

REMOVING BARRIERS TO IMPROVE TRIBAL ACCESS TO GRANT FUNDS

AUGUST 2023

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The Tribal Transit Mobility

Grant Program provides for the transportation needs of tribal communities.

ABOUT THE TRIBAL TRANSIT MOBILITY GRANT PROGRAM

The Washington State Legislature established the Tribal Transit Mobility Grant Program as part of the Move Ahead Washington \$17-billion, 16-year transportation funding package (ESSB 5974 – 2021-22, Sec. 103). In its 2023 session, the Legislature added its intent for the grant program to support transit needs of tribal communities (ESHB 1125 – 2023-24, Sec. 221(11)).

WSDOT's Public Transportation Division administers the Tribal Transit Mobility Grant Program as a competitive grant under the <u>Consolidated</u> Grant Program.

ENGAGEMENT TO REMOVE GRANT PROGRAM BARRIERS

In its 2023 session, the Legislature directed WSDOT to engage with tribes for recommendations on how to remove barriers for tribes to access Tribal Transit Mobility and other grant funds (ESHB 1125 – 2023-24, Sec. 221(11)(a)). The Legislature noted removing barriers and improving access could mean eliminating match requirements and providing technical assistance.

WSDOT used a survey to conduct engagement with tribes. The survey and this report are a first step as WSDOT works to make the Tribal Transit Mobility and its other grant programs more accessible and beneficial to tribes. Agency staff will implement actionable changes from survey results.

Recommended changes to the Tribal Transit Mobility Grant Program include:

- Eliminate the match requirement for the Tribal Transit Mobility Grant Program (agency action; underway for 2025-2027 biennium).
- Work with partners to develop, update, and deploy training directly to tribes (agency action; underway for 2025-2027 biennium).
- Continue to simplify the Tribal Transit Mobility Grant application (agency action; underway for 2025-2027 biennium).
- Remove the Tribal Transit Mobility Grant Program from the Consolidated Grants process (requires legislative action).
- Limit administrative burdens that create tight Tribal Transit Mobility Grant timelines (requires legislative action).

With this report due to the Legislature Sept. 1, 2023, WSDOT used a survey to seek initial input from tribes in the limited time available. The agency is committed to making the Tribal Transit Mobility Grant and its other grant programs more accessible and beneficial to tribes and will continue to invest in its relationship with tribes. WSDOT's Public Transportation Division is hiring a tribal and rural engagement planner and will conduct subsequent, ongoing engagement with tribes to collaboratively develop actionable changes to its public transportation grant programs that remove barriers for tribes. The goals of this engagement are to:

- Receive more applications for and award more funding to tribal projects.
- Foster a closer partnership among WSDOT, tribes, and the state's public transportation sector.
- Exceed the state's goal of 10 percent of Climate Commitment Act public transportation funding benefitting or supporting tribes.
- Increase transit accessibility and use in tribal areas.

WSDOT Public Transportation Division's tribal and rural engagement planner will be one, full-time-equivalent employee devoted to the public transportation needs of the 29 federally recognized tribes in Washington. While a single employee will design a system of assistance for tribes, implementing the system across all tribal areas is extremely resource intensive.

For example, to handle the grant application needs of WSDOT's other public transportation grantees statewide, the Legislature has funded eight full-time-equivalent employees to assist grantees regionally.

The Legislature should consider administrative funding for a similar level of resource for tribes. This would enable WSDOT to work proactively, one-on-one with tribes to develop proposals for Tribal Transit Mobility and other public transportation grant funding.

SURVEY METHODOLOGY

WSDOT tribal relations, grants, data analytics, and community engagement staff collaborated to create a 14-question survey that reflected the objectives outlined by the Legislature in ESHB 1125 – 2023-24, Sec. 221(11)(a).

The survey asked tribes about their history of public transportation grant funding, what barriers they experience obtaining grant funding, and how WSDOT can assist in their future grant applications. Survey questions are in the appendix.

Staff sent the survey to the 29 federally recognized tribes in Washington. The survey was active June 27 - July 14, 2023, and received responses from 11 tribes:

- Squaxin Island Tribe
- Confederated Tribes and Bands of the Yakama Nation
- Puvallup Tribe of Indians
- Skokomish Indian Tribe
- Spokane Tribe of Indians
- Confederated Tribes of Umatilla Indian Reservation

- Suguamish Tribe
- Cowlitz Indian Tribe
- Hoh Indian Tribe
- The Confederated Tribes of the Chehalis Reservation
- Jamestown S'Klallam Tribe

WSDOT is grateful for the time and effort tribes committed responding to the survey.

SUMMARY SURVEY RESULTS

The following are summarized survey results. Full survey results are in the appendix.

Note: The Tribal Transportation Mobility Grant survey included optional questions and used "skip logic." Due to these variables, total responses will vary for certain questions.

- Eight out of eleven respondents have applied to public transportation grant funding.
- Four out of nine respondents have applied for Tribal Transit Mobility grant funding.
- Six out of nine respondents are interested in grant application process training.
- Five out of nine respondents note that the current local match requirement for the Tribal Transit Mobility
 Grant is a barrier for funding, with seven respondents noting they would be more likely to apply for the grant if
 WSDOT removed the requirement.

Summarized individual written responses:

• Multiple tribes noted the grant application process is too time-consuming, confusing, and resource-intensive for tribal staff and they would like to be notified earlier about grant opportunities.

IDENTIFIED BARRIERS AND ASSISTANCE

WSDOT used the survey results to identify the following barriers for tribes' access to Tribal Transit Mobility and other public transportation grant funds:

- Grant match requirement: While individual barriers exist for multiple tribes, the grant match requirement is a
 barrier for most. Five out of nine respondents identified the local match requirement as a barrier. Additionally,
 seven out of nine respondents stated that removing match requirements would make them more likely to apply
 for public transportation grant funding in the future.
- **Grant application and management training availability:** Six out of nine respondents suggested increasing training and technical assistance to make the grant application process more accessible.
- Application process usability: Individual responses also described the application process as time-consuming, confusing, and resource-intensive.

RECOMMENDATIONS

WSDOT's recommendations for the Tribal Transit Mobility Grant come directly from the tribes' responses. The responses helped the agency better understand the barriers tribes experience while applying for and accessing Tribal Transit Mobility Grants and other public transportation grant funding.

While the survey focused on Tribal Transit Mobility Grants and other public transportation grants, responses to the survey are important to WSDOT's inclusive decision-making and planning processes for the agency.

WSDOT staff analyzed survey results and identified the following actionable changes for the 2025-2027 Tribal Transit Mobility Grant Program:

• Eliminate the match requirement for the Tribal Transit Mobility Grant Program and continue to investigate or consider whether it's appropriate to remove match requirements for additional public transportation grant programs. (Agency action; underway for 2025-2027 biennium.)

- Work with partners to develop, update, and deploy training directly to tribes, specifically around grant application writing, creating partnerships, coordination, and grant management. (Agency action; underway for 2025-2027 biennium.)
- Continue to simplify the Tribal Transit Mobility Grant application by identifying, deleting, updating, or making optional elements of the application that aren't considered for evaluation or aren't applicable to tribes. (Agency action; underway for 2025-2027 biennium.)
- Remove the Tribal Transit Mobility Grant Program from the Consolidated Grants process to facilitate the continued usability improvements (including match, optional elements, and unscored information). (Requires legislative action.)
- Limit administrative burdens that create tight Tribal Transit Mobility Grant timelines by allowing additional time for applications, additional awards as needed, and a single point of approval for projects. (Requires legislative action.)

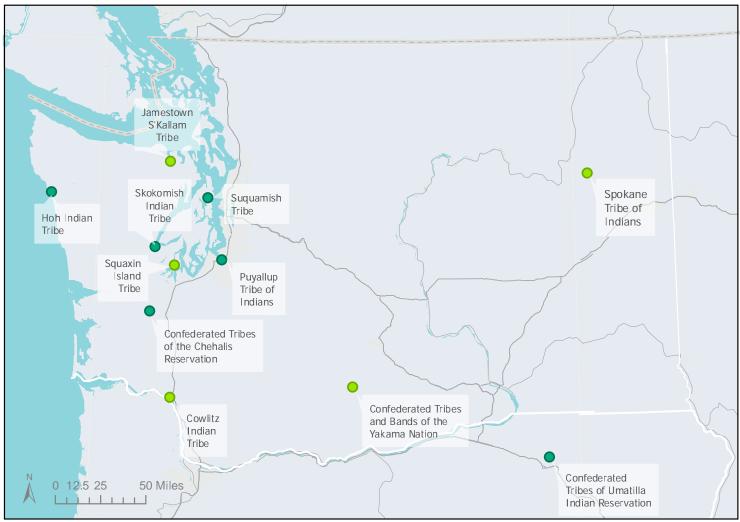
APPENDIX: SURVEY QUESTIONS AND RESULTS

Note: The Tribal Transportation Mobility Grant survey has optional questions and uses "skip logic." Due to these variables, total responses will vary for certain questions.

The survey data below includes summarized and individual data. WSDOT has made data anonymous when possible and minor grammatical and spelling edits to survey comments.

Survey respondents

There were 11 respondents to the survey. The map below shows tribes that responded to the survey.



Tribal Survey Respondents

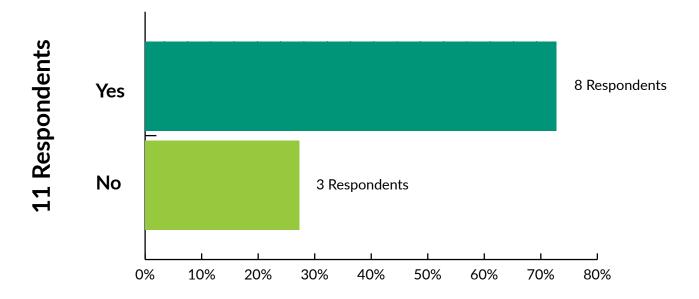
Awarded 2023-2025 Tribal Mobility Grant

Other Tribes

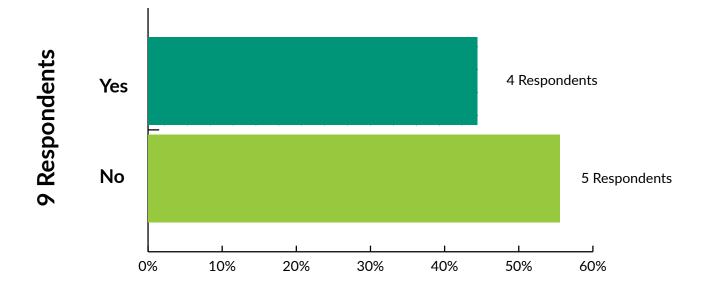
WA State Parks GIS, Esri, HERE, Garmin, FAO, NOAA, USGS, Bureau of Land Management, EPA, NPS

Author: Katie Bunge, WSDOT 7/18/2023

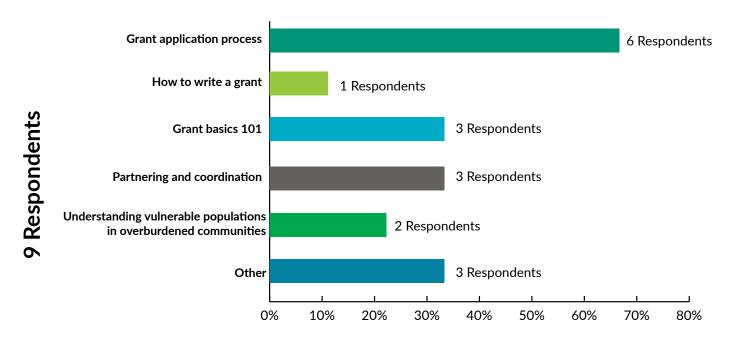
Question: Have you ever applied for public transportation grant funding?



Question: Did you apply to WSDOT for Tribal Transit Mobility funding?



Question: What training would assist you in applying for grant funds (select all that apply)?



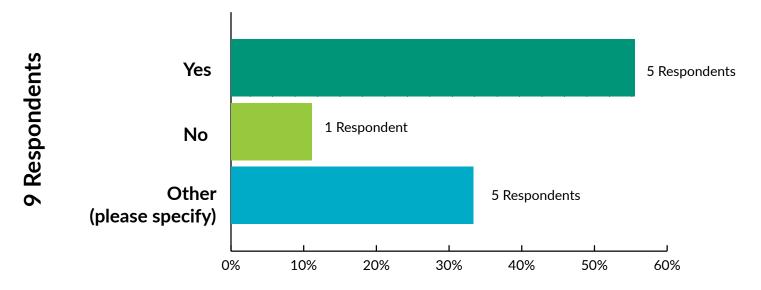
Other (please specify):

Response

[Tribe] has "roads" in its Treaty, it should be the duty and obligation for the feds to take care of the roads, why do we have to apply for grants?

Create a granting process focused on successful implementation, instead of creating grants that REQUIRE training to even apply for. The RESULT is what we're interested in, not the process.

Question: Matching funds are an organization's share of project costs for a grant-funded project as specified in a grant agreement. As an example, the Tribal Transit Mobility Grant Program requires 5-10 percent match. Is the match requirement a barrier to you applying for funding?



Other (please specify):

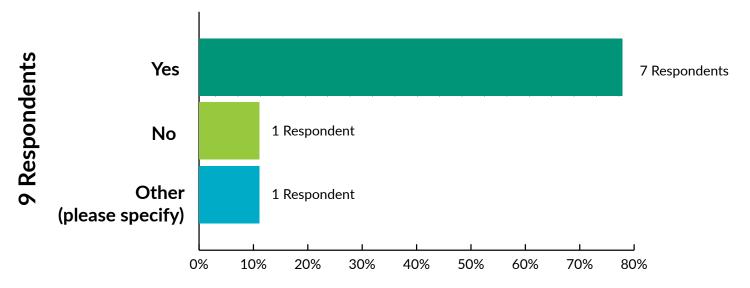
Response

I have no answer for this. I'm sorry.

Nominally no, but relative cost of WSDOT grants have been historically higher than Oregon Department of Transportation grants.

Sometimes.

Question: Would removing the match requirement make you more likely to apply for future funding?



Other (please specify):



Question: Why haven't you applied for public transportation grant funding?

Response

We rely on public transit and have limited tribal transit services.

When I started work here, we had public transit. The grant funding didn't cover all costs some years, so we gave our route to [Mason Transit Authority]... They still do this route through the tribal lands. Route 11, Shelton to Lake Cushman.

No directive to do so from Tribal Council. Frankly, applying for a state grant through [WSDOT] seems like chasing small amounts of money but taking large inputs of time.

Question: Did you receive any assistance from Public Transportation Division staff with your Tribal Transit Mobility Grant application? If you did, was it helpful? Do you have suggestions for how we could improve the help we offered?

Response

We knew the Tribal Transit Mobility funding existed in the Legislative Budget, but the Consolidated Grant Process does not distinguish any differences to the general public. We had to educate the Peninsula [Regional Transportation Planning Organization] Project Selection Committee that we were self-selecting Tribal Transit Mobility as a kind of Consolidated Grant opportunity. Match, special eligibility requirements, and potentially state funds with new implementation guidelines made a flat sale to local elected officials. I haven't decided if blending with the region is the best use of the Tribe's time and whether blending into the Consolidated Process benefits cohesive regional planning.

Question: Why didn't you apply for Tribal Transit Mobility Grant funding?

Response

Match requirements

Previous match requirements. Our services in Washington are funded through our grant applications through the state of Oregon and directly with [the Federal Transit Administration]. If we have more extensive routes into Washington, we will need to coordinate with Washington for grants.

We just found out about it last year.

We're already served by other transit providers.

Grant writer was going to and missed sending it in.

Question: How can we help you apply for future funds?

Response

Extend the deadlines to 2 months. Keep sending out heads up announcements. Make grant applications visible to others not set-up with GMS access. Do not ask tribes to pull data from the Census or ACS when the census is not representational of tribal members, assets and overburdened rural communities. For Vanpool funding, make sustaining programs easier with a lower match. Be aware of tribes using their sovereignty to register and license vehicles per tribal code, i.e., to not have this become a hurdle.

Remove the match

Allow Tribes with no transit service to act as a pass-through to support local transit operators provide service to Tribal locations. I'm not sure if this funding source allows that, typically it has not been permitted with other transit grants.

I think the tribe plans to continue to let [Mason Transit Authority] deliver our route to the public.

By getting out of the usual 'grants are filled with bureaucratic requirements' that make applying confusing and time-consuming.

We are heavily ingrained into [Oregon Department of Transportation] cycle and systems for transit grants. We don't have the same coordination with Washington, mostly because our routes into WA are much smaller than our routes throughout NE Oregon. We expect that to change in the coming years as we restore the Tri-Cities connection to Hermiston.

We are looking to change things here at the tribe. If I could be the contact on these opportunity's would help the tribe move forward.

Question: Is there anything else that prevents you from applying for public transportation grant funding?

Response

Not really, being a direct recipient of federal transit funds makes it a question of time and efficiency for applying for capital project grants.

Too short of notification to write and process via our procedures.

We have a small community. We would never have much routes on our reservation.

Response

By focusing on the grant PROCESS, rather than successful results, you dilute and discourage participation of those not part of the embedded bureaucracy. An embedded bureaucracy is important in any government for continuity and getting the background work done. However, when that bureaucracy's sole focus on 'process' (hey, it's what they do, but don't let it infect everything it touches) actually gets in the way of a successful end result, then it needs to be examined and hopefully re-imagined.

Time, capacity.

Grant funds have so many strings and obstacles to overcome. Too labor intensive for a small tribe with few staff.

No

Question: For grant applications submitted by another agency or group that you may support, what are the challenges in providing a formal resolution in support of a project?

Response

Challenges are: a) The partnership relationship is not present or b) the concept of Tribal Consultation is foreign. c) Requesting a formal resolution becomes a shallow act and d) providing a tribal resolution is an act of generosity to improve the region with [WSDOT Public Transportation Division] investment. (Letters of Support are easier for staff/CEO to handle.) e) Scheduling a Tribal Council meeting for a resolution can become a burden to meet grant deadlines especially when the local agency has never presented to Council before. f) What goes into the resolution? -- the support language does not negate or waive the resource management responsibilities of the Tribe during permitting and Cultural Resource Assessment.

The time and process we have to go through.

Resolutions are a bit formal and have an added labor element to drafting them. Substituting this step with something like a letter of support with the Tribal Chair's signature or an authorized designee to approve is much easier to develop. Resolutions will simply be slower than developing a letter of support/approval. Sometimes Councils want a full quorum in order to approve a resolution. This can create delays.

I don't know if there are any challenges. We do support [Mason Transit Authority] and will continue to work with them for our route.

We need to get a Tribal Council resolution, which requires its own process, which can take a month or more after Legal review and sign-offs.

None

No challenges

Question: Is there anything else you would like to share?

Response

Could WSDOT [Public Transportation Division] review [public transportation benefit area] language for board composition with the concept of tribal consultation? For example, if the Transit Board contains seats for every federally recognized tribe within the [public transportation benefit area] service area -- great--no worries! If elected tribal seats are missing from the composition, then the [public transportation benefit area] needs to adopt a tribal consultation policy.

Response

Some tribes call for assistance because they don't have a plan or have outdated plans. The county is supposed to take care of their roads within our reservation.

I support public transit.

The grant process has become captured by a love of process - with the result that end results are less important than the process. We, however, are focused on successful implementation and end results, with that granting process getting in the way.

The WA Dept of Commerce [Victims of Crime Act] program is outstanding in their assistance to tribes with implementing grant funds. Look to them on how to best assist tribes when it comes to grant funding, they are wonderful.

Be more involved with WSDOT.

ACRONYMS

ESHB Engrossed Substitute House Bill

ESSB Engrossed Substitute Senate Bill

WSDOT Washington Department of Transportation

WEBSITES FEATURED

The Tribal Transit	https://wsdot.wa.gov/business-wsdot/grants/public-transportation-grants/grant-programs-
Mobility Grant	and-awards/tribal-transit-mobility

Program

ESSB 5974 - 2021- https://lawfilesext.leg.wa.gov/biennium/2021-22/Pdf/Bills/Session Laws/Senate/5974-S.

22, Sec. 103 SL.pdf?q=20230711152724#page=4

ESHB 1125 - 2023- https://lawfilesext.leg.wa.gov/biennium/2023-24/Pdf/Bills/House Passed

24, Sec. 221(11) Legislature/1125-S.PL.pdf?q=20230516094653#page=77

Consolidated Grant https://wsdot.wa.gov/business-wsdot/grants/public-transportation-grants/grant-programs-

Program and-awards/consolidated

29 federally https://dor.wa.gov/education/industry-guides/indian-tax-guide/federally-recognized-indian-

recognized tribes tribes

ENGLISH

Title VI Notice to Public

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This material can be made available in an alternate format by emailing the Office of Equity and Civil Rights at wsdotada@wsdot.wa.gov or by calling toll free, 855-362-4ADA(4232). Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

ESPAÑOL

Notificación de Titulo VI al Público

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Información de la Ley sobre Estadounidenses con Discapacidades (ADA, por sus siglas en inglés)

Este material puede estar disponible en un formato alternativo al enviar un correo electrónico a la Oficina de Equidad y Derechos Civiles a <u>wsdotada@wsdot.wa.gov</u> o llamando a la línea sin cargo 855-362-4ADA(4232). Personas sordas o con discapacidad auditiva pueden solicitar la misma información llamando al Washington State Relay al 711.

한국어 - KOREAN

제6조 관련 공지사항

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미국 장애인법(ADA) 정보

본 자료는 또한 평등 및 민권 사무국에 이메일 <u>wsdotada@wsdot.wa.gov</u> 을 보내시거나 무료 전화 855-362-4ADA(4232)로 연락하셔서 대체 형식으로 받아보실 수 있습니다. 청각 장애인은 워싱턴주 중계 711로 전화하여 요청하실 수 있습니다.

русский - RUSSIAN

Раздел VI Общественное заявление

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Закон США о защите прав граждан с ограниченными возможностями (ADA)

Эту информацию можно получить в альтернативном формате, отправив электронное письмо в Ведомство по вопросам равенства и гражданских прав по адресу wsdotada@wsdot.wa.gov или позвонив по бесплатному телефону 855-362-4ADA(4232). Глухие и слабослышащие лица могут сделать запрос, позвонив в специальную диспетчерскую службу штата Вашингтон по номеру 711.(4232). Глухие и слабослышащие лица могут сделать запрос, позвонив в специальную диспетчерскую службу штата Вашингтон по номеру 711.

tiếng Việt - VIETNAMESE

Thông báo Khoản VI dành cho công chúng

Chính sách của Sở Giao Thông Vận Tải Tiểu Bang Washington (WSDOT) là bảo đảm không để cho ai bị loại khỏi sự tham gia, bị từ khước quyền lợi, hoặc bị kỳ thị trong bất cứ chương trình hay hoạt động nào vì lý do chủng tộc, màu da, hoặc nguồn gốc quốc gia, theo như quy định trong Mục VI của Đạo Luật Dân Quyền năm 1964. Bất cứ ai tin rằng quyền bảo vệ trong Mục VI của họ bị vi phạm, đều có thể nộp đơn khiếu nại cho Văn Phòng Bảo Vệ Dân Quyền và Bình Đẳng (OECR) của WSDOT. Muốn biết thêm chi tiết liên quan đến thủ tục khiếu nại Mục VI và/hoặc chi tiết liên quan đến trách nhiệm không kỳ thị của chúng tôi, xin liên lạc với Phối Trí Viên Muc VI của OECR số (360) 705-7090.

Thông tin về Đạo luật Người Mỹ tàn tật (Americans with Disabilities Act, ADA)

Tài liệu này có thể thực hiện bằng một hình thức khác bằng cách email cho Văn Phòng Bảo Vệ Dân Quyền và Bình Đẳng wsdotada@ wsdot.wa.gov hoặc gọi điện thoại miễn phí số, 855-362-4ADA(4232). Người điếc hoặc khiếm thính có thể yêu cầu bằng cách gọi cho Dịch vụ Tiếp âm Tiểu bang Washington theo số 711.

ARABIC - العَرَبيّة

العنوان 6 إشعار للجمهور

تتمثل سياسة وزارة النقل في ولاية واشنطن (WSDOT) في ضمان عدم استبعاد أي شخص، على أساس العرق أو اللون أو الأصل القومي من المشاركة في أي من برامجها وأنشطتها أو الحرمان من الفوائد المتاحة بموجبها أو التعرض للتمييز فيها بخلاف ذلك، كما هو منصوص عليه في الباب السادس من قانون الحقوق المدنية لعام 1964. ويمكن لأي شخص يعتقد أنه تم انتهاك حقوقه التي يكفلها الباب السادس تقديم شكوى إلى مكتب المساواة والحقوق المدنية (OECR) التابع لوزارة النقل في ولاية واشنطن. للحصول على معلومات إضافية بشأن إجراءات الشكاوى و/أو بشأن التزاماتنا بعدم التمييز بموجب الباب السادس، يرجى الاتصال بمنسق الباب السادس في مكتب المساواة والحقوق المدنية على الرقم 7090-705 (360).

معلومات قانون الأمريكيين ذوى الإعاقة (ADA)

يمكن توفير هذه المواد في تنسيق بديل عن طريق إرسال رسالة بريد إلكتروني إلى مكتب المساواة والحقوق المدنية على

wsdotada@wsdot.wa.gov

أو عن طريق الاتصال بالرقم المجاني: (Washington State Relay على الرق 711.

中文 - CHINESE

《权利法案》Title VI公告

<華盛頓州交通部(WSDOT)政策規定,按照《1964年民權法案》第六篇規定,確保無人因種族、膚色或國籍而被排除在WSDOT任何計畫和活動之外,被剝奪相關權益或以其他方式遭到歧視。如任何人認為其第六篇保護權益遭到侵犯,則可向WSDOT的公平和民權辦公室(OECR)提交投訴。如需關於第六篇投訴程式的更多資訊和/或關於我們非歧視義務的資訊,請聯絡OECR的第六篇協調員,電話(360) 705-7090。

《美国残疾人法案》(ADA)信息

可向公平和民權辦公室發送電子郵件 <u>wsdotada@wsdot.wa.gov</u> 或撥打免費電話 855-362-4ADA(4232) , 以其他格式獲取此資料。 听力丧失或听觉障碍人士可拨打711联系Washington州转接站。

Af-soomaaliga - SOMALI

Ciwaanka VI Ogeysiiska Dadweynaha

Waa siyaasada Waaxda Gaadiidka Gobolka Washington (WSDOT) in la xaqiijiyo in aan qofna, ayadoo la cuskanaayo sababo la xariira isir, midab, ama wadanku kasoo jeedo, sida ku qoran Title VI (Qodobka VI) ee Sharciga Xaquuqda Madaniga ah ah oo soo baxay 1964, laga saarin ka qaybgalka, loo diidin faa'iidooyinka, ama si kale loogu takoorin barnaamijyadeeda iyo shaqooyinkeeda. Qof kasta oo aaminsan in difaaciisa Title VI la jebiyay, ayaa cabasho u gudbin kara Xafiiska Sinaanta iyo Xaquuqda Madaniga ah (OECR) ee WSDOT. Si aad u hesho xog dheeraad ah oo ku saabsan hanaannada cabashada Title VI iyo/ama xogta la xariirta waajibaadkeena ka caagan takoorka, fadlan la xariir Iskuduwaha Title VI ee OECR oo aad ka wacayso (360) 705-7090.

Macluumaadka Xeerka Naafada Marykanka (ADA)

Agabkaan ayaad ku heli kartaa qaab kale adoo iimeel u diraaya Xafiiska Sinaanta iyo Xaquuqda Madaniga ah oo aad ka helayso wsdotada@wsdot.wa.gov ama adoo wacaaya laynka bilaashka ah, 855-362-4ADA(4232). Dadka naafada maqalka ama maqalku ku adag yahay waxay ku codsan karaan wicitaanka Adeega Gudbinta Gobolka Washington 711.

If you have difficulty understanding English, you may, free of charge, request language assistance services by calling 360-705-7921 or email us at: PubTrans@wsdot.wa.gov

ESPAÑOL - SPANISH

Servicios de traducción

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한국어 - KOREAN

번역 서비스

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русский - RUSSIAN

Услуги перевода

Если вам трудно понимать английский язык, вы можете запросить бесплатные языковые услуги, позвонив по телефону 360-705-7921, или написав нам на электронную почту: PubTrans@wsdot. wa.gov

tiếng Việt - VIETNAMESE

các dịch vụ dịch thuật

Nếu quý vị không hiểu tiếng Anh, quý vị có thể yêu cầu dịch vụ trợ giúp ngôn ngữ, miễn phí, bằng cách gọi số 360-705-7921, hoặc email cho chúng tôi tại: PubTrans@wsdot.wa.gov

الْعَرَبِيَّةُ - ARABIC

خ دمات الترجمة

إذا كنت تجد صعوبة في فهم اللغة الإنجليزية، فيمكنك مجا نَّا طلب خدمات المساعدة اللغوية عن

طريق الاتصال بالرقم 360-705-7921 أو مراسلتنا عبر البريد الإلكتروني : PubTrans@wsdot.wa.gov

中文 - CHINESE

翻译服务

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Af-soomaaliga - SOMALI

Adeegyada Turjumaada

Haddii ay kugu adag tahay inaad fahamtid Ingiriisida, waxaad, bilaash, ku codsan kartaa adeegyada caawimada luuqada adoo wacaaya 360-705-7921 ama iimayl noogu soo dir: PubTrans@wsdot.wa.gov



MORE INFORMATION

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PUBLIC TRANSPORTATION DIVISION

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