Exhibit 8

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, et al., Plaintiffs, v. TRUMP, et al., Defendants.	20-CV-5770 (JMF)

DECLARATION OF GIA BIAGI

1. My name is Gia Biagi, and I make this Declaration in connection with the above-captioned case. I was appointed as Commissioner of the Chicago Department of Transportation (CDOT) by Mayor Lori Lightfoot in 2019. Under my leadership, CDOT has undertaken a strategic plan looking at all aspects of the Department's operations including how resources are programmed throughout the City.

2. As the chief executive of CDOT, my primary responsibility is to provide our residents and visitors with a world class transportation system that is safe, efficient, and equitable for all users. My duties include managing CDOT's operational and capital components so as to provide the transportation system wanted and needed by the City, State and nation. Transportation impacts everyone's lives both positively and negatively and, as a national transportation hub, what we do here in Chicago, reverberates across the nation.

3. To assure a well-functioning transportation system for our residents, businesses, and visitors to the City, CDOT is heavily reliant on accurate and relevant data. Providing an equitable transportation system requires targeting of resources to those areas in the most need.

4. The US census is a primary source of the data we require to achieve our goals and serve our constituents.

5. The 2020 census data for Chicago is particularly important as there have been unprecedented socio-demographic population shifts by race and geography particularly over this last decade. Changing patterns may require changes to planning efforts and adjustment to where resources are targeted for their most efficient use.

6. CDOT uses all demographic characteristics from the census to understand, assess, and predict travel demand and travel behavior. Race and age data are especially significant, as well as the travel behavior components of the American Community Survey (ACS) and the decennial Census data to which these ACS data are associated. Among other uses, CDOT uses demographic census data, such as race, age, and home ownership, to:

- provide estimates of commuting patterns to work, which has been a key indicator to determine the share of people driving to work or using sustainable modes of transportation, such as biking or transit. This information was a key feature in the city's *Roadmap for the Future of Transportation and Mobility in Chicago* report, which developed policies and goals to improve transportation for all in the city.

- understand transportation trends and forecasting of future transportation needs and travel demand. These forecasts guide planning and policymaking regarding infrastructure investments that serve people walking, bicycling, taking urban transit, intercity transportation, and/or driving, as well as freight, aviation, and maritime transportation.

- provide info to planners and policy analysts to understand the benefits and impacts of public investments and policy decisions over time. Understanding past performance is necessary to guide prudent future public policy and investment decisions.

- complete certain federal grant requirements where an Environmental Assessment or an Environmental Impacts Statement is required.

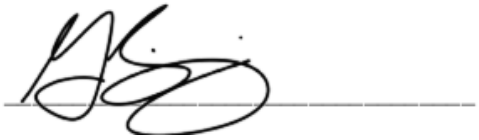
- complete applications for most federal funding programs such as BUILD ("Broader Urban Involvement & Leadership Development"), one of Chicago's leading gang intervention, violence prevention, and youth development organizations that focus on hard-to-serve youth in some of Chicago's most challenging neighborhoods.

- determine population density for allocating Divvy bikes and stations and scooter density. For example, the scooter per capita/population density this year is based on the population of the pilot area and the number of scooters deployed last year. Census population data is used to set the boundaries of the equity priority areas.

- define High Economic Hardship (HEH) areas, which are used in Vision Zero (Chicago's commitment and approach to eliminating fatalities and serious injuries from traffic crashes), the Divvy program, and scooters.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 3rd day of August 2020



Gia Biagi
Commissioner
Chicago Department of Transportation