



March 25, 2010

Director, Office of Executive Secretariat
U.S. Department of Agriculture
1400 Independence Avenue SW
Room 116—A Whitten Building
Washington, DC 20520

Re: Docket no. USDA-2010-0001

The Safe Routes to School National Partnership appreciates the opportunity to provide public comment to inform the recommendations of the Task Force on Childhood Obesity. The Safe Routes to School National Partnership is a network of more than 450 nonprofit organizations, government agencies, schools, and professionals working together to advance the Safe Routes to School movement in the United States. Our focus is on making it safer for more children to walk and bicycle to and from school.

We greatly appreciate the leadership of the Task Force on Childhood Obesity (Task Force) and First Lady Michelle Obama in working to solve the challenge of childhood obesity within a generation. The Safe Routes to School movement can assist with this goal given its focus on increasing safe walking and bicycling as a part of everyday physical activity. Safe Routes to School was launched at a national level in 2005 through the adoption of the federal transportation bill, SAFETEA-LU, and now there are programs that are helping to make children more physically active in all 50 states and the District of Columbia.

Safe Routes to School addresses traffic and personal dangers that prevent and discourage children and families from walking and bicycling to and from school. The program results in changes to the built environment such as bike lanes, sidewalks and pathways, and through education and encouragement, it changes the habits of parents and children to lead to a more physically active trip to school, and more physically active lifestyles.

We believe the Task Force should adopt recommendations which:

- A) Increase funding for Safe Routes to School. This will allow more schools to implement programs that improve education, encouragement, enforcement, and engineering around schools and in neighborhoods. This will result in children and families being more physically active.
- B) Provide for greater resources for research and evaluation of Safe Routes to School. There is already scientific evidence linking Safe Routes to School with increased physical activity, but it would be beneficial to formalize evaluation of the federal program and increase research.
- C) Reduce the overhead burdens associated with implementation of the federal Safe Routes to School program through Title 23 regulations which govern highway construction.
- D) Expand the federal Safe Routes to School program to high schools, allowing the program to benefit programs and communities for grades K-12.

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Ongoing support provided by Bikes Belong. The Safe Routes to School National Partnership is hosted by the Bikes Belong Foundation, a 501(c)(3) nonprofit organization.

We also urge the Task Force to develop benchmarks for achieving federal goals for the Safe Routes to School program. Some measures could include the number of children walking and bicycling to school, reduction in collisions, and the number of schools being served by the program.

Our primary focus in our comments is on objective 2 of the Task Force, increasing physical activity in schools and communities, but some of our recommendations also impact other objectives. From this perspective, we have comments on several of the questions from the Federal Register notice:

(1) For each of the four key objectives described above, what key topics should be addressed in the report?

Walking and bicycling to school and Safe Routes to School is a critical topic for the Task Force's report. Forty years ago, nearly half of children walked and bicycled to school—providing important minutes of physical activity before and after school. Today, less than 15 percent of children walk and bicycle to school, with the rest being ferried by school buses or their parents' vehicles.

Getting more children walking and bicycling safely to school increases physical activity levels, and can help set important habits for active transportation that can last a lifetime. But, this is not as easy as simply encouraging parents to make different choices. Parental choices about the trip to school are influenced greatly by the distance from their home to the school and the built environment around the school. Schools need to be surrounded by a network of sidewalks, pathways, bike lanes, crosswalks, and low-speed, low-traffic school zones. When they are not (and few are today), parents have concerns about traffic volume and speeds, lack of safe places for children to walk and bicycle that is separate from traffic, and personal safety. In fact, in 2007, 14,000 children under the age of 14 were injured and 300 were killed while walking and struck by cars. A total of 88% of children killed while bicycling are killed in the street—nearly double the 47% in 2005—because of a lack of safe facilities for bicycling separate from traffic. And, distance to school has increased over the past several decades as well, with fewer schools sited in or near the neighborhoods of the children they serve.

Addressing these concerns takes a lot of coordination, careful planning, and effort. The federal Safe Routes to School program, funded by the U.S. Department of Transportation through the 2005 transportation act, looks to change that dynamic and get more children on their feet and their bicycles on their way to and from school. Safe Routes to School is bringing together city and school officials, law enforcement personnel, parents and community organizations to make important changes to the built environment and to promote healthy active transportation. Safe Routes to School funds are building sidewalks, crosswalks and bike paths; teaching children bicycle and pedestrian safety; improving traffic enforcement around schools; and launching walking school buses and encouragement campaigns to increase physical activity levels.

There is great momentum behind Safe Routes to School. All fifty states and the District of Columbia have awarded a total of \$425 million in grants thus far to local communities, with additional funds available for FY2010. Nearly 6,500 schools are using these funds to work collaboratively with community organizations and city leaders and to implement comprehensive programs to increase safe walking and bicycling to school. All across the country, parents and children are joining walking school buses, tracking their miles walked or bicycled, switching from cars to active transportation, and making the healthy and active choice on their trip to school.

In addition to Safe Routes to School, it is important that the Task Force also look at several other topics:

- Laws and policies that help schools serve as centers of physical activity for children and families. Schools located near the children and families they serve—particularly those with a safe network of bicycle and pedestrian infrastructure surrounding them—have higher levels of children walking and bicycling. This effect is compounded if the school also has a “joint use” policy in place to allow community residents to use school facilities—including parks, playgrounds, and gymnasiums—on evenings and weekends.
- National standards on physical education (P.E.). PE standards should include teaching children skills that will allow them to be physically active throughout their lives. Teaching bicycle and pedestrian safety is an important component of this, and should be included in any PE standards or curriculum recommendations.
- Laws, policies and programs that make the built environment safer and more conducive to walking and bicycling. Complete Streets policies (which can be passed at the state or local level) require jurisdictions to consider the needs of all users—whether walking, bicycling, taking public transportation or driving—in all transportation projects. Planning for active transportation networks throughout a community can help make sure that bicycle and pedestrian improvements are planned and implemented so that they connect bicyclists and pedestrians from their homes to schools, jobs, recreation and retail. Making these broader improvements will also address safety and connectivity to schools.
- Coordination of land use planning, housing, transportation, and health is an important part of these efforts. Health impact assessments can also help make sure that health considerations, such as impact on physical activity levels, are taken into account when making planning decisions.

(2) For each of the four objectives, what are the most important actions that Federal, State and local governments can take?

Specific to the Safe Routes to School program, it is important that the Task Force work with state Departments of Transportation (DOT) to effectively use the federal funds that have already been provided. While states have awarded out the majority of funds available to them, obligation rates and spending rates are lower. When obligation and outlay rates lag, it means that the programs are delayed and engineering projects are not being built—delaying the impact on physical activity. There are barriers in the regulations governing federal transportation funds, but the US Department of Transportation should be able to work with state DOTs to simplify the regulatory process where possible and speed up implementation of projects.

The federal Safe Routes to School program also needs additional funding—which can be accomplished through Congress in the next transportation bill, through inclusion of Safe Routes to School as an eligible activity in other related grant programs, or creation of state and local funding sources. While approximately 6,500 schools around the country are receiving federal Safe Routes to School dollars, the program will only likely benefit approximately 7.5% of schools nationwide for a fraction of their needs.

It would also be helpful to expand the Safe Routes to School program to allow high schools to access funding. Currently, only K-8 schools are eligible. Physical activity levels decline greatly as children age, so it is important to ensure that the focus on walking and bicycling to and from school continues

into adolescence. Another important addition to the Safe Routes to School program would be funding specifically dedicated to research and evaluation. This will allow for greater in-depth research and evaluation that can continue to help strengthen the program and increase results on physical activity levels.

Another important area is school siting. Children are significantly more likely to walk and bicycle to school when they live within a reasonable distance of the school. State governments should be encouraged to do comprehensive reviews of their laws and policies that affect the location (or siting) of schools to encourage schools to be located near children being served. This can include laws or policies on school siting (such as requirements that schools occupy a minimum number of acres or regulations that favor building of new schools over renovation of existing smaller, neighborhood schools), school transportation funding formulas, school funding formulas, and other relevant policies. A state's laws in these areas has a distinctive impact on the ability of local communities to consider siting a school within or near the neighborhood it serves, or to choose to renovate an existing neighborhood school instead of building a new school on the outskirts of the community.

State departments of transportation and education can also support Safe Routes to School and walking and bicycling to school by building bicycle and pedestrian safety instruction into PE standards and curriculum, lowering speeds in school zones, ensuring that the safety of bicyclists and pedestrians is also addressed in school transportation policies, and by passing Complete Streets policies.

Local governments and school districts can support Safe Routes to school by passing policies that encourage safe walking and bicycling to school, requiring developers to build sidewalks and bike lanes as part of residential and commercial developments, developing comprehensive Safe Routes to School plans, incorporating Safe Routes to School into school wellness policies, passing Complete Streets policies, and undertaking comprehensive planning and implementation of active transportation networks.

(3) Which Federal government actions aimed at combating childhood obesity are especially in need of cross-agency coordination?

The US Departments of Transportation, US Department of Housing and Urban Development, and the Environmental Protection Agency already have a great start on collaboration through their Interagency Partnership for Sustainable Communities. Their partnership is looking at coordinating land use, transportation, housing, and environment to create livable, sustainable communities. All of these aspects are also likely to support active transportation and could therefore be a critical asset to the Task Force. There are also a number of other federal agencies that would be important partners in this effort, including:

- The US Department of Health and Human Services and the Centers for Disease Control and Prevention to ensure that health impact assessments are incorporated into land use, transportation, and built environment planning, policies and decisions.
- The US Department of Justice to ensure that community policing grants and enforcement policies also address the safety of children who are walking and bicycling to and from school (including personal safety and traffic safety.)
- The US Department of Education to address issues like school siting, school transportation policies, joint use of school facilities, and bicycle/pedestrian safety instruction as part of PE.

- The US Department of Interior to address issues like the ability of children to safely walk and bicycle to green spaces, parks, and recreational areas.

The Task Force should ideally model the partnerships that are needed at the local and state levels for successful implementation of Safe Routes to School. This would include local governments, schools, law enforcement, public works, planners, health departments.

(4) For each of the four objectives, what are the most important actions that private, nonprofit and other nongovernmental actors can take?

Private, nonprofit and nongovernmental organizations are important partners in this effort. Given their reach into the local community, these entities can share information about government opportunities for funding and federal and state policies that support efforts to combat childhood obesity. These organizations can also engage partners and coalitions to educate and motivate parents about the importance of physical activity and nutrition, and to advocate for policy change across a range of state and local governments that supports the reversal of childhood obesity. Finally, these partners can serve as a key information source for federal, state and local governments. These partners are more likely to be familiar with what government policies and programs are or are not working locally, and to share examples of promising practices that can inform future federal, state and local government actions.

(5) For each of the four objectives, what strategies will ensure that efforts taken by all of the entities mentioned above reach across geographic areas and to diverse racial, ethnic, socioeconomic, and geographic groups, including children who are at highest risk of obesity and children with disabilities?

It is critical to ensure that these efforts reach communities that are most in need. Children in low-income communities are also more likely to suffer from childhood obesity. Safe Routes to School programs are fairly geographically spread, and grants are going to range of urban, suburban and rural settings. We also believe that funds are getting down to low-income communities where they are most needed—but more should be done. We recommend that state DOTs track the applicants and recipients of all Safe Routes to School funds by the free and reduced school lunch rate at the school that will benefit from funding. If low-income schools are not receiving adequate support, state DOTs should be required to implement targeted trainings, technical assistance, and application procedures to ensure that more low-income schools are able to successfully apply for and implement Safe Routes to School initiatives to improve safety and physical activity levels for children. Similar requirements could be implemented for other federal, state and local programs affecting childhood obesity.

(6) What goals should we set within each objective to ensure that we meet our overall goal of solving the problem of childhood obesity in this Nation in a generation?

It is critical that we improve the percentage of children walking and bicycling to school. As stated in the response to question 1, rates of walking and bicycling have fallen nearly three-fold in forty years. While it is difficult to determine a goal given the relatively recent creation of the Safe Routes to School program, it might be feasible to set a goal of doubling the percentage of children that walk and bicycle to and from school in the next generation. That would take us to nearly one-third of all children getting important levels of physical activity on a regular basis.

Related goals and measures could include the percentage of schools reached by federal Safe Routes to School funds, percentage of federal Safe Routes to School funds that are obligated (or expended), percentage of schools with joint use policies, and average distance from homes to schools.

(7) What concrete, specific actionable recommendations or guidelines would help parents reduce the risk that their child will become overweight or obese and how can their effectiveness be measured?

The clear message for parents is to ask them to allow their children to walk and bicycle to and from school. But, for that ask to be successful and realistic, they will need support, education and motivation to make that choice realistic. They will need to know how to teach their children to safely walk and bicycle—or where else they can go to receive that education. Families that live close to school need to learn to think about making the choice to walk or bicycle to school with their children instead of putting the children automatically into the car. Parents that live farther may have to get creative through “park and walk” or “bus and walk” strategies that encourage school buses and parents to drop kids off at a park or area near the school, and for children to walk from there to school. Ideally, parents should be able to tap into their local school’s Safe Routes to School program so they can make the active transportation choice in conjunction with other parents. Parents should also be modeling good behaviors and walk and bicycle in the neighborhood with their children so that active transportation becomes a regular habit.

(8) What are the key benchmarks by which we should measure progress toward achieving those goals?

We recommend that the primary benchmark be the percentage of children that walk and bicycle to school. The National Household Travel Survey, conducted by the Bureau of Transportation Statistics at USDOT, collects several data points relating to the commute to school, but this survey is only conducted every six or seven years. It would be very beneficial to conduct at least the travel to school portion of the NHTS survey annually to measure progress. This survey also captures the average distance from homes to schools, which can help assess the impact of distance on the mode of travel to school and whether distance to school is decreasing (the preferable outcome).

It would also be helpful to work with USDOT to measure the percentage of schools participating in Safe Routes to School, the percentage of federal Safe Routes to School funds that are obligated (or expended), and measures of child bicycle and pedestrian injury and fatality rates around schools. The US Department of Education might be able to assist with tracking the percentage of schools that have Safe Routes to School access plans and joint use policies and what percentage of states or local schools incorporate bicycle and pedestrian safety skills into their PE standards or curricula.

Finally, it would be good to measure the number of injuries and fatalities that occur through children walking and bicycling, and set a benchmark to reduce these collisions.

(10) What are the key unanswered research questions that need to be answered with regard to solving childhood obesity and how should the Federal government, academia, and other research organizations target their scarce resources on these areas of research?

Overall, it is important to develop a better system for collecting bicycle and pedestrian injury and fatality reports around schools, as this will help understand safety concerns and where improvements are most needed. Developing a method of quantifying and tracking traffic safety and personal safety

incidents around schools will help with these assessments—and would also be valuable to researchers looking to quantify impacts of the built environment and safety on physical activity levels. In addition, as mentioned in our response to question 8, we need an annual measure of the percentage of children that are walking and bicycling to and from school. It would also be helpful if this measurement was available at the state and city/county level in addition to nationally.

Existing research shows that children who walk and bicycle to and from school have higher levels of physical activity and lower BMIs. But, we need additional research with greater specificity on calories burned and minutes of moderate-to-vigorous physical activity that can be generated through active transportation to school for children of different ages, weights and fitness levels. Research can also help better understand the implementation of Safe Routes to School along with other school-based physical activity and wellness activities and whether there are compounded benefits. Funding specifically for research and evaluation within the Safe Routes to School program would help with this objective.

(14) Specifically with regard to objective 3 (access to healthy, affordable food): What are the biggest challenges to enhancing access to healthy and affordable food in communities across America, and what are the most promising strategies to overcome these challenges?

While this is not the primary focus of our comments, it is important to note that access to healthy foods does not depend solely on presence of a grocery store in a community. It also depends on whether residents are safely able to get to the grocery store. For residents without cars, they depend on walking, bicycling and transit to get to the grocery store. Improving safety for bicyclists and pedestrians is also an important component of improving access to healthy foods. Complete Streets policies and building active transportation networks will help create safe and convenient links between homes, transit, and grocery stores.

(15) Specifically with regard to objective 4 (physical activity): What steps can be taken to improve quality physical education and expand opportunities for physical activity during the school day, in local communities and neighborhoods, and in outdoor activities and other recreational settings?

As previously stated, there are a number of steps that can be taken to increase physical activity, specifically walking and bicycling to and from school. In addition to impacting objective 4, the majority of these steps will also help empower parents to make walking and bicycling a more regular part of the lives of their children. Steps that should be taken, many of which are expanded upon in the responses to prior questions include:

- Broaden the availability of Safe Routes to School so that more schools can benefit—both in terms of the funding level and inclusion of high schools.
- Make sure existing Safe Routes to School funds are obligated as efficiently as possible by state DOTs and that FHWA is working in partnership with state DOTs to reduce implementation burdens.
- Make federal funding available for more research and evaluation in Safe Routes to School.
- Build messages about the importance of walking and bicycling to school into any awareness campaigns on physical activity.
- Include bicycle and pedestrian education and safety skills in physical education and health education curriculums and standards.

- Incorporate Safe Routes to School into school wellness policies so that physical activity on the way to and from school and outside school is encouraged and supported.
- Examine school siting policies and laws at the state and local levels and revamp them to encourage schools that are sited near the children they serve.
- Pass state and local policies that support and encourage safe walking and bicycling to school and overturn any bans on walking and bicycling to school.
- Implement joint use agreements between local schools and communities to provide families and children with places to play and be active on weekends and evenings.
- Pass policies or laws to decrease speed limits in school zones, increase fines, and dedicated fine revenue to improving school zone safety and Safe Routes to School.
- Develop a community-wide comprehensive Safe Routes to School assessment and prioritized plan for needed improvements and programming around all schools in the community.
- Implement broader policies and plans on bicycle/pedestrian infrastructure including Complete Streets policies and active transportation networks that connect residents to schools, jobs, recreation and retail.

Thank you very much for the opportunity to comment on the Task Force on Childhood Obesity's recommendations and action plan. Should you have any questions or need additional information, please do not hesitate to contact me at deb@saferoutespartnership.org or (415) 454-7430.

Sincerely,



Deb Hubsmith
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