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Director, Office of Executive Secretariat
U.S. Department of Agriculture
1400 Independence Avenue SW
Room 116—A Whitten Building
Washington, DC 20520

Re: Docket no. USDA-2010-0001

The Transportation for America campaign appreciates the opportunity to provide public comment to inform the recommendations of the Task Force on Childhood Obesity.

About Transportation for America

Transportation for America is a diverse coalition of over 450 organizations, local governments, and public officials that are committed to creating a new national transportation program that will take America into the 21st Century. We represent different backgrounds and find different ways to get around, but we believe all Americans can work together to invest in modernized infrastructure, provide families and individuals with more and better options and create healthy communities where people can live, work and play.

Comments

We greatly appreciate the leadership of the Task Force on Childhood Obesity and First Lady Michelle Obama to solve the challenge of childhood obesity within a generation. We believe efforts to address childhood obesity should include strategies that recognize the demonstrated linkages between the transportation system, the built environment, and public health outcomes. To this end, national, state, and local transportation policy should support a balanced portfolio of automobile-based, public transit, and active transportation funding that supports health and reduces health care costs.

Our primary focus in these comments is on objective 2, increasing physical activity in schools and communities, but some of our recommendations also impact objective 1, ensuring access to healthy affordable foods. From this perspective, we have comments on several of the questions from the Federal Register notice. We would also like to strongly recommend that the US Department of Transportation be included on the Task Force, ensuring that transportation projects are included as part of the Task Force discussions.

(1) For each of the four key objectives described above, what key topics should be addressed in the report?

A key topic for inclusion under Objective 1 in the Task Force's report is strategies that address active

living. The links between physical activity and the built environment are well established - transportation practices strongly influence physical activity habits and impact health outcomes for people of all ages.¹

Active living is an approach to increasing levels of physical activity by incorporating opportunities for walking and bicycling into everyday activities. Forty years ago, nearly half of children walked and bicycled to school—providing important minutes of physical activity before and after school. Today, less than 15 percent of children walk and bicycle to school, with the rest being ferried by school buses or their parents' vehicles. Providing children with safe, convenient, and ample walking and bicycling opportunities in their communities increases physical activity levels, and can help set important habits for active transportation that can last a lifetime.

Components of Active Living include:

1. Promoting Compact, Mixed-use Community Design
2. Infrastructure to Support Walking and Biking
3. Access to Public Transportation

Compact, Mixed-use Community Design

Laws, incentives, and policies that increase community accessibility will increase the number of essential destinations, such as schools, grocery stores, health centers, and parks that are reachable by walking and biking. A study conducted in Atlanta, Georgia, found that each quartile increase of land-use mix—an attribute of neighborhoods that encourages walking—was associated with a 12 percent reduction in the likelihood of obesity.² Compact, mixed-use developments that locate these everyday destinations near the children and families they serve—particularly those with a safe network of bicycle and pedestrian infrastructure surrounding them—will have higher levels of children walking and bicycling.

- People who live in neighborhoods with a mix of shops and businesses within easy walking distance have a 35 percent lower risk of obesity.³
- A national study of 448 metropolitan counties found that people living in compact, higher-density counties walk more, weigh less and are less likely to be obese or have hypertension than people living in more sprawling counties.⁴
- People in more compact metropolitan areas suffer from significantly fewer chronic medical conditions than their counterparts in more sprawling regions.⁵

¹ Committee on Physical Activity, Health, Transportation, and Land Use. (2005). Does the built environment influence physical activity? Examining the evidence. (Special Report 282). Washington, DC: Transportation Research Board/Institute of Medicine. Retrieved January 11, 2005 from http://www.trb.org/news/blurb_detail.asp?id=4536

² Frank LD, Andresen MA, Schmid TL. Obesity relationships with community design, physical activity, and time spent in cars. *American Journal of Preventive Medicine*. 2004;27(2): p. 87–96. And Goldberg DMB, Frank L, Chapman J, Kavage S. New data for a new era: a summary of the SMARTRAQ findings: linking land use, transportation, air quality and health in the Atlanta region http://www.smartgrowthamerica.org/documents/SMARTRAQSummary_000.pdf.

³ Frank, L.D., Andresen, M.A., & Schmid, T.L. (2004). Obesity relationships with community design, physical activity, and time spent in cars. *American Journal of Preventive Medicine*, 27, 87-96.

⁴ Ewing, R., Schmid, T., Killingsworth, R., et al. (2003). Relationship between urban sprawl and physical activity, obesity, and morbidity. *American Journal of Health Promotion*, 18, 47-57.

⁵ Sturm, R., & Cohen, D.A. (2004). Suburban sprawl and physical and mental health. *Public Health*, 118, 488-96.

Building new communities that are less car dependent and making existing communities denser are two strategies that can make it easier for people to be active in their daily life. Higher land-use mix encourages more utilitarian trips among residents and increases their ability to reach their destinations by walking or biking, rather than in a car. The proximity of neighborhood shops to residences has been shown to increase the number of trips on foot or by bicycle.⁶ In addition to mixed-land uses, other measures, such as higher residential density, smaller street blocks,⁷ and access to sidewalks,⁸ have been shown to translate to increased walking. Conversely, sprawl that limits connectivity and increases the distance between destinations has been associated with less physical activity and with more obesity in adults,⁹ as well as higher automobile passenger and pedestrian fatality rates.¹⁰

Researchers have identified five “D” variables that determine the relationship between community design and active living travel patterns: density, diversity, and design—the original “three Ds” coined by Robert Cervero and Kara Kockelman— as well as destination accessibility and distance to transit. Neighborhood and community design that improves these elements will result in increased levels of physical activity included in everyday activities.¹¹

Infrastructure to Support Walking and Biking

Enhancing the network of infrastructure to support walking and bicycling should also be included in the Task Force recommendations. Infrastructure to support walking and biking includes creating bike lanes, shared-use paths, and routes on existing and new roads; and providing sidewalks, footpaths, walking trails, and pedestrian crossings. Longitudinal intervention studies have demonstrated that improving bicycling infrastructure is associated with increased frequency of bicycling.¹²

Street-scale neighborhood design – such as improved street lighting, infrastructure projects to increase the safety of street crossings, use of traffic calming approaches (e.g., speed humps and traffic circles), and enhancing street landscaping - can also be used to support physical activity in small geographic areas.

- On average, people in highly walkable neighborhoods take one or two more walking trips per week than those living in places with poor walkability. This additional 15 to 30 minutes of walking per week means a 150 pound person expends the energy equivalent of about one extra pound per year.¹³

⁶ Cervero R, Gorham R. Commuting in transit versus automobile neighborhoods. *J Am Plann Assoc.* 1995;61(2):210-225

⁷ Berrigan D, Troiano R. The association between urban form and physical activity in U.S. adults. *Am J Prev Med.* 2002;23(2 suppl):74-79

⁸ Hoehner C, Ramirez L, Elliott M, Handy S, Brownson RC. Perceived and objective environmental measures and physical activity among urban adults. *Am J Prev Med.* 2005;28(2 suppl 2):105-116

⁹ Ewing R, Schmid T, Killingsworth R, Zlot A, Raudenbush S. Relationship between urban sprawl and physical activity, obesity, and morbidity. *Am J Health Promot.* 2003;18(1):47-57

¹⁰ Ewing R, Schieber RA, Zegeer CV. Urban sprawl as a risk factor in motor vehicle occupant and pedestrian fatalities. *Am J Public Health.* 2003;93(9):1541-1545

¹¹ Cervero R, Kockelman K. Travel demand and the 3 D's: design, diversity, and design. *Transp Res D.* 1997;2(3):199-219

¹² Dill, J., & Carr, T. (2003). Bicycle commuting and facilities in major U.S. cities: If you build them, commuters will use them. *Transportation Research Record, 1829, 116-123.*

¹³ Saelens, B.E., Sallis, J.F., & Frank, L.D. (2003). Environmental correlates of walking and cycling: Findings from the transportation, urban design, and planning literatures. *Annals of Behavioral Medicine, 25, 80-91.*

- After only two years, The Safe Routes to School Program in Marin County, CA, serving 4,665 students in 15 schools, found participating public schools reported an increase in school trips made by walking (64%), biking (114%), and carpooling (91%) and a decrease in trips by private vehicles carrying only one student (39%).¹⁴
- Vulnerable populations, such as seniors and minorities, who cannot or choose not to drive have a higher risk of being killed as a pedestrian. African-Americans make up approximately 12 percent of that population, but they account for 20 percent of pedestrian deaths. Native Americans are 1.5 times more likely to die from traffic crashes than anyone else.¹⁵

Laws, policies and programs are also available to make the built environment safer and more conducive to walking and bicycling. Public health officials, including the Centers for Disease Control (CDC) recommend building more sidewalks, improving walking and biking access to transit service, and shifting highway funds to create bike lanes to encourage more physical activity.¹⁶ One study found that 43% of people with safe places to walk within 10 minutes of home met recommended activity levels; among those without safe places to walk just 27% met the recommendation.¹⁷ Residents are 65% more likely to walk in a neighborhood with sidewalks.¹⁸

Complete Streets policies (which can be passed at the national, state or local level) require jurisdictions to consider the needs of all users—whether walking, bicycling, taking public transportation or driving—in all transportation projects. Planning for active transportation networks throughout a community can help make sure that bicycle and pedestrian improvements are planned and implemented so that they connect bicyclists and pedestrians from their homes to schools, jobs, recreation and retail.

Access to Public Transportation

People who use public transportation tend to walk to and from bus stops and train stations, increasing their likelihood of meeting physical activity recommendations. Indeed, nearly one third of transit users meet the Surgeon General’s recommendations for minimum daily exercise through their daily travels. Improving access to public transportation, particularly by walking and biking, will increase levels of physical activity included in everyday activities.

Increasing federal and state funding sources for public transportation, as well as giving states, regions, and local governments more flexibility to move resources among transportation projects and programs to meet local needs, will increase the number of people who can use public transportation for their daily needs. Investing in projects that increase the network of bicycling and walking paths

¹⁴ Staunton, C. E., Hubsmith, D., & Kallins, W. (2003). Promoting safe walking and biking to school: the Marin County success story. *Am J Public Health, 93*(9), 1431-1434.

¹⁵ Transportatin for America. *Dangerous By Design*. 2009.

¹⁶ Brennan-Ramirez, L. et al. “Indicators of Activity-Friendly Communities: An Evidence-Based Consensus Process” 2006. *American Journal of Preventive Medicine, Volume 31, Issue 6*

¹⁷ Powell, K.E., Martin, L., & Chowdhury, P.P. (2003). *Places to walk: convenience and regular physical activity. American Journal of Public Health, 93, 1519-1521.*

¹⁸ Giles-Corti, B., & Donovan, R.J. (2002). *The relative influence of individual, social, and physical environment determinants of physical activity. Social Science & Medicine, 54 1793-1812.*

connecting to transit stops will also increase safety and reduce dependence on private cars.

- The more time a person spends in a car, the more likely he or she is to be overweight. A 2004 study found that every additional hour spent in a car is associated with a six percent increase in the likelihood of obesity, and every additional kilometer walked is associated with a 4.8 percent reduction.¹⁹
- A study in Houston found that 3 out of 5 disabled and elderly citizens do not have sidewalks between their home and the nearest bus stop. Fewer than 10 percent of them use public transportation, even though 50 percent live within two blocks of a bus stop.²⁰

Developing transportation planning policies that encourage transit-oriented developments and other mixed-use developments, and increase connectivity among neighborhoods and communities for all transportation modes.

Health Impact Assessments

Coordination of land use planning, housing, transportation, and health is an important part of these efforts. Health impact assessments (HIA) can also help make sure that health considerations, such as impact on physical activity levels, are taken into account when making planning decisions. Health Impact Assessment is a method by which a policy, program, or project may be judged as to its potential effects – and distribution of those effects – on the health of the population.

(2) For each of the four objectives, what are the most important actions that Federal, State and local governments can take?

Implementation of the Task Force strategies will require working with Departments of Transportation (DOTs) at the federal, state, and local levels in order to effectively direct the use of public funds toward projects that increase opportunities for active living.

Federal Actions

The authorization of the next federal surface transportation bill presents an immense opportunity to engage the Task Force to forge an equitable policy response to the childhood obesity and public health challenges facing the country. The bill authorizes federal funding for highways, highway safety, public transportation, and bicycling and pedestrian infrastructure for approximately six years. It transfers hundreds of billions of dollars from the federal government to states and localities. It also triggers hundreds of billions more in matching state and local spending. The bill marks the largest transportation expenditure in the United States.

Engaging in the debate to shape this bill into a healthy, equitable, transportation policy would increase investment in transportation projects that enable everyone to walk more, travel by bicycle, and use public transportation more—in other words, to get around in ways that improve health, expand access to opportunity, and reduce toxic pollutants and greenhouse gas emissions. The federal government must provide leadership linking the built environment and obesity prevention by

¹⁹ L. D. Frank, M. Andresen, and T. L. Schmid, "Obesity Relationships and Community Design, Physical Activity, and Time Spent in Cars," *American Journal of Preventive Medicine* 27, no. 2 (2004): 87–96, <http://www.act-trans.ubc.ca/documents/ajpmaug04.pdf>.

²⁰ Gilderbloom JJ, Markham JP. Housing quality among the elderly: A decade of changes. *Int J Aging Hum Dev* 1998; 46(1). Also available at http://www.louisville.edu/org/sun/housing/cd_v2/Bookarticles/Ch1.htm

supporting three important pieces of legislation that address the health and transportation connection.

One is CLEAN-TEA, a Senate bill that would allocate ten percent of revenue from climate legislation toward clean transportation, walking and biking, and other modes that can help reduce emissions. The second is the National Transportation Objectives Act, which would create explicit, specific targets and benchmarks for the transportation bill, including goals like reducing CO2 from transportation by 40%, eliminating at-risk exposure to pollution, and tripling the amount of walking and biking we do. Lastly is Complete Streets legislation to make our streets safe and accommodating for all users and people — bus riders, bicyclists and pedestrians.

Other actions at the federal level to implement the Task Force recommendations include increasing the transparency and accountability of project decision-making, as well as prioritizing projects that increase the safety of walking and bicycling. Nationally, less than 1.5 percent of federal transportation funds have been spent on pedestrians and bicyclists under SAFETEA-LU, even though pedestrians comprise 11.5 percent of all traffic deaths and trips made on foot account for almost 9 percent of all trips. This 1.5 percent of federal spending, about \$441 million per year, includes both pedestrian safety funding, and funding for pedestrian and bicycling facilities such as crosswalks, sidewalks, traffic calming projects, pedestrian signals, paths and speed humps.²¹

State Activities

While federal policy plays a significant role in shaping transportation systems, states and metropolitan regions are also critical agents of change. The Task Force should also engage organizations, government officials, the non-profit community, and community members to increase support, encouragement, and pressure for integrating land use and transportation planning to promote balanced regional growth, equitable economic opportunity, and healthy communities for all.

Local Governments

Municipal governments play a central role in local land use decisions, zoning, and street and sidewalk improvements to eliminate barriers to walking and biking and encourage residents to be more physically active. City leaders can use their authority to ensure the safety and accessibility of walking and biking routes, create pedestrian-friendly zoning codes, and adopt traffic-calming measures that keep children safe while engaged in physical activity.

Local governments in conjunction with school districts can also pass policies that encourage safe walking and bicycling to school, develop comprehensive Safe Routes to School plans, pass Complete Streets policies, and overturn any bans on walking and bicycling to school.

(3) Which Federal government actions aimed at combating childhood obesity are especially in need of cross-agency coordination?

The US Departments of Transportation, US Department of Housing and Urban Development, and the Environmental Protection Agency already have a great start on collaboration through their Interagency Partnership for Sustainable Communities. Their partnership is looking at coordinating

²¹ Transportation for America. *Dangerous by Design*. 2009.

land use, transportation, housing, and environment to create livable, sustainable communities. All of these aspects are also likely to support active transportation and could therefore be a critical asset to the Task Force. There are also a number of other federal agencies that would be important partners in this effort, including:

- The US Department of Health and Human Services and the Centers for Disease Control and Prevention to ensure that health impact assessments are incorporated into land use, transportation, and built environment planning, policies and decisions.
- The US Department of Justice to ensure that community policing grants and enforcement policies address the safety of children who are walking and bicycling to and from school (including personal safety and traffic safety), as well as environmental justice issues associated with health outcomes in low-income and minority communities.
- The US Department of Education to address issues like school siting, school transportation policies, joint use of school facilities, and bicycle/pedestrian safety instruction as part of PE.

The Task Force should ideally model the partnerships that are needed at the local and state levels for successful implementation of Safe Routes to School. This would include local governments, schools, law enforcement, public works, planners, and health departments.

(4) For each of the four objectives, what are the most important actions that private, nonprofit and other nongovernmental actors can take?

Nonprofit and nongovernmental organizations are important partners in this effort. Given their reach into the local community, these entities can share information about government opportunities for funding and federal and state policies that support efforts to combat childhood obesity. These organizations can also engage partners and coalitions to educate and motivate parents about the importance of physical activity and nutrition, and to advocate for policy change across a range of state and local governments that supports the reversal of childhood obesity. For example, community gardens and farms can host educational programs on the importance of nutrition and encourage area residents to walk or bike to local neighborhood gardens. Finally, these partners can serve as a key information source for federal, state and local governments. These partners are more likely to be familiar with what government policies and programs are or are not working locally, and to share examples of promising practices that can inform future federal, state and local government actions.

Engaging the private sector in implementing the Task Force recommendations offers a unique opportunity to change both real estate development and the infrastructure that supports it. Over the past 15 years, many consumers have been demanding different options in where they live, such as downtown and suburban downtown revitalization, New Urbanism, transit-oriented development, green field mixed-use development (“lifestyle centers”), regional mall redevelopment, among others. Progressive public policy responses that allow for and promote this kind of development include smart growth, strategy and management of walkable urban places, impact fees that “level the planning field”, affordable & workforce housing development and creating “blueprint plans.” There is pent-up market demand for the alternative to drivable sub-urbanism that is readily apparent and real estate developers must be incentivized to change how they design, plan, regulate and finance to serve these markets.

(5) For each of the four objectives, what strategies will ensure that efforts taken by all of the entities mentioned above reach across geographic areas and to diverse racial, ethnic, socioeconomic, and geographic groups, including children who are at highest risk of obesity and children with disabilities?

It is critical to ensure that these efforts reach communities that are most in need. Children in low-income communities are also more likely to suffer from childhood obesity.

We recommend that state DOTs track the location, use, and safety of projects that receive federal transportation funds. In addition, applicants and recipients of all Safe Routes to School funds could be partially measured by the free and reduced school lunch rate at the school that will benefit from funding. If low-income schools are not receiving adequate support, state DOTs should be required to implement targeted trainings, technical assistance, and application procedures to ensure that more low-income schools are able to successfully apply for and implement Safe Routes to School initiatives to improve safety and physical activity levels for children. Similar requirements could be implemented for other federal, state and local programs affecting childhood obesity.

(6) What goals should we set within each objective to ensure that we meet our overall goal of solving the problem of childhood obesity in this Nation in a generation?

With regard to objective 1 and 2, Transportation for America supports the national goals and performance targets included in H.R.2724 the National Transportation Objectives Act of 2009 introduced in June 2009 by three members of the U.S. House of Representatives, Russ Carnahan (D-MO), Rush Holt (D-NJ), and Jay Inslee (D-WA).

- Reduce vehicles miles traveled by 16 percent.
- Triple walking, biking, and public transit use.
- Increase by 50 percent the number of essential destinations accessible within 30 minutes by public transportation or 15 minutes by walking, for low-income, senior, and disabled populations.

(7) What concrete, specific actionable recommendations or guidelines would help parents reduce the risk that their child will become overweight or obese and how can their effectiveness be measured?

The clear message for parents is to ask them to allow their children to walk and bicycle to and from school. But, for that ask to be successful and realistic, they will need support, education and motivation to make that choice realistic. They will need to know how to teach their children to safely walk and bicycle—or where else they can go to receive that education. Families that live close to school need to learn to think about making the choice to walk or bicycle to school with their children instead of putting the children automatically into the car. Parents that live farther may have to get creative through “park and walk” or “bus and walk” strategies that encourage school buses and parents to drop kids off at a park or area near the school, and for children to walk from there to school. Ideally, parents should be able to tap into their local school’s Safe Routes to School program so they can make the active transportation choice in conjunction with other parents. Parents should also be modeling good behaviors and walk and bicycle in the neighborhood with their children so that active transportation becomes a regular habit.

(8) What are the key benchmarks by which we should measure progress toward achieving those goals?

We recommend that the primary benchmark be the frequency and duration of children that walk, bicycle, or ride public transportation. The National Household Travel Survey, conducted by the Bureau of Transportation Statistics at USDOT, collects several data points relating to the commute to school, but this survey is only conducted every six or seven years and does not include recreational or non-commute trips. This survey also captures the average distance from homes to schools, which can help assess the impact of distance on the mode of travel to school and whether distance to school is decreasing (the preferable outcome). The Task Force should recommend increasing the frequency of the NHTS to at least every two years and to increase the qualitative data such as why people travel certain ways and why they do not choose other modes of transportation.

(10) What are the key unanswered research questions that need to be answered with regard to solving childhood obesity and how should the Federal government, academia, and other research organizations target their scarce resources on these areas of research?

Overall, it is important to develop a better system for collecting, modeling, and evaluating the impact of investments in public transportation, walking, and bicycling on the frequency and duration of these activities, particularly by children.

Further, collecting bicycle and pedestrian injury and fatality reports is also needed, as this will help understand safety concerns and where improvements are most critical. Developing a method of quantifying and tracking traffic safety and personal safety incidents around schools will help with these assessments—and would also be valuable to researchers looking to quantify impacts of the built environment and safety on physical activity levels. Results from such research and assessment could then be targeted towards areas that would make the most impact on activity levels.

(14) Specifically with regard to objective 3 (access to healthy, affordable food): What are the biggest challenges to enhancing access to healthy and affordable food in communities across America, and what are the most promising strategies to overcome these challenges?

While this is not the primary focus of our comments, it is important to note that access to healthy foods does not depend solely on presence of a grocery store in a community. It also depends on whether residents are safely able to get to the grocery store. For residents without cars, they depend on walking, bicycling and public transportation to get to the grocery store. Improving safety for bicyclists and pedestrians is also an important component of improving access to healthy foods. Complete Streets policies and building active transportation networks will help create safe and convenient links between homes, transit, and grocery stores.

Public-private van and bus systems to shuttle customers to grocery stores and expanding weekend bus service to connect low-income neighborhoods to supermarkets and other food outlets are two options for this.

(15) Specifically with regard to objective 4 (physical activity): What steps can be taken to improve quality physical education and expand opportunities for physical activity during the school day, in local communities and neighborhoods, and in outdoor activities and other recreational settings?

As previously stated, there are a number of steps that can be taken to increase physical activity, specifically walking and bicycling in local communities and neighborhoods. In addition to impacting objective 4, the majority of these steps will also help empower parents to make walking and bicycling a more regular part of the lives of their children.

Steps that should be taken, many of which are expanded upon in the responses to prior questions include:

- Pass state and local policies that support and encourage safe walking and bicycling to school and overturn any bans on walking and bicycling to school.
- Pass policies or laws to decrease speed limits in school zones, increase fines, and dedicated fine revenue to improving school zone safety and Safe Routes to School.
- Implement policies and plans on bicycle/pedestrian infrastructure including Complete Streets policies and active transportation networks that connect residents to schools, jobs, recreation and retail.

Thank you very much for the opportunity to comment on the Task Force on Childhood Obesity's recommendations and action plan. Should you have any questions or need additional information, please do not hesitate to contact me at lilly.shoup@t4america.org or (202) 955-5543 ext. 204.

Sincerely,

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