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April 1, 2014

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

Docket Number: FHWA-2013-0020

Dear Sir or Madam:

On behalf of the American Heart Association, including the American Stroke Association and more than 22.5 million volunteers and supporters, we appreciate this opportunity to provide comments on the proposed rule for national performance management measures, specifically on why we believe a non-motorized safety performance measure is necessary.

Cardiovascular disease (CVD) is our nation's number one killer and costliest chronic disease. We know that prevention is the key to conquering heart disease and simple changes in habit, including increasing physical activity, can dramatically reduce the risk of heart disease and stroke. In addition, the United States is in the grips of a full-blown obesity epidemic. More than 35 percent of adults and almost 17 percent of children are obese. A sedentary lifestyle contributes to both CVD and obesity, but we know that moderate-intensity physical activity, such as brisk walking, is associated with a substantial reduction in chronic disease. In light of these dire statistics, it is imperative to find ways to increase physical activity opportunities for all Americans. Having access to pedestrian or bicycling transportation options is one critical way to increase a person's daily physical activity. But people cannot be expected to walk or bike unless it is safe to do so.

The number of non-motorized fatalities is increasing. After years of decline and a general trend downwards, the number of bicyclists and pedestrians killed in traffic crashes has increased for the past two years. A total of 5,000 people on foot or on bike were killed in 2012. Against a backdrop of an overall decline, bicyclists and pedestrians now account for more than 16 percent of all traffic fatalities – up from 12 percent just a few years ago. This means one out of every six fatal traffic crash victims is a cyclist or pedestrian, and without specific countermeasures and strategies focused on reducing this number, we are likely to see the percentage continue to grow.

Bicyclist and pedestrian safety is worst among populations that remain underserved by the transportation system and existing programs – and these are some of the populations that are most vulnerable for CVD and obesity.

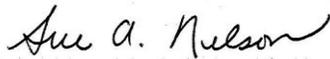
The Centers for Disease Control and Prevention has determined that compared to white bicyclists, the bicyclist fatality rate was 23 percent higher for Hispanic and 30 percent higher for African-American riders. Despite the fact that 16 percent of all fatal crashes on our nation's roadways have victims that are bicyclists or pedestrians, less than one-tenth of one percent of the Highway Safety Improvement Program and 402 safety funds are allocated to address this problem.

To address this issue, we recommend the addition of a specific non-motorized safety performance measure. Such a measure is technically feasible and timely given the increasing share of traffic fatalities represented by bicyclists and pedestrians. The Federal Highway Administration's leadership in establishing a performance measure on safety for pedestrians and bicyclists will enable states to collect and analyze critical transportation data that has been needed for decades, as well as hold them accountable for the poor state of traffic safety for pedestrian and bicyclists. In addition, a performance measure on safety for pedestrians and bicyclists would provide valuable assistance and guidance to metropolitan planning organizations at the same time.

The Highway Safety Improvement Program was amended to improve the collection of data around non-motorized traffic crashes, and requires that states address motor vehicle crashes that involve a bicyclist or pedestrian. Funding is explicitly eligible to be used for addressing the safety needs of bicyclists and pedestrians, which is clearly needed. At a time when the United States is in the midst of a cardiovascular and obesity crisis, we must have a national goal of making walking and biking a safe transportation option.

If you have any questions or need any additional information related to our comments, please do not hesitate to contact Kristy Anderson, Government Relations Manager at 202-785-7927 or via e-mail at [kristy.anderson@heart.org](mailto:kristy.anderson@heart.org).

Sincerely,

A handwritten signature in cursive script that reads "Sue A. Nelson". The signature is written in black ink on a white background.

Sue Nelson  
Vice President, Federal Advocacy  
American Heart Association