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The Honorable Secretary Anthony Foxx
The Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

August 30, 2013

Dear Secretary Foxx,

Thank you for the opportunity to submit comments on the U.S. Department of Transportation's strategic plan "Transportation for a New Generation," which lays out how the US Department of Transportation proposes to manage our transportation system from 2014 to 2018.

The League of American Bicyclists represents bicyclists in the movement to create safer roads, stronger communities, and a bicycle-friendly America. Through education, advocacy and promotion, we work to celebrate and preserve the freedom cycling brings to every community.

We support the overriding priorities you have laid out for the Department including making the U.S. transportation system the safest in the world, improving the efficiency and performance of the existing transportation system, and rebuilding the nation's infrastructure "to meet the needs of the next generation of Americans."

We believe the following comments and suggestions can help the department meet those goals.

III. Safety

Performance Goal and Indicators

The plan includes the goal of reducing roadway fatalities per 100 million VMT. The League believes this goal would be stronger if, a) U.S. DOT set specific numerical goals for each of the sub-indicators, and b) priority is given to develop a metric based on non-motorized miles traveled.

RECOMMENDATION:

Performance Goal: Reduce roadway fatalities by 50 percent by 2020 for each of the following sub-categories



- **Passenger vehicle occupant fatalities**
- **Motorcycle rider fatalities**
- **Bicycle and pedestrian fatalities**
- **Roadway fatalities involving larger trucks and buses**

Recommended Strategies to meet that performance measure

As an overriding principle the League supports emphasis on strategies that benefit all road users- such as the focus on reducing distracted driving. Other suggestions:

- Implement a complete street approach when designing safety measures, such as:
 - Ensuring intersection improvements benefit motorists, transit users, bicyclists and pedestrians;
 - Implementing rumble strip policies which improve driver safety but do not create safety hazards for bicyclists, etc.
- Focus areas on reducing speed as crash factor, especially in metropolitan areas.
- Study alternatives to the common practice of setting speed limits using the 85th percentile speed of free flowing traffic.

Other Suggested Strategies for reducing bicycling and walking fatalities and injuries

- Implement MAP-21 performance measures that address non-motorized safety under FHWA Highway Safety funding (suggested for motor vehicle safety but not bicycle and pedestrian safety)
- Actively encourage investment in bicycling and pedestrian infrastructure that addresses system-wide safety issues.
- Improve Data Collection
 - Improving data collection and analysis of use and crash data at the municipal, MPO and State level (suggested for motor vehicle safety but not bicycle and pedestrian safety)
 - Improving NHTSA 's data collection and analysis system to enhance bicycle and pedestrian crash data (suggested for motor vehicle safety but not bicycle and pedestrian safety)
 - Conduct a bicycle and pedestrian crash causation study to identify contributing factors for bicycle and pedestrian crashes and identify effective countermeasures based on evaluation and analysis of the study data (current study on motorcycle crashes underway, but not for bicycle and pedestrian crashes)
 - Support, conduct and encourage research on innovate design of bicycle facilities



Comment

In its strategies to reducing fatalities and injuries of pedestrians, bicyclists and older drivers, DOT has included several strategies we agree with, most notably:

- Encourage States to adopt policies and programs that improve pedestrian, and bicyclist safety.
- Providing technical assistance such as bike/ped safety assessments to State, local and Tribal governments
- Developing training programs for drivers, bicyclists and pedestrians
- Distribute technical guidance on improving bike/ped safety through engineering, outreach and enforcement activities

IV. Livable Communities

Performance Goal and Indicator Recommendation

Performance Goal (existing): Improve networks that accommodate pedestrians and bicyclists

RECOMMENDATION

Performance Goal: Increase bicycle mode share nationally to 5% by 2025. Mode share goals for urban, suburban and rural communities may vary.

Performance Indicator: Set incremental bicycle and pedestrian goals for the years 2015-2018.

Comment:

The current goal reads: *“Improved networks that accommodate pedestrians and bicycles by increasing to 65 the number of States, MPOs, and/or plans that improve transportation choices for walking and bicycling by FY 2018”*

This is baffling. There are already over 500 Complete Streets policies across the nation, and even more bike plans at the state, MPO and local level.

RECOMMENDATION:

Recommended Strategies to meet that performance measure

- Create a model system of accountability so that projects programmed with multi-modal accommodations in the STIP are built with those components. (E.g. a STIP amendment is required to change the scope of work concerning sidewalks and bike facilities).



- Research and disseminate best practices for retrofitting urban and suburban transportation facilities to consider all roadway users

Comment

The League supports many of the identified strategies under the Livable Communities goal. In particular:

Performance Measures

- Developing national and local performance measures on livability
- Continue to encourage the impact of transportation investments on local land use, affordable housing and additional infrastructure needs

Infrastructure investments

- Focus transportation spending to support complementary infrastructure investments that enhance livability
- Addressing disproportionately high and adverse human health and environmental effects of transportation policies and programs on minority populations and low-income populations.

Data Collection and analysis

- Developing and improving planning data and analytic techniques for planning and implementation of livability projects

In addition we would recommend that adoption of a Complete Street policy to ensure that livability is integrated into every program and project.

VII. Environmental Sustainability

Performance goal and Indicator

There are currently no goals or indicators that address bicycling or walking under any of the Environmental Sustainability Strategic Objectives:

Strategic objective: “Avoid and mitigate transportation related impacts to climate, ecosystems and communities by helping partners make informed project planning decisions through an analysis of acceptable alternatives, balancing the need to obtain sound environmental outcomes with demands to accelerate project delivery.”



RECOMMENDATIONS

Performance Goal: Institute a Complete Streets policy

Performance Indicator: Mode share increases in biking, walking and transit.

Recommended Strategy:

Develop training programs for federal, state and local transportation engineers on complete streets policies and practices.

Create a clearinghouse of best practices and innovative design for complete streets policies and practices.

VIII. Organizational Excellence

Performance Goal and Indicator

This section lists as a Strategic Objective: Build a capable, diverse, and collaborative workforce of highly skilled, innovative, and motivated employees by making DOT a workplace of choice through employee empowerment and engagement, learning and development, succession planning, workplace flexibilities, and a healthy and safe workforce.

RECOMMENDATION

Performance Goal: Retrain the next generation of transportation professionals to be truly multimodal.

Performance Indicator: Percent of new hires with experience or education in multimodal engineering, planning, etc.

Percent of existing staff receiving continuing education on designing, planning and building multimodal projects

Recommended Strategies

- Develop and offer training programs for US DOT transportation headquarter and regional staff.



Thank you again for the opportunity to comment on US Department of Transportation's Strategic Plan. We look forward to working with you to implement the plan and build a Bicycle Friendly America.

Sincerely

A handwritten signature in black ink that reads "Andrew D. Clarke". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew Clarke

President, League of American Bicyclists