January 27, 2010

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

Re:  Docket no. RITA 2009-0005

The Safe Routes to School National Partnership appreciates the opportunity to provide public comment for the 2010-2015 strategic planning initiative for the Research and Innovative Technology Administration (RITA). The Safe Routes to School National Partnership is a network of more than 400 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 and more prevalent for more children to walk and bicycle to and from school.

The federal Safe Routes to School program, administered by the Federal Highway Administration (FHWA), is addressing safety, livability and environmental sustainability. Rates of walking and bicycling to school have declined dramatically in recent decades, from 41 percent in 1969 to 13 percent in 2001. Instead, parents are increasingly driving their children to and from school—which means that neighborhoods surrounding schools suffer from traffic congestion, these vehicles are emitting greenhouse gases and air pollutants on the trip to school, and that safety for the children who do walk and bicycle is decreased due to traffic volume and speed. When many people think of a livable community, they think of a community in which families are comfortable with their children walking and bicycling to school—which requires attention to safety, neighborhood design, and more.

The federal Safe Routes to School program is in great demand to redress these situations at the local level, but the National Safe Routes to School Task Force, in its 2008 report, estimated that only 7.5% of schools nationwide will receive Safe Routes to School funding over the course of the initial five-year authorization, and not for all of the needs at these schools. To spur additional investment in Safe Routes to School initiatives and get more children walking and bicycling to school, the Safe Routes to School National Partnership encourages RITA to conduct research focused on the federal Safe Routes to School program and walking and bicycling to schools.

We have developed a list of the types of research that would be extremely beneficial in advancing Safe Routes to School programs, and getting more children walking and bicycling to school—which will help with safety, livability, and environmental sustainability. Many of these proposed research topics would be ideally carried out by RITA in close partnership with FHWA and other federal agencies such as the Environmental Protection Agency and the Centers for Disease Control and Prevention. Suggested research topics include:
**Quantifying the Economic Benefits of Safe Routes to School (SRTS)**

Research that codifies the financial benefits of SRTS is greatly needed in the US and would be valuable for advocates as they make their case before policy makers for more funding for SRTS. Similar research has already taken place in the UK; however, US policy makers want US research. Sustrans' (UK) Research and Monitoring Unit, working with partners at Bolton University and the Institute for Transport Studies at Leeds University, have recently produced leading guidance into the appraisal of cycling and walking schemes for the Department for Transport. The guidance enables a monetary valuation to be placed on the costs and benefits of such schemes as new cycling and walking routes and other features such as road crossings. For a full summary and an explanation of the analysis used, please visit [http://www.sustrans.org.uk/default.asp?sID=1164381904000](http://www.sustrans.org.uk/default.asp?sID=1164381904000)

**Linking Physical Activity to Academic Performance and Attendance**

Schools and education partners frequently request research showing the connection between physical activity, academic performance, and attendance. This is particularly important as school budgets are shrinking and schools are focused on test scores. As we seek to increase collaboration between public health, school, and transportation sectors, more research substantiating ties between walking and bicycling to school and increased levels of academic performance, attendance, and behavior is highly important. Such research is also necessary to the school siting debate. State and local-level decisions regarding where schools are built have significant impacts on whether homes are located within walking and bicycling distance of schools. And as a result of No Child Left Behind, the main focus of Departments of Education is on academic performance. We need research that assesses the direct ties that SRTS has to academic performance, attendance, and behavior.

**Delving into the National Household Travel Survey (NHTS)**

The US Department of Transportation is reporting that preliminary results from the 2009 NHTS update shows that driving to school, even for short distances, continues to be at a significant level. Based on this, an important research need is for the NHTS data to be cross referenced with program evaluation data from communities that are running Safe Routes to School programs. Cross-referencing this data can help make the case that a reversal of the national trend is be possible through Safe Routes to School. Use of data generated through the federal parent surveys and student tallies would demonstrate to Congress that SRTS is an evidence-based solution, while accentuating the need for more funding to make SRTS available to a greater percentage of schools nationwide.

We also recommend that RITA consider partnering with the Bureau of Transportation Statistics and the Federal Highway Administration to ensure regular collection of the National Household Travel Survey (NHTS). NHTS provides important data on travel trends, which has a direct link to safety. Unfortunately, this survey is only done every five to seven years on an irregular basis as funds are raised. This lengthy gap in the data makes it difficult to understand and analyze national trends on travel patterns. NHTSA should commit to putting funding in its budget to help ensure NHTS is collected annually.
Quantifying Calories Burned and Minutes of Physical Activity through Active Transportation to School

It is difficult to measure the amount of calories burned and minutes of physical activity gained through walking and bicycling to and from school, because these factors depend on distance traveled, speed/intensity of travel, and the age and weight of the child. To be able to compare walking and bicycling to school with other health and obesity interventions—such as increasing P.E. classes or cutting back on sugary foods—requires additional research on the average calories burned and minutes of physical activity gained during an active commute to and from school.

Assessing the Impact of Safe Routes to School on Neighborhood Crime

Parents often identify fear of neighborhood crime as one reason why they do not allow children to walk and bicycle to and from school. Safe Routes to School advocates that increasing walking and bicycling to school can build social interactions with neighbors, create a sense of community, and reduce fears about crime due to the increased number of people out on the street during the commute to and from school. However, academic research in this area is hard to come by. It would be beneficial to be able to show the broader neighborhood benefits of Safe Routes to School on neighborhood crime, if such a link can be proven.

Determining if Safe Routes to School Behaviors Influence Parents

Some Safe Routes to School programs report anecdotally that getting more children to walk and bicycle can have an impact on parent behaviors. Parents may walk and bicycle more themselves and try to avoid the car for short trips. Parents may also walk with their children, getting more exercise themselves, impacting health and physical activity. However, these reports are anecdotal and there is no research we are aware of examining whether these are isolated incidents or more widespread changes in behavior that could be attributed as further benefits for Safe Routes to School programs.

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Thank you again for the opportunity to comment on RITA’s 2010-2015 strategic planning initiative. We look forward to working together to strengthen the availability of research on Safe Routes to School. Please contact us if you have questions about our ideas or would like to discuss them further.

Sincerely,

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