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June 10, 2020

The Honorable Andre Carson  
The United States House of Representatives  
Washington, DC 20515

Dear Congressman Carson,

I write to convey IndyGo's support for the INVEST in America Act and to thank you for your efforts on the Transportation and Infrastructure Committee to formulate a strong transit package. IndyGo especially appreciates the increased funding levels for the Federal Transit Administration's ("FTA's") bus programs, along with additional funding made available for transit agencies to address the ongoing challenge to serve safely the public in the midst of the coronavirus pandemic. These increased funding levels recognize public transit's contributions to the quality of life of our people – providing our citizens needed access to their jobs, schools, retail, faith communities, and medical care, while minimizing environmental harm.

Attached is a list of the provisions that I believe will have a positive effect directly on IndyGo. I would like to highlight the changes Title 2 makes to the Capital Investment Grant program as significant for IndyGo. Increasing the Small Starts project caps, streamlining the Federal approval process, providing benefits to applicants that chose to apply with a Federal cost share less than 60%, and allowing rating improvements in mobility considerations for projects that haven't another related project in the planning process will all benefit IndyGo's BRT program.

IndyGo stands ready to support your hard work in creating such impactful legislation and looks forward to working with you to see it enacted. Thank you again for your strong support for Indianapolis's transit.

Sincerely,

A handwritten signature in black ink that reads "Inez Evans". The signature is written in a cursive, slightly slanted style.

Inez Evans

Enclosure

IndyGo Supports the following INVEST in America Act provisions:

**DIVISION A – COVID-19 RESPONSE AND RECOVERY**

Sec. 103. Federal Transit Administration.

Authorizes an additional \$5.79 billion in contract authority from the Mass Transit Account above FY20 levels and allows funds obligated in FY21 to be up to 100 percent Federal share.

**DIVISION B – SURFACE TRANSPORTATION REAUTHORIZATION**

**TITLE II—PUBLIC TRANSPORTATION**

**Subtitle A—Federal Transit Administration**

Sec. 2101. Authorizations.

Authorizes \$66.3 billion in contract authority for FY22 through FY25 for the Federal transit program.

Sec. 2102. Chapter 53 Definitions. [49 USC 5302]

Adds definitions for *resilience* and *assault on a transit worker*.

**Subtitle B—Improving Frequency and Ridership**

Sec. 2203. Mobility Innovation. [49 USC 5316]

Creates a new flexible set of Federal rules for mobility on demand services integrated with mobility as a service. Allows Transit agencies to shift urban, rural, and seniors and individuals with disabilities funding to this program to take advantage of the greater flexibilities and waivers.

Sec. 2204. Formula grants for rural areas. [49 USC 5311]

Revises the rural transit formula to increase the funding attributed to actual transit service. Provides flexibility to States for areas transitioning from rural to urban after a new census designation.

**Subtitle C—Buy America and Other Procurement Reforms**

Sec. 2301. Buy America. [49 USC 5320]

Recodifies Buy America.

Incentivizes higher domestic content by including final assembly costs into the domestic content calculation, providing an automatic 2.5 percent increase in domestic content if a zero-emission vehicle uses domestic battery cells, providing 17 a bonus of 10 percent of domestic content for any component that exceeds 70 percent, and providing a bonus of 15 percent of domestic content for any component that exceeds 75 percent.

Requires FTA to conduct rolling stock certifications to remove the burden from transit agencies, allows certifications to be used for multiple procurements, sets a standard for recertifications, and provides fair competition by ensuring certifications are consistently applied.

Sec. 2302. Bus Procurement Streamlining. [49 USC 5323(v)]

Requires bus procurements to use performance-based specifications in a procurement instead of specifying individual components.

Sec. 2303. Bus Testing Facility. [49 USC 5318]

Puts the Secretary on a deadline to grant a manufacturer's request for testing, requires a public estimate of the backlog at the testing facility to begin a new bus test, and provides additional funds to expedite testing.

**Subtitle D—Bus Grant Reforms**

Sec. 2401. Formula Grants for Buses. [49 USC 5339(a)]

Provides \$5 billion for FY22 through FY25.

Sec. 2402. Bus facility and fleet expansion grants. [49 USC 5339(b)]

Provides \$1.6 billion for FY22 through FY25. Modifies the competitive bus program to focus on large one-time needs for bus garages, bus stations, and fleet expansions. Grant considerations are limited to age and condition of facilities, resilience, and multimodal connections at stations.

Sec. 2403. Zero-emission bus grants. [49 USC 5339(c)]

Provides \$1.7 billion for FY22 through FY25 and an average annual increase of 500 percent over FAST Act funding.

Sec. 2404. Restoration to state of good repair formula subgrant. [49 USC 5339(d)]

Creates a subgrant, administered through the bus formula grant, that provides an increase in funding for transit agencies with the oldest buses.

**Subtitle E—Supporting All Riders**

Sec. 2501. Low-income urban formula funds. [49 USC 5336(j)]

Doubles the urban formula low-income set aside from 3 to 6 percent. Expands the formula to include an emphasis on the low-income population in urban census tracts with a poverty rate above 20 percent. Requires transit agencies to ensure they are serving low-income individuals.

Sec. 2503. Demonstration grants to support reduced fare transit.

Creates a demonstration grant to provide for a reduced fare for low-income riders to help close transit equity gaps.

**Subtitle F—Supporting Frontline Workers and Passenger Safety**

Sec. 2601. National transit frontline workforce training center. [49 USC 5314(b)]

Creates a training center modeled on the successful National Transit Institute, but with a frontline employee mandate.

Sec. 2604. Performance-based metrics. [49 USC 5329]

Establishes four performance-based safety metrics which can trigger a safety set-aside of up to 10 percent in Federal funds and directs those funds to projects that are likely to reduce injuries and fatalities.

**Subtitle G—Transit-Supportive Communities**

Sec. 2703. Affordable housing incentives in capital investment grants. [49 USC 5309]

Provides multiple incentives in the CIG ratings process if the project preserves or encourages higher density affordable housing near the project. Allows Economic Development Administration Public Works grants and Department of

Housing and Urban Development Community Development Block Grants to be counted as part of the local share, provided that the funds are used in conjunction with an affordable housing development.

#### **Subtitle H—Innovation**

Sec. 2802. Transit bus operator compartment redesign program. [49 USC 5312(d)]

Authorizes FTA research on redesigning bus driver compartments to improve driver visibility, expand driver functionality, and reduce driver assault.

Sec. 2804. Technical corrections. [49 USC 5312]

Replaces research and deployment of “low-no” emission buses with zero-emission buses.

#### **Subtitle J—Streamlining**

Sec. 2911. Fixed guideway capital investment grants. [49 USC 5309]

Reduces the bureaucratic burden within the Capital Investment Grant (CIG) approval process. The Federal approval process for a new transit project is burdensome in comparison to the Federal approval process for a new highway project. Modifications to the CIG program include:

- **Small Starts:** The Federal cost cap for small starts projects increases to \$320 million and the total cost cap increases to \$400 million, providing more small projects a streamlined approval process.
- **Engineering phase:** Increases to 3 years the time projects have to move through the engineering phase.
- **Project Development phase:** Cost and risk assessments may not be required in the project development phase, but applicants may choose to do their own assessments and FTA can provide technical assistance.
- **Federal Cost Share:** Reestablishes an 80 percent CIG cost cap for all CIG projects. Replaces the requirement on FTA to minimize Federal cost share, with an option for a transit agency to choose a CIG cost share under 60 percent. Transit agencies that remain under 60 percent cost share are subject to less strenuous requirements for project approval by allowing the applicant to: determine the amount of the contingency funds; certify that local resources are available to continue running their current service; and secure only 75 percent of the local financial commitment to sign the Full Funding Grant Agreement (FFGA), with the remaining 25 percent budgeted, but not committed.
- **Contingency Funds:** For projects that seek the higher cost share, FTA will now provide 50 percent of the contingency amount required.
- **Transparency:** Provides an opportunity for applicants to seek clarification, at several key stages of the approval process, of what information FTA still requires from the applicant to secure project approval. Requires FTA to create a publicly-accessible CIG dashboard to post monthly updates on the status of each CIG project in the approval process or under construction including the status of pending approvals.
- **Interrelated Projects:** Allows a rating improvement in mobility for projects that have another related project in the planning process that has secured initial NEPA guidance and will boost ridership on the current project seeking a rating.

Sec. 2913. Disposition of assets beyond useful life. [49 USC 5334]

Establishes a new policy for proceeds from the sale of old equipment. The original Federal share of the proceeds shall be retained by each transit agency and available for new capital projects following Federal rules.

Sec. 2914. Innovation coordinated access and mobility. [49 USC 5311]

Expands an existing program designed to streamline the coordination of public transportation services and non-emergency medical transportation.