



U.S. Department of Transportation
Docket Operations
M-30, West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

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 FHWA RIN 2125-AF52
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Comments Submitted by the Safe Routes to School National Partnership on Proposed State and Metropolitan Planning Guidance

To Whom It May Concern:

The Safe Routes to School National Partnership is a network of more than 700 nonprofit organizations, government agencies, schools, and professionals working together to grow the Safe Routes to School movement in the United States. Our mission is to advance safe walking and bicycling to and from schools, and in daily life, to improve the health and well-being of America's children and to foster the creation of livable, sustainable communities.

Safe Routes to School initiatives focus on improving the built environment around schools so that streets are safe for children to walk and bicycle. Safe Routes to School programs also utilize education, encouragement and law enforcement techniques to promote safety, and to encourage parents and children to regularly choose walking and bicycling, which are active and healthy ways to get to school. This comprehensive approach results in building physical activity into children's daily routines and in improving the built environment around schools so they can be safe hubs for physical activity.

We appreciate the opportunity to comment on Statewide, Nonmetropolitan, and Metropolitan Transportation Planning to the U.S Department of Transportation's (U.S. DOT) Federal Highway Administration (FHWA) and Federal Transit Authority (FTA).

While we are pleased with the U.S. DOT's efforts to implement key reforms to our state and metropolitan planning, as directed by the Moving Ahead for Progress in the 21st Century Act (MAP-21), we believe the rule would be greatly strengthened by the inclusion of public health among the issues that state and regional planners must consider. MAP-21 set forward the clear

objective of improving the safety and security of non-motorized users, as well as protecting and enhancing “quality of life.” As an organization dedicated to improving the health and safety of America’s children, we strongly believe public health to be a key component of quality of life.

Specifically, we urge U.S. DOT to consider including performance measures related to the impact of transportation infrastructure on public health, with a particular focus on physical activity. The health and safety of our children as well as future generations is intrinsically linked with the availability of accessible, safe infrastructure and thoughtful planning.

To that effect, over the past 50 years we have seen a significant decline in the amount of children who walk or bicycle to and from school: from 50 percent in 1969 to 15 percent today. At the same time, obesity has increased among children ages 6 to 11 from 4 percent in 1969 to 17.7 percent in 2012. Now, more than 23 million children and teens are overweight or obese. The high rates of childhood obesity in America affect health care costs, academic achievement and future work productivity. Yet, studies show that children who walk and bicycle to school are more physically active, have lower body mass index scores, lower obesity levels and are more likely to meet physical activity guidelines than students who are driven or bused to school.

Given the critical role that state and regional planners can play in increasing health and safety for our children, and the important role adequate and meaningful data provides in making smart decisions about how we shape our roadways, we believe performance measures should be expanded to include miles and connectivity of active-transportation facilities, percentage of users who report commuting to work or trips to school (their own or a child’s school) by foot or bike at least once a week for even a part of their trip, the percentage of trips of varying lengths that are traveled on foot or by bike and the percentage of transit trips accessed via active transportation. An essential part of any performance measure is also ensuring that the underlying data is collected on a regular basis, so each of these areas should also have data collection requirements. This information will be vital in allowing planners to better measure progress and facilitate healthier outcomes for their communities.

Additionally, we urge U.S. DOT to address equity and inclusiveness in state and metropolitan planning. The safety challenges are greater in disadvantaged communities, with children living in lower-income areas at a higher risk of pedestrian injury. We often find that lower-income schools are more likely to be placed in closer proximity to high-traffic roads, higher crime rates and less walkable streets. Children from families without a vehicle are 16 percent more likely to walk to school, and children from families earning less than \$30,000 are twice as likely to walk to school as students from households with an annual income greater than \$60,000.

Because income and access to vehicles has a significant impact on safety and mobility, we recommend that U.S. DOT require the collection and sharing of data on travel behavior that is disaggregated by race and income. The rule would also be strengthened by including performance measures focused on eliminating the mobility and safety disparities currently experienced by people of color and low income residents in many communities. Finally, we

recommend that U.S. DOT require that MPO boards are more representative of the economic and racial/ethnic makeup of the communities served. These recommendations will help ensure that transportation planning is sensitive to the needs of all residents.

We thank you for considering our comments and hope that you will give serious thought to health, equity and active transportation considerations in transportation planning in the proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Margo Pedroso". The signature is written in a cursive, flowing style.

Margo Pedroso
Acting Director