gov](mailto:wsdotada@wsdot.wa.gov) or by calling toll free, 855-362-4ADA(4232). Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711. [Select here for other language formats \(PDF 399KB\).](#)