Appendix C Performance Measures

Performance management is a strategic approach to connect investment and policy decisions to achieve performance goals. Performance goals are achieved through establishing performance measures and targets adopted in the TPA's Long Range Transportation Plan (LRTP). TPA's aim is to provide a process that uses data-driven, quantitative criteria to set and analyze achievable targets. Using a performance-based method ensures the most efficient investment of federal transportation funds by increasing accountability, transparency, and providing for better investment decisions that focus on key outcomes.

The FHWA and FTA have established performance measures (PMs) and reporting requirements for DOTs, MPOs, and transit agencies through five (5) Planning Rules. In response, the Palm Beach TPA and FDOT have adopted performance measures and targets based on the national goals enacted by Congress in Moving Ahead for Progress in the 21st Century (MAP-21). The Planning Rules specify the requirements to implement a performance-based approach to planning and programming. In total, there are three FHWA performance measure (PM) rules and two FTA rules for transit-transit asset management and transit safety.

The performance measures within the Planning Rules assess:

- Highway Safety (PM1)
- Pavement & Bridge Condition (PM2)
- System Performance, Freight & Congestion Mitigation & Air Quality Improvement Program (PM3)
- Transit Asset Management (TAM)
- Transit Safety Performance

The Planning Rules and associated performance measures also specify how the TPA should set targets, report performance, and integrate performance management into the Long-Range Transportation Plans (LRTP) and Transportation Improvement Programs (TIP).

To coordinate between agencies, the FDOT and the Metropolitan Planning Organization Advisory Council (MPOAC) developed the Transportation Performance Management (TPM) Consensus Planning Document to describe the processes through which FDOT, the TPA, and the providers of public transportation in the TPA planning area will cooperatively develop and share information related to transportation performance management and target setting. The adopted FDOT/TPA performance measures and targets are listed in the table below.

Federal Performance Measures and Targets

Category	Performance Measure	TPA Target
Safety	Fatalities	(2025) Zero
	Serious Injuries	Zero
	Rate of Serious Injuries per 100M vehicle miles travelled (VMT)	Zero
	Rate of Fatalities per 100M VMT	Zero
	Nonmotorized Fatalities and Serious Injuries	Zero
System Performance	Percent of reliable person-miles traveled on the Interstate	(2025) ≥ 75%
	Percent of reliable person-miles traveled on the non-Interstate National Highway System (NHS)	≥ 60%
	Truck travel time reliability ratio (TTTR) on the Interstate	≤ 2.00
Bridges	Percent of NHS bridges classified as in Good condition by deck area	(2025) ≥ 50%
	Percent of NHS bridges classified as in Poor condition by deck area	≤10%
Pavement	Percent of Interstate pavements in Good condition	(2025) ≥ 60%
	Percent of Interstate pavements in Poor condition	≤ 5%
	Percent of non-Interstate NHS pavements in Good condition	≥ 40%
	Percent of non-Interstate NHS pavements in Poor condition	≤ 5%
Transit (Palm Tran)	Percent of Vehicles exceeding useful life	(2024)
Vehicles	Vehicles - Articulated Bus (> 14 yrs old)	≤ 10%
	Vehicles - Fixed Route Bus (> 14 yrs old)	≤ 10%
	Vehicles - Cutaway Bus (> 10 yrs old)	≤ 25%
Equipment	Percent of Equipment exceeding useful life	
	Equipment – Automobiles	≤ 20%
	Equipment – Trucks	≤ 20%
Facilities	Percent of Facilities exceeding useful life	≤ 0%
Transit (SFRTA)		(2024)
Rolling Stock	Revenue vehicles (>39 yrs old)	≤ 30%
Equipment	Non-revenue support service & maintenance vehicles (>8 yrs old)	≤ 41%
Facilities	Stations, maintenance facilities, & operations center (<2.5 on 1-5 scale)	≤ 0%
Fixed Guideway	Rail fixed-guideway track with performance restrictions	≤ 3%
Transit Safety (Palm Tran)	Fixed Route / Paratransit	Fixed
	Fatalities	Route/Paratransit
	Fatality Rate per 100k vehicle revenue miles (VRM)	(2022) Zero/Zero
	Injuries	Zero/Zero
	Injury Rate per 100k VRM	63/34
	Safety Events	0.9/0.4
	Safety Event Rate per 100k VRM	43/32
	System Reliability (VRM per failure)	0.6/0.3
		14,000/7,700

Highway Safety Performance Measures (PM1)

Safety is the first national goal identified in the FAST Act and is also the first goal of the Florida Transportation Plan (FTP), the State's long-range transportation plan, and the emphasis of Florida's Strategic Highway Safety Plan (SHSP), which SHSP is currently being updated and will be adopted in March 2026. In 2017, FDOT established statewide performance targets of zero fatalities and serious injuries. FDOT has reaffirmed these targets through 2025 in the 2024 Highway Safety Improvement Program (HSIP). The 2021 SHSP calls on Florida to think more broadly and inclusively by addressing four additional topics, referred to as the 4 Is: information intelligence, innovation, insight into communities, and investments and policies. The SHSP development process includes a review of safety-related goals, objectives, and strategies in MPO plans. The SHSP guides FDOT, MPOs, and other safety partners in addressing safety and defines a framework for implementation activities to be carried out throughout the state. The Palm Beach TPA also adopted the target of zero from 2019-2024 and reaffirmed those targets for 2025. The TPA plans and programs projects in the TIP that, once implemented, are anticipated to make progress toward achieving the targets. Safety performance measure targets are required to be adopted on an annual basis.

Trend Analysis and Targets

Safety Performance Measures are evaluated using a five-year rolling average of crash data and Vehicle Miles Traveled (VMT). The following table presents the Baseline Safety Performance Measures 2019-2023 five-year rolling average for Florida and the Palm Beach TPA.

Safety Performance Measures and Targets (Annual Averages)

Performance Measure	2013- 2017	2014- 2018	2015- 2019	2016- 2020	2017- 2021	2018- 2022	2019- 2023	2024 Target	2025 Target
Palm Beach County									
Number of Fatalities	159	169	177	178	184	198	200	0	0
Statewide	2,825	2,972	3,111	3,192	3,306	3,398		0	0
Number of Serious Injuries	1,089	1,108	1,095	1,078	1,030	967	879	0	0
Statewide	20,917	20,729	20,181	18,994	18,030	17,165		0	0
Fatality Rate per 100 million VMT*	1.19	1.22	1.24	1.24	1.30	1.40	1.40	0	0
Statewide	1.361	1.395	1.429	1.467	1.517	1.460		0	0
Serious Injury Rate per 100 million VMT	1,089.2	1,107.8	1,095.8	1,077.8	1,030.2	967.0	879.6	0	0
Statewide	10.126	9.766	9.297	8.716	8.251	7.444		0	0
Number of non-motorized Fatalities & serious injuries	206	206	208	207	206	205	205	0	0
Statewide	3,286	3,309	3,290	3,194	3,190	3,200		0	0
100 million VMT	132.6	136.4	139.6	139.5	139.4	139.8	141.1		
Statewide	2,067.9	2,126.1	2,175.5	2,177.2	2,183.1	2,200.9			

*VMT= Vehicle Miles Traveled Source: FDOT & Signal4Analytics

Highway Safety Projects and Programs in the TIP

Safety is a primary focus of the Palm Beach TPA's Vision of a "Safe, Efficient, and Connected Multimodal Transportation System." The TPA adopted a Vision Zero Action Plan in April 2019 and an updated version in October 2021 to establish safety priorities and identify achievable strategies to reduce, and ultimately eliminate, fatalities and serious injuries for all roadway users. Furthermore, each year, the TPA evaluates progress on the actions in the plan and considers updates to the plan. The Vision Zero Action Plan specifically addresses the five safety performance measures in PM1.

Safety is integrated into the planning, selection, and prioritization of TPA projects, especially projects selected through the Local Initiatives (LI) and Transportation Alternatives (TA) grant programs. LI and TA are annual competitive grant programs for projects submitted by local planning partners. Both the LI and TA grant programs include safety within the scoring criteria, and the TA program includes scoring specific to the Vision Zero Action Plan. The scoring for both programs also includes measures to address priority bike and pedestrian network gaps identified in the TPA's Long Range Transportation Plan. A sample of projects in the TIP that are programmed to address safety is shown in the table below.

TIP Section	Project Location	Project Description
State Road	SR-80 from SR 15 to CR-880	Installation of roadway lighting
Modifications (SRM)	SR-5/US-1 from Camino Real to NE 8 th St/Mizner Blvd	Lane Repurposing from 6L to 4L between Camino Real and SE Mizner Blvd; associated multimodal facilities
	Cresthaven Blvd from S Jog Rd to S Military Trl	Construct 7' buffered bike lanes and three intersection modifications
Local Initiatives (LI)	Greenbrier Blvd from Aero Club Dr to Greenview Shores Blvd	Construct 10' shared use path on north side of roadway. Upgrade intersections and pedestrian crossings with enhanced visibility and signage.
	36th St from N Australian Ave to N Flagler Dr	Construct buffered bicycle lanes and pedestrian enhancements. Includes construction of bicycle and pedestrian bridge.
	NW 6 th Way from S of NW 38 th Dr to Spanish River Blvd	Construct 10' shared use path and include bicycle and pedestrian intersection changes
Transportation Alternatives (TA)	49 th St from Greenwood Ave to N Flagler Drive	Construct ADA curb ramps and sidewalks, traffic calming speed humps, and sharrows
	Fairchild Ave from Fairchild Gardens Ave to Campus Dr	Construct buffered bicycle lanes and 8' pathway on south side of roadway

Bridge and Pavement Condition Performance Measures (PM2)

On December 16, 2022, FDOT established statewide performance targets for the second four-year performance period (2022-2025) for bridge and pavement conditions and in September of 2024, adjusted the 2025 target for percent of NHS bridges (by deck area) in poor condition. The TPA adopted FDOT's statewide pavement and bridge performance targets into the Vision 2050 Long Range Transportation Plan (LRTP). The table below shows the Palm Beach TPA and statewide performance and targets.

Bridge and Pavement Condition and Performance Targets

Performance Measure	2019	2020	2021	2022	2023	2025 Targets
Palm Beach County (%)						
NHS bridges (by deck area) in good condition	87.4%	85.2%	82.2%	81.7%	84.2%	≥ 50%
NHS bridges (by deck area) in poor condition	1.0%	1.0%	1.0%	1.0%	0.0%	≤5%
Interstate pavements in good condition	61.2%	53.2%	59.5%	65.0%	67.3%	≥ 60%
Interstate pavements in poor condition	0.0%	0.2%	0.0%	0.0%	0.0%	≤ 5%
Non-Interstate NHS pavements in good condition	44.0%	not available	45.1%	53.3%	56.4%	≥ 40%
Non-Interstate NHS pavements in poor condition	0.1%	not available	1.2%	1.1%	0.6%	≤ 5%
FDOT - Statewide (%)						
NHS bridges (by deck area) in good condition	65.6%	64.1%	61.3%	58.2%	55.3%	≥ 50%
NHS bridges (by deck area) in poor condition	0.5%	0.7%	0.9%	0.6%	0.6%	≤5%
Interstate pavements in good condition	68.5%	68.8%	70.5%	73.4%	67.6%	≥ 60%
Interstate pavements in poor condition	0.2%	0.6%	0.3%	0.2%	0.2%	≤ 5%
Non-Interstate NHS pavements in good condition	41.0%	not available	47.5%	48.8%	50.8%	≥ 40%
Non-Interstate NHS pavements in poor condition	0.2%	not available	0.6%	0.5%	0.5%	≤ 5%

FDOT is mandated by Florida Statute 334.046 to preserve the state's bridges and pavements to specific standards. To adhere to the statutory guidelines, FDOT prioritizes funding to ensure the current transportation system is adequately preserved and maintained before funding is allocated for capacity improvements. These statutory guidelines cover the statewide federal targets that have been established for pavements and bridges.

In addition, MAP-21 required FDOT to develop a Transportation Asset Management Plan (TAMP) for all state NHS bridge and pavement assets. The TAMP must include investment strategies leading to a program of projects that would make progress toward the achievement of the state DOT targets for asset condition and performance of the NHS. FDOT's current TAMP was updated to reflect MAP-21 requirements in 2018. Most of the NHS bridge and pavement projects that address PM2 are in the Operations and Maintenance (O&M)- Roadways section of the full TIP document. These projects have been identified and programmed by FDOT.

The table below shows a sample of TIP projects programmed to improve bridge and pavement conditions on the NHS.

Project Location	Project Description
LAKE WORTH RD/SR-802 FROM W OF CYPRESS EDGE DR TO W OF CYPRESS ISLES WAY	Resurfacing
OKEECHOBEE BLVD/SR-704 & LAKEVIEW AVE FROM E TAMARIND AVE TO W S FLAGLER DR	Resurfacing
BEELINE HWY/SR-710 FROM W OF PARK COMMERCE BLVD TO E OF AVIATION BLVD	Resurfacing
FOREST HILL BLVD/SR-882 FROM E OF LAKE CLARKE DR TO US-1/DIXIE HIGHWAY	Resurfacing
SR-811 FROM SOUTH OF RCA BLVD TO N OF DONALD ROSS RD	Resurfacing
SR-7 FROM N OF BOYNTON BEACH BLVD/SR-804 TO LAKE WORTH RD/SR-802	Resurfacing
BOYNTON BEACH BLVD/SR-804 FROM SR-7 TO LYONS RD	Resurfacing
BOYNTON BEACH BLVD/SR-804 FROM E OF ORCHID GROVE TRAIL TO E OF PALM ISLES DR	Resurfacing
PALM BEACH LAKES BLVD OVER FEC RAILROAD	BRIDGE Repair/Rehab
US-1/SR-5 FEDERAL HWY FROM CR-A1A TO BEACH RD	Bridge Replacement
SR-811/ALT A1A OVER LOXAHATCHEE RIVER BRIDGE #930339	Bridge Repair/Rehab
E INDIANTOWN RD/SR-7056 BRIDGES #930453 & 930454	Bridge Rehab
SR-706/E. INDIANTOWN RD. BRIDGES # 930453 & 930454	Bridge Rehab

System Performance (Travel Reliability), Freight, & Congestion Mitigation & Air Quality Improvement Performance Measures (PM3)

FHWA's System Performance/Freight/CMAQ Performance Measures Final Rule, which is referred to as the PM3 rule, requires state DOTs and MPOs to establish targets for the following six performance measures:

National Highway Performance Program (NHPP)

- 1. Percent of person-miles traveled on the Interstate system that is reliable;
- 2. Percent of person-miles traveled on the non-Interstate NHS that is reliable;

National Highway Freight Program (NHFP)

3. Truck Travel Time Reliability Index (TTTR);

Congestion Mitigation and Air Quality Improvement Program (CMAQ)

- 4. Annual hours of peak hour excessive delay per capita (PHED);
- 5. Percent of non-single occupant vehicle travel (Non-SOV); and
- 6. Cumulative 2-year and 4-year reduction of on-road mobile source emissions (NOx, VOC, CO, PM10, and PM2.5) for CMAQ-funded projects.

Because all areas in Florida meet current national air quality standards, the three CMAQ measures do not apply in Florida. Below is a description of the first three measures.

Travel time reliability provides a way to measure the unexpected congestion drivers experience over normal travel flow during specific parts of the day. The level of travel time reliability (LOTTR) measures the percent of person-miles traveled on the Interstate or the non-Interstate NHS that are reliable. LOTTR is defined as the ratio of longer travel times (80th percentile) to a normal travel time (50th percentile) of all applicable roads, across four time periods between the hours of 6 a.m. and 8 p.m. each day. The measure is expressed as the percent of person-miles traveled on the Interstate or Non-Interstate NHS system that are reliable. Person-miles assumes a people per vehicle estimate.

The truck travel time reliability (TTTR) measures the reliability index for trucks traveling on the interstate. A TTTR ratio divides the 95th percentile truck travel time by a normal travel time (50th percentile) for each segment of the Interstate system over specific time periods throughout weekdays and weekends. This is averaged across the length of all Interstate segments in the state or metropolitan planning organization (MPO) planning area to determine the TTTR index.

On December 16, 2022, FDOT established statewide performance targets for 2023 and 2025 for the system performance measures that assess the performance of the Interstate and National Highway System (NHS) and freight movement on the Interstate System. FDOT adjusted the 2025 targets in September 2024. The TPA adopted FDOT's statewide targets into the 2050 LRTP. The table below presents the statewide and TPA targets.

Statewide System Performance and Freight Targets and Current Conditions

Performance Measure	2019	2020	2021	2022	2023	2025 Targets
Palm Beach County						
Percent of person-miles on the Interstate system that are reliable	78.0%	93.6%	83.1%	77.6%	75.5%	≥ 75%
Percent of person-miles on the non-Interstate NHS that are reliable	94.0%	98.0%	96.8%	92.4%	89.2%	≥ 60%
Truck travel time reliability	1.86	1.66	1.78	1.95	2.02	≤ 2.0
FDOT - Statewide						
Percent of person-miles on the Interstate system that are reliable	83.4%	92.3%	87.5%	85.7%	82.8%	≥ 75%
Percent of person-miles on the non-Interstate NHS that are reliable	86.9%	93.5%	92.9%	92.1%	89.1%	≥ 60%
Truck travel time reliability	1.43	1.45	1.38	1.46	1.48	≤ 2.0

The table below provides a brief list of projects that address system performance in the NHS. They include both TPA, FDOT, and Palm Beach County priorities. System performance can be addressed in a variety of ways, such as through roadway capacity, improved signal and corridor technology, shifts to other reliable forms of transportation such as transit, emergency response, and reducing traffic crashes. Given the significant resources devoted in the TIP to programs that address system performance and freight, the TPA anticipates that once implemented, the TIP will contribute to progress towards achieving the statewide reliability performance targets.

Project Location	Project Description
Atlantic Ave from FL Turnpike to Cumberland Dr Atlantic Ave from Cumberland Dr to Jog Rd	Widen from 4 to 6 lanes, including 7' buffered bike lanes and 10' shared use paths where feasible
FL Turnpike from Beeline Hwy to PGA Blvd	Widen from 4 lanes to 8 lanes.
FL Turnpike from North of Glades Rd to North of L-38 Canal	Widen from 6 lanes to 10 lanes, with improvements for future managed lanes
FL Turnpike from Okeechobee Blvd to Beeline Hwy/SR-710	Widen from 4 lanes to 8 lanes, with improvements for future managed lanes
FL Turnpike from Southern Blvd/SR-80 to Okeechobee Blvd	Widen from 4 lanes to 8 lanes
FL Turnpike from Broward County Line to Glades Rd	Widen from 6 lanes to 10 lanes and construct auxiliary lanes
Okeechobee Blvd from SR 7 to US-1; SR-7 from Forest Hill Blvd to Okeechobee Blvd	Implement Transit Signal Prioritization for entire corridor

Transit Asset Management (TAM)

On July 26, 2016, FTA published the final Transit Asset Management (TAM) rule. This rule applies to all recipients and subrecipients of Federal transit funding that own, operate, or manage public transportation capital assets. The rule defines the term "state of good repair," requires that public transportation providers develop and implement TAM plans and establishes state of good repair standards and performance measures for four asset categories: equipment, rolling stock, transit infrastructure, and facilities. The rule became effective on October 1, 2018. The table below identifies performance measures outlined in the final rule for Transit Asset Management (TAM).

FTA TAM Performance Measures

Asset Category	Performance Measure
Equipment	Percentage of non-revenue, support-service and maintenance vehicles that have met or exceeded their Useful Life Benchmark
Rolling Stock	Percentage of revenue vehicles within a particular asset class that have either met or exceeded their Useful Life Benchmark
Infrastructure	Percentage of track segments with performance restrictions
Facilities	Percentage of facilities within an asset class rated below condition 2.5 on the TERM scale

Within the TPA planning area, there are two Tier 1 providers, Palm Tran operated by Palm Beach County and Tri-Rail operated by the South Florida Transportation Authority. Tier 1 providers, defined by the TAM Rule, are those that operate rail service or more than 100 vehicles in all fixed route modes, or more than 100 vehicles or more in one non-fixed route mode.

Useful Life Benchmark (ULB)

For equipment and rolling stock classes, useful life benchmark (ULB) is defined as the expected lifecycle of a capital asset, or the <u>acceptable period of use in service</u>, for a particular transit provider's operating environment. ULB considers a provider's unique operating environment such as geography, service frequency, etc. and is <u>not the same as an asset's useful life</u>.

On September 19, 2019, Palm Beach TPA incorporated transit asset targets that reflect the targets established by Palm Tran and SFRTA through their TAM Plans. The targets for the TPA planning area are shown in the table below. The Palm Beach TPA TIP is developed and managed in coordination with Palm Tran and SFRTA and reflects investment priorities established in the 2050 LRTP.

Palm Tran and the South Florida Regional Transportation Authority (SFRTA) initially established transit asset targets as part of their Transit Asset Management (TAM) Plans in September 2018 and have updated targets annually since. The transit asset management targets are based on the condition of existing transit assets and planned investments in equipment, infrastructure, rolling stock, and facilities. The targets reflect the most recent data available on the number, age, and condition of transit assets, and capital investment plans for improving these assets. The tables below summarize the asset conditions and targets by asset class for each transit provider.

Transit Asset Management Performance Measures Targets

Percentage of assets that meet or exceeds useful life for		
Palm Tran	2023 Condition	2024 Target
Vehicles - Articulated Bus (> 14 yrs old)	0.0%	≤ 10%
Vehicles - Fixed Route Bus (> 14 yrs old)	0.0%	≤ 10%
Vehicles - Cutaway Bus (> 10 yrs old)	0.0%	≤ 13%
Equipment - Automobiles (> 4 yrs old or 100,000 miles)	43.4%	≤ 14%
Equipment - Trucks (> 4 yrs old or 100,000 miles)	0.05%	≤ 0%
Facilities (<2.5 on 1-5 scale)	0.0%	0%
South Florida Regional Transportation Authority	2023 Condition	2024 Target
Rolling stock – revenue vehicles (>39 yrs old)	31.58%	≤ 30%
Equipment – non-revenue support service & maintenance vehicles (>8 yrs old)	41%	≤ 41%
Facilities – stations, maintenance facilities, & operations center (<2.5 on 1-5 scale)	0%	≤5%
Rail fixed – guideway track with performance restrictions	0.16%	≤3%

Transit asset condition and state of good repair are considerations in the methodology the Palm Beach TPA and the transit agencies use to select projects for inclusion in the TIP. The Palm Beach TPA's TIP, once implemented, will make progress toward achieving these targets. The Transit—Operations and Maintenance section of the TIP provides the full list of capital and operating expenses to maintain the Palm Tran system. Below is a short list of transit projects directly prioritized and funded by the TIP to improve Transit assets.

Transit Agency	Project Location	Project Description
SFRTA	Passenger Rail Cars	Purchase passenger rail cars
Palm Tran	Countywide	Construct and Replace Transit Shelters
Palm Tran	Electric Bus Transition Initiative	Purchase Electric Transit Buses and Charging Stations
Palm Tran	Countywide	Fixed Route Bus Replacement

Transit Safety Performance

The Federal Transit Administration (FTA) established transit safety performance management requirements in the Public Transportation Agency Safety Plan (PTASP) final rule published on July 19, 2018. The rule requires public transit agencies that receive federal funding under 49 U.S.C. Chapter 53 to develop and implement a PTASP. Rail operators, such as SFRTA, fall under different rules and are not required to include the same measures. The PTASP must include the following performance measures with associated targets:

- Total number of reportable fatalities and rate per total vehicle revenue miles (VRM) by mode.
- Total number of reportable injuries and rate per total vehicle revenue miles (VRM) by mode.
- Total number of reportable safety events and rate per total vehicle revenue miles (VRM) by mode.
- System reliability mean distance between major mechanical failures by mode.

Palm Tran adopted safety targets in their 2021 Public Transportation Agency Safety Plan. The Palm Beach TPA formally adopted Palm Tran's targets on February 18, 2022. Although Palm Tran is required to set targets annually, the TPA's re-adoption of targets is not required until an update of the next Long Range Transportation Plan (LRTP). Instead, the TPA is required to include Palm Tran's annually adopted targets into this TIP. Palm Tran's reported values for 2021 and new 2022 targets are indicated below.

2025 Transit Safety Performance Measures and Targets for Palm Tran

Performance Measure	Reported 2024	2025 Target
Palm Tran		
Fixed Route Bus		
Number of Fatalities	1	0
Fatality Rate per 100k VRM	0.01	0
Number of Injuries	18.00	17
Injury Rate per 100k VRM	0.20	0.2
Number of Safety Events	49	20
Safety Event Rate per 100k VRM	0.70	0.4
Mean distance between mechanical failures (miles)	6,609	8,000
Paratransit (Palm Tran Connection)		
Number of Fatalities	0.00	0
Fatality Rate per 100k VRM	0.00	0
Number of Injuries	20.00	22
Injury Rate per 100k VRM	0.20	0.3
Number of Safety Events	14	24
Safety Event Rate per 100k VRM	0.10	0.3
Mean distance between mechanical failures (miles)	10,569	7,700