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PUBLIC
TRANSPORTATION
ASSOCIATION**

May 20, 2022

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The Honorable Peter Buttigieg
Secretary

U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Secretary Buttigieg:

On behalf of America's \$80 billion public transportation industry, which directly employs 450,000 workers and supports millions of private-sector jobs, I write to urge the U.S. Department of Transportation (DOT) to extend for 10 business days the deadline for pending surface transportation Notices of Funding Opportunities (NOFOs) that include equity as a consideration. In particular, we request a 10-day extension for DOT's Multimodal Project Discretionary Grant Opportunity (Deadline: May 23) and the Federal Transit Administration's Low or No Emission Grant Program and the Grants for Buses and Bus Facilities Competitive Program (Deadline: May 31). This extension would better enable public transportation agencies and other applicants to ensure that their applications address equity using DOT's corrected Transportation Disadvantaged Census Tracts (Historically Disadvantaged Communities (HDCs)) mapping tool.

In addition, in its consideration of Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant applications (Deadline: April 14), we urge DOT to provide appropriate credit to any public transportation agency that submitted a project with an HDC designation using DOT's available mapping tool at the time of application, regardless of its HDC designation under the corrected mapping tool. This approach will "hold harmless" public transportation agencies that acted in good faith in submitting their RAISE grant applications using the available HDC mapping tool.

Addressing equity is a shared commitment of both the public transportation industry and the Biden-Harris Administration and DOT's HDC mapping tool is critical to these efforts. Last week, DOT corrected its mapping tool, which had incorrectly designated a significant number of Census tracts.¹

PRESIDENT AND CEO

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Public transportation agencies have used this mapping tool extensively as part of their efforts to address equity in their competitive grant applications. The changes to Census tract designations have significantly affected many forthcoming applications for competitive grants.

Public transportation agencies go through a long and intense process for deciding which projects to submit for competitive grants. Given transit agencies shared equity objectives, a project's HDC designation is a major consideration in project selection. Many agencies have selected projects based on how historically disadvantaged communities will benefit from the project. Agencies also recognize that equity is a significant factor for consideration in DOT's and FTA's decision-making processes for grant awards.

Given the extensive time and effort that agencies have undertaken to develop these competitive grant applications, we urge DOT to provide an extension to enable agencies to recraft their applications to best describe how their submissions align with the Administration's priorities based on corrected HDC data.

For these reasons, we request a 10-day extension for DOT's Multimodal Project Discretionary Grant Opportunity (Deadline: May 23) and the Federal Transit Administration's Low or No Emission Grant Program and the Grants for Buses and Bus Facilities Competitive Program (Deadline: May 31) to better enable public transportation agencies and other applicants to ensure that their applications address equity using DOT's corrected HDCs mapping tool. In addition, we urge DOT to provide appropriate credit to any public transportation agency that submitted a RAISE grant project application with an HDC designation using DOT's available mapping tool at the time of application.

Finally, I want to express my great appreciation to your staff for taking the time to meet with APTA staff today to help us better understand how the HDC designation is simply a tool to inform a project's impact on equity. We greatly appreciate your partnership and look forward to working with you on our shared commitment to address equity in transportation.

Thank you for your consideration.

Sincerely,



Paul P. Skoutelas
President and CEO

cc: The Honorable Nuria Fernandez, Administrator, Federal Transit Administration

The Honorable Amit Bose, Administrator, Federal Railroad Administration

¹ See Federal Transit Administration, Bus and Low-No Potential Applicants: Update on USDOT Transportation Disadvantaged Mapping Tool, March 12, 2022.