

September 2, 2025

The Honorable Marcus J. Molinaro
Administrator
Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Federal Transit Administration Notice of Availability of Proposed Policy Guidance for the
Capital Investment Grants Program (Docket No. FTA-2025- 0068)

Dear Administrator Molinaro,

The American Public Transportation Association (APTA) represents a \$79 billion public transportation industry that directly employs 430,000 people and supports millions of private-sector jobs. We greatly appreciate the opportunity to respond to the Federal Transit Administration's (FTA) Notice of Availability of Proposed Policy Guidance for the Capital Investment Grants (CIG) Program (Docket No. FTA-2025-0068), published in the *Federal Register* at 90 FR 40465 on August 19, 2025.

APTA strongly endorses the CIG program and the public benefits that it brings to communities throughout our country. We appreciate that FTA is seeking feedback from the public transit industry and is considering how best to streamline and improve the CIG process. APTA strongly supports FTA's efforts to resolve issues preventing the allocation of available CIG funding and streamline the CIG program consistent with the statutory requirements of 49 U.S.C. § 5309.

Environmental Benefits Criterion

FTA proposes revising its methodology for the evaluation and rating of the Environmental Benefits criterion in the CIG program. FTA proposes replacing the existing evaluation methodology that uses vehicle miles traveled (VMT) to estimate a project's effect on air quality, energy use, greenhouse gas emissions, and safety. Instead, FTA proposes utilizing the Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS) designation for each metropolitan area in which the project is located to rate each project's effects on the environment.

The proposed revision removes a complicated and burdensome evaluation from the CIG process, which should result in faster approvals for vital public transportation projects. With 77 percent of Federal funding for transit flowing to the private sector, increasing the speed at which FTA can allocate and obligate CIG funding will help drive economic growth, increase opportunities, and foster innovation.

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Paul P. Skoutelas

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APTA supports the proposed change to the Environmental Benefits criterion and believes it will expedite the CIG process. In the future, we would like to work with FTA to develop a new methodology and measure for this criterion to better capture the specific environmental benefits of public transportation projects.

Land Use Criterion

FTA also proposes removing the requirement to analyze accessibility of urgent care centers from the evaluation of access to essential services. FTA instructed applicants in its December 2024 CIG policy guidance to use the Department of Homeland Security (DHS) Homeland Infrastructure Foundational-Level Data (HIFLD) website to evaluate access to urgent care centers. Given that the HIFLD website no longer provides the relevant data, APTA appreciates FTA's proposal to remove urgent care centers from the evaluation of access to essential services.

However, with this change, APTA encourages FTA to revisit the rating thresholds for access to essential services. The average essential services per station area measure is calculated by counting all medical and educational facilities within a one-mile radius of project stations and divides that figure by the total number of project stations.¹ The breakpoints for this measure are as follows:

Rating	Average Essential Services per Station Area
High	> 7
Medium-High	5 - 7
Medium	3 - 4
Medium-Low	1 - 2
Low	< 1

Given that project sponsors will no longer be able to include urgent care centers in their calculation of essential services, APTA encourages FTA to revise the breakpoints to reflect lower average essential services per station area.

We appreciate your strong support for the Capital Investment Grants program and look forward to working with you to improve the CIG program consistent with the statutory requirements of 49 U.S.C. § 5309. We will provide additional ideas on how to improve the CIG program in our response to FTA's Request for Information Concerning the Capital Investment Grants Program (Docket No. FTA-2025-0069). If you or your staff have any questions regarding APTA's comments, please contact Ward McCarragher, Vice President, Government Affairs and Advocacy, at (202) 819-4895 or wmccarragher@apta.com, or Taria Barron, General Counsel, at (202) 496-4808 or tbarron@apta.com.

¹ FTA currently lists six types of facilities for projects to count for the average essential services per station area measure: hospitals, urgent care centers, Veterans Administration centers, colleges/universities, supplemental colleges, and public schools. *See* FTA, CIG Policy Guidance (December 2024), at 21.

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Thank you for your consideration and we look forward to continuing to work with FTA to streamline regulations and improve transportation.

Sincerely,

A handwritten signature in blue ink that reads "Paul P. Skoutelas". The signature is written in a cursive style with a prominent initial "P" and a stylized "S".

Paul P. Skoutelas
President and CEO