October 3, 2008

The Honorable Mary Peters
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Comments on Refocus. Reform. Renew.

Dear Secretary Peters:

On behalf of the Safe Routes to School National Partnership, which represents more than 350 national, state and local partners, we appreciate the opportunity to comment on the report “Refocus. Reform. Renew. A New Transportation Approach for America.”

We recognize that you are wrestling with many issues, including the fact that the Highway Trust Fund will soon exceed available resources. We agree with several of your recommendations, including:

• We need a new national vision and a new authorization for the next transportation bill;
• Performance based outcomes will be important for achieving a new national vision for transportation in America, provided that fair and complete measures can be developed;
• We must find a way to address rising congestion, which threatens our mobility, economy and quality of life;
• Metropolitan mobility issues are of critical national interest and will only grow more important as the population and economic clout of urbanized areas continues to increase;
• Increasing the speed of project delivery without sacrificing necessary environmental protections is critical for decreasing project costs, reducing delay, and improving transportation systems; and
• America needs new sources of revenue for transportation to ensure the ability to maintain and expand the United States’ surface transportation system.

However, while the Report aims to achieve a new transportation vision for America, we believe you have omitted two important factors:

1) Your report does not include walking and bicycling as modes of transportation at a time when one-third of Americans do not drive and approximately 9.5 percent of all trips in the U.S. are
already made on foot or by bicycle. Nor does it recognize the important role that walking and bicycling can play in addressing local traffic congestion concerns.

2) Your report also does not include health outcomes in your list of accountability measures that transportation projects should be evaluated on, including whether projects will have positive or negative health impacts on current rates of physical inactivity, traffic injuries and deaths, and poor air quality, all of which are directly related to our transportation system.

**Walking and Bicycling Are Core Transportation Modes**

The 2001 National Household Travel Survey reveals that at least 9.5 percent of all trips in the U.S. are already being made by walking or bicycling, and 41 percent of all trips are two miles or less in length. This is the perfect length for walking and bicycling as transportation. However, neither the analysis nor recommendations in the Report make mention of walking and bicycling as methods to help solve our U.S. surface transportation challenges. This is a major oversight and a sincere disappointment.

By increasing the rate at which Americans walk and bicycle for transportation, it can help lead toward important performance based outcomes such as: reducing road congestion and vehicle miles traveled; reducing our carbon footprint; decreasing dependence on foreign oil and fossil fuels; and improving obesity, physical inactivity and public health concerns. All of these are important federal priorities.

The U.S. Congress allocated $286.4 billion for the five-year SAFETEA-LU transportation bill in 2005. Walking and bicycling received only about 1 percent of the funding in SAFETEA-LU, but these modes already represent at least 9.5 percent of all trips in America. Traffic fatality data from states shows us that bicycle and pedestrian modes comprise an average of 13 percent of deaths on U.S. roadways. This shows the profound inequity in transportation funding in our current system. The chronic under-funding of walking and bicycling contributes to traffic congestion, obesity, economic loss, dependence on foreign oil and carbon emissions.

The way we build our roadways and transit systems affects whether people can even walk across the street safely to get to school, a store or a bus stop. Too often, roadways built with federal funding are designed only for automobiles, making it impossible for most people to walk or bicycle safely on a regular basis.

The Safe Routes to School National Partnership encourages you to consider including a “complete streets” approach in which all roadways are designed to meet the needs of all transportation users including pedestrians, bicyclists, the disabled and transit users. Complete streets can help increase the capacity of the transportation network by giving people more transportation choices.

We also need more transportation options for people of all ages and abilities such as multi-use pathways and traffic-calmed streets that connect to residential areas and business districts. The Texas Transportation Institute found that providing more travel options, including public transportation, bicycling and walking facilities, is an important element in reducing congestion. Many studies show that when roads are better designed for bicycling, walking, and taking transit, more people choose these modes of transportation.
Concentrated investments in bicycle and pedestrian networks and supporting such programs over time yields increasingly cost-effective mobility improvements. Portland, Oregon, for instance, has seen a quintupling of bicycle miles traveled over the past 15 years in response to focused infrastructure development and supportive policies. And in California, a 2007 Safe Routes to School Mobility and Safety Analysis conducted by the California Department of Transportation showed that direct observations of schools that received capital safety improvements through the Safe Routes to School program yielded walking and bicycling increases that were often in the range of 20 percent to 200 percent. The report also indicated that the estimated safety benefit of the program was up to a 49 percent decrease in the childhood bicycle and pedestrian collision rates. Investing further in Safe Routes to School can help improve both transportation and health.

In addition, Congress must develop new ways to measure transportation performance. Current modeling of transportation needs by state Departments of Transportation and the Federal Highway Administration do not even register positive impacts from bicycle and pedestrian use, which could be significant if the right questions are asked.

The Health Impacts of Our Transportation System
At this juncture, we can no longer continue to measure performance-based outcomes largely through automobile-centric approaches such as how quickly vehicles can move from point A to point B. This is an antiquated approach that does not address current priorities.

Our nation must create a more inclusive vision for America and evaluate our transportation performance-based goals through overarching themes such as improving public health. We urge you to advocate for “improved public health” as an overarching performance measure and theme for the next transportation bill for all transportation programs that are funded. Measures for the health impact of our transportation system should include impact on rates of physical inactivity and obesity; traffic injuries and deaths; and air quality.

Physical Inactivity and Obesity
Transportation policies are contributing to the obesity epidemic. Today in America, 67 percent of adults are overweight or obese and nearly one-third of all children are overweight or obese. In addition, childhood obesity has increased nearly five-fold for children aged 6-11 over the past forty years, and doctors state that the current generation might be the first in more than two hundred years to live shorter life spans than their parents.

Numerous studies have confirmed the relationship between the built environment and physical activity. Studies have consistently found that people living in auto-oriented communities drive more, walk less, and are more obese than people living in walkable communities. For each hour of driving per day, obesity increases 6 percent. On the contrary, studies show that individuals who walk or bicycle to get around or access public transit reduce the risk of obesity and gain public health benefits. This demonstrates how transportation shapes land-use, and how those factors are linked to obesity. The Center for Disease Control and Prevention's (CDC) Community Guide to Preventative Services indicates that building facilities for physical activity, such as sidewalks and trails, is an effective means of increasing physical activity.

Regarding costs, CDC estimated that obesity cost America $117 billion in the year 2000, and another study showed that physical inactivity results in $76 billion in direct medical costs annually in the
United States. The Surgeon General recommends thirty minutes of physical activity each day for adults and sixty minutes of physical activity most days for children. New data based on objective monitoring of physical activity shows that less than 20 percent of adolescents and less than 5 percent of adults are meeting these guidelines.

Physical inactivity is a crisis in America. This crisis is directly related to the fact that our surface transportation system has largely ignored the needs of cyclists and pedestrians, and does not have a comprehensive, connected, and convenient public transit system. In many cases, Americans cannot even safely cross the street or walk or bicycle a short distance to access public transit, stores, or schools because of hazardous conditions.

Traffic Injuries and Deaths
Over the past two decades, traffic fatalities on United States roadways have averaged about 43,000 per year, and approximately 2.5 million people are injured on roadways each year. In addition to the loss of human life and health, traffic crashes cost Americans an estimated $164 billion each year.

Further, 13 percent of traffic fatalities in the United States are pedestrians and bicyclists, a number that is grossly disproportionate to the approximately 1 percent of funding that supported these modes in SAFETEA-LU, and the approximately 9.5 percent of trips in the United States that are made by walking and bicycling.

Walking and bicycling are much more dangerous in the U.S. than in other countries. American pedestrians are roughly three times more likely to get killed than German pedestrians and over six times more likely than Dutch pedestrians. Per kilometer and per trip bicycled, American bicyclists are twice as likely to get killed as German bicyclists, and over three times as likely to get killed as Dutch bicyclists. It’s no wonder that Americans cite safety as the number one reason that they do not walk and bicycle more often.

Air Quality
Nearly half of Americans live in areas with unhealthy air quality. Air pollutants from cars, buses and trucks can worsen respiratory diseases, trigger asthma attacks, and are tied to heart disease and cancer. Asthma is on the rise in the United States, with one in ten children now suffering from this disease. Researchers have found that one in three schools are located in air pollution danger zones. And, the public health costs of pollution from cars and trucks have been estimated at between $40 billion and $64 billion per year.

In addition to air pollutants that contribute to poor air quality, transportation is responsible for one-third of U.S. carbon dioxide emissions, and approximately half of carbon monoxide emissions. Curbing increasing trends in the amount that Americans drive and the aggregate amount of vehicle miles traveled (VMT) in the United States is imperative. Otherwise, these trends will soon undercut the progress achieved in reducing pollution through increased vehicle fuel efficiency standards and reduced carbon content of transportation fuels as provided for in the Energy Independence and Security Act of 2007.

A recent report submitted to Congress in January 2008 on the Nonmotorized Transportation Pilot Program that was funded in section 1807 of SAFETEA-LU shows that in Minneapolis MN, 19.6 percent of trips in that city are already being made by walking and bicycling. According to the report, walking
and bicycling reduced automobile driving by 89 million miles in that city in the year 2006. Using an Environmental Protection Agency calculator for carbon reductions, this equates to approximately 39,000 tons of carbon that was not emitted into the atmosphere, and based on an average of $3 gallon/gas, walking and bicycling in Minneapolis resulted in avoided fuel cost of more than $13 million in one year. The reduction in climate emissions from Minneapolis’ baseline walking and bicycling rate dwarfs the current contribution of more popularized CO2 reduction strategies such as hybrid vehicles.

**Conclusion: Creating A Healthy Transportation Vision and Plan for America**

It’s time for America to invest substantially in walking and bicycling infrastructure and programs, and to move forward with ensuring a “complete streets” approach for transportation spending, rather than funding transportation projects that make it difficult and unsafe for people to be able to walk and bicycle in their communities.

We understand your desire to collapse many of the transportation programs into broad funding categories. However, unless one of those categories specifically dedicates funding to walking and bicycling, it will lead to the elimination of critical programs like Safe Routes to School, Transportation Enhancements, Recreation Trails, and the Nonmotorized Transportation Pilot Program. This will move us in the opposite direction of where we need to go. America already incurs high costs due to a built environment that is hostile for walking and bicycling, and we must use the opportunity of the next transportation bill to reverse those costs.

As a nation we will not achieve goals in reducing congestion and carbon emissions, improving air quality and safety, and reducing obesity until a very high priority is placed on building transportation systems designed to encourage and support walking and bicycling. These outcomes demonstrate a direct link to how our transportation affects Americans’ ability to be physically active, have a good quality of life, and live, work and go to school in livable communities.

The Safe Routes to School National Partnership urges you to take a second look at your report and revise it to highlight how we can we can build an America that is pedestrian- and bicycle-friendly, which will be an America that is healthier and stronger, and less dependent on foreign oil.

We appreciate your consideration.

Sincerely,

[Signature]

Deb Hubsmith
Director, Safe Routes to School National Partnership