



June 30, 2023

Christopher Coes  
Assistant Secretary for Transportation Policy  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Subject: Request for Information on U.S. Department of Transportation  
Equity Action Plan Update (Docket No. DOT-OST-2023-0087-0002)

Dear Assistant Secretary Coes:

Equiticity is a racial equity movement, operationalizing racial equity by harnessing our collective power through research, advocacy, programs, Community Mobility Rituals, and social enterprises to improve the lives of Black, Brown, and Indigenous people in our society. We focus on transportation as an essential element of providing a means to opportunities for health, education, economic development, jobs, recreation, civic engagement, and social activities.

In reviewing the USDOT Equity Action Plan, we are mindful of these facts:

- Transportation is the economic sector where federal investments contribute more to shaping future development than any other sector of the national economy.
- Transportation is the Nation's largest source of air pollution that disproportionately harms the health and economic well-being of more than 60 million Americans, with a high proportion of Black, Brown, and Indigenous people, who live in close proximity to heavily

trafficked highways, ports, airports, warehouses and intermodal terminals.

- Transportation infrastructure is one of the arenas that most painfully demonstrates the continuing impact of historical inequities that divided communities and destroyed much of their economic vitality.

We believe that the USDOT Equity Action Plan reflects a lack of imagination about how to reduce inequities. The Plan focuses too heavily on adjusting the programs the Department already has in place to achieve better equity metrics, rather than creating innovative new ones that might make a bigger difference and that take a hard look at how past governmental actions have led to current inequities.

In this comment, we note six areas in which the USDOT could improve equity outcomes and measures, followed by questions for consideration by the USDOT.

### **Areas for Improvement**

- A. Focus more on **communities** and the impact that transportation infrastructure has on housing, retail, economic development, health, and walkable bikeable safe neighborhoods. Infrastructure leads to wealth creation (or destruction) for the entire community. The Equity Action Plan will be more successful if it is outcome oriented as well as process oriented. While we appreciate the importance of technical assistance to communities seeking grants and the imperative for supporting historically disadvantaged contractors, the holistic view of how infrastructure shapes the entire community and its mobility options is not sufficiently addressed in the Equity Action Plan.
- B. An area where the Plan falls short is in the failure to recognize the impact that infrastructure has on the devastating potential for conflict with law enforcement. For example:

- Where streets are coded for speed, drivers will speed, both endangering valuable road users and increasing law enforcement interactions.
- Where street infrastructure and traffic is not safe for cyclists, bikes will ride on the sidewalks. Equitcity's research partner concluded a quantitative analysis focused on the intersection of bicycle citations by the Chicago Police Department and bicycle infrastructure. See the two enforcement-related reports below:
  - i. [\*Biking where Black: Connecting transportation planning and infrastructure to disproportionate policing\*](#), by Jesus M. Barajas
  - ii. [\*Bicycle Ticketing Compounds Inequities and Fails to Improve Safety\*](#), by Jesus M. Barajas
- Recently released research shows the scope, impact, and inequities of traffic stops on Black and Brown communities in Chicago:
  - i. [\*New Vehicle for Stop and Frisk\*](#)
  - ii. [\*A New Vehicle for Stop and Frisk: Updated Report, May 2023\*](#)
- The Equity Action Plan does not mention police enforcement and the resulting police violence impacting racially marginalized communities, and how these serve as a barrier to achieving racially equitable transportation outcomes. USDOT, along with the USDOJ, explicitly supports cities implementing pretextual stops as a crime prevention strategy, despite ample research reflecting both the ineffectiveness and the harms of this strategy. USDOT and the Equity Action Plan should publicly state that pretextual vehicular stops are not supported.

C. Transportation equity will not happen without accelerated decarbonization. People most impacted by climate catastrophe are low and moderate-income Black and Brown communities. Flooding, heat, and other extreme climate events exacerbate the problems of long commutes coupled with inadequate community services and infrastructure.

- D. Pollution from transportation sources weighs heavily on disinvested communities. The Equity Action Plan should ensure that all parts of the Department and funded programs 1) consider the cumulative impact of all the pollutants emitted from transportation facilities, 2) assess the cumulative health impact of exposure to all pollutants from transportation sources and other sources that contribute to the health burden borne by at-risk communities, and 3) evaluate alternatives and mitigation designed to minimize or eliminate those impacts.
  
- E. Infrastructure funds must be prioritized to repair the consequences of past unjust actions of governments at all levels. Equity action is outcome-oriented as well as process-oriented. Repairing communities holistically is a necessary step toward reparations.
  
- F. The Equity Action Plan places a significant emphasis on expanding "access" to mobility choices and to federal resources. Equiticity asserts that the Equity Action Plan must instead focus on increasing the "usage" of these mobility choices and federal resources. A focus on increasing this usage for marginalized communities puts the burden on USDOT to execute strategies and invest to achieve this goal and have a transformative impact on neighborhoods adversely and disproportionately impacted by a full range of compounding racialized inequities.

## **Questions for Consideration**

Some questions about the Equity Action Plan are noted below. In addition, it would be helpful to have links in the Equity Action Plan to actions that further the objectives noted. Questions:

1. Why would it take until 2027 to make this step proposed in the EAP: "Launch enhanced transportation cost burden measure (incorporating new data sources) as part of a transportation disadvantage index – December 2027"?

2. If these items below are an issue, as noted in the EAP, then is it possible for the Department to fix them by making them less complex and/or more meaningful?

- “Navigating the complex environment of federal grant opportunities requires specialized expertise and experience. Overburdened or disadvantaged communities in urban and rural areas may not have adequate resources to gain access to the necessary expertise and experience.
- “Benefit-cost analysis (BCA) is very influential in discretionary grant applications. BCAs require specialized analysis tools. When underserved communities do not have access to those tools, potentially beneficial projects in underserved communities might not be selected due to incomplete or flawed BCAs”

We are pleased to see that the Department of Transportation is engaged in institutional reflection on its Equity Action Plan. Thank you for your consideration of our comments. We would be happy to meet with you for further discussion about how transportation can move us toward more equitable communities for Black, Brown, and Indigenous people.

Respectfully,



Olatunji Oboi Reed  
President & CEO, The Equiticity Racial Equity Movement  
773-916-6264 | [Oboi@equiticity.org](mailto:Oboi@equiticity.org)