

March 16, 2023

Pete Buttigieg, United States Secretary of Transportation
United States Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Subject: Request for Information on US DOT Equitable Transportation Community Explorer (ETCE)
Tool and Index Methodology (Docket No. DOT-OST-2023-0020)

Secretary Buttigieg:

The Oklahoma Department of Transportation (ODOT) is providing comments herein regarding the Request for Information on US DOT Equitable Transportation Community Explorer (ETCE) Tool and Index Methodology (Docket No. DOT-OST-2023-0020), published in the Federal Register on February 21, 2023.

ODOT offers the following comments regarding methodology, datasets and map usability and accessibility.

Methodology:

1. While the additional breakdown of the overall disadvantaged components data on the dashboard is helpful, the correlation between the "...percentile ranked indicators" data and the "overall disadvantage components percentile ranked" data do not seem to correlate. Furthermore, this is not explained in the methodology. This makes it very difficult for users to understand the data that they are receiving and nearly impossible to explain to state and community leaders, peers or community members.
 - a. The methodology and data outputs need to be described more clearly regarding how the presented numbers are determined and how they correlate the overall percentiles.
2. It is unclear what triggers the "Percent of Population Living in a Disadvantaged Community" to populate. There seems to be some tracts that have two or more overall disadvantage components that are over 65%, but there is "no disadvantaged population selection" while others with the same number of overall disadvantage components identified do populate a disadvantage percentage.
3. There is a note that states "Tribal jurisdictions and US Territories receive disadvantage designation under M-21-28 Community definition..." but this is not reflected in the "Percent of Population Living in a Disadvantaged Community" data output.

Datasets:

1. Equitable transportation data is difficult to identify thus it is helpful that this tool is highlighting that data, however, it doesn't seem to weigh more or cause a tract to be considered disadvantaged which seems to be in opposition of equitable transportation.

- a. An example is a tract in Oklahoma (it would be helpful to be able to identify the tract number and demographic data from the dashboard) has 73% for Transportation Insecurities as well as 80% for Health Vulnerability, but the tract is not considered disadvantaged.

Map Usability and Accessibility:

1. The website and tool do not seem to be as intuitive as those associated with the Climate and Economic Justice Screening Tool (CEJST).
 - a. There are multiple places to start a search which is confusing and they seem to interact in unexpected ways with each other.
 - i. If the search buttons on the top right of the dashboard are used, the user may end up with erroneous data outputs due to it being unclear as to which of the selected areas the data is representing. It would be helpful for the areas to be highlighted or outlined on the map.
 - ii. If a user tries to search directly from the map, just by clicking a location, the corresponding data doesn't always show in the dashboard. Additionally, sometimes the map will allow you to click on multiple tracts and presents the data and other times the user can only select one tract directly from the map.
2. To be able to get the most use out of the tool, it would be helpful to be able to use the lasso or rectangle tool to identify the footprint of a project and then receive the disadvantaged population information for the footprint and not just the tract(s) in which it resides. Adding demographic data to the tool would further enhance this feature.
3. Although there appears to be a lot of a good data and visualization on the dashboard, it feels cluttered and a bit overwhelming.
 - a. It is not obvious that there are arrows at the bottom of the "Percentile Ranked Indicators" that allow the user to look at the data for the indicators within each of the components.
4. This tool still seems to not be the most accurate representation of our state.

Thank you for your consideration and the opportunity to provide our comments regarding the Request for Information on US DOT Equitable Transportation Community Explorer (ETCE) Tool and Index Methodology.

Sincerely,



Dawn R. Sullivan, P.E.
Deputy Director