



August 26, 2022

The Honorable Peter Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Request for Information; Thriving Communities Initiative (Docket No. DOT-OST-2022-0082)

Dear Secretary Buttigieg:

The Association of Metropolitan Planning Organizations (AMPO) writes to request consideration of the following comments in response to the U.S. Department of Transportation's (USDOT) Request for Information (Docket No. DOT-OST-2022-0082) that was published in the Federal Register on August 5, 2022. We appreciate the opportunity to provide these comments.

AMPO, the transportation advocate for metropolitan regions, is committed to enhancing metropolitan transportation systems by planning, programming, and coordinating Federal highway and transit investments. AMPO's mission is to help communities thrive by strengthening the Metropolitan Planning Organizations (MPOs) that plan for safe, reliable, and equitable multimodal transportation networks that are accessible to all. MPOs vary by size, region, and needs, and AMPO provides innovative approaches and context-sensitive solutions to help all MPOs. Our vision is a MPO community that fosters economic resilience, quality of life, and opportunity for all by creating thriving metropolitan regions.

AMPO is eager to partner with USDOT to assist with delivering technical assistance, planning, and capacity building needs faced by disadvantaged communities through the Thriving Communities Initiative. Working with our members and partners AMPO has a long history of delivering technical assistance through facilitating peer-to-peer programs and developing resources in partnership with USDOT. We are always appreciative of any opportunity to do so. We recognize the need to strengthen urban, rural, and tribal communities concurrently. We support the efforts of our fellow stakeholder organizations and look forward to continuing to coordinate and collaborate on important efforts such as this program.

We appreciate the importance of all the questions raised in the Request for Information. We have organized our comments by providing summary responses with specific examples where appropriate. The following are identified themes in response to the Request for Information:

Leveraging the MPOs

One size does not fit all communities or regions. Applying flexibility such as that seen on the DOT Navigator will be the most beneficial. This holds true for both funding streams and the delivery of technical assistance. Building trust with disadvantaged communities and energizing a neighborhood takes time and a sustained effort, something which MPOs have been working towards for decades. MPOs have strong existing relationships with local elected officials and community-based organizations throughout their respective planning areas; many are willing to host and facilitate regional training and workshops in partnership with USDOT. Allowing for the use of federal funds to compensate community members for their time would bolster active participation and engagement from disadvantaged communities. Trainings hosted by MPOs, and funded by USDOT, that build capacity in neighborhood associations, community organizations, and local governments will have a meaningful and lasting impact. Every effort towards strengthening a community through a MPO not only lifts that municipality but benefits the entire region and every community under that MPO's umbrella.

Funding Challenges

Our member organizations have conveyed that often the greatest barriers to disadvantaged communities pursuing Federal transportation funds revolve around identifying the non-federal match.

Allowing for and encouraging innovative ways to supply the non-federal match is something that we have overwhelmingly heard from our members. Local governments have limited authority and ability to raise revenue; these challenges are especially pronounced in disadvantaged communities, where the combination of high public needs, depressed property values, and low household resources create a funding gap. Because of these limited resources disadvantaged communities often apply for smaller grants which ultimately require a relatively greater cost of effort to comply with federal requirements, diminishing the benefit of federal funds. Recent economic struggles, inflation, and the lingering impacts of COVID-19 have exacerbated these challenges.

More active engagement on the available resources and options for regional and state governments to meet the non-federal match would help to educate local and regional governments and could encourage a wider application of federal funds. Beyond flexibility in non-federal match, increases in the federal share, or a complete waiver of local match requirements, would benefit disadvantaged communities that most struggle with the non-federal match.

In addition to federal requirements, State agencies often impose additional requirements and restrictions on the use of federal funds. These can include forbidding or limiting the use of non-federal match alternatives, even when they are allowed under federal programs. Such restrictions create an additional hurdle to the use of federal funds and may have the impact of effectively excluding communities that lack the capacity to meet cost share requirements with cash (such as disadvantaged communities) from federal programs.

An important role of MPOs is to help local/regional/state partners navigate the Federal system and to establish successful, collaborative relationships with these partners that submit joint applications to programs where appropriate. This can occasionally be difficult when these same partners are competing for the same grant awards.

Building Capacity and Providing Training

USDOT has been helpful in building capacity and increasing knowledge. However, many small local governments or small regional organizations still do not have the staff capacity or financial resources to apply, receive, and manage a federal award.

Notably, finding and retaining staff has become increasingly difficult for the transportation and planning industries; finding and retaining staff that have the tools to identify, design, develop, finance, and implement projects even more so. In many small to medium communities, staff often must serve in many roles, covering a diverse set of responsibilities. This limited staffing often leads them to hire consultants not only to implement projects, but often to even apply to funding sources. The application process can include components such as a Benefit Cost Analysis (BCA) or other technical requirements that a staff member either is not familiar with or simply does not have the time to complete in combination with their other job responsibilities. These hurdles from the very first step of applying often keep communities and organizations from considering federal grants. However, we believe providing additional training and technical assistance, either at the federal or state level, would be beneficial. In addition to training for in-house application development, USDOT could consider working through partner organizations to establish a technical assistance program that provides grant writing services for those in need.

For new programs it is critical that USDOT find opportunities to engage directly with applicants in-person at the local and regional level. Local and regional governments are navigating a plethora of new programs and requirements related to implementation of the Bipartisan Infrastructure Law (BIL). Hosting workshops, roundtables, and developing materials to assist potential applicants with a better understanding of what it means to manage a federal project and how innovative practices may apply would be beneficial. Providing information about what types of projects tend to be most successful at achieving the goals of a community and how the federal programs can help achieve such goals would be valuable. With time and resources stretched thin, it can be challenging to stay informed of all the new funding opportunities.

The Technical Assistance/Local Support webpage on the USDOT FHWA BIL website has been very helpful at a national level, but sometimes this information does not trickle down to local and regional areas. We understand that the role of the Division offices is primarily to regulate and ensure that federal requirements are being met accordingly. However, with all the new funding and programs provided by the BIL, there is an opportunity for the Division offices to both regulate and educate.

As previously noted, local, regional, and state resources are stretched thin navigating the implementation of the BIL. Strengthening coordination and communication between USDOT headquarters and the Division offices and working with the Division offices to deliver additional training and technical assistance opportunities would be beneficial at the local, regional, and state levels.

Leveraging the existing resources of the FHWA Division and Local Technical Assistance Program (LTAP) Offices at the local and regional level to disseminate information would be valuable. USDOT could partner with MPOs and their regional networks, which integrate disadvantaged communities, in providing training and specialized technical assistance for local governments and regional stakeholders.

In addition to the themes identified above, AMPO also strongly encourages USDOT to continue its engagement in technical assistance, planning, and capacity building needs faced by disadvantaged communities with stakeholder agencies. AMPO is ready to work with USDOT, our members, and industry stakeholders to address the questions stated in the Request for Information and assist in meeting the technical assistance, planning, and capacity building needs of disadvantaged communities. We appreciate the opportunity to respond to this Request for Information and look forward to engaging with you as this conversation continues. Should you have questions or comments regarding this letter, please feel free to contact me at any time.

Respectfully,



William Keyrouze
Executive Director