

June 21, 2021



*Requests Regarding the Invest in America Act and the American Jobs Plan
Relating to Transportation.*

Regarding the Invest in America Act

We are encouraged to see a bill that better distributes funds across transportation modes and we support the bill's prioritization of funding to public transit, safety programs, active transportation, complete streets, transit-oriented development, low-to-zero emission transportation solutions, and infrastructure maintenance.

That said, more funding is needed to address historically racist transportation projects and the transportation sector's negative environmental impacts. Specifically, we recommend the following:

- 1. Funding for reconnecting neighborhoods should be commensurate with the state or region's legacy of racist transportation projects.** Across the nation, there are 165,865 lane-miles of urban freeways¹. A ballpark estimate of the cost to rebuild an urban freeway is \$3,000,000 per lane-mile². By multiplying these figures, we estimate that the cost to rebuild all of the nation's urban freeways is \$500B. A serious effort to reconnect communities might budget **\$50B to address the 10% of urban freeways** that represent the greatest equity concern.

¹ We sum the totals for "Urban - Interstate" and "Urban - Other Freeways and Expressways" from **FHWA: Functional System Lane-Length - 2019**.

<https://www.fhwa.dot.gov/policyinformation/statistics/2019/hm60.cfm>

² \$3M is in the middle of the **Reconstruct Existing Lane** estimates (Small Urban: \$2.3M; Small Urbanized: \$2.3M; Large Urbanized: \$3.8M; Major Urbanized: \$7.7M) found in **Exhibit A-1: Typical Costs per Lane Mile Assumed in HERS by Type of Improvement** of FHWA's **Status of the Nation's Highways, Bridges, and Transit Conditions & Performance 23rd Edition**.

<https://www.fhwa.dot.gov/policyinformation/statistics/2019/hm60.cfm>

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2. Reallocate, and increase, funds dedicated for electric vehicle (EV) charging infrastructure to the electrification of municipal fleets, transit, freight hubs, and/or heavy-and-medium duty trucks. The nation's EV charging needs are largely being addressed by the private sector via the Volkswagen (VW) Emission Scandal Settlement, through which VW is directing \$14.7B to EV charging infrastructure buildout across the country. Given this, we encourage the funds be directed towards electrification needs where investment is currently lacking such as the electrification of freight hubs and medium and heavy-duty commercial trucks. Such investment would achieve greater environmental outcomes because commercial vehicles run far higher miles than passenger vehicles, and their electrification, therefore, would result in much larger emission reductions. Electrifying freight hubs, such as Port Houston, would additionally reduce emissions and would help meet equity goals by reducing exposure to adjacent communities who are often economically disadvantaged and exposed to high levels of air pollution.

3. Incorporate carbon pollution reduction, mitigation and resiliency, and clean construction requirements into all surface transportation projects. Against the backdrop of the climate crisis, \$14.5B allocation for greenhouse gas reductions, mitigation and resiliency, and clean construction materials is inadequate and should not be a stand-alone line item. Instead, these requirements to reduce environmental harms should be incorporated into every transportation project funded through federal dollars, especially since the Federal Highway Administration, Department of Energy, and other Federal Agencies have been funding the creation of clean construction standards, resiliency best practices, and emission reduction practices & technologies for years. Texas Metropolitan Planning Organizations have been the recipients of many such grants, and it is time to move these programs from Pilot phase to institutionalized requirements.

Regarding the American Jobs Plan

We applaud the American Jobs Plan (Plan) as the most meaningful climate bill ever proposed by the U.S. Government and appreciate the Plan's attention to equity, safety, and the reduction of environmental impacts within the Plan's Transportation sections. Its proposed investment represents a veritable once-in-a-generation opportunity to shape and control the impacts of the transportation system for decades to come.

Because of this, we are concerned by the Plan's continued prioritization of SOV use over other transportation modes, specifically over public mass transit. It is the SOV transportation

paradigm, including its supporting infrastructure of highways and roads, that is responsible for the sprawl, congestion, terrifyingly high fatality rate, and emissions that plague the nation's transportation system today. With almost \$800B dedicated towards the SOV mode (\$621B dedicated to the repair of roads and bridges and \$174B dedicated to winning the electric vehicle (EV) market), the Plan is perpetuating a transportation system that is unequitable and unsafe.

Stop TxDOT I-45 offers the following recommendations to improve equity, safety, and emissions reductions throughout the Plan's transportation provisions:

1. Dedicate more funding to public mass transit than to the SOV mode: How transportation dollars are spent is a matter of equity. Today, the transportation system's overwhelming burdens—in dollars, time, and pollution exposure—are borne by low-income and minority communities. If Congress is sincere about reducing inequalities within the transportation system, it must stop prioritizing SOV use over other modes. We must advance walking, biking, and public mass transit.

2. Support electrification at the commercial and municipal, not consumer, level: We recommend the Plan to direct EV funds towards the electrification of municipal and commercial fleets, especially medium- and heavy-duty trucks, for the same reasons as discussed above.

While, yes, consumer-scale EVs generate considerably less emissions than conventional (internal combustion engine) vehicles, they do not address the equity, affordability, health and land use issues surrounding SOV use. Moreover, to a large degree, the private sector is already addressing consumer-scale EV needs. For instance, via the Volkswagen (VW) Emission Scandal Settlement, VW is directing \$14.7 B to EV charging infrastructure buildout across the country and virtually every car manufacturer has already committed to converting the entirety of their fleet to EVs by 2045 or earlier.

3. Funding for reconnecting neighborhoods should be commensurate with the state or region's legacy of racist transportation projects. While \$20B is an improvement over the Invest in America's \$3B proposal, it still drastically falls short of the need. We request that **\$50B be spent to address the 10% of urban freeways** that represent the greatest equity concern. Please see the previous section on the *Invest in America Act* to learn how we arrived at this estimate.

4. Fix it first. In the Houston region, it is an exception to drive on a smooth road unless that road is new or that road has recently been widened. This is due, in large part, to the way federal transportation grants are structured. Some streets can't be widened because of their urban context, and so these most urban streets have fallen into disrepair. The Plan should prioritize road maintenance over new roads and road widening. Our SOV network is already too big, and we need to address its state of disrepair instead of expanding it.

As Congress moves forward on infrastructure and surface transportation legislation, we urge you to support a bill that puts health, safety, and equity first by prioritizing funding for public transit, safety programs, active transportation, complete streets, low-to-zero emission transportation solutions, and infrastructure maintenance. Like you, we desire a safe, equitable, and clean transportation system and understand that this will only be possible through profound reform to how federal transportation dollars are spent.

Sincerely,

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