



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY

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**Uniform Procedures for State Highway Safety Grant Program
Notification of Public Meetings; Request For Comments
87 Federal Register 23781, April 21, 2022**

Advocates for Highway and Auto Safety (Advocates) files these comments in response to the National Highway Traffic Safety Administration's (NHTSA) request for comments (RFC) regarding implementing changes to the Highway Safety Grant Program required by the Infrastructure Investment and Jobs Act (Pub. L. 117-58).¹ Advocates will be filing more detailed comments to the upcoming Notice of Proposed Rulemaking.

Motor Vehicle Crashes are a Public Health Crisis.

According to recent data released by NHTSA, 42,915 people were killed in motor vehicle crashes in 2021.² This represents a 10.5 percent increase from 2020 and the highest number of deaths since 2005.³ In addition, fatalities across a number of categories increased from 2020 to 2021 including speeding (five percent), alcohol-involved crashes (five percent) and unrestrained occupants of passenger vehicles (3 percent).⁴ The NHTSA currently values each life lost in a crash at \$11.8 million.⁵ The crashes, injuries, and fatalities impose a financial burden of well over \$800 billion in total costs to society -- \$292 billion of which are direct economic costs,⁶ equivalent to a "crash tax" of \$877 on every person living in the U.S. with total costs reaching nearly a trillion dollars annually when adjusted solely for inflation.⁷ In 2019, crashes alone cost employers \$72.2 billion.⁸

¹ 87 FR 23780 (Apr. 21, 2022).

² Early Estimate of Motor Vehicle Traffic Fatalities in 2021, NHTSA, Apr. 2022, DOT HS 813 283.

³ *Id.*

⁴ Early Estimates of Motor Vehicle Traffic Fatalities And Fatality Rate by Sub-Categories in 2021, NHTSA, May 2022, DOT HS 813 298.

⁵ John Putnam, DOT Deputy General Counsel, Guidance on the Treatment of the Economic Value of a Statistical Life (VSL) in U.S. Department of Transportation Analyses – 2021 Update.

⁶ Economic costs include lost productivity, medical costs, legal and court costs, emergency service costs, insurance administration costs, congestion costs, property damage, and workplace losses.

⁷ "The Economic and Societal Impact of Motor Vehicle Crashes, 2010," NHTSA (2015).

⁸ Cost of Motor Vehicle Crashes to Employers 2019, Network of Employers for Traffic Safety, March 2021.

The Highway Safety Programs are Essential to Improving Safety on our Nation's Roads

Advocates has long supported the Highway Safety Grant Program including the establishment of the National Priority Safety Programs in 2012 in the Moving Ahead for Progress in the 21st (MAP-21) Act as they address some of the leading causes of crashes and deaths including seat belt use, impairment, distraction and driver inexperience.⁹ Many of the reckless driving behaviors addressed by the Highway Safety Grant Program, including speeding, impairment and lack of seat belt use, have been a major factor behind fatality increases that began during the early months of the COVID-19 pandemic. Based on the most recent data from NHTSA, these behaviors are continuing as traffic volumes increase from peak pandemic lows. In addition, the public is deeply concerned about safety on our roads. According to a public opinion survey released this year by Advocates, 84 percent expressed concern about distracted driving, 80 percent are concerned about impaired driving and 68 percent are concerned with speeding.¹⁰

The Highway Safety Grant Program can help to reduce the devastating number of deaths and injuries that occur annually. However, to ensure its effectiveness, proper oversight and reporting requirements must be in place to ensure funds distributed under the Highway Safety Grant Program are being expended on the most productive countermeasures.¹¹ Transparency is an essential component to verifying Highway Safety Plans are data-driven and constructive to achieving safety goals. In addition, NHTSA must work with states seeking funding under the National Priority Safety Programs to provide guidance on how to meet all the qualifying criteria. When states fail to obtain funding, they must be given a full accounting by the agency.

Conclusion

Far too many lives are lost each year on our nation's roads. In light of the most recent data released by NHTSA indicating record increases in highway fatalities, it is incumbent on the agency to use every available resource to reduce this grim toll including the Highway Safety Grant Program.

Sincerely,



Peter Kurdock
General Counsel



Shaun Kildare
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⁹ 23 USC § 405.

¹⁰ Engine's Caravan Survey, Public Concern About Roadway Safety (Jan. 2022): available at: <https://saferoads.org/wp-content/uploads/2022/01/Advocates-January-2022-Poll-Report-Final.pdf>

¹¹ 23 USC § 402.