



December 23, 2009

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. NHTSA-2009-0171**

The Safe Routes to School National Partnership appreciates the opportunity to provide public comment for the 2010-2015 Strategic Plan of the National Highway Traffic Safety Administration (NHTSA). 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 for more children to walk and bicycle to and from school.

We greatly appreciate the efforts NHTSA has made in the past in this area, including the creation of the first pilot programs for Safe Routes to School in the year 2000 that eventually led to the creation of the federal Safe Routes to School program. However, we believe it is time for NHTSA to create a much stronger focus on safety of bicyclists and pedestrians, including children. From this perspective, we have comments on several of the questions from the Federal Register notice.

**(A1) What are critical highway safety issues facing the nation today?**

NHTSA should not confine itself to “highway safety issues” as traffic safety affects people’s lives on roads of all sizes and locations. The safety of people—particularly children—walking and bicycling is a critical issue facing the nation today. The rates of walking and bicycling to school have declined dramatically, from 41 percent in 1969 to 13 percent in 2001. Even at these low rates, safety is a critical concern. In 2007, an estimated 14,000 children ages 14 and under were injured as pedestrians, while more than 300 children were killed while walking. In 2008, an estimated 11,000 children ages 14 and under were injured while bicycling. Children walking and bicycling to school represent 11 percent of injuries and fatalities during the school commute, but less than two percent of miles traveled. Because of lack of safe places for children to ride separate from traffic, an estimated 88 percent of children’s bicycle-related fatalities take place in the street – an increase from just 47 percent in 2005. To increase physical activity rates and address the childhood obesity crisis, our nation must get more children and families walking and bicycling for short trips. But, parents are concerned about a range of safety hazards, including the amount of traffic on the roads, the speed of traffic, inadequate or missing sidewalks and poor quality or missing crosswalks. 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 estimated that only 7.5% of schools nationwide will receive Safe Routes to School funding over the course of the initial five-year authorization.

P.O. Box 663 / Fairfax, CA 94978 / [saferoutespartnership.org](http://saferoutespartnership.org)

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.

**(A7) What changes in energy and environmental issues will impact public policy and highway safety? How will these changes impact vehicle use?**

In the fall of 2008, rising gasoline prices led many drivers to cut back on their miles traveled, and to shift to walking, bicycling and transit use. If comprehensive climate legislation passes or gasoline prices shift higher again, more individuals are likely to reconsider their driving habits. Returning to 1969 levels of walking and bicycling to school would save 3.2 billion vehicle miles, 1.5 million tons of carbon dioxide and 89,000 tons of other pollutants—equal to keeping more than 250,000 cars off the road for a year. Local jurisdictions looking to reduce their greenhouse gas emissions could turn to Safe Routes to School efforts—meaning more children will be walking and bicycling. In addition, fuel price increases have led to decreases in school bus transportation—again shifting more children to walking and bicycling. These cutbacks in bus transportation are often done without infrastructure and safety upgrades to improve safety for children walking and bicycling—potentially creating additional hazards for children. NHTSA must be prepared to shift resources and expertise to better understand safety measures that protect individuals walking and bicycling.

**(A14) What additional analytical data need to be collected with respect to motor vehicle and highway safety?**

**(A15) What are critical data elements that NHTSA does not collect that should be collected to identify areas to target to reduce traffic fatalities and injuries?**

Local and state-level injury and fatality reports are the most common way to assess bicycle and pedestrian risks. But, there is no universal system for identifying and reporting bicycle and pedestrian fatalities and injuries. A number of researchers have estimated that bicycle and pedestrian injury rates are underreported by up to 20 percent. These data collection issues must be addressed so that a full measure of bicycle and pedestrian fatalities and injuries can be reliably collected. This data is critical to national safety evaluations, state usage of safety funds, and local assessments of needed safety improvements.

In addition, NHTSA should work 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.

**(A17) What role will public education and consumer information play in the future of highway safety?**

Public education is an effective means of improving traffic safety. Campaigns to encourage seat belt use and to decrease drunk driving are examples of effective interventions. NHTSA should undertake a similar campaign to increase driver acceptance and awareness of individuals walking and bicycling, and to make sure that motorists drive particularly safely in school zones. Increasing driver safety and acceptance of bicyclists and pedestrians will help encourage more adults and children to walk and bicycle—which will also help with physical activity levels, obesity, livability, and air quality. The Centers for Disease Control and Prevention would be a natural partner for this public education campaign.

**(A18) What changes in the area of Federal, State, and local legislation are appropriate and how might that legislation affect traffic safety in the future?**

There is a growing movement behind Complete Streets policies, and over 100 jurisdictions around the country have already adopted Complete Streets policies. Under these policies, jurisdictions consider the needs of all users—whether walking, bicycling, taking public transportation, or driving—in all transportation projects. As this movement gains traction, NHTSA should also adopt a “complete streets” approach to its safety priorities to ensure that the safety of all transportation users are monitored and analyzed.

**(A21) How will “Smart Growth” or livable community concepts impact traffic safety? What is NHTSA’s role within these growing inter-disciplinary fields?**

In livable communities, land use decisions are made to encourage mixed-use developments—shortening distances between homes, businesses, schools and retail. These communities also ensure safety for pedestrians, bicyclists and transit users—as well as motorists—to encourage more active transportation and less traffic congestion. 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. For parents to allow their children to walk and bicycle to school, safety must be a foremost consideration. To keep pace with increased interest in smart growth and livable communities, NHTSA must strengthen its ability to track bicycle and pedestrian injuries and fatalities, and develop better countermeasures to ensure safety of all transportation users. Simply focusing on “highway safety” will not be adequate in this environment.

**(D1) In your view, should there be major changes in NHTSA’s role/mission in the future?**

As stated in the responses to prior questions, NHTSA’s role should shift from “highway safety” to safety for all transportation users—including bicyclists and pedestrians. Having a “complete streets” type of approach will help ensure balance in safety monitoring and improvements. Many of the safety improvements that NHTSA promotes thus far focus on moving as many cars as quickly as possible—which dramatically increases the hazards for bicyclists and pedestrians. As Secretary LaHood emphasizes livability and safety as his two primary focuses, NHTSA must adapt to ensure that its safety mission accommodates livable communities and increased levels of bicycling, walking and transit use.

Thank you again for the opportunity to comment on NHTSA’s 2010-2015 Strategic Plan. We greatly appreciate all of the efforts that NHTSA has undertaken in the past for bicycle and pedestrian safety, and look forward to working together to strengthen that focus in the future.

Sincerely,



Deb Hubsmith

Director

Safe Routes to School National Partnership

P.O. Box 663 / Fairfax, CA 94978 / [saferoutespartnership.org](http://saferoutespartnership.org)

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.