



May 15, 2018

LeeAnne Ferguson
Oregon Department of Transportation
355 Capitol Street
Salem, OR 97301

RE: Safe Routes to School Draft Rule

Dear Ms. Ferguson:

Thank you and the Safe Routes to School (SRTS) Rulemaking Advisory Committee for your work to update Oregon's SRTS Rules. Dedicated SRTS infrastructure funding is a great first step that will allow many cities and towns in Oregon to start to make streets safer for children in the area around schools, and we greatly appreciate your support in this work. Please accept the following comments on the draft rules:

Plan Definition: While the rules are focused on infrastructure needs and funding, it is well-established that a comprehensive SRTS program includes non-infrastructure elements for greatest positive impact on the number of students walking and bicycling to and from school. Comprehensive SRTS programs have been proven to work by improving safety for children, and getting more children walking and bicycling to and from school. A 2015 study showed:

- After an engineering improvement was completed, schools saw an 18 percent increase in walking and bicycling rates.
- Each year of SRTS education and encouragement programming resulted in a 5 percent increase in walking and bicycling rates—adding up to 25 percent after five years.
- These results could be cumulative – so a school that implements a comprehensive SRTS initiative with engineering improvements plus five years of education and encouragement would result in a 43 percent increase in walking and bicycling rates.
- **Our recommendation:** Write the “SRTS Infrastructure Plan” such that it points to non-infrastructure elements such as education and encouragement. Furthermore, ODOT should ensure these two components of SRTS programming are closely linked in communications, criteria, and calls for proposals.

Cash Match: One of our major concerns about the rules, as written, is the very high 40 percent cash match requirement for funding. In some circumstances, the match will be reduced to 20 percent, but even this requirement may be a prohibitive burden for smaller and lower income communities. This is a high threshold for communities to overcome to be able to provide safe travel routes for students on dangerous roadways. Specifically, this may mean lower-income schools and communities with an historical underinvestment in transportation safety projects, who typically need safety fixes the most, will be unable to apply for these funds. Throughout the SRTS rulemaking process, we have advocated for the reduction or elimination of this cash match requirement, so that communities with the highest needs and lowest means in Oregon will be able to access these funds, make needed safety improvements around schools, and provide safe travel routes for their students.

- **Our recommendation:** We suggest waiving the cash match requirement in those communities that can demonstrate high safety needs and low ability to pay cash match.



Competitive Grant Program: We are concerned that, in a program where state and local agencies compete against one another for limited funds, safety needs on the state system—which should be addressed using ODOT’s All Roads Transportation Safety (ARTS) funds—will overwhelm the available SRTS funding. Local agencies, who know their school and community needs best, should have the opportunity to compete successfully for local roadway priorities.

- **Our recommendation:** Set a target in the program guidance that ensures an appropriate balance between investments on the state and local roadway systems. Ensure written agreement between local and state agencies is a requirement of the grantmaking process.

Thank you again for your service, your consideration, and the opportunity to provide comment on the Safe Routes to School Draft Rules. Please do not hesitate to reach out with any questions.

Best regards,

Kari Schlosshauer, Senior Policy Manager (SRTS RAC member)

Becky Gilliam, Regional Policy Manager

Pacific Northwest Regional Network, Safe Routes to School National Partnership