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MEMORANDUM

**To:** Stephanie Pollack, Acting Administrator, FHWA and Robin Hutcheson,  
Deputy Assistant Secretary for Safety Policy, FHWA

**Re:** Safe Streets and Roads for All Program Recommendations

**Date:** December 1, 2021

On behalf of the National Association of City Transportation Officials (NACTO), we appreciate the opportunity to provide USDOT with the following recommendations concerning the implementation of the new Safe Streets and Roads for All program established in Section 24112 of the newly-passed infrastructure bill. These recommendations were informed by NACTO’s member cities and transportation agencies, who collectively have decades of experience designing and implementing Vision Zero and traffic safety programs. Through Safe Streets and Roads for All, USDOT has an opportunity to directly support local governments’ safety initiatives. The following recommendations are intended to inform the successful implementation of this new program, build upon cities’ best practices, and maximize equitable safety outcomes.

**Application Process Recommendations**

NACTO members are typically unable to pursue grants with administrative costs that outweigh financial benefits. USDOT can take the following steps to ensure high standards for the Safe Streets and Roads for All Program and minimize the administrative burden for potential applicants.

- **Set high expectations and a simple, adaptable process.** FHWA can set rigorous expectations for the benefits of projects, minimize time spent on ineligible or low-priority applications, and provide technical support to applicants in order to achieve program goals.
- **Ensure that all funded planning and implementation projects are designed to improve multimodal safety:** Funded projects should rely on a Safe Systems approach. In the absence of an up-to-date, infrastructure-focused pedestrian safety or Vision Zero plan, projects should address known risk factors for people walking, biking, and using transit.

- **Short application process with more than one opportunity per year.** Rolling applications with quarterly prioritization and disbursement will ensure that grantees can implement on their schedule. The grant process will ideally be about three months long in total.
- **Pre-grant screening and co-development process**
  - **Eligibility screening:** Create a short, online multiple-choice questionnaire about project elements to give instant feedback to applicants about eligibility. This step allows FHWA to quickly identify potential projects *and* promising applicants whose specific projects need better focus.
  - **Early technical assistance/co-development:** Next, FHWA contacts applicants whose projects are eligible to workshop them as needed with an FHWA grant manager, non-profit partner, and/or technical assistance personnel.
  - **Prioritization and funding estimate:** The project applications are prioritized using a brief, clear process.
  - **Administrative finalization:** FHWA also provides technical assistance to the applicants in developing any materials needed to meet administrative requirements.
- **Require executive commitment, not legislative adoption.** Applicants should demonstrate executive or department leadership commitment to safety goals, but applicants should not be required to have already adopted a safety plan or to have taken legislative action at the time of the grant application.
- **Step-by-step local match.** Allow recipients to commit a portion of their local match rather than the entire match upfront. Cities build their street redesign programs by demonstrating early success, then asking for legislative commitments such as budget and plan adoption. Requiring all of these elements up front is a barrier to participation by cities that are understaffed or new to safety planning, an important equity issue in the distribution of funds.
- **Leave room for local voices by awarding implementation funds to locations *or* designs solutions** - but not requiring specifics of *both* location and conceptual design. At the time they apply for implementation grants, city agencies often cannot responsibly commit to *specific changes at specific locations*. These decisions require site assessments and extensive discussions with implementation partners, stakeholders, and civic leaders - all of which have costs. Some cities fund these activities with planning grants, but then face uncertainty about implementation funding. Ideally, these activities would be part of a single plan-design-build grant. Allowing grantees to commit to locations *or* design concepts at the time of granting, but not both, would help cities make these decisions in keeping with a local outreach and design timeline, rather than a grant timeline. This would make projects more adaptable to local needs and best practices, and more likely to gain community support.

- **Set a minimum grant amount of \$1 million.** Applying for federal grants is resource-intensive for cities in terms of time, staff capacity, and financial commitment. Many cities will likely not pursue federal grants in amounts below \$1 million, at which point the local commitment outweighs the potential payout. As no minimum grant amount is required for this program in legislation, NACTO recommends setting a floor of no less than \$1 million for implementation grants.
- **Provide a simple list of eligible projects and program types that do not require additional analysis** beyond site appropriateness or geographic prioritization. A sample list is provided in Appendix A (page 7).
- **Evaluate proposals based on ambition of goals and clarity of qualitative benefits, rather than a dollar-value cost-benefit analysis:** The test of a project or program should be whether the proposed ideas have a logical connection to safety issues. Pedestrian and bicycle safety initiatives, such as developing a Vision Zero action plan or building out a high-quality bike network, have the potential to prevent large economic and social losses from injury crashes. Yet, the benefits of a specific vulnerable-user safety project can be difficult to measure through traditional cost-benefit criteria, and are under-researched compared with highway infrastructure. A logical connection between the proposed program or project and the goals or expected benefits of the project is more relevant than a hard-to-verify dollar benefit amount. Grant criteria should recognize how decisions are made within cities by combining quantitative and qualitative data, from a variety of sources, to best anticipate the value and effectiveness of a specific treatment in a specific context.
- **Match reporting requirements to the project, and focus on supporting project progress.** Both during and after the grant period, reporting should meet the need for information on whether projects are on track, and barriers or potential issues, as well as what FHWA or partners need to do to support the implementing agency. Meetings or (virtual) site visits, photographs, and data about the project provide more information to FHWA than a conventional report, and should be used in lieu of long grant reports. Financial and other oversight should be scaled to the project scope and should be built to recognize, not hinder, flexibility and adaptation to new information as the project progresses.
- **Underserved Communities:** IIJA and other laws' equity requirements can be met by either a geographic or mode-based focus, as well as inclusion of accessibility elements.
- **Prioritization Metrics:** Grantees should be encouraged to use KSI per mile of street, 'raw' KSI, or vulnerable user injuries per mile of street, rather than per VMT, in prioritizing their projects.

## **Defining Planning and Implementation Grants**

NACTO offers the following recommendations about the types of planning and implementation actions that should be eligible for grant support, beyond the level of detail provided in legislation.

- **Allow funding of planning, design, and implementation in one grant award.** To speed up implementation and minimize the number of grants that need to be issued, consider providing both planning and implementation funding under one grant application. Given the relative difficulty in applying for Federal grants, it is important for scoping, outreach, analysis, design, and interim or permanent implementation to all be part of the funded work with as few steps as possible.
  - For example, a project to redesign a high-injury corridor might start with basic scoping, data collection and outreach/in-reach, followed by design, further stakeholder consultation, and final design. This timeline is largely out of the control of the grant recipient, with details - such as the number of pedestrian islands, or the exact routing of a bikeway - that depend on the project analysis and outreach funded by the grant itself.
  
- **Adopt a wide definition of “planning”:** 40 percent of program funding is set aside for planning. To ensure these funds are impactful and far-reaching, NACTO recommends considering the following activities as eligible for planning grants.
  - **Pre-construction activity:** All pre-construction activity should be eligible for planning grants. In addition to mapping out high-injury networks, data collection, and corridor planning activities, planning grants should cover public engagement and outreach. Producing a Vision Zero or equivalent plan (including graphic design and multimedia communications about the plan), project design, conducting a mobility equity needs assessment, data collection, public outreach, project software, staff positions and time, and consulting fees should all be considered eligible grant expenses.
  - **Interim interventions and MUTCD experimentation:** Interim and demonstration projects are a key part of planning activities for larger projects. These activities include traditional planning activities such as outreach, analysis, and preliminary drawings, as well as operational changes to signals, signs, markings and other traffic control devices, some of which may be experimental. It is important to allow cities to apply for a Safe Streets for All grant that includes experimental components *without* having to separately apply for an MUTCD experiment. The timeline should be parallel and ideally managed by a caseworker at USDOT.
  
- **Implementation:** Funding should be available for scaling up the use of effective designs at many locations and creating focused safety improvements on specific streets.
  - **Fund a wide range of construction activities:** Implementation grants should be available for both construction and project-related data collection, outreach, analysis, and design. These project activities are site-specific, and are best conducted in very close coordination with construction.

- **Distribute funding in block grants:** To ensure projects are implemented on a reasonable timeline and can respond to changing local conditions, cities need to be able to apply for and receive grant approval before committing to specific sites or designs. At the time of approval, grantees should have an overall *method* for selecting projects from a Vision Zero plan or project list. Eliminating the need to apply for grants on a project-by-project basis will give cities the flexibility to implement projects in an order consistent with shifting local needs.
- **Encourage the adoption of new design guidance:** Applicants should be encouraged and supported in using the authority provided by the IIJA to adopt FHWA-recognized design guidance; a list is suggested in Appendix B. For cities without an up-to-date safety or active transportation plan, implementation grants could be conditioned on a commitment to follow such street-appropriate guidance. A link to such a list should be provided on the Safe Streets and Roads for All application website.
- **Create flexible contracting requirements:** A combination of statutory and regulatory requirements often prevent the use of on-call contracts or in-house staff for construction, yet many city DOTs can perform such work in-house or with on-call contracts more quickly and cost-effectively than with conventional site by site contracts. . Federal regulations typically require project locations and quantities of work to be specified in contract documents prior to solicitation. USDOT can address this by allowing and reminding qualified local agencies to rely on indefinite delivery/indefinite quantity (ID/IQ) contracting, or on-call contracting, which is authorized via FHWA’s [recent rulemaking](#), rather than requiring them to wait for their state transportation departments to first develop their own procedures. These improvements are particularly critical to cities’ ability to use direct federal aid. FHWA should not hesitate to issue waivers allowing the use of Safe Streets for All to grantees capable of building safety projects in house.

### **Technical Assistance**

NACTO members identified the following forms of technical assistance USDOT should offer applicants and grantees to ensure plans and projects succeed.

- **During the Application Process:**
  - **Resource Library:** Create a “resource library” of recognized guidance (suggested in Appendix B leading examples of safety plans, project data, and technical drawings from available and new [ITE](#), [NACTO](#), [FHWA](#), State, and [City](#) guidance for grantees to reference throughout the project and grant process.
  - **Equity Analysis:** Provide applicants with best practices for mapping high-injury networks overlaid with equity considerations. Recommend resources cities can use to find or develop the most suitable methodology for their community. A robust outreach and engagement process should be rewarded in the grant criteria.

- **Ad-hoc Support:** Designate USDOT staff to advise cities on an ad-hoc basis about grant eligibility and support the development of strong applications, as a foundation might do during a grant-making process. Note that local, MPO, state or Federal district office advice is not always available or may be limited to nearby experience, not necessarily applicable to a new program.
- **After Awarding Grants:**
  - **Community Outreach:** USDOT should provide resources and best practices on engaging small businesses and community-based organizations, to ensure they are able to participate as consultants and contractors during the planning phase.
  - **Safety Data Collection and Evaluation:** USDOT can support cities to develop robust project priority maps based on both historic crash data as well as data and information that indicates potential high-risk locations. In particular, identifying areas at risk of becoming crash sites is much less straightforward than analyzing areas where crashes have already occurred. USDOT should encourage grantees to address these potential locations by mapping conflict areas, providing guidance on the use of cameras, IoT tech, and recommending other analysis tools to identify potentially dangerous sites. The City of New Orleans' [Safer Streets Priority Finder](#) is one such tool USDOT can support other cities in adopting.
  - **NEPA Clearance:** The NEPA process can add years and hundreds of thousands of dollars to project schedules and budgets, even those focused on pedestrian or transit improvements in the existing right-of-way. USDOT is well-positioned to provide grantees with clarity on NEPA requirements and streamlining options.
  - **Peer-to-Peer Support:** Create a forum for grantees to exchange ideas, best practices, and resources to support the development of plans and successful project implementation and evaluation.

### **Role for Community-Based Organizations (CBOs)**

Effective safety and Vision Zero plans reflect local expertise and the lived experiences of the communities they serve. USDOT should incentivize and reward strong community engagement, especially through CBO involvement in the development and implementation of plans and projects. Additionally, grants made through the Safe Streets and Roads for All program should cover the following activities:

- Staff time spent conducting outreach and engagement with CBOs.
- Sub-grants for CBO capacity building, including for local bicycle, pedestrian, and transit rider advocacy organizations.
- Community ambassador programs for street safety.
- Compensation for community members who participate in public engagement activities, including childcare

## **Appendix A: Eligible Project Elements**

**Eligible projects** that do not require additional research justification beyond appropriateness to proposed site(s) should include but not be limited to:

- **Project Goals:**
  - Reducing motor vehicle speeds and speeding, especially on arterial and collector streets
  - Reducing pedestrian and bicycle crossing distances and wait times
  - Reducing the distance to the nearest safe crossing point, especially on multilane streets/roads, at transit stops, and near high-pedestrian land uses.
  - Reducing turn conflicts with vulnerable users, including turn speeds
  - Improving existing intersection and midblock crossings, especially on arterial and collector streets.
- **Scopes:**
  - Analysis, design, and implementation of markings, delineators, and vertical separation elements as noted below.
  - Analysis and Implementation of signal timing changes, signal equipment modification, or new signals as noted below
  - Installation of concrete or other permanent elements as noted below.
  - Resurfacing or pavement maintenance of bicycle or pedestrian elements of a roadway.
  - Elements noted below as part of a street/roadway reconstruction project
- **Actions:**
  - Repurposing existing roadway space or mixed-traffic lanes to create safe space for people to walk and bike, retail activity, dining, and community programming, with priority given to redesigns of arterial and collector streets in urban, suburban, small-town, and developing areas
  - Reduction of crossing distances or of the total number of through lanes available to private motor vehicles
  - Repurposing of full- or part-time parking lanes to public space uses and transit, bicycle, or pedestrian mobility uses.
  - Street reconfigurations, traffic calming interventions, signal modifications, and aimed at achieving safer vehicle speeds and improving comfort and safety for people to walk, bike, or use public transportation.
    - Removal of through motor vehicle lanes
    - Lane narrowing
    - Speed humps, cushions, or tables
    - Roundabouts and mini traffic circles
    - Tightened radii or curb extensions
    - Raised center medians
    - Other traffic calming elements or street reconfigurations (e.g. converted streets for exclusive use by pedestrians and cyclists, visual treatments with paint, new crosswalks, etc.
  - Crossing improvements for Pedestrian, Bicycle, and Transit Access
    - Pedestrian crossing or refuge islands
    - Transit boarding islands and boarding bulbs

- Signal upgrades at intersections or mid-block crossings, including:
  - New midblock or intersection traffic signals for pedestrian and bike access on major streets
  - Leading Pedestrian Intervals
  - Signal modification as needed for dedicated or improved pedestrian, bicycle, and transit signal phases.
  - Raised crosswalks or raised intersections
- Curb extensions, including using interim materials
- Turn speed management within the existing roadway, including truck aprons or mountable speed bumps (“turn wedges”), centerline hardening at walkable intersections, and related uses.
- Expanded pedestrian or public space using permanent or interim materials
- Protected bicycle intersections and related elements, including
- Supportive elements, such as markings, on-street transit, lighting, and signs as part of the above projects
- Dedicated transit lanes and curb-separated transit lanes
- Boarding islands, bulbouts, and curb improvements to ease boarding.
- Transit shelters, especially in concert with the above.
- New or widened sidewalks
- Pedestrian and bike network facilities
- Raised bike lanes
- Sidewalk upgrades to shared-use path standards
- Shared-use paths
- Protected bike lanes/separated bike lanes
- Raised bike lanes
- On-street bike lanes, with preference for buffered bike lanes
- Bicycle boulevards (traffic-calmed streets with bike priority over cross-traffic)
- Contiguous walking and/or biking corridors among neighborhoods and/or destinations
- Bicycle/pedestrian counter equipment
- At-grade rail crossing improvements for bicyclists and pedestrians
- Other bicycle facilities except stand-alone sharrows
- Other pedestrian facilities
- Project development and evaluation (within implementation or planning grants)
- Project outreach and stakeholder engagement
- Data collection and analysis, especially if directed at bicycle, pedestrian, transit safety and mobility needs or outcomes.
- Site evaluations, qualitative analysis, photography, and video documentation
- Graphic design related to project or plan development.
- Site design and typical-drawings development
- Interim materials and installation including roadway markings and color material, vertical elements to protect in-roadway bicycle, pedestrian or transit spaces including delineators, bollards, planters, and construction barriers, signal modification.



- Additional speed management including automated speed enforcement following non-discriminatory camera site practices.
- Traffic signal retiming for low-speed or transit-friendly signal progression speeds or shorter pedestrian wait times.
- Pedestrian Environment & Other Infrastructure
- Street lighting
- Environment and streetscape investments
- Wayfinding signs
- Bicycle parking
- Bicycle-friendly drain grates
- Transit: Establish new facilities for buses, including but not limited to dedicated bus lanes, traffic-signal priority equipment, and bus shelters.
  - Dedicated bus or bus/bike lanes (inclusion in any project results in extra credit in project scoring)
  - Transit service improvements (e.g. transit signal priority)
  - Transit station/stop access improvements
  - Bikeshare stations or equipment.

**Ineligible or requiring evidence of benefit to vulnerable users:**

Project elements that should not be permitted without express approval from FHWA *and* documentation that vulnerable road users would benefit from the change include:

- Addition of net motor vehicle capacity such as new through lanes
- Introduction of more than one vehicle turn lane per direction at an intersection (e.g. introduction of two left turn lanes)
- Introduction of lanes wider than 11' except for lanes to be used by frequent transit services
- Removal of any pedestrian, bicycle, or transit facility without creating a more convenient one; bus stop consolidation or introduction of more direct crosswalks should be permitted);
- Lengthening of pedestrian wait time at signals beyond 45s except to provide increasing pedestrian crossing time, dedicated pedestrian, bicycle, or transit signal phases, or remove a through motor vehicle lane.

**Appendix B: Recognized Guidance**

A list of FHWA-recognized guidance would be valuable for applicants from the beginning of the grant application process, through conceptual design and final design. Some of the below are FHWA-produced or recognized; others should be considered for recognition.

- NACTO *Urban Street Design Guide*
- NACTO *Transit Street Design Guide*
- NACTO *Urban Bikeway Design Guide* and supplements:
  - Intersections Design: <https://nacto.org/publication/dont-give-up-at-the-intersection/>

- Facility Selection: <https://nacto.org/publication/urban-bikeway-design-guide/designing-ages-abilities-new/#>
- FHWA Bikeway Selection Guide  
[https://safety.fhwa.dot.gov/ped\\_bike/tools\\_solve/docs/fhwasa18077.pdf](https://safety.fhwa.dot.gov/ped_bike/tools_solve/docs/fhwasa18077.pdf)
- FHWA Small Town and Rural Multimodal Networks  
[https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/publications/small\\_towns/](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/small_towns/)
- FHWA Separated Bikeway Planning & Design Guide.  
[https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/publications/separated\\_bikelane\\_pdg/page00.cfm](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/separated_bikelane_pdg/page00.cfm)
- MassDOT Separated Bike Lane Planning and Design Guide  
<https://www.mass.gov/lists/separated-bike-lane-planning-design-guide>
- MassDOT Guidelines for the Planning and Design of Roundabouts  
<https://www.mass.gov/lists/guidelines-for-the-planning-and-design-of-roundabouts>
- *Seattle Streets Illustrated* <https://streetsillustrated.seattle.gov/overview/vision-for-seattles-new-streets/>