



CHICAGO DEPARTMENT OF TRANSPORTATION
CITY OF CHICAGO

June 14, 2013

Mike Hine
Federal Highway Administration
Illinois Division
Mike.Hine@dot.gov

Subject: Buy America Waiver Request for "Chicago Area Alternative Fuels Deployment Program – Phase 2", Federal Project Number CMM-6000(439)

Dear Mr. Hine:

The City of Chicago Department of Transportation (CDOT) is seeking a waiver from the Federal Highway Administration's (FHWA) Buy America requirements for the vehicles and vehicle conversions deployed through CDOT's Congestion Mitigation Air Quality (CMAQ)-funded Chicago Area Alternative Fuels Deployment Program – Phase 2 (Program).

Project Description

The Program will assist Chicago area fleets transition their vehicles to use petroleum alternatives that reduce dependence on foreign oil while also reducing local emissions. Due to the higher upfront costs of purchasing and/or converting to alternative fuel vehicles and lack of robust public fueling infrastructure, CDOT, utilizing \$15 million in federal CMAQ funding, will distribute incentives to Chicago area fleets and fuel providers to deploy alternative fuel vehicles and build public fueling stations. CDOT anticipates deploying approximately 251 electric trucks and 127 alternative fuel taxis.

Waiver Justification

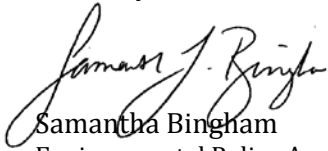
FHWA's Buy America policies require 100 percent of all steel or iron incorporated into Federal-aid projects must be domestically manufactured. With respect to vehicles, manufacturers typically assemble these products with many different components and subcomponents containing steel and iron. As a result, vehicles are typically referred to as being made where the final product rolls off the assembly line for delivery into the marketplace.

FHWA through its own investigation has determined that no vehicle is comprised of 100 percent domestically produced steel and iron. FHWA states that since many vehicles and components that may be needed for a conversion, are assembled in the United States, the intent of Buy America policies to support American jobs can be achieved and affected projects can be granted waivers provided that the vehicles are assembled and/or converted in the United States. CDOT agrees with FHWA's approach to

granting Buy America waivers for vehicles and conversions and affirms the City of Chicago and its subrecipients will use these Federal funds for the Program so long as the vehicle or conversion is assembled in the United States.

Attachment A lists the anticipated vehicles and conversions participating in the Program for this waiver request. If you have any questions or need additional information, please contact me at (312) 744-8096 and Samantha.bingham@cityofchicago.org.

Sincerely,

A handwritten signature in black ink that reads "Samantha Bingham". The signature is written in a cursive style with a large, looping initial "S".

Samantha Bingham
Environmental Policy Analyst

Attachment A
City of Chicago Department of Transportation
Federal Project Number CMM-6000(439)

State	Locality	Description of Item(s)	Estimated Number of Vehicles	State Transportation Improvement Program (STIP) Project ID Number
Illinois	City of Chicago	Incentive vouchers for light, medium and heavy-duty plug-in battery electric and compressed natural gas vehicles	378	P-75-009-12