

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

PolicyLink is pleased to offer the following comments on the proposed rulemaking on the National Performance Management Measures for the Highway Safety Improvement Program (HSIP) to the U.S. Department of Transportation's (U.S. DOT) Federal Highway Administration (FHWA). As a leader in the movement to build more equitable infrastructures, PolicyLink is supportive of policies and investments that enhance access to safe and reliable transportation options. Moreover, safe, accessible transportation infrastructure – including streets, crosswalks and sidewalks – are critical to connecting people to economic opportunity.

However, we know that for some communities, particularly low-income communities and communities of color, this critical infrastructure is missing, meaning that those populations are cut off from opportunities to prosper and thrive. As such, PolicyLink is deeply invested in development of performance measures that prioritize the equitable investments needed to make our streets safer for all.

We appreciate U.S. DOT's work to set clear, consistent and measurable rules regarding safety. However, we believe the proposed measures can be strengthened in the following ways.

**Recommendation #1: States and MPOs must have separate roadway safety measures for pedestrians and vehicles.**

Measuring safety of pedestrians and bicyclists, apart from vehicles will ensure a robust safety performance measure that takes into account all road users. U.S. DOT should establish requirements for states and localities to demonstrate meaningful and significant improvements to safety outcomes, particularly for pedestrians and bicyclists. With regard to this recommendation, PolicyLink is in agreement with comments offered to the Federal Highway Administration by The League of American Bicyclists and Smart Growth America.

**Recommendation #2: Include geographic indicators information among data collected and evaluated for pedestrian and vehicle accidents.**

Identification of opportunities for safety improvements is critical to effective targeting of safety efforts. The proposed performance measures do not integrate or require collection of data that indicates the infrastructure deficits that may exist in a particular community, which may have contributed to persistent safety issues facing pedestrians and drivers in low-income communities or communities of color.

States should be required to collect accident information per intersection to provide data that reflects the geographic trends of pedestrian and vehicle accidents. This data can inform states and localities about the location of accidents, and where improvements are needed to increase

pedestrian and vehicle safety. For example, the California Highway Patrol (CHP) Statewide Integrated Traffic Records System (SITRS) captures data from traffic collision reports filed by all law enforcement agencies in the state. This collision data helps law enforcement agencies identify problems related to traffic safety and to seek effective solutions to improve safety conditions on roads. Collision reports also are made available to the public and provide a count of traffic collisions on a specific roadway in a city or county. With this data Caltrans (state DOT), metropolitan planning organizations, residents and other stakeholders are equipped with information to identify intersections and roads needing safety improvements and investments. By using SITRS datasets and California school-level data on student eligibility for free or reduced price lunch, PolicyLink conducted geospatial analysis of accidents involving child pedestrians and bicyclists. This analysis revealed nearly two-thirds of accidents in 2008 involving child pedestrian and bicyclists occurred within a mile of a low-income school<sup>1</sup>. Comparable analyses of geographic data are critical for identifying persistent safety issues in communities, which can enhance states and localities capacity to effectively target transportation infrastructure investments that will maximize mobility and safety outcomes for all.

**Recommendation #3: Establish a performance measure for pedestrian accidents/fatalities by race/ethnicity and income.**

Although the overall rate of accidents is decreasing nationally, there remain communities where pedestrians face significant and disproportionate risk of serious injury and death. Currently African Americans make up 12.7 percent of the U.S. population, yet they account for 17.3 percent of all pedestrian deaths. Similar data is revealed for Hispanics who make up a little over 15 percent of the population, but represent 18.6 percent of pedestrian deaths<sup>2</sup>. Furthermore, children in lower-income neighborhoods are more likely to walk to school and are also 3.5 to 5.7 times more likely to be injured as pedestrians than children in other neighborhoods<sup>3</sup>. Ensuring this information is captured in the data collected on accidents can help states identify populations that should be targeted for improvements in terms of accidents and fatalities.

Currently demographic data and travel trends are made available through the American Community Survey and the National Household Travel Survey. Efforts to coordinate the dissemination of information between FHWA, the U.S. Census Bureau and State DOTs should be executed to the fullest to ensure demographic and travel data is accessible, and available to aid in identification of safety issues facing communities.

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<sup>1</sup> National Center for Education Statistics' Common Core of Data Build a Table: 2008-2009 School Year. Available at: <http://nces.ed.gov/ccd/bat/>

2008 Statewide Integrated Traffic Records System's Crash and Victim datasets by UC Berkley, Transportation Injury Mapping System. Available at: [http://tims.berkeley.edu/login.php?next=/page.php?page=switrs\\_resources](http://tims.berkeley.edu/login.php?next=/page.php?page=switrs_resources)

<sup>2</sup> Dangerous by Design 2014. Smart Growth America (May 2014). <http://www.smartgrowthamerica.org/documents/dangerous-by-design-2014/dangerous-by-design-2014.pdf>

<sup>3</sup> Wazana A, Krueger P, Raina P, Chambers L. A review of risk factors for child pedestrian injuries: are they modifiable? *Injury Prevention*. 1997 Dec;3(4):295-304

Creating performance measures that take into consideration travel patterns and demographic indicators when assessing accidents and fatalities can equip FHWA and states with the right tools necessary to improve fair access to safety for all communities. Establishing a performance measure with regard for travel patterns by race/ethnicity and income will enhance states capacity to identify communities where pedestrians and drivers face disproportionately high rates of accidents and fatalities, and the investments required to improve safety. Specifically, the performance measure should be developed in a way that reduces disproportional rates of accidents and fatalities in communities to a level comparable to the state or national average. To be considered achieving significant progress toward achievement of performance measures, states and localities that have disproportionate rates of injuries and fatalities by race/ethnicity or income must be required to invest in enhancements that improve safety conditions and decrease pedestrian and vehicle accidents in these communities.

## Conclusion

Safety guides transportation agencies at all levels of governance. Strong, clear, and equity-focused safety performance measures that hold states and localities accountable will increase safe access to roads and streets, and enhance mobility for all. However, eliminating barriers in access to safe streets for pedestrians in low-income communities and communities of color will require purposeful action from U.S. DOT. Thus, we urge U.S. DOT to develop performance measures that prioritize safety in ways that allow all communities to thrive.