November 3, 2017

The Honorable Elaine Chao  
Secretary, U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC  20590

Re: Comments on US Department of Transportation Strategic Plan for FY2018-2022

Dear Secretary Chao:

The Safe Routes to School National Partnership is a national non-profit that advances policy change and catalyzes support for healthy, active communities, starting with walking and bicycling to school. We are dedicated to creating livable, sustainable communities where all people can be healthy and physically active.

We appreciate the opportunity to provide input on the draft FY2018-2022 strategic plan for the US Department of Transportation.

In reviewing the draft strategic plan, we have identified several recommendations for additions to better shape transportation in our nation in the coming years.

1. **Safety: Add a new strategy focused on addressing the disproportionate transportation safety risks experienced by vulnerable users – such as pedestrians, bicyclists, children, and senior citizens.**

   The strategic plan mentions the increase in fatalities experienced by people walking and bicycling—which now makes up 17 percent of all transportation deaths. Given the rates of walking and bicycling, these modes experience disproportionate safety risks and deserve increased focus by USDOT. In addition, older individuals and children are also at greater risk in our transportation system. Similar to the strategy identified for rural communities, we would urge USDOT to work with state DOTs and local transportation agencies to build their capacity through better data collection, technical assistance, and investments that improve safety conditions for vulnerable users. USDOT should also take a leadership role in encouraging better data collection on bicycling and walking, which lags behind other types of data collection and is critical to understanding how to mitigate these disproportionate safety risks.
2. **Safety:** Add a new strategy focused on implementing the recommendations of the National Transportation Safety Board study on reducing speeding-related crashes.

This year, the National Transportation Safety Board (NTSB) issued an unprecedented examination of the role of speeding in vehicle crashes. They did this because approximately 30 percent of all traffic fatalities are tied to speeding. This affects drivers and passengers within vehicles—but also significantly increases the dangers to people walking and bicycling. NTSB made a number of recommendations for reducing speed-related crashes, including eliminating the usage of the 85th percentile speed standard to set speed limits, using data-driven approaches or automated speed enforcement, and public awareness campaigns. We urge USDOT to identify speed as a key contributing factor to our current rate of traffic deaths and prioritize working with state DOTs and local transportation agencies to lower speed limits and speeding through the range of recommendations identified by NTSB.

3. **Infrastructure:** Add a new strategy within Strategic Objective 4 (Economic Competitiveness and Workforce) focusing on improving access to affordable transportation options.

Strategic Objective 4 is focused on promoting transportation policies and investments that bring lasting economic benefits to the nation. It does not currently include any acknowledgement of the critical role that transportation plays in ensuring that adults and families are able to travel from their homes to their jobs or school. Affordable transportation options—including biking, walking, and transit—are a critical economic lifeline particularly for lower-income workers. Transportation costs can be a significant economic burden for families, and when there are few transportation options, people have a harder time finding and keeping good jobs. We ask that USDOT add a new strategy focused on encouraging transportation investments and prioritizing policies and programs that provide affordable transportation options linking low-income families to jobs and schools.

4. **Infrastructure:** Add a new strategic objective and strategies focused on environmental sustainability.

There is no mention in the strategic plan of preparing for and mitigating the impact of climate change. Yet, we are experiencing exponential costs due to the impacts of stronger hurricanes, tropical storms, massive wildfires—which are a result of climate change—on our transportation systems. Roads are being destroyed and must be rebuilt, and the flow of transportation that is vital to our economy is disrupted. Transportation is the single largest contributor of greenhouse gas emissions. We urge USDOT to take leadership on working with state DOTs and local transportation agencies to consider the environment and climate when choosing transportation projects, to identify ways to reduce tailpipe emissions, and to and shift people from reliance on cars to less polluting transit, biking and walking trips. USDOT can also help these agencies plan ahead about how those transportation systems may be impacted by the changing climate and building them accordingly to mitigate future reconstruction costs.

5. **Accountability:** Include transparency as one of the key goals in the department’s accountability.

Incorporate into the existing objectives and strategies a focus on transparency. In order to build support for future transportation investments, it is critical that the American public be able to clearly understand what projects are being built and implemented using federal transportation
dollars, and the impact and benefits of those projects. USDOT should prioritize creating user-friendly, accessible ways to view and explore federal transportation investments and impacts.

Thank you for your consideration of these comments. If you have any questions, please contact Margo Pedroso, Deputy Director, at margo@saferoutespartnership.org or 301-292-1043.

Sincerely,

Cass Isidro
Executive Director