



**American  
Public Transportation  
Association**

May 20, 2026

The Honorable Sam Graves  
Chairman  
House Committee on Transportation  
and Infrastructure  
2165 Rayburn House Office Building  
Washington, DC 20515

The Honorable Rick Larsen  
Ranking Member  
House Committee on Transportation  
and Infrastructure  
2165 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Graves and Ranking Member Larsen,

On behalf of the American Public Transportation Association (APTA), which represents the \$102 billion public transportation industry that directly employs more than 450,000 people and creates millions of additional private-sector jobs, I write to you regarding your bipartisan, five-year surface transportation authorization legislation, H.R. 8870, the “BUILD America 250 Act”. APTA applauds your strong leadership and dedication to enacting bipartisan legislation that provides certainty for the public transportation industry to make the long-term investments necessary to continue to grow our economy.

**The BUILD America 250 Act is a great first step. We look forward to working with you and the Committee on Appropriations to ensure that the BUILD America 250 Act, when considered by the House of Representatives, builds upon current investment levels (including guaranteed funding) for public transit and passenger rail to drive job creation, innovation, and our economy. Every \$1 invested in public transportation generates \$5 in long-term economic returns.**

*APTA’s 2026 Surface Transportation Authorization Recommendations* urge Congress to invest **\$138 billion for public transit** and **\$130 billion for passenger rail** over five years. These investments will help address the more than \$150 billion state-of-good-repair backlog, meet the growing mobility demands in our communities, and drive innovation and new technologies to enhance safety, security, and the rider experience.

**In addition, we greatly appreciate the BUILD America 250 Act’s many policy initiatives to accelerate project delivery by eliminating statutory and regulatory barriers to advancing public transit and passenger rail projects.**

**Finally, APTA would like to continue to work with the Committee on key policy areas of significant concern, including establishing a Consolidated State Block Grant Program; limiting the Federal contribution for bus procurements; and imposing new mandates on States and local public transit agencies.**

**EXECUTIVE COMMITTEE**

Leanne Redden CHAIR  
Joel Young VICE CHAIR  
Jannet Walker-Ford SECRETARY-TREASURER  
MJ Maynard-Carey IMMEDIATE PAST CHAIR

**PRESIDENT AND CEO**

Paul P. Skoutelas

1300 I Street NW | Suite 1200 East | Washington, DC 20005  
(202) 496-4800 | [APTA.COM](https://www.apta.com)

Richard W. Andreski • Randy Clarke • Robert DeJournett • Charles DiMaggio • Shawn Donaghy • Sharon Fleming • Carolyn Gonot • Beth Holbrook • Jennifer Ide • Debra A. Johnson • Bacarra Mauldin • Kenneth A. McDonald • Raymond Melleady • Erin Rogers • Peter Rogoff • Patricia Gillum Sams • Kimberly Slaughter • Bryan D. Smith • Reginald Townsend • Veronica Vanterpool • Stephanie Wiggins

## **Guaranteed Public Transit and Passenger Rail Investments**

**Public transit investments that put Americans to work today will drive the U.S. economy for decades to come. To that end, APTA strongly urges Congress to provide advance appropriations in the BUILD America 250 Act at least equal to current levels.** The Infrastructure Investment and Jobs Act's (IIJA) \$21.25 billion of advance appropriations for public transit provided an initial downpayment to address the more than \$150 billion state-of-good-repair backlog in our nation's transit systems. Although the IIJA's critical guaranteed investments will begin to address decades of underinvestment, the American Society of Civil Engineer's 2025 Infrastructure Report Card still graded American transit infrastructure as a "D". Congress must build upon current public transit investments (including guaranteed funding) to ensure public transit agencies can address this state-of-good-repair backlog.

**APTA also urges the Committee on Transportation and Infrastructure, working together with the Committee on Appropriations, to ensure guaranteed funding for passenger rail investments. Currently, H.R. 8870 provides no guaranteed funding for passenger rail grants.** The IIJA's \$66 billion of advance appropriations for passenger rail has provided critical funding to begin to bring America's intercity passenger rail system into the 21<sup>st</sup> century, make Americans safer by eliminating dangerous highway-rail grade crossings, and expand access to passenger rail vehicles and stations for people with disabilities. Predictable, long-term Federal investment enables railroads and communities to plan and deliver these vital infrastructure projects. To restore and grow our nation's passenger rail network, Congress must provide guaranteed funding for passenger rail and build upon current investment levels.

## **Accelerating Project Delivery**

**APTA greatly appreciates the BUILD America 250 Act's many policy initiatives to accelerate project delivery by eliminating statutory and regulatory barriers to advancing public transit and passenger rail infrastructure and manufacturing projects.**

### *Reforming Capital Investment Grants*

**APTA strongly supports the legislation's significant reforms to the Federal Transit Administration's (FTA) Capital Investment Grants (CIG).** H.R. 8870 establishes Streamlined Starts projects for a simplified CIG review and increases the limit on the total cost for such projects from \$400 million (i.e., Small Starts under current law) to \$1 billion and adjusts the limit annually. For the overwhelming number of CIG projects that will qualify under this revised threshold, these changes will significantly reduce Federal bureaucratic delays to project delivery. The bill also makes important improvements to Core Capacity authorities to better enable funding for accessibility improvements at stations and public transit system-wide improvements. Finally, APTA supports the legislation's provision allowing costs incurred by project sponsors prior to entering Project Development to qualify for Federal reimbursement.

### *Accelerating Project Delivery*

**APTA also applauds the BUILD America 250 Act's significant changes to accelerate project delivery, including:**

- Authorizing advance acquisition of real property for public transit and passenger rail projects;
- Authorizing additional projects covered by National Environmental Policy Act (NEPA) Categorical Exclusions (CEs), including public transit bus shelters;
- Allowing large public transit agencies to assume responsibility for certain NEPA actions (e.g., approving CEs); and
- Authorizing simultaneous consideration of various consultation steps during Federal reviews and limiting the requirements on documentation.

### *Implementing Commonsense DOT Reforms*

**In addition, APTA appreciates H.R. 8870's many provisions to implement commonsense U.S. Department of Transportation reforms, including:**

- Authorizing public transit agencies to determine the number of spare vehicles necessary for their fleets without the limitation of FTA's one-size-fits-all spare ratio policy;
- Permanently allowing States to waive the Federal Motor Carrier Safety Administration's (FMCSA) Commercial Driver's License Under the Hood testing requirement for public transit operators; and
- Expanding the authorities for innovative procurement to include goods, technologies, and software services.

### *Strengthening Passenger Rail*

With regard to passenger rail, APTA strongly supports the BUILD America 250 Act's provisions to limit increases to the passenger rail liability cap and provide commuter rail agencies with the necessary time to make cap adjustments. APTA also appreciates the creation of an Emergency Relief program for passenger and freight rail to be administered by the Federal Railroad Administration. Finally, APTA strongly supports provisions authorizing the advance acquisition of real property for passenger rail projects and CEs for certain passenger rail projects on existing rights-of-way.

## Key Policy Areas of Significant Concern

In addition to APTA's stated concerns about total guaranteed investment levels, APTA has several key policy areas of significant concern with the BUILD America 250 Act. As the Committee continues its work on the bill, APTA looks forward to working with it on areas of significant concern, including establishing a Consolidated State Block Grant Program; limiting the Federal contribution for bus procurements; and imposing new mandates on States and local public transit agencies.

### *Establishing a Consolidated State Block Grant Program*

To improve transportation outcomes, a key pillar of [APTA's Recommendations](#) is to strengthen collaborative, local decision making. **APTA is concerned that the new Consolidated State Block Grant Program moves in the opposite direction by adding more bureaucracy and decision-makers who are often far removed from the communities served. We believe local decision-makers are best positioned to determine which public transit investments will best serve their riders and communities.** For this reason, [APTA's Recommendations](#) urge Congress to provide direct funding to public transit agencies in small urbanized areas, similar to the process for large urbanized areas. We do not understand the policy rationale underpinning the Consolidated State Block Grant Program and would like to continue to work with the Committee to ensure that it meets our shared goal of best serving communities.

### *Limiting the Federal Contribution for Bus Procurements*

**APTA also has significant concerns with the BUILD America 250 Act's provision to limit the Federal contribution for bus procurements.** Since 2023, APTA, through its Bus Manufacturing Task Force, has advanced several key changes to adjust industry procurement practices that constrained cash flow at major bus manufacturers, which contributed to bus manufacturer bankruptcies and market exits. Bus production is capital intensive with long lead times, volatile input costs, and complex Buy America compliance requirements. A policy that limits cost recovery may undermine supply-chain stability and U.S. manufacturing investment.

In addition, the Bus Manufacturing Task Force has specifically addressed bus customization issues, as one factor that can lead to increased bus costs and impact the health of the limited number of U.S. bus manufacturers. Based on the work of the Bus Manufacturing Task Force, the industry is actively working to encourage the use of common, volume-supported bus designs that we believe will achieve our common objective to reduce the cost of buses and enhance competition. In fact, several foreign bus manufacturers are actively assessing their ability enter the U.S. public transit market and achieve Buy America requirements. We would like to continue to work with the Committee to achieve our shared goals of reducing the cost of buses, ensuring the health of U.S. bus manufacturers, enhancing competition, and growing manufacturing in the United States.

The Honorable Sam Graves, Chairman  
The Honorable Rick Larsen, Ranking Member  
May 20, 2026  
Page 5

### *Imposing New Mandates on States and Local Public Transit Agencies*

For public transit agencies, safety is a core value—a non-negotiable operating principle and promise to our riders, workers, and communities. Public transit agencies across the country have adopted a layered, multifaceted approach to public transit safety. **APTA is concerned about mandating specific safety technologies, such as fully enclosed bus workstations, in a one-size-fits-all approach. The BUILD America 250 Act specifically requires that all new buses have fully enclosed bus workstations. H.R. 8870 also establishes a Working Group to consider requiring the retrofit of existing buses with workstation barriers, which could lead to mandating new bus enclosures on more than 62,000 buses in transit agency fleets today.** Under current law, the Safety Committee of large transit agencies, which include an equal number of agency management and front-line worker representatives, are required to consider bus enclosures as part of the development of their annual Agency Safety Plan when recommended as part of an agency’s risk assessment. APTA would like to work with the Committee on Transportation and Infrastructure to explore opportunities to utilize public transit agency’s existing Safety Committee structure and Safety Management Systems to determine whether to adopt specific technologies, such as fully enclosed bus workstations, for bus procurements.

### **Conclusion**

Public transportation creates family-wage jobs across the nation and across all sectors of the economy. The public transit industry employs more than 450,000 people directly and creates millions of additional jobs in the private sector. Seventy-seven percent of Federal public transit investment flows to the private sector—to a network of 3,000 companies in more than 1,700 communities across all 50 States.

[\*APTA’s 2026 Surface Transportation Authorization Recommendations\*](#) urge Congress to invest **\$138 billion for public transit** and **\$130 billion for passenger rail** over five years. These investments will help address the more than \$150 billion state-of-good-repair backlog, meet the growing mobility demands in our communities, and drive innovation and new technologies to enhance safety, security, and the rider experience.

Again, the BUILD America 250 Act is a great first step. We look forward to working with Congress as this legislation moves forward.

Sincerely,



Paul P. Skoutelas  
President and CEO

The Honorable Sam Graves, Chairman  
The Honorable Rick Larsen, Ranking Member  
May 20, 2026  
Page 6

cc: The Honorable David Rouzer, Chairman, Subcommittee on Highways and Transit,  
Committee on Transportation and Infrastructure, U.S. House of Representatives

The Honorable Eleanor Holmes Norton, Ranking Member, Subcommittee on Highways  
and Transit, Committee on Transportation and Infrastructure,  
U.S. House of Representatives

The Honorable Daniel Webster, Chair, Subcommittee on Railroads, Pipelines, and  
Hazardous Materials, Committee on Transportation and Infrastructure,  
U.S. House of Representatives

The Honorable Dina Titus, Ranking Member, Subcommittee on Railroads, Pipelines, and  
Hazardous Materials, Committee on Transportation and Infrastructure,  
U.S. House of Representatives

Members, Committee on Transportation and Infrastructure, U.S. House of Representatives