

CLASP

Submitted via: <http://www.regulations.gov>

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

Re: DOT Docket No: DOT-OST-2023-0087-0002, Request for Information: Equity Action Plan Update

Dear Assistant Secretary Coes,

On behalf of the Center for Law and Social Policy (CLASP), thank you for the opportunity to provide comments on the U.S. Department of Transportation's (USDOT) Equity Action Plan.

CLASP is a national, nonpartisan, nonprofit advancing anti-poverty policy solutions that disrupt structural and systemic racism and sexism and remove barriers blocking people from economic security and opportunity. With deep expertise in a wide range of programs and policy ideas, longstanding relationships with anti-poverty, child and family, higher education, workforce development, and economic justice stakeholders, including labor unions and worker centers, and over 50 years of history, CLASP works to amplify the voices of directly impacted workers and families and help public officials design and implement effective programs.

Suggested Revisions to the Equity Action Plan

We appreciate USDOT's creation of the Equity Action Plan in an effort to achieve the Administration's ambitious equity goals and implement Executive Orders 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Rather than provide comments on the existing equity measures, we would like to call attention to the lack of equity measures that relate to the composition of our nation's transportation workforce. While the Equity Action Plan includes "Wealth Creation" as one of the plan's four highlighted equity actions, the key performance indicator tied to this goal centers exclusively on increased USDOT direct contracts to small, disadvantaged businesses and omits any goal tied to the workers themselves. We strongly recommend expanding this Wealth Creation goal to include a performance indicator that sets concrete employment targets to specifically increase the number of women; Black, Latino, Indigenous, Native, Asian persons, Pacific Islanders, and other persons of color; immigrants; people with disabilities; and justice-involved individuals in the transportation and related construction workforces.

Women are deeply underrepresented in the construction industry, holding just one in 10 construction jobs.¹ In the highest-paid trade jobs, women hold just four percent of jobs.² Black workers are also underrepresented,

¹US Bureau of Labor Statistics, *The Construction Industry: Characteristics of the Employed, 2003-20*, April 2022. <https://www.bls.gov/spotlight/2022/the-construction-industry-labor-force-2003-to-2020/home.htm>

² Institute for Women's Policy Research, *Numbers Matter: Clarifying the Data on Women Working in Construction*, March 31, 2021. <https://iwpr.org/numbers-matter-clarifying-the-data-on-women-working-in-construction/>

making up just 5.1 percent of the construction jobs.³ The USDOT estimates that federal investments through the Bipartisan Infrastructure Law (BIL) are slated to create millions of jobs over the next five years, underscoring the urgency of diversifying the transportation and construction workforce to ensure the gains from these jobs are justly distributed. Indeed, it is estimated that without intervention, women will hold only 29 percent of the new jobs created, Black women less than 4 percent, Latinas less than 5 percent and Asian and Pacific Islander women less than 2 percent.⁴ Workforce equity and pipelines to good transportation and infrastructure jobs must be a central component of USDOT's updated Equity Action Plan.

CLASP's Efforts to Increase Transportation and Construction Equity

USDOT's Request for Information specifically solicits examples of how organizations have taken action to influence or advance transportation equity. CLASP has partnered with Chicago Women in Trades, Jobs to Move America, and Jobs with Justice to create the national table: Leveraging Federal Funds for Equity. Comprised of more than 25 national policy and advocacy organizations, labor unions, organizing networks, and tradeswomen groups, the Leveraging Federal Funds For Equity table collectively strategizes and coordinates work to ensure the jobs created by the Bipartisan Infrastructure Law, the Inflation Reduction Act, and the Creating Helpful Incentives to Produce Semiconductors and Science Act are quality jobs accessible to and filled by women, workers of color, and individuals with barriers to employment. Our collective work would be much enhanced by an Equity Action Plan that included workforce equity, diversification goals, and performance indicators as part of the Wealth Creation goal.

Conclusion

Thank you for the opportunity to provide comments on USDOT's Equity Action Plan. As outlined above, the goal of achieving equity through transportation funding would greatly benefit from the inclusion of workforce-specific equity goals and performance indicators. The good jobs funded through federal dollars should be accessible to all workers. Concerted action is necessary to ensure that women; Black, Latino, Indigenous, Native, Asian persons, Pacific Islanders, and other persons of color; immigrants; people with disabilities; and justice-involved individuals can equitably access these jobs. Please do not hesitate to contact Emily Andrews, Director of Education, Labor & Worker Justice, at eandrews@clasp.org to provide further information.

Sincerely,

Emily Andrews
Director of Education, Labor & Worker Justice

³ US Bureau of Labor Statistics, *The Construction Industry: Characteristics of the Employed*, 2003-20, April 2022. <https://www.bls.gov/spotlight/2022/the-construction-industry-labor-force-2003-to-2020/home.htm>

⁴ Sharita Gruberg et al, *Historic Investments in Good Infrastructure Jobs Can't Leave Women Behind*, National Partnership for Women and Families, September 2022. <https://www.nationalpartnership.org/our-work/economic-justice/reports/infrastructure-investment-jobs-act.html>