**AMPO MEMBER SUBMISSION INSTRUCTIONS**
Submitting Comments to USDOT’s Request for Information on the Next Surface Transportation Reauthorization
**Docket No.** DOT–OST–2025–0468

**Overview**

USDOT is soliciting public comment to inform the development of the next surface transportation authorization. This is a critical opportunity for MPOs to share their experiences, elevate regional priorities, and shape federal policy.

The RFI focuses on four themes:

1. Enhancing transportation safety
2. Accelerating project delivery
3. Increasing investment opportunities
4. Strengthening partnerships with states and stakeholders

We strongly encourage all AMPO members to submit comments. The perspectives of MPOs are essential to ensuring the next authorization reflects the realities of regional planning and the needs of local communities.

**How to Submit Your Comments**

Comments must be received by **August 20, 2025**. Access the RFI [**here**](https://www.federalregister.gov/documents/2025/07/21/2025-13663/advancing-a-surface-transportation-proposal-that-focuses-on-americas-most-fundamental-infrastructure).

**Submission Options:**

1. **Regulations.gov** (Recommended):
	* Go to [**www.regulations.gov**](https://www.regulations.gov)
	* Search for **Docket No. DOT–OST–2025–0468**
	* Follow instructions to upload your comments
	* Attach your response as a PDF or Word file
2. **Email:**
	* Send to: **STR2026@dot.gov**
	* Include your full response in the email body *and* as an attachment
	* Subject line: *Comments on Docket No. DOT–OST–2025–0468*
3. **Mail:** Address to: *Dockets Operations, U.S. Department of Transportation*, *1200 New Jersey Avenue SE, West Building, Ground Floor, W12–140*, *Washington, DC 20590–0001*

**Note:** Include your full name, title, organization, address, phone number, and email in your comment letter.

**Instructions for Using the Comment Template**

AMPO has created a customizable template to help members respond. Please download or copy the template below, insert region-specific information, and edit/add to the policy sections as appropriate.

Please reach out to Katie Economou, Legislative Director, at **keconomou@ampo.org** with any questions.

**COMMENT TEMPLATE FOR MEMBERS**

**Response to Docket No. DOT-OST-2025-0468**

**Re: Request for Information – Advancing a Surface Transportation Proposal that Focuses on America’s Most Fundamental Infrastructure Needs**

Submitted by: [Insert Name]
[Insert Title]
[Insert Organization]
[Insert Address]
[Insert Phone]
[Insert Email]

**I. Introduction**

Dear U.S. Department of Transportation,

Thank you for the opportunity to submit comments in response to the Request for Information (Docket No. DOT-OST-2025-0468) on the development of the next surface transportation authorization.

At [Insert MPO Name], we plan for the future of transportation across [X] counties and [Y] cities, serving [Z] residents in the [insert region]. We oversee approximately [$$$] annually in federal transportation funding, working to improve safety, reduce congestion, and support economic development. Guided by a board of local elected officials and supported by a professional planning staff, we ensure federal dollars are invested strategically to deliver transformative projects to the [Insert Region] area.

Metropolitan Planning Organizations (MPOs) are federally required regional policy-making bodies responsible for developing the long-range transportation blueprints that guide critical infrastructure investments. By law, MPOs coordinate multimodal transportation plans using Congressionally mandated performance measures, in collaboration with local governments, transit agencies, state DOTs, and the public. This ensures that federal investments are cost-effective, locally informed, and nationally aligned.

Local governments are foundational to our national transportation system, owning over 75% of roads, more than half of bridges, and the majority of public transit systems. Yet, they receive just 14% of federal transportation funds, despite being closest to the needs of businesses, residents, and job creators. A more balanced, streamlined system is needed. One that empowers regions to invest in projects that deliver real economic value, improve safety, and support long-term competitiveness.

A strong and collaborative relationship between the U.S. Department of Transportation (USDOT) and MPOs is essential to the success of the nation’s transportation infrastructure. In a dynamic transportation landscape, fostering this partnership will enable us to tackle critical challenges and build strong, safe, and thriving transportation networks.

We applaud USDOT for initiating this Request for Information and offer the following recommendations, based on our direct experience in implementing federal surface transportation policy. Our priorities align with the Association of Metropolitan Planning Organizations (AMPO), the Local Officials in Transportation (LOT) Coalition, and reflect the needs of MPOs nationwide. They are organized by the four major themes outlined in the RFI.

**II. Responses to Major Policy Themes**

**Theme 1: Enhancing Transportation Safety**

**Empower MPOs to Advance Safety Outcomes.** We support the Secretary’s call to address the significant safety challenges on our roads, highways, bridges, and infrastructure. Regions play a critical role in addressing safety nationwide. MPOs are uniquely positioned to identify and respond to safety challenges, such as dangerous intersections and high-crash corridors. Regions offer an efficient and effective path to ensure safety investments lead to substantial improvements, helping Americans travel safely to work, play, and home to their loved ones. The administration should support expanded MPO eligibility and decision-making authority for federal safety programs to ensure investments are guided by local data and regional safety action plans.

**Strengthen the Regional and Local Role in Bridge Safety and Asset Management.** Locally owned bridges make up about half of all US bridges but are twice as likely to be in poor condition compared to state-owned bridges. AMPO recommends continuing the Bridge Formula Program and converting it to a suballocated program. Local and regional governments should have authority to prioritize and program bridge funds based on local and regional needs.

[Insert Any Region-Specific Priorities]

**Theme 2: Accelerating Project Delivery**

**Modernizing Funding Mechanisms for Effective Regional Delivery**. As the federally designated entity responsible for regional transportation planning, [Insert MPO Name] supports reforms that grant MPOs the option to serve as direct recipients of Metropolitan Planning (PL) funds, with an opt-out option. We also support the creation of a pilot program allowing a select group of MPOs with Transportation Management Areas (TMAs) to directly receive capital funds that are currently suballocated (e.g., STBG, CMAQ, CRP, etc.). Additionally, all MPOs should be guaranteed a meaningful role in project selection to ensure that federally funded projects reflect local priorities and deliver the greatest benefit to communities, while reaching national goals. These changes would enhance local accountability, improve project delivery, and streamline the process.

**Allowing for Carryover of Federal Funds.** Many of [Insert MPO Name]’s projects, such as [insert example: regional BRT network, grade separation project], require extensive coordination and span multiple fiscal years. Oftentimes, these critical efforts do not align neatly with the federal fiscal calendar. Allowing the carryover of federal funds from one fiscal year to the next ensures uninterrupted progress on essential long-term projects, promoting consistent infrastructure improvements that enhance safety, congestion relief, and economic vitality for residents.

**Streamline environmental review and permitting for certain local and regional projects.** Many locally supported projects are delayed by review processes that were not designed for their scope or scale. Targeted reforms would accelerate delivery without compromising environmental protection. Planning funds support the initial steps in the federal permitting process. Increased planning funds can better address environmental and permitting delays, by identifying and resolving problems early in the process (see below).

[Insert Any Region-Specific Priorities]

**Theme 3: Increasing Opportunities Through Investment in Transportation Infrastructure**

**Increase Planning Funds to Meet Federal Planning Requirements.** Planning is the foundation of effective project delivery. Despite expanding responsibilities, Metropolitan Planning funds (PL) remain below 1% of total formula dollars. At [Insert MPO Name], we are responsible for efforts such as [e.g., freight coordination, congestion management, safety planning, housing and land use integration, etc.]. These activities require sophisticated modeling, public engagement, and interagency coordination.We advocate for an increase in the total amount of PL funds and an increase in the federal share to adequately meet the needs of the evolving role of MPOs. These funds empower MPOs to plan for transportation systems that are responsive to the needs of our communities, fostering economic growth, safety, and congestion relief. PL funds are also critical to the efficient resolution of permitting challenges.

**Reducing Local Match for Federal Transportation Programs.** [Insert MPO Name] is tasked with developing federally required transportation blueprints that guide billions in public investment and are central to meeting national performance goals. Yet, we must secure local funds just to access the planning resources needed to carry out these obligations. For our region, including [insert examples, such as rural communities, economically distressed areas, or constrained local budgets], this requirement poses a recurring challenge. Reducing local match requirements for federal transportation funds allows projects to move faster to construction. Reducing match requirements also supports rural, small, and economically distressed communities that struggle to access critical federal funds.

**Shifting Certain Discretionary Funding to Formula Funding.** While competitive grant programs play an important role and have expanded access for many jurisdictions, small and rural communities continue to face significant barriers, including limited staff capacity, complex application processes, and difficulty meeting match requirements. A shift to formula-based funding for certain federal programs, with guaranteed regional access, ensures a more predictable and efficient distribution of resources, allowing federal dollars to better support long-term growth and safety in communities across the US.

**Establish Dedicated Formula Funding for Rural Transportation Planning.**RTPOs play a vital role in rural planning but lack consistent federal funding. A dedicated formula program for RTPOs, modeled on MPO PL funding, yet separate in source, would strengthen rural project delivery, regional coordination, and safety outcomes.

[Insert Any Region-Specific Priorities]

**Theme 4: Strengthening Partnerships with States and Other Key Stakeholders**

**Strengthen Requirements for State Coordination with MPOs and RTPOs Throughout All Phases of Planning and Programming.** MPOs and RTPOs build partnerships at the local, regional, and state levels that allow projects of national and regional significance to advance. MPOs and RTPOs bring local insight, data, and expertise to the table and are essential to identifying the projects that offer the greatest value to their regions. Clearer statutory requirements would reduce duplication, support better coordination, and lead to more integrated transportation systems.

**Recognize Local Governments as Co-owners of the National Transportation System, with the Authority to Lead Regional Investment Decisions.** Local and regional governments are accountable to the people they serve and are best equipped to identify and respond to regional needs. Strengthening their role will lead to more responsive planning, more efficient project delivery, and more effective use of federal funds.

[Insert Any Region-Specific Priorities]

**III. Additional Context**

MPOs are federally designated policy-making bodies responsible for developing long-range transportation plans based on performance measures defined by Congress. We work directly with local governments, transit agencies, state DOTs, and the public to ensure that transportation investments are aligned with both regional and national goals.

As the first step in project development, MPOs are uniquely positioned to turn national priorities into regional action. We conduct data-informed planning, convene diverse stakeholders, and coordinate across jurisdictions to promote accountability and efficiency. However, administrative and funding barriers continue to limit our ability to deliver on this mandate.

**IV. Conclusion**

We respectfully urge USDOT and Congress to strengthen the role of MPOs, RTPOs, and local governments as co-implementers of the federal transportation program. With the right tools, funding, and authority, regional agencies can improve safety, support economic growth, and accelerate the delivery of infrastructure that meets the needs of the American people.

Thank you for the opportunity to contribute to this process. We welcome the opportunity to meet with you to discuss these recommendations in greater detail and answer any questions you may have. We greatly value our partnership with USDOT and look forward to continuing to work together as strong, collaborative partners throughout this process.

Sincerely,

[Insert e-signature]

 [Insert Full Name]
 [Insert Title]
 [Insert MPO Name]
 [Insert Email] | [Insert Phone Number]