

September 12, 2023

The Honorable Pete Buttigieg  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

**Re: West Broad Street Bus Rapid Transit Corridor Pilot Program for Transit-Oriented Development (TOD) Planning**

Dear Secretary Buttigieg:

On behalf of the law firm of Squire Patton Boggs (US) LLP, I am writing in support of the Central Ohio Transit Authority's (COTA) request for funding under the Pilot Program for Transit Oriented Development (TOD) to conduct comprehensive capacity, economic, and market analysis as well as resource and policy recommendations for the remaining transit stations along the West Broad Street Bus Rapid Transit (BRT) corridor. As you might imagine, being a downtown law firm, public transportation is very important to our employees.

The West Broad Street BRT corridor is the first rapid transit corridor that will be constructed as part of the regional LinkUS partnership. LinkUS is Central Ohio's comprehensive mobility initiative to help address growth, affordability and opportunity gaps in our community. In 2022, LinkUS was awarded a Regional Infrastructure Accelerator Grant from the Build America Bureau and the West Broad Street BRT was accepted into the Small Starts FTA CIG program.

Central Ohio is one of the fastest growing regions in the country and is on track to increase by 726,000 more residents over the next 25 years. The average Central Ohio household spends more than \$12,000 on transportation and the median home sale price is up 68% since 2020. More than 40,000 Franklin County households lack access to a personal vehicle and 1/3 of Franklin County residents live in areas of low opportunity. To address these challenges, LinkUS will build faster and more reliable public transportation, create safer and expanded bike and pedestrian paths, and enable truly walkable communities with more affordable access to work, home, and

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entertainment. Implementing LinkUS will also advance numerous existing initiatives that are working to improve housing, poverty, safety, and climate action in our community. By 2050, LinkUS plans to construct: 5 rapid transit corridors and increase transit service hours by 45%; 500 new miles of sidewalks, bikeways, and trails; and \$250 million in complete streets roadway improvements. LinkUS will move our region forward, together.

The three LinkUS corridors in design will utilize bus rapid transit (BRT) and have dedicated lanes for transit with premium stations in the center lane where possible. It will also run on 15 minutes or less intervals and have many of the same amenities as light rail such as off board fare collection and level and multidoor boarding.

COTA's West Broad Street BRT Corridor includes 17 stations and will run approximately 9.3 miles-along West Broad Street connecting Prairie Township, Franklin Township, Hilltop, and Franklinton to Downtown Columbus. This investment will greatly improve the opportunity gaps in our community. One-third of the residents along the corridor live below the poverty level, 16% of households lack access to a personal vehicle, 36% are Black, Indigenous, or persons of color, and 76% of residents live within an area of persistent poverty. Concurrently, the West Broad BRT is projected to connect residents to 100,000 jobs while adding 40,000 more residents by 2040. The corridor will also connect the workforce to Columbus State Community College, a federally designated anchor institution for one of the nation's five regional Workforce Hubs announced this year.

The Pilot Program for TOD is essential to implementing the LinkUS Equitable Transit-Oriented Development Action Plan that will build connected, walkable, and bikeable communities where the existing residents benefit from new residential and commercial development and are not displaced by it. The LinkUS ETOD strategy aims to preserve existing housing affordability, existing jobs and businesses, and valued community resources and amenities. It will create new housing with an emphasis on affordability, attracting new business investment, and job creation, and encourage new or enhanced community resources and amenities. At the same time, ETOD will be inclusive in ensuring diversity in housing options and price points, ensuring access to jobs, services and amenities for all residents.

The West Broad Street BRT is the first fixed guideway BRT project in Central Ohio and the additional resources that the grant could provide would be a large step toward helping our community address the challenges noted above. Columbus is concurrently seeking Capital Construction and Regional Partnership Challenge Grants within the USDOT Neighborhood Access and Equity Grant Program for the West Broad BRT.

The strong partnership of COTA, the City of Columbus, Mid-Ohio Regional Planning Commission, and Franklin County and the major impact that the West Broad BRT will make in our community perfectly aligns with Pilot Program for TOD. Our

organization wholeheartedly encourages USDOT to fund this application and thank you for your consideration

Sincerely,

**SQUIRE PATTON BOGGS (US) LLP**



Alex Shumate  
Senior Partner