

Docket Management Facility
United States Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

March 2, 2022

Re: Docket No. FHWA–2021-26145

To whom it may concern:

Thank you for the invitation to provide input on the implementation of the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58).

Coalition Helping America Rebuild and Go Electric ([CHARGE](#)) is made up of transportation, industry, environmental, labor, health, equity, and civic organizations that support smart policy to electrify America's transportation system. Together, we support a holistic and equitable transition to 100% zero-emission mobility. Our [broad and diverse coalition](#) has come to agreement on sets of principles for implementation of the IIJA with regard to supporting, strengthening and electrifying public transit, and converting medium- and heavy-duty vehicles to zero-emissions. If the IIJA is implemented well in these areas, we can make progress toward reducing greenhouse gas pollution and improving equity in transportation.

Public Transportation

Public transit provides essential, reduced-pollution mobility. As the collective owners of 70,000 fleet vehicles, transit agencies need significant increased funding from the federal government to update that fleet to zero emission vehicles with necessary infrastructure; grow the fleet and provide better, more equitable essential service that reduces pollution and provides an alternative to congestion; and allow these crucial services to survive the COVID-19 crisis and thrive during the recovery. In addition, the public transit workforce provides an essential service, and policy must preserve jobs and provide training to ensure a smooth and equitable transition to zero-emission service.

Our recommendations for implementing the IIJA with regard to public transportation are as follows.

Support and strengthen transit throughout COVID-19 recovery and beyond by:

- Requiring new transit projects, as a condition of federal grants, to address environmental justice, job creation within communities the project intends to serve, affordable housing, and other equity concerns in their initial application by:
 - Facilitating riders', workers', and community groups' participation in implementing the IIJA by prioritizing grants that include these constituencies as named applicants or endorsers;
 - Using the Justice40 initiative as a framework for these priorities;

- Including conditions in each grant to hold applicants accountable to the metrics they presented as part of their original grant application;
- Equitably expanding access to our transit systems for all populations, using the responses to the FTA's RFI on Title VI implementation (FTA-2021-0014) as a roadmap;
- Prioritizing grant applications and projects at FHWA and FTA which improve the frequency, reliability, and accessibility of public transit and provide multi-modal, bike/ped, and shared micromobility options that connect to existing public transportation systems;
- Immediately and equitably implementing safety and assault prevention titles of the IIJA (49 USC 5329 / IIJA Section 30012) to ensure that transit workers and riders feel safe in our transit systems, retain more transit operators, and encourage a faster return to normal ridership levels on our transit systems
- Encouraging localities in states that may not increase transit spending to identify other sources of funds to take advantage of federal funding opportunities;
 - facilitate TIFIA loans and other grants to these communities that would count towards their local match for transit projects;
 - support efforts to raise transit spending in every state to match the increases in the IIJA.

Support rapid electrification of transit fleets by:

- Providing transit agencies with technical assistance to develop the workforce training plans required under 49 USC 5339(d) / IIJA Section 30018; empowering the Transit Workforce Center to lead these efforts and facilitate national standards for training and workforce development related to zero emission transit fleets;
- Coordinating electrification efforts with FHWA, DOE, EPA, USPS, and other federal agencies to co-locate charging infrastructure and develop the grid to handle transit and federal fleet power needs;
- To the extent possible under the law, funding ZEV buses and supportive infrastructure exclusively;
- Supporting electrification of commuter trains and ferries.

Medium- and Heavy-duty Vehicles

Medium- and heavy-duty vehicles, including those operated at off-road facilities such as ports, railyards, and warehouses, represent a small fraction of vehicles in the US but significantly contribute to air pollution and global warming emissions. Funding from the IIJA should be used to accelerate the transition of these vehicles to zero-emissions technologies while developing a high-road domestic supply chain for ZEV technology. These technologies are well-suited for many applications across the commercial freight and transportation industry today. The following principles should guide DOT's design of programs with funding available for medium- and heavy-duty vehicles and supporting infrastructure.

- Fund the purchase of zero-emission medium- and heavy-duty vehicles and off-road freight equipment, and the necessary charging and fueling infrastructure.

- Limit investments in hydrogen infrastructure to green hydrogen (i.e., hydrogen produced from 100% renewable electricity) where possible . Other investments should require a plan for how the investment will support an eventual transition to green hydrogen.
- Do not invest in infrastructure or vehicles that perpetuate use of fossil fuels and other carbon-based fuels (e.g., biofuels).
- Prioritize investments that benefit underserved communities and those disproportionately impacted by pollution first, e.g., communities adjacent to high polluting facilities such as ports, rail yards and major highway interchanges, and those lacking access to clean mobility options. Ensure benefits exceed Justice40 commitments so more than 40 percent of funding benefits these communities .
- Ensure support for these programs through early, targeted, and frequent outreach to stakeholders, in addition to technical assistance, and fleet transition planning. Technical assistance should also be provided to agencies that manage public fleets (e.g. school districts, local governments).
- Promote the creation of good, family-sustaining careers in the manufacture, installation, operation, and maintenance of fueling/charging infrastructure. Ensure that employees in impacted sectors receive the training they need to safely and properly install, repair, and maintain EVSE, including through training programs such as the Electric Vehicle Infrastructure Training Program (EVITP). Workers from underrepresented communities, workers with barriers to employment, and displaced workers should receive top priority for opportunities for high-quality jobs and financial well-being, including through inclusive practices in hiring, training, retention, and advancement.
- Coordinate federal agencies and regulatory authorities, state governments, and relevant in-state entities (like utilities) to ensure that medium- and heavy-duty vehicle charging infrastructure is successfully integrated with the grid in ways that facilitate proportionately more renewable, rather than fossil fuel, electricity generation.

Thank you for the opportunity to comment.

Sincerely,

Chris Rall
Outreach Director for Transportation for America
Co-leader of CHARGE