MEMORANDUM

To:	Mayor and City Council
Through:	Jon Fortune, Deputy City Manager
From:	Carrie Rogers, Government Relations Officer
Date:	March 23, 2026
Subject:	**Fiscal Year 26-27 Congressional Community Project Funding Requests & Legislative Updates**

The purpose of this memorandum is to provide the Mayor and City Council with an update on the awarded Fiscal Year (FY) 2026 Community Project Funding (CPF) and communicate the next phase of the FY 27 CPF process, including actions completed to date, anticipated federal guidance, and upcoming coordination steps. This memorandum builds on the initial CPF overview memorandum and focuses on project refinement, federal engagement, and status of FY27 submissions.

Awarded FY26 Community Project Funding

Community Project Funding (formerly known as "earmarks") allows Members of Congress to request federal funding for specific, high-impact projects in their districts. Since FY22, the City of Austin has successfully secured approximately $38.1 million in CPF awards, including more than $14 million in FY26.

Congressman Lloyd Doggett
- Sunken Garden Springs Historic Rehabilitation and Environmental Restoration Project: $625,000
- Austin Community Violence Intervention: $1,031,000
- Waterloo Greenway Creek Restoration and Water Quality Improvements: $1,092,000
- West Bouldin Creek Trail Extension: $3,500,000
- Connecting Windsor Park: Belfast Bridge & Trail: $2,000,000
- Cool Corridors: Tree Planting and Workforce Development to Reduce Extreme Heat in Austin's Hottest Corridors: $500,000
- Foundation Communities/Mary Lee Campus Redevelopment – Lamar Square: $625,000

Congressman Greg Casar
- Esperanza Community Project: $850,000
- Persimmon Point: $250,000 (Casar)

- All Abilities Playground – Onion Creek Metro Park: $3,150,000
- Sir Swante Palm Park: $850,000

The Austin Congressional delegation secured 39% of total project *dollars* submitted by the City, up from 31% in 2024, the last year CPFs were awarded, and 14.5% in 2023. The *number* of project awards increased by 83% from 2024 to 2026.

With enactment of the FY26 budget now complete, these awarded projects may now move forward toward implementation. Austin Government Relations (AGR) has begun meeting with all City departments that received FY26 CPF awards to discuss next steps, federal award coordination, and project startup activities, with the goal of initiating work as quickly as possible. FY-22-26 awarded projects is included in Attachment B to this memorandum. Given the shifting landscape, AGR continutes to emphasize the urgency of grant agreement execution and project delivery completion related to prior CPFs.

FY27 CPF Status Update
Following the initiation of the FY27 CPF process in January 2026, Austin Government Relations solicited and reviewed CPF project concepts from City departments. In total, 31 project concepts were submitted for consideration. AGR subsequently met with departments to discuss project eligibility, readiness, and alignment with anticipated federal CPF guidelines and City priorities.

Importantly, AGR worked closely with Congressional offices to review potential FY27 CPF projects and gather early feedback regarding competitiveness, alignment with each Member's priorities, and submission interest. Based on these discussions and internal review, 24 projects have been submitted to Congressional members for consideration in the FY27 Appropriations package. These projects are summarized in Attachment A of this memorandum. The refinement reflects the competitive nature of the CPF process, anticipated limits on the number of requests Members of Congress may submit, and the need to focus on projects that are well-positioned under expected federal requirements.

Participation in this phase of the process does not constitute a commitment that a project will be submitted or funded, as final outcomes remain contingent on Congressional guidance, Member office selections, and federal appropriations decisions.[1]

<u>**Legislative Division Highlights**</u>
On March 12, 2026, the U.S. Senate passed the 21st Century ROAD to Housing Act (HR 6644) in a bipartisan 89-10 vote, described as the most significant housing legislation package in 30–36 years. The bill, which combines elements of the House-passed *Housing for the 21st Century Act* and the Senate's *ROAD to Housing Act,* aims to boost housing supply and affordability, largely addressing needs highlighted by local officials.

Key Provisions of the 21st Century ROAD to Housing Act (HR 6644):

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[1] In Appendix A, *submitted* means a project has been submitted to the Congressional Member for consideration to include in their total submitted projects to House Appropriations Committee for inclusion in the FY 27 Budget.

- Permanent CDBG-DR Authorization: Provides permanent, consistent funding authorization for Community Development Block Grant-Disaster Recovery, a key priority for local leaders.
- HOME Program Reauthorization: Reauthorizes and modernizes the HOME Investment Partnerships Program, including expanded homeownership eligibility to households earning up to 100% of the Area Median Income (AMI).
- Investor Restrictions: Includes a provision (Sec. 901, "Homes Are For People, Not Corporations") that bans institutional investors owning 350 or more single-family homes from purchasing additional properties, with a 7-year divestment requirement for build-to-rent properties.
- CDBG for New Construction: Expands eligible uses of Community Development Block Grants to include new construction of affordable housing.
- Regulatory Reform & Streamlining: Cuts "red tape" by streamlining environmental review requirements (NEPA) for small-scale and infill housing projects.
- Innovation & Repair Grants: Establishes an innovation fund, "Pattern Book" grants for pre-approved housing designs, and a "Whole-Home Repairs" pilot program for rehabilitating existing housing stock.
- Rural and Manufactured Housing: Updates definitions to facilitate manufactured housing development (e.g., removing the permanent chassis requirement) and addresses financing hurdles in rural areas.

The Senate bill now heads to the House of Representatives for reconciliation before it can be sent to the President for signature. While having bipartisan support, the bill faces some industry pushback regarding the investor ban and requires reconciliation to address differences between House and Senate versions.

The HOME provisions of HR 6644, the House version of the housing bill, are the result of a thorough and bipartisan stakeholder outreach process by Reps. Mike Flood (R-NE) and Emmanuel Cleaver (D- MO). In June 2025, Mayor Watson met with Chairman Flood and Congressman Cleaver on Austin's priorities and provided insight relating to the HOME program, and has been steadily advocating for these program improvements.

Congressional Outreach / National League of Cities (NLC) Congressional City Conference
The annual NLC Congressional City Conference was held in Washington, D.C. March 15-18, 2026. Austin Government Relations staff attended panels on transportation, immigration and public safety.

In meetings with the offices of Senator John Cornyn and Senator Ted Cruz, and Congressman Greg Casar, Congressman Lloyd Doggett and Congressman Michael Michael McCaul, staff highlighted key legislative priorities for the City of Austin. Staff also thanked Congressman Doggett and Congressman Casar for their continued work to return dollars to Austin through community project funding.

During these discussions, the legislative team encouraged signing on to the Bridges and Safety Infrastructure for Community Success (BASICS) Act (HR 7437). This bipartisan legislation would strengthen local decision-making in transportation funding in urban and rural areas and help Austin and Central Texas advance regionally prioritized mobility and safety projects. The bill has the support of all major local government organizations. Local governments own four out of every five miles of roads in the United States, yet nearly all federal highway formula

funding flows through state departments of transportation before reaching metropolitan areas and local jurisdictions.

- The BASICS Act would increase the share of federal highway formula funding that is suballocated directly to metropolitan regions, allowing communities to advance projects that have already been prioritized through the regional transportation planning process.
- In addition, the BASICS Act strengthens investment in bridge and safety infrastructure by ensuring that funding intended for locally owned bridges is directed to those facilities and by reserving a portion of Highway Safety Improvement Program (HSIP) funding for projects selected at the local level.

Mayor Watson shared a letter with the Texas Congressional delegation and encouraged CAMPO members to send a letter of support on behalf of their respective cities and counties.

Staff also emphasized the City's support for federal efforts to increase housing supply and modernize housing programs, including the 21st Century ROAD to Housing Act, which passed the Senate last week as noted earlier.

The legislative team also expressed strong opposition to HR 2289, which would significantly preempt local authority over public rights-of-way (ROW) and telecommunications infrastructure. Preserving local authority allows cities to coordinate infrastructure placement, protect public safety, and ensure fair compensation for the use of public property. The legislation could also limit local government franchise fee authority, which is an important source of revenue used to support essential services and infrastructure management. Similar to legislation filed in prior sessions of the Texas Legislature, federal preemption of these authorities could undermine the ability of cities to manage public infrastructure effectively and reduce the local revenue needed to maintain essential services. One example, the proposal could allow industry to install a cell phone tower in any public ROW without local government intervention.

Finally, staff encouraged strong funding for key programs that directly support Austin residents and local governments, including:
- Community Development Block Grant (CDBG) – Austin receives approximately $7.2 million annually
- HOME Investment Partnerships Program – Austin receives approximately $3 million annually
- Emergency Solutions Grants Program – Austin receives approximately $647,000 annually
- Housing Opportunities for Persons With AIDS Program – Austin receives approximately $2.7 million annually

Next Steps
Austin Government Relations will continue to regularly engage with state and federal delegations and funders, and in coordination with City departments and local partners, to advocate for the City's priorities. We are also awaiting the release of Senate and House interim charges for the 89th Texas Legislature in advance of the 90th Texas Legislature, which will convene in January 2027. Austin Government Relations is scheduled to brief the City Council on potential 2027 legislative priorities in May.

Should you have any questions, please contact Carrie Rogers, Government Relations Officer, at Carrie.Rogers@AustinTexas.gov, or Erike Dzangare, Deputy Government Relations Officer, at Erika.Dzangare@AustinTexas.gov.

cc: T.C. Broadnax, City Manager
        Erika Brady, City Clerk
        Jason Hadavi, City Auditor
        Mary Jane Grubb, Municipal Court Clerk
        Judge Sherry Statman, Municipal Court
        CMO Executive Team
        Austin Government Relations

Appendix: **Appendix A** – FY 27 Community Project Funding Final Submissions
                  Appendix B – FY22-26 Congressional Project Funding Requests and Awards
                  Appendix C – Federal Rulemaking Comments Update

Attachments: **Attachment A** – City of Austin Comments on HUD's notice titled *"HUD's Implementation of the Fair Housing Act's Disparate Impact Standards Comments."*
Attachment B – City of Austin Comments on EPA's noticed titled *"Updating the Water Quality Certification Regulations."*
Attachment C – City of Austin Comments on Census Bureau's notice titled *"2026 Operational Test in Support of the 2030 Census."*
Attachment D – City of Austin Comments on DOT's notice titled *"Request for Information-Research To Support Establishing a National Strategy for Transportation" Digital Infrastructure."*
Attachment E – City of Austin Comments on Treasury's notice titled *" Privacy Act; Systems of Records."*
Attachment F – City of Austin Comments on FHWA's notice titled *"Proposed Modification of the Waiver of Buy America Requirements for Electric Vehicle Chargers."*

Appendix A – FY2027 Community Project Funding Final Submissions
Submitted means a project has been submitted to the Congressional Member for consideration.

Member	FY	Project Submitted	Project Description	District	Amount Requested	Status
Greg Casar	2027	**Esperanza Trail / Montopolis Tributary Trail**	Design and construct approximately 6,200 lineal feet of shared-use trail improvements improving access between disconnected pocket neighborhoods in the Montopolis area	3	$5,520,000	Submitted
Greg Casar	2027	**East Ave. Trail**	Funds design and construction of the East Avenue Trail Betterment project	1,3, 9	$4,000,000	Submitted
Greg Casar	2027	**John Trevino Jr. Metro Park - Phase 2 "The Farm"**	Funds Phase 2 of the park development and converts former ranchland into a community agriculture, nutrition programming, workforce development, and environmental resilience.	1	$2,000,000	Submitted
Greg Casar	2027	**Bolm District Park**	Funds a one-mile nature trail loop to provide access to the park and Colorado River	3	$1,000,000	Submitted
Greg Casar	2027	**Walter E long Loop**	Funds the preliminary design of a 13-mile loop trail at Walter E. Long Metropolitan Park	1	$3,000,000	Submitted
Greg Casar	2027	**Mariposa**	Funds expansion of the existing affordable, high-quality childcare program by constructing a new childcare facility on the existing footprint of the 69-year-old building. The expansion will include indoor and outdoor space to serve 60 children, up from the current capacity of 20 children	3	$3,000,000	Submitted
Greg Casar	2027	**Del Valle Food Coop**	Funds establishing a community-owned grocery store in the Del Valle area of Austin, a federally recognized food desert where residents lack reliable access to fresh and affordable food	2	$3,000,000	Submitted
Greg Casar	2027	**Block 16**	Funds revitalization and development of a two-parcel section of East Austin identified in the 1999 Urban Renewal Plan as a vibrant mixed-use development reflecting the culture and heritage	1	$5,000,000	Submitted

Member	FY	Project Submitted	Project Description	District	Amount Requested	Status
			of the historic Black community that has been displaced			
Greg Casar/	2027	**First Responder Protective Equipment**	Funds Ballistic Vests for EMS CAST-MED Team (Post-March 1 Shooting Event)	All	$3,000,000	Submitted
Lloyd Doggett	2027	**First Responder Protective Equipment**	Funds Ballistic Vests for EMS CAST-MED Team (Post-March 1 Shooting Event)	All	$3,000,000	Submitted
Lloyd Doggett	2027	**Waterloo Greenway**	Funds repair, restoration and reconstruction of eroded creek banks; improvements to end of pipe stormwater treatment devices; and stormwater retrofits for inline treatment at multiple outfall locations	9	$5,000,000	Submitted
Lloyd Doggett	2027	**Bartholomew District Park**	Funds stormwater improvements project at Bartholomew District Park	4	$2,000,000	Submitted
Lloyd Doggett	2027	**Pease Park Bridge at Shoal Creek**	Funds design and construct a bridge or low-water trail crossing of Shoal Creek to repair a gap in the Shoal Creek Trail network caused by an upstream slope failure	10	$4,250,000	Submitted
Lloyd Doggett	2027	**Lakeline Trail**	Funds Urban Trail extension in northwest Austin, connecting Capital Metro's (CapMetro) Lakeline Station and W Parmer Lane, along the Red Line railway	6	$5,000,000	Submitted
Lloyd Doggett	2027	**Ryan Drive**	Funds transit-oriented development comprising 320 mixed-income rental housing units, 1.25 acres of public park land, and a bike/ped crossing designed to improve connectivity to CapMetro's Crestview Station	7	$5,000,000	Submitted

Member	FY	Project Submitted	Project Description	District	Amount Requested	Status
Lloyd Doggett	2027	**Good night Ranch (Habitat for Humanity)**	Funds 47 affordable, energy-efficient three bedroom homes for purchase for working families	2	$1,140,012	Submitted
Lloyd Doggett	2027	**AFD Boat Lift**	Funds construction of a boat lift at Fire Station 31 to support its emergency response vessel on Lake Travis	10	$1,700,000	Submitted
Lloyd Doggett	2027	**Trauma Recovery Center**	Funds continued critical services to survivors of violent crime and their families across Austin and Travis County	4	$4,000,000	Submitted
Lloyd Doggett	2027	**Crisis Diversion to Treatment Program Supporting Implementation of Texas HB 2405**	Funding to implement a Crisis Diversion to Treatment Program that equips first responders with training, protocols, and data tools to identify high utilizers of emergency services experiencing behavioral health crises and connect them to treatment and support services, supporting implementation of Texas HB 2405 and the City's No Wrong Door initiative.	All	$2,000,000	Submitted
Lloyd Doggett	2027	**Foundation Communities**	Funds additional renovations to the new Prosper Center North location where low- to moderate- income clients throughout Central Texas seek financial and postsecondary education attainment help	3	$2,000,000	Submitted
Lloyd Doggett	2027	**The Trails Conservancy**	Funds additional costs for the Boardwalk Central Project, which will construct a new boardwalk along a 700-foot segment of the Ann and Roy Butler Hike-and-Bike Trail between South 1st Street and Congress Avenue, improving safety, accessibility, and capacity while restoring shoreline habitat and creating new parkland along Lady Bird Lake.	3	$3,950,000	Submitted

Member	FY	Project Submitted	Project Description	District	Amount Requested	Status
Lloyd Doggett	**2027**	**East Avenue Trail Betterment**	Funds design and construction of the East Avenue Trail Betterment project	1,3, 9	$4,000,000	Submitted
Lloyd Doggett	**2027**	**I-35 at Onion Creek grade-separated crossing**	This project will create a new Onion Creek trail crossing over I-35 to close major gaps in pedestrian and bicycle connectivity and link surrounding neighborhoods to regional trail networks.	5	$2,800,000	Submitted
TOTAL					**$78,160,012***	

*Additional projects may be added at a later date. An update will be provided to the Mayor and City Council.

Appendix B – FY22-26 Congressional Project Funding Awards

Member	FY	Project	Amount	Status
Lloyd Doggett	2026	Austin Community Violence Intervention (Resubmitted FY25)	$1,031,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Lloyd Doggett	2026	Waterloo Greenway Creek Restoration and Water Quality Improvements (Resubmitted FY25)	$1,092,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Lloyd Doggett	2026	West Bouldin Creek Trail	$3,500,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Lloyd Doggett	2026	Connecting Windsor Park: Belfast Bridge & Trail	$2,000,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Lloyd Doggett	2026	Cool Corridors: Tree Planting and Workforce Development to Reduce Extreme Heat in Austin's Hottest Corridors	$500,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Lloyd Doggett	2026	Sunken Garden Springs Historic Rehabilitation and Environmental Restoration Project (Resubmitted FY25)	$625,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Lloyd Doggett	2026	Foundation Communities/Mary Lee Campus Redevelopment – Lamar Square (Resubmitted FY25)	$625,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Greg Casar	2026	All Abilities Playground – Onion Creek Metro Park	$3,150,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Greg Casar	2026	Esperanza Community Project (Resubmitted FY25)	$850,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Greg Casar	2026	Persimmon Point (Resubmitted FY25)	$250,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements
Greg Casar	2026	Sir Swante Palm Park (Resubmitted FY25)	$850,000	CPF appropriations have been enacted; federal agencies have not yet released funding agreements

Member	FY	Project	Amount	Status
Lloyd Doggett	2024	**Bergstrom Spur Urban Trail West Segment**	$4,116,279	Project is at 90% design, with TxDOT reviews scheduled and a late 2026 construction bid anticipated
Lloyd Doggett	2024	**Victims & Survivors of Violent Crime Trauma Recovery Program**	$1,445,000	Funds are currently being drawn down for the Harvest Trauma Recovery Center, with project completion anticipated this fiscal year
Lloyd Doggett	2024	**Buttermilk Creek Water Quality Improvement Project**	$959,752	Project is partially reimbursed, with one reimbursement received and a second pending EPA approval; an additional invoice will be submitted later this year.
Greg Casar	2024	**Longhorn Dam Multimodal Improvements**	$4,116,279	Advance Funding Agreement with TxDOT is nearing completion; design is underway, public engagement is anticipated in early 2026, and Halff is supporting preliminary drainage and survey work.
Greg Casar	2024	**Bergstrom Spur Urban Trail Central Segment**	$500,000	Advance Funding Agreement with TxDOT has been finalized; the City will complete design for the Bergstrom Spur segment under I-35, with construction to be delivered by TxDOT as part of the I-35 project
Greg Casar	2024	**John Trevino Metro Park at Morrison Ranch Development**	$1,000,000	Contract has been executed; the project is currently in permitting and is expected to enter the bidding phase next month.
Lloyd Doggett	2023	**City of Austin Northern Walnut Creek Trail**	$5,000,000	Advance Funding Agreement with TxDOT has been finalized; Project is on schedule and expected to be approved for bidding by TxDOT in September 2026
Lloyd Doggett	2023	**Austin Public Health's Substance Abuse, Awareness, Education**	$2,000,000	Funds have been expended and award is closed
Lloyd Doggett	2023	**Office of Community Violence Intervention Neighborhood Peace Project expansion**	$1,000,000	Funds have been fully expended and the award has been closed.
Lloyd Doggett	2022	**Colony Park Water and Wastewater Project**	$1,000,000	Contract is in place and funds are being drawn down.

Member	FY	Project	Amount	Status
Lloyd Doggett	**2022**	**I-35 Cap & Stitch Planning Study**	$1,500,000	Funds have been received through a TxDOT reimbursement program; $174,245.16 of the $1,666,667 CPF award remains.
Lloyd Doggett	**2022**	**Mokan Trail Project**	$1,000,000	Construction for Phase 5 is underway, with completion anticipated in fall 2026. A ribbon cutting is planned toward the end of the 2026 calendar year.

Appendix C – Federal Rulemaking Comments Update

Agency	Rulemaking Title	Status	Departments	Agency Abstract/Summary of Comments
Department of Housing and Urban Development (HUD)	***HUD's Implementation of the Fair Housing Act's Disparate Impact Standard*** *– Docket No. FR-6540-P-01*	**Submitted** Feb. 13, 2026	AH, HSO	City of Austin urges HUD to withdraw its proposed changes to the Fair Housing Act's disparate impact standard and maintain the existing rule, which provides clear, consistent guidance for enforcing fair housing protections and helps local governments identify and prevent discriminatory housing practices.
Environmental Protection Agency (EPA)	***Updating the Water Quality Certification Regulations*** *– Docket No. EPA-HQ-OW-2025-2929; FRL- 6976.2-01-OW*	**Submitted** Feb. 17, 2026	WPD	City of Austin urges EPA to reconsider proposed revisions to the Water Quality Certification Regulations, citing concerns that the changes weaken environmental protections, limit state and local authority, and reduce meaningful public engagement.
Census Bureau	***Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2026 Operational Test in Support of the 2030 Census*** *– Docket Number USBC-2026-0034*	**Submitted** Mar. 5, 2026	PLAN	The City urges the Census Bureau to reinstate all six original test sites, clarify methodologies for counting Group Quarters populations, and use the Decennial Operational Test rather than the American Community Survey (ACS), emphasizing the importance of accurate enumeration for rapidly growing cities like Austin.
Department of Transportation (DOT)	***Office of the Assistant Secretary for Research and Technology; Request for Information-Research To Support Establishing a National Strategy for Transportation Digital Infrastructure*** *– Docket No. DOT-OST-2026-0430*	**Submitted** Mar. 5, 2026	TPW	The City urges DOT to focus on the need for clear national standards, strong data governance, and avoiding unfunded mandates to support safe, equitable, and future-ready mobility.
Department of the Treasury	***Privacy Act; Systems of Records*** *entitled "Department of the Treasury, Departmental Offices DO .0197— Financial Assistance Programs"*	**Submitted** Mar. 6, 2026	AFS	The City of Austin urges Treasury to avoid unfunded mandates, ensure subrecipients have direct system access if new reporting is required, and rely on existing reporting portals to prevent unnecessary operational and financial strain.
Agency	**Rulemaking Title**	**Status**	**Departments**	**Agency Abstract/Summary of Comments**

Federal Highway Administration (FHWA)	*Proposed Modification of the Waiver of Buy America Requirements for Electric Vehicle Chargers* – Docket No. FHWA-2025-0070	**Submitted** Mar. 13, 2026	AE, TPW, FMS	The City of Austin urges FHWA to avoid immediately requiring 100 percent domestic content for EV chargers and instead adopt a phased, capacity-based approach aligned with actual U.S. manufacturing capability.
Department of Housing and Urban Development (HUD)	*Housing and Community Development Act of 1980: Verification of Eligible Status –* Docket No. FR-6524-P-01	**Pending Distribution** Due April. 21, 2026	AH, APH, HSO, AFS	The City of Austin urges HUD to withdraw the proposed rule eliminating prorated housing assistance for immigrant and mixed-status families and to retain existing policies that preserve housing stability while preventing significant cost burdens on local governments.
General Services Administration (GSA)	*Agency Information Collection Activities; Proposals, Submissions, and Approvals: System for Award Management Registration Requirements for Financial Assistance Recipients* (OMB Control No. 3090-0290)	**Reviewing** Due Mar. 30, 2026	E&I, APH	The City of Austin urges GSA to ensure that System for Award Management (SAM) registration certification requirements clearly affirm data-driven public health practices remain permissible, allowing local health departments to continue effective, federally funded prevention efforts without confusion or disruption.

Austin

February 13, 2026

Mr. Craig Trainor
Assistant Secretary for Fair Housing and Equal Opportunity
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Re: City of Austin Comments – HUD's Implementation of the Fair Housing Act's Disparate Impact Standard [Docket No. FR-6540-P-01]
Submitted electronically through the Federal eRulemaking Portal at *https://www.regulations.gov*.

Dear Mr. Trainor:

On behalf of the City of Austin (Austin), thank you for the opportunity to provide comments on the U.S. Department of Housing and Urban Development (HUD)'s proposed rule titled "*HUD's Implementation of the Fair Housing Act's Disparate Impact Standard.*"

General Comments:
Austin is a governmental entity with statutory obligations under the Fair Housing Act (the Act). Like HUD, Austin is required to affirmatively further fair housing. In addition, Austin operates as a substantially equivalent agency to HUD for purposes of enforcing the Act within its jurisdiction.
As a city committed to advancing fair housing and inclusive community development, Austin values clear and consistent standards that guide local policies. Disparate impact analysis is an essential tool for identifying practices that, while neutral on their face, may disproportionately affect protected classes.

Austin respectfully submits these comments to ensure that any changes to HUD's regulatory approach continue to support substantially equivalent agencies and local governments with complying with the Act's obligation to affirmatively furthering fair housing and reducing barriers to housing choice. Austin strongly opposes HUD's proposed removal of the discriminatory effects regulations (the current rule).

Reasons for Opposition
The Fair Housing Act (the Act) is intended to provide fair housing choice options for households. It prohibits discrimination in housing, lending, and sales based on race, color, religion, national origin, sex, familial status (including children under 18), and disability. Discrimination can occur through policies or actions that intentionally treat individuals or classes of individuals or groups differently on purpose.

After many years of federal appellate decisions, the United States Supreme Court, in 2015, ruled that the Act includes a claim for liability under the disparate impact theory, which means a policy that is facially neutral but has the effect of treating individuals or classes individuals differently.

As the federal agency that is tasked with implementing and enforcing the Act, it is important for HUD to maintain the current rule. As adopted, the current rule assists both HUD and local government investigators with applying evidence correctly, ensuring uniform application of the Act nationwide, and helping housing providers and other related entities adopt fairer practices while still meeting business needs. Lastly, the current rule also helps individuals understand and ensure protection of rights.

Conclusion

The proposed changes – and any retreat from full enforcement of the Fair Housing Act (the act) – would significantly undermine Austin's ability to protect fair housing rights. We respectfully urge HUD to withdraw its notice and instead reaffirm its commitment to enforcing the Act in accordance with its statutory mandate and established case law.

HUD should work to remove arbitrary, unnecessary, and discriminatory barriers to housing choice that harm communities nationwide. Austin appreciates HUD's commitment to fair housing protections and welcomes continued collaboration to clarify standards that guide local implementation. We submit these comments to firmly oppose the proposed rule and urge HUD to maintain the existing disparate impact standards, which is critical to promoting equal opportunity, reducing uncertainty, and enabling jurisdictions to affirmatively further fair housing.

Compliance with the Act is necessary to avoid moving America "toward two societies, one black, one white—separate and unequal," as warned by the 1968 Kerner Commission Report. Instead of supporting compliance, repealing the current rule will undermine the purpose of the Act and result in more legal battles.

Should you have any questions, please reach out to Carrie Rogers, Austin Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577 or Deletta Dean, Austin Housing Director, at deletta.dean@austintexas.gov or 512.978.1410.

Sincerely,

Deletta Dean
Austin Housing Director
City of Austin

cc: Honorable Mayor and City Council Members
         Erika Brady, City Clerk
         Jason Hadavi, City Auditor
         CMO Executive Team
         Department Directors

March 4, 2026

Mr. George M. Cook
Acting Director
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Re: City of Austin Comments – *2026 Operational Test in Support of the 2030 Census (Docket Number USBC-2026-0034)*
Submitted electronically through the Federal eRulemaking Portal at *https://www.regulations.gov*.

Mr. Cook:

On behalf of the City of Austin, thank you for the opportunity to provide comments on the U.S. Census Bureau's notice titled "*Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2026 Operational Test in Support of the 2030 Census.*"

The City of Austin recognizes this as a consequential step in preparation for the 2030 Census. High-quality, accurate census data is an invaluable tool for planning and funding services to residents of the City of Austin as well as representation in local city council districts. Furthermore, the City of Austin has a long history of working in support of the U.S. Census Bureau's Decennial Census and annual surveys. With this in mind, we offer the following recommendations.

General Comments:

I. Reinstate the Full Set of Test Sites: The original six test sites were research-driven and strategically selected as optimal sites to make the 2030 Census more accurate and cost-effective. Reducing the test sites to two locations presents several issues that risk undermining the accuracy of the 2030 Census. For instance, the elimination of Colorado Springs, Colorado as a testing site removes testing on the only site with high instances of new construction. The City of Austin has been leading the nation in unit construction, with mid-decade construction already nearing the total construction seen last decade. Eliminating the Colorado Springs site risks undermining the accuracy of the count in rapidly developing cities like Austin. Despite a joint investment between the City of Austin and Travis County of nearly half a million dollars in support of 2020 enumeration efforts, the City of Austin's internal analysis indicated an undercount of the Austin population in the Decennial Census. This undercount is estimated to result in an annual loss of approximately $67.5 million through 2030. This same analysis found that a significant number of units missing from the 2020 Census were located in rapidly redeveloping areas of Austin. U.S. Census Bureau staff have invested months of testing at all six sites, and Congress has already approved funding for testing in these sites. We encourage the Department to avail itself of these investments by reinstating the 2026 Operational

Test in the original set of six test sites. Testing in all six sites would allow for proper testing of cities undergoing rapid construction as well as cities with substantial historically hard-to-count populations such as the City of Austin.

II. Incorporate Strategies to Count the Group Quarters Population: Four of the six sites in the original 2026 Operational Test proposal and two of the sites in the latest proposal were selected in part due to their substantial Group Quarters populations. However, the notice does not specify the methodologies that will be employed to test the count of the Group Quarters population at the remaining sites. Understanding strategies to achieve an accurate count of the Group Quarters population would be highly informative for cities like Austin, consisting of a significant college student population, a substantial unhoused population, and an increasingly aging population with many living in group settings. Outlining the methodologies for testing the Group Quarters populations in the 2026 Test would help mitigate persistent undercounts among historically undercounted populations.

III. Employ the Decennial Form in the Decennial Operational Test: The proposed use of the American Community Survey (ACS) instrument does not replicate the operational conditions of the Decennial Census and therefore will not generate data sufficiently predictive of 2030 Census response behavior. First, the ACS form includes over 70 questions compared to the ten questions included in the Decennial Census form and has a much lower response rate than the decennial count. Any data received from a test using the ACS would be an unreliable predictor of census participation and response rates. Furthermore, Congress has already funded the use of the Decennial Census form in the 2026 Operational Test, facilitating a cost-effective test of the actual measure in need of testing. We strongly urge the Department to test the actual survey measure to be used during the 2030 Census – the Decennial Census form.

Conclusion

The City of Austin remains firmly committed to supporting a complete and accurate 2030 Census. For the foregoing reasons, the City of Austin respectfully urges the Department of Commerce and U.S. Census Bureau to reinstate the original set of test sites and to employ methodologies aligned with congressional intent and U.S. Census Bureau staff research, thereby ensuring the rigor and representativeness necessary for a valid 2026 Operational Test.

Thank you again for the opportunity to provide comments and for your continued attention to ensuring that all communities, including ours, are fully and accurately represented.

Should you have any questions, please reach out to Carrie Rogers, Austin Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577 or Dr. Lila Valencia, Austin City Demographer, at lila.valencia@austintexas.gov or 512.987.1559.

Sincerely,

T.C. Broadnax
City Manager
City of Austin

cc: The Honorable Mayor and Austin City Council
       The Honorable Greg Abbott, Governor of Texas
       The Honorable Dan Patrick, Lieutenant Governor of Texas
       The Honorable Dustin Burrows, Speaker of the Texas House of Representatives
       The Honorable Austin State Legislative Delegation
       The Honorable Austin Congressional Delegation
       Jon Fortune, Austin Deputy City Manager
       Dr. Eric A. Johnson, Austin Assistant City Manager
       Lauren Middleton-Pratt, Austin Planning Director
       Dr. Lila Valencia, Austin City Demographer
       Carrie Rogers, Austin Government Relations Officer

February 17, 2026

Lauren Kasparek
Office of Water
Oceans, Wetlands, and Communities Division
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: City of Austin Comments – Docket ID No. EPA-HQ-OW-2025-2929, Updating the Water Quality Certification Regulations
Submitted via email (OW-Docket@epa.gov) and via https://www.regulations.gov

Dear Ms. Kasparek:

The City of Austin respectfully urges the Environmental Protection Agency (EPA) to reconsider the proposed revisions to Docket EPA-HQ-OW-2025-2929. As currently drafted, the rule prioritizes administrative expediency over environmental safety and undermines the essential sovereignty of state and tribal partners. These modifications pose a direct threat to the long-term security of our regional water quality and the reliability of our critical water resources. By imposing rigid procedural and substantive constraints, this rule diminishes the capacity of local and state authorities to manage water quality certifications in the best interests of their constituents.

The City of Austin holds particular concern regarding the following points:

- **Narrowed Scope of Review:** Shifting the regulatory focus from the "activity as a whole" to a narrow "point source discharge" fundamentally limits a region's ability to assess the cumulative environmental impacts of a project.
- **Procedural Vulnerabilities:** Proposed changes to "withdraw-and-resubmit" procedures facilitate tactics designed to artificially compress review timelines. This allows applicants to circumvent rigorous scrutiny, depriving states of the time necessary to evaluate complex permit applications that may have irreversible effects on local ecosystems.

Furthermore, the City of Austin expresses its profound disappointment regarding the EPA's decision to truncate the standard 60-day review period to a mere 30 days. This abbreviated window is fundamentally insufficient for a thorough analysis of the rule's long-term consequences. Such a departure from standard practice suggests a dismissal of meaningful public engagement and limits the ability of stakeholders to provide the substantive feedback this complex proposal requires. The City of Austin also notes with concern that the EPA declined to grant an extension for public

comment. Given the complexity and potential long-term implications of these proposed changes, additional time would have allowed for a more comprehensive and collaborative review.

In summary, the City of Austin opposes the proposed revisions as they weaken environmental protections, limit state and local authority, and curtail meaningful public engagement. We respectfully urge the EPA to maintain a regulatory framework that respects local expertise and ensures comprehensive environmental oversight.

Should you have any questions, please reach out to Carrie Rogers, Austin Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577 or Jorge Morales, Austin Watershed Protection Director, at jorge.morales@austintexas.gov or 512.974.3438.

Sincerely,

T.C. Broadnax
City Manager
City of Austin

cc: The Honorable Members of the Austin Congressional Delegation
        Honorable Mayor and City Council Members
        Erika Brady, City Clerk
        Jason Hadavi, City Auditor
        CMO Executive Team
        Carrie Rogers, Austin Government Relations Officer
        Jorge Morales, Director, Austin Watershed Protection

March 5, 2026

Mr. Michael Halem,
Principal Deputy Assistant Secretary for Research and Technology
Office of the Assistant Secretary for Research and Technology
U.S. Department of Transportation
1200 New Jersey Ave., SE Washington, DC 20590

Re: TDI Strategy RFI Response, City of Austin - Docket No. DOT-OST-2026-0430
Submitted via email to: *TDI-Strategy-RFI@dot.gov*

Mr. Halem:

On behalf of the City of Austin, thank you for the opportunity to provide comments on the US Department of Transportation's notice titled "*Office of the Assistant Secretary for Research and Technology; Request for Information-Research To Support Establishing a National Strategy for Transportation Digital Infrastructure.*"

We sincerely appreciate the U.S. Department of Transportation's efforts to advance safe and innovative mobility solutions through thoughtful research and stakeholder engagement. As a city committed to multimodal transportation and inclusive technology deployment, we welcome the opportunity to contribute ideas that reflect the needs and priorities of urban communities.

At the broadest level, the City of Austin urges USDOT to refrain from imposing unfunded mandates on local governments as you develop policies in this area. The following comments represent a consolidated response from multiple departments and take into consideration transportation and public works, airport, and public safety/first responder considerations.

General Comments

A. Research, Development and Deployment

1. How should Transportation Digital Infrastructure be defined? Transportation Digital Infrastructure (TDI) defined as collective public and private technology assets that create, exchange, or use data or information to improve the transportation system by the provision of existing and new services for travelers, businesses, and agencies.

Work in this area continues to apply system engineering and research principles to identify the technology and policy gaps as the application of intelligent transportation systems continues to improve through integration, expansion, and more focused application.[1]

TDI is a coordinated implementation of core digital systems, connectivity and communication layers, data and analytic layers and capabilities and operational and safety systems that creates an integrated ecosystem of intelligent transportation systems (ITS) (e.g., digital systems, communications networks, data platforms, governance frameworks, cybersecurity protections, and interoperable technologies) that enable real-time monitoring, management, optimization, and resilience of the physical transportation system.

In the current era of new emerging technologies, TDI should be treated as a national strategic infrastructure layer, similar in importance to physical transportation infrastructure (e.g., highways, bridges, ports, rail networks, and aviation systems).

2. What TDI research needs should be prioritized? Based on the City of Austin's observations, it is essential to conduct a comprehensive assessment of legacy systems and existing physical transportation infrastructure conditions and requirements before prioritizing TDI research needs. This evaluation will help ensure that TDI investments are strategically aligned with established physical infrastructure priorities. In doing so, future TDI infrastructure can be thoughtfully integrated into the broader transportation network, ensuring compatibility, efficiency, and long-term sustainability. To support a smooth and effective transition to TDI, the City of Austin identifies several key research priorities:

- There is a need to establish clear definitions and open national architecture standards that can serve as a reference framework for evaluating existing infrastructure and guiding its transition to TDI, with scalable reference architectures tailored to cities and DOTs of varying sizes and capacities.
- Establishing national guidance on digital twins' implementation and predictive analysis is a crucial need for traffic optimization, asset management and preventive maintenance solutions.
- Standard guidelines for data governance, privacy, and data security management plans are needed. Some information in the TDI may constitute confidential critical infrastructure. As such, there must be a data classification process and protocol for appropriate handling of critical and confidential information. In parallel, it is recommended to establish standard data sharing strategies/protocols and communication standards within the TDI architecture among different agencies and stakeholders (e.g., government agencies, private companies, and researchers) to enable seamless integration and analysis of transportation data between various agencies. All the while maintaining proper confidentiality and security standards. This should include a layer for cybersecurity guidelines including incident response frameworks for state and local agencies.
- There is a need to ensure that transportation and public sector professionals can make decisions with AI. This could be achieved through Public-sector AI literacy programs, as well as robust AI governance and specific guardrails around its use.

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[1] Digital Infrastructure | ITS Joint Program Office

- Research is needed to define context-specific performance latency thresholds across different environments (urban, rural, highway, port, airport) and to validate hybrid communication architectures.
- Research on AI driven techniques to improve safety, and operational efficiency is needed while maintaining specific guardrails around its use.
- Standardized AI plan and guidelines combining federated data governance, standardized interoperability protocols, and strong privacy and cybersecurity protections.
- Creating an assessment tool to determine where TDI would be most effective in supporting safe and sustainable mobility.

3. What travel corridors or regions should be prioritized for TDI development and deployment?
The City of Austin is currently developing a fiber upgrade plan and has created a prioritization tool to determine which areas or corridors should be addressed first. A similar approach should be implemented to identify and prioritize the corridors or areas that need to be prioritized for TDI development and deployment. Priorities need to be identified based on needs considering economic impact, safety needs, resilience risk, and equity. Proposed prioritization areas could include:
- Areas/corridors lacking fiber networks, ITS coverage, and broadband connectivity.
- Corridors with high fatality rates and traffic safety risk.
- Corridors with limited traffic monitoring.
- Climate-vulnerable regions (e.g., flood-prone areas).
- Corridors with high multimodal activities and proximity to transit. Areas adjacent to schools, transit stops and other activities that have high vulnerable road user usage.
- Corridors with high economic access, near jobs, higher education, and training centers.
- Corridors with high volume freight as they are critical to national economic security.

4. Are there existing testbeds, pilots or demonstrations that could be leveraged? Yes. USDOT could leverage existing testbeds or pilots (examples are listed below). Also, they could create national TDI testbed, and standard metrics to evaluate those pilots.
- Existing Connected and autonomous Vehicle Pilots through Cities and DOTs.
- Pilot projects through existing smart mobility projects.
- ITS Joint Program Office (JPO) testbeds.
- Smart City Challenge deployments.
- University Transportation Center (UTC) research sites.

5. What TDI use cases or applications should be prioritized?
Priority use cases should deliver measurable safety, mobility, resilience, and economic benefits. This could include:
- Improving traffic safety through detection and real-time monitoring. Examples include vulnerable road user detection, wrong-way driving detection, weather-responsive and traffic management, adaptive signage control, automated incident detection, and dynamic lane and speed management.
- Improving mobility and multimodal integration through transit system optimization including real time bus arrival predictive, automated dispatching and headway management, digital fare systems (integration of mobile payment, account based ticketing, etc.).
- Multimodal and traveler information including integrated mobility apps showing real-time traffic, transit, parking, bike/scooter availability, dynamic wayfinding for special events,

detours, and emergencies and smart parking systems that show available spaces and enable digital payment.

- Connected and automated mobility including V2X-enabled intersections that communicate with vehicles for red-light warnings, pedestrian alerts, and signal priority, emergency vehicle preemption that clears intersections for fire/EMS response and autonomous shuttle corridors supported by high-precision mapping and sensor networks.
- Asset management including AI-enabled roadway and bridge monitoring, digital lifecycle tracking and infrastructure condition dashboards, digital twins of transportation networks for planning, simulation, and scenario modeling, IoT-based pavement and bridge monitoring that detects deterioration early and smart streetlights that adjust brightness, report outages, and host sensors.
- Safety and vision zero applications including, near-miss detection using AI video analytics to identify dangerous intersections, pedestrian and cyclist detection at crosswalks and school zones and crash prediction models that guide targeted safety investments.
- Work zone and construction management including smart work zones with connected signs, sensors, and automated speed enforcement, digital permitting and coordination platforms that prevent overlapping closures and Real-time traveler alerts for lane closures and detours.
- Cybersecurity and resilience including network segmentation for OT systems (signals, cameras, sensors), continuous monitoring of field devices for tampering or outages and Redundant communications paths for critical corridors.
- Smart city and environment monitoring including air quality and noise sensors integrated with traffic operations, flood and weather sensors that trigger detours or warnings and energy optimization for streetlights and transit fleets.
- Data Driving Planning including origin-destination analytics from sensors, mobile data, and connected vehicles, equity dashboards showing access to transit, safety risks, and infrastructure gaps and performance management platforms tracking congestion, reliability, and emissions.
- Emergency and incident management including real-time data sharing throughout different agencies.

6. How should U.S. DOT leverage or expand existing programs to advance TDI development and deployment? U.S. DOT could leverage existing programs to advance TDI through the following:
- Integrate TDI into existing funding programs.
- Create a national TDI coordination office/group.
- Establishing the standard definitions and performance metrics for TDI.
- Encourage/support multi-state, city-state collaboration through providing bonus funding for regional digital integration.
- Encourage Public-Private partnerships through developing shared-risk pilot programs.
- Socialize TDI development into transportation professional organizations like ITE, SAE, APWA, and NACTO.
- Strengthen and scale the SMART Grant Program.
- Integrate TDI requirements into Rebuilding American Infrastructure with Sustainability and Equity (RAISE), Infrastructure for Rebuilding America (INFRA), and National Infrastructure Project Assistance (MEGA).
- Expand intelligent transportation systems (ITS) and connected vehicles (CV) Pilots into a national connected corridor program.
- Modernize the National Highway System (NHS) to include digital infrastructure.

- Expand the role of the Federal Transit Administration (FTA) in digital modernization.
- Use the Technology and Innovation Deployment Program (TIDP) to create national standards.
- Expand the National Roadway Safety Strategy (NRSS) to include digital safety systems.
- Leverage the Broadband and BEAD programs for transportation fiber.
- Expand workforce and technical assistance programs.
- Create a national TDI governance and data-sharing framework.

B. System Architecture, Interoperability and Standards

1. What are the key elements of a TDI system architecture that can accommodate the operation of all transportation modes including surface, maritime, and aviation? TDI system architecture should be built to enable seamless integration across all modes of transportation (e.g., surface, maritime, and aviation). All built with standard guidelines for data governance, privacy, and data security management plans. Key elements include:

- **Physical layer** including existing conditions and new emerging technologies (e.g., sensors, roadside units (RSUs), onboard units (OBUs), edge computing devices, etc.).
- **Communications layer** including fiber, cellular, satellite, V2X, etc.
- **Data integration layer** including standardized data models, APIs, and message sets supporting real-time and historical data exchange.
- **System dashboard** including applications that support different use cases, AI, digital twins, predictive analytics, and decision support tools.
- **Cybersecurity, privacy and data governance layer** including data management, data monitoring, and incident response.
- AI Governance that includes research on AI driven techniques to improve safety, and operational efficiency is needed while maintaining specific guardrails around its use.
- **Duplication/redundancy layer** to maintain safe operations especially during outages.

2. How can TDI be integrated into infrastructure planning, construction and asset management processes? TDI should not be treated as a standalone technology investment; it should be integrated across the full infrastructure life cycle. The following components illustrate how TDI can be embedded into planning, design and construction, and long-term asset management and operations:

- **Planning Integration:** Planning efforts should build digital readiness into all early project scoping and decision-making processes.
  - **Strategic integration**: Digital-first planning frameworks; Use-case–driven planning; Embedding digital readiness assessments into planning, corridor studies, the Manual on Uniform Traffic Control Devices (MUTCD), and project design standards; Demonstrations and communications to the public and policymakers on the value of digital infrastructure.
  - **Planning tools and data:** GIS and asset inventories; digital twins; integrating real-time condition monitoring into transportation asset management plans.
  - **Governance and standards**: Establish digital infrastructure standards; Require TDI components in project scoping; Aligning TDI investments with capital improvement programs and asset management plans.
- **Design & Construction Integration:** Use connected, model-based project delivery methods to enhance accuracy, collaboration, and digital continuity throughout construction, such as: Integrated Digital Project Delivery (IDPD); Advanced Digital Construction Management Systems (ADCMS); and 3D/4D/5D models.

- **Field and Data Integration:** Incorporate data collection and sensing technologies during field operations to improve accuracy and reduce lifecycle costs: Leveraging IoT Enabled Construction equipment, and Leverage UAS, LiDAR and mobile mapping.
- **Standards and Interoperability:** Ensure digital systems remain usable, transferable, and maintainable over time. Use open data formats so models and data remain usable and accessible across platforms and over time.
- **Asset Management & Operations Integration:** Integrate TDI into ongoing operations to support proactive maintenance, optimized mobility, and real-time decision-making: Leverage Lifecycle Digital Twins; Unified Data Environments leveraging Cloud Services and platforms for all asset data as the single source of truth; and Smart Operations to enable real-time traffic management, connected vehicle applications, automated incident detection and digital work zones as examples. Maintenance and renewal can leverage sensor data and digital models to support continuous and condition-based maintenance.

3. What methods should be used for federating data sharing across States and regions? National standards should identify the methods that could be used for data sharing. Examples could include shared data standards and access management, privacy and cyber security techniques, open dashboards, regional data hubs. Creating a feedback system from regional and local entities on the highest value data and uses to further tailor data gathering to support local mobility.

4. What existing architecture frameworks or standards could be used to underpin TDI development and deployment (e.g., U.S. DOT's Architecture Reference for Cooperative and Intelligent Transportation (ARC-IT))? To establish a strong foundation for TDI, different architecture standards could be used, examples include ARC-IT, National ITS standards, cloud and edge computing reference architectures, cybersecurity standards, and international standards for data exchange and data sharing.

5. What are the necessary latency and throughput requirements for safety-critical applications (e.g., Vehicle-to-Everything (V2X) communications, Automated Driving Systems (ADS), and Cooperative Driving Automation (CDA))?
In general, safety-critical automotive applications such as V2X, ADS, and CDA, emergency and incident response require ultra-low latency, very high reliability, and sufficient throughput to ensure safe real-time decision-making. Latency thresholds for different uses need to be identified.

6. What are the highest-priority research gaps and challenges to advancing interoperability across modes and sectors?
- Lack of communication between different sectors (transportation, energy, sustainability, emergency, etc.) within the region and different departments within the sector.
- Lack of harmonized multimodal data standards.
- Cybersecurity risks associated with increased connectivity.
- Interoperability challenges between existing physical conditions and new emerging technology (legacy versus TDI).
- Energy and power needs for V2X.

C. Artificial Intelligence and Automation
1. How should AI applications be leveraged to support TDI development and deployment?

- AI should support TDI throughout their life cycle including planning (e.g., demand forecasting, site selection, traffic simulation), design, real time operations, maintenance, asset management, and optimization.
- AI could be used to make TDI self-optimizing, predictive, and resilient, not just reactive.
- Today, AI is leveraged for strategic decision-making, faster data processing, and efficient workflow execution.
- Strong AI Governance must be imbedded to maintain protocols for privacy, security and specific guardrails on use.

2. How should TDI be best used to accelerate the development and deployment of autonomous vehicles, drones, and other transformative technologies?
- TDI should be the foundational digital backbone for all new technologies including autonomous vehicles (AVs), drones (UAS) and other emerging technologies. It should also accelerate the safe deployment of these technologies.
- It should enable infrastructure supported autonomy (e.g., real time infrastructure status feed, edge computing capabilities).
- TDI can be used to communicate temporary traffic changes to AVs as well as enable AVs to assist local entities with incident management and provide real-time information to support decision-making.

3. What are the highest-value, near-time AI and automation applications enabled by comprehensive sensing and data sharing?
Any application that would improve safety, enhance operational efficiency, extend infrastructure life is of a high value. Examples include:
- Proactive Safety Management for crash and fatalities reduction (e.g., wrong-way detection, VRU sensing).
- Predictive asset management for preventive maintenance.
- Real-time traffic optimization.
- Incident detection and emergency response.

4. How can AI applications be safely deployed to accommodate data exchange and data use across jurisdictional boundaries?
- Standardized AI plan guidelines combining federated data governance, standardized interoperability protocols, and strong privacy and cybersecurity protections.
- Providing AI training can support safe and scalable cross-jurisdictional AI deployment.
- Agencies with existing AI framework such as Texas Department of Transportation (TxDOT) have an AI strategic plan [2] can serve as a model for cross jurisdiction coordination.
- AI planning should be updated on an ongoing basis based on needs and feedback from users and other stakeholders.

D. Data Governance, Privacy, and Cybersecurity
1. What data governance principles, access controls, and cybersecurity measures are needed to ensure trust, accountability, and privacy?
- Clear Ownership, access control, use, stewardship, transparency, and purpose limitation.
- Cybersecurity measures, continuous monitoring, and incident response plans.

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[2] Artificial Intelligence Strategic Plan, January 2026 Update

- Privacy-preserving techniques, including by adopting privacy by design and secure by design principles to ensure that privacy and security are embedded in every layer of the TDI architecture.
- Privacy Risk Assessments must be made for all use-cases of TDI information, including business need, value, and deletion of information once purpose is served.
- Disaster planning and recovery measures.

2. What models or frameworks should be used to ensure secure data exchange (*e.g.,* data trusts, federated data sharing, and public Application Programming Interfaces (APIs))?

The goal is to ensure regional collaboration through multi-agency and multi-state safe data. Recommended approaches include:

- Federated data sharing frameworks: the originating agency takes control of data, while standardized APIs and secure protocols allow query and analysis across jurisdictions without centralizing sensitive information.
- Standard data sharing protocols/agreements and administrative policies to govern how data will be shared, used and protected.
- Data stewardship models.
- Clear interoperability and expectations to ensure TDI system data work consistently across all agencies.
- Privacy Risk Assessments (PRA) must be made for all use-cases of TDI information, including business need, value, and deletion of information once purpose is served.

3. What are the most significant threat vectors introduced by extensive transportation system sensing and data integration, beyond traditional Information Technology (IT) and Operational Technology (OT) threats?

- **Data integrity is a central theme across TDI threats. Ensuring** integrity through secure data management, access control and validation is important to safeguard the transportation data system.
- **Data Manipulation and Spoofing**: hackers could inject false/misleading information into sensors, AVs or traffic control systems, which could result in unsafe decisions.
- **AI and Automation Exploits**: Vulnerabilities in AI algorithms, if the AI model is poorly designed, or fails, it could make wrong or unsafe decisions.

4. How should U.S. DOT apply the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF) to TDI development and deployment?

The U.S. DOT should apply the NIST Cybersecurity Framework (CSF) as a foundational guideline for TDI by:

- **Mapping its six core functions**: Govern, Identify, Protect, Detect, Respond, and Recover to the operational, physical, and digital characteristics of transportation systems.
- **Using CSF profiles to tailor cybersecurity controls to specific operational and system needs**. This approach will enable a risk-based implementation while maintaining consistency with NIST best practices.

5. How should TDI be aligned with federal data strategies and privacy frameworks?

Developing data management plan specifically for TDIs to ensure that all data collection, storage, and sharing practices adhere to federal data governance principles, interoperability standards, and

privacy-by-design approaches with reference to the Federal Data Strategies, national standards and privacy framework.

6. How can legacy and proprietary data sources be effectively incorporated into a new national data exchange environment?
- Metadata standardization to make legacy datasets discoverable and usable.
- Data adapters to transforming legacy formats into standardized schemas without changing original systems.
- API and Middleware Integration, use secure APIs or middleware to bridge proprietary systems with federated data platforms, while adhering governance policies when connecting legacy systems to maintain compliance and data integrity.
- Phased Modernization: Prioritize high-value legacy sources based on mission importance and risk impact for early integration while planning gradual system upgrades.

Conclusion

The City of Austin welcomes the opportunity to collaborate further on this process and respectfully submits these comments for your consideration.

Should you have any questions, please reach out to Carrie Rogers, Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577. For technical follow-up, please use COAAVWorkingGroup@austintexas.gov.

Sincerely,

T.C. Broadnax
City Manager
City of Austin

cc: The Honorable Mayor and Austin City Council
Jon Fortune, Austin Deputy City Manager
Manager Michael Rogers, Austin Assistant City Manager
Richard Mendoza, Austin Transportation and Public Works Director
Carrie Rogers, Austin Government Relations Officer

March 6, 2026

Mr. Ryan Law
Deputy Assistant Secretary
Office of Privacy, Transparency, and Records
U.S. Department of the Treasury
1500 Pennsylvania Avenue NW,
Washington, DC 20220

Re: City of Austin Comments – Department of the Treasury, Departmental Offices DO .0197—Financial Assistance Programs
Submitted electronically through the Federal eRulemaking Portal at *https://www.regulations.gov*.

Dear Mr. Law:

On behalf of the City of Austin, thank you for the opportunity to provide comments on the Department of Treasury's notice titled "*Privacy Act; Systems of Records.*"

General Comments:
The City of Austin supports Treasury's intent to collect information necessary to administer financial assistance programs. Local governments, including the City of Austin, already follow Treasury's reporting requirements for newly created programs.

As the State and Local Fiscal Recovery Funds (SLFRF) program approaches its final phase, the City recommends that Treasury ensure the new system does not require duplication of information already submitted through Treasury's existing portal.

The proposed system would collect information on the ultimate beneficiaries of federal funding. The City of Austin often administers federally funded programs through subrecipients, who maintain applications, scoring documentation, payment records, and other compliance materials.

Because subrecipients have historically retained and managed these records, requiring them to transmit this information to the City of Austin for entry into a new federal system would create significant administrative burden. To minimize this burden, subrecipients must receive timely notice of any new information requirements and have direct access to any new federal reporting system to enter the required data themselves.

The City of Austin urges Treasury to ensure that any new data collection requirements are properly funded and do not impose retrospective administrative burdens without clear public benefit.
Conclusion

Date: March 6, 2026

Subject: City of Austin Comments – Department of the Treasury, Departmental Offices DO .0197—Financial Assistance Programs

Building on these concerns, the City of Austin emphasizes the importance of Treasury avoiding unfunded or retroactive data collection requirements.

Existing federal programs should continue reporting through Treasury's current reporting system rather than being shifted into the new system. For any newly created federal programs, it is important to ensure that subrecipients are informed of any new reporting requirements and have appropriate access to the new system to submit the necessary information.

Should you have any questions, please reach out to Carrie Rogers, Austin Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577 or Ed Van Eenoo, Chief Financial Officer, at ed.vaneenoo@austintexas.gov or 512.987.2638.

Sincerely,

T.C. Broadnax
City Manager
City of Austin

cc: The Honorable Mayor and Austin City Council
Jon Fortune, Austin Deputy City Manager
Ed Van Eenoo, Chief Financial Officer, Austin Financial Service
Carrie Rogers, Austin Government Relations Officer

March 13, 2026

Mr. Robert Mooney
Federal Highway Administration (FHWA)
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Agency: Federal Highway Administration (FHWA)
Docket No. FHWA-2025-0070
Re: City of Austin Comments – Notice of Proposed Modification of the Waiver of Buy America Requirements for Electric Vehicle Chargers
Submitted electronically through the Federal eRulemaking Portal at *https://www.regulations.gov*.

Dear Mr. Mooney:

On behalf of the City of Austin, thank you for the opportunity to provide comments on the Federal Highway Administration (FHWA)'s notice titled "*Notice of Proposed Modification of the Waiver of Buy America Requirements for Electric Vehicle Chargers*."

These comments reflect the City of Austin's position and incorporate technical expertise of Austin Energy, the City's municipally owned electric utility responsible for electric vehicle (EV) charging infrastructure procurement and deployment.

General Comments:
The City of Austin supports long-term efforts to strengthen domestic manufacturing and enhance U.S. supply chain resilience. However, based on Austin Energy's operational experience procuring, installing, and maintaining EV charging infrastructure, the City has significant concerns regarding the feasibility and impacts of increasing the domestic content requirement for EV chargers from 55 percent to 100 percent. The following comments outline the specific issues identified by the City:

1. **A 100% domestic content requirement is not achievable at this time.** Many critical components – including LCD displays, transformers, charging cables, circuit boards, and semiconductors – are not produced at scale within the United States. Based on current market conditions and procurement experience, no fast-charging equipment has been identified as meeting a full domestic content requirement.

2. **The proposed change would significantly delay the deployment of EV charging infrastructure.** Supply chain constraints already create extended lead times for procurement under the existing 55 percent requirement. Increasing the requirement to 100

percent would further limit supplier availability and extend project timelines, delaying expansion of public charging access across the Austin region.

3. **Reduced availability of compliant manufacturers would increase project costs.** Fewer eligible vendors would lead to increased equipment prices and reduced competition. Higher costs would limit the number of chargers deployable under fixed budgets and hinder progress towards local mobility and electrification goals.

4. **A phased or capacity-based approach would better support both deployment and domestic manufacturing growth**. The City of Austin supports increasing domestic content requirements over time but believes this must correspond to demonstrated U.S. manufacturing capacity. A gradual phase-in would allow continued deployment while providing manufacturers with certainty to expand domestic production.

Conclusion

The City of Austin appreciates FHWA's commitment to strengthening domestic manufacturing and ensuring a national EV charging network. However, an immediate shift to a 100% domestic content requirement is not aligned with current market realities and would significantly slow the deployment of EV charging infrastructure needed to support community mobility and electrification goals.

A phased, capacity-based approach would allow continued progress while providing manufacturers with a predictable pathway for expanding U.S. production. The City remains committed to working with FHWA to advance effective, practical policies that support both domestic industry growth and timely infrastructure delivery.

Should you have any questions, please reach out to Carrie Rogers, Austin Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577 or Stuart Reilly, Austin Energy General Manager, at stuart.reilly@austinenergy.com or 512.322.6817.

Sincerely,

T.C. Broadnax
City Manager
City of Austin

cc: The Honorable Mayor and Austin City Council
Jon Fortune, Austin Deputy City Manager
Stuart Reilly, Austin Energy General Manager
Jennifer Walls, Austin Fleet Mobility Services Director
Richard Mendoza, Austin Transportation and Public Works Director
Carrie Rogers, Austin Government Relations Officer