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:
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Dear Secretary Duffy,

On behalf of the Association of Metropolitan Planning Organizations (AMPO) and our national membership of Metropolitan Planning Organizations (MPOs), I appreciate the opportunity to submit comments in response to the Department's Request for Information (Docket No. DOT-OST-2025-0468) on the development of the next surface transportation authorization.

We thank the Department for its continued leadership and dedication to advancing transportation solutions that serve communities of all sizes. AMPO is a nonprofit membership organization that serves the needs and interests of MPOs nationwide. As federally mandated and locally driven organizations, MPOs are key to ensuring that federal transportation investment reflects regional priorities while meeting national goals.

MPOs are federally designated regional policy-making bodies that ensure federal surface transportation funds are invested in ways that are efficient, forward-looking, and locally responsive. 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.

As the first step in project execution, MPOs are uniquely positioned to translate national transportation goals into regional outcomes. MPOs conduct data-driven planning, engage a wide range of stakeholders, break down jurisdictional silos, and ensure transparency and accountability in transportation investment.

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.

We commend the Department for initiating this RFI and for its ongoing commitment to strengthening partnerships with local and regional governments. The following recommendations are grounded in the on-the-ground experience of MPOs and align with the priorities of the Local Officials for Transportation (LOT) Coalition. Our comments are organized by the four key themes outlined in the RFI:

Theme 1: Enhancing Transportation Safety

Empower MPOs to Advance Safety Outcomes. AMPO supports 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 address safety challenges such as dangerous intersections and high-crash corridors, and have delivered proven results including applying data-driven crash analysis to guide investments that improved corridor lighting and optimized signal timing in high-incident areas, using digital twin technology to model and improve safety in high-crash corridors, and advancing freight corridor safety plans that reduce truck-related crashes. 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. AMPO supports proposals that expand MPO and Rural Transportation Planning Organizations (RTPOs) eligibility and decision-making authority for federal safety programs to ensure investments are guided by local data and regional safety action plans. AMPO specifically recommends:

- **Incorporate the Safe Streets and Roads for All (SS4A) grant program into the Highway Safety Improvement Program (HSIP) formula, while preserving its local focus:** To advance the Department's safety focus, the Safe Streets and Roads for All (SS4A) grant program should be incorporated into the Highway Safety Improvement Program (HSIP) formula, with a portion suballocated to MPOs and RTPOs. SS4A has proven to be an effective safety program to address America's road safety crisis but could be delivered more efficiently via formula at the regional level. The addition of SS4A funding and policy intent into HSIP will complement and enhance the existing highway safety program. The SS4A program fills critical gaps by empowering local and regional governments to proactively develop comprehensive safety action plans and implement a broader range of community-driven safety strategies than HSIP alone. SS4A's local and regional nature, flexibility, and focus on preventative planning is critical for addressing systemic safety risks before they become tragedies. Together, HSIP and SS4A form complementary pillars of a stronger, more proactive national safety framework that delivers life-saving investments where they are needed most.

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. Federal efforts to help locally owned bridges have often come through assistance for "off-system" bridges, or bridges not on the Federal-aid Highway System. However, "locally owned" and "off-system" are not synonymous, with 27 percent of bridges owned by local governments being on the Federal-aid Highway System. AMPO recommends:

- Continuing the Bridge Formula Program and giving local decision makers more control over those funds, to ensure that they are used for the bridges that need it the most.

Theme 2: Accelerating Project Delivery

Allowing for Carryover of Federal Funds: Current law restricts obligation timelines for many suballocated federal funds, which face the risk of being clawed back if not obligated within the fiscal year, creating pressure to obligate funds quickly rather than strategically. Many transformative projects cannot be funded in a single fiscal year. MPOs often need to save and combine multiple years of allocations to deliver these larger, multi-year projects. Without carryover authority, regions are forced to rush smaller projects to meet the deadline or risk losing funds intended for more impactful investments. Allowing carryover of both planning and capital funds would enable MPOs to align obligations with project readiness, strategically accumulate funding, and maintain uninterrupted progress on multi-year projects that improve safety, reduce congestion, and strengthen the economy. We recommend:

- **Provide Carryover Authority:** Align obligation timelines with contract authority and allow both planning and capital funds to carry over into future years.

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, driving up costs and stretching timelines. Targeted reforms would accelerate delivery without compromising environmental protection. This could include categorical exclusions for smaller projects (i.e., specifically those below a certain dollar threshold that pose little risk for environmental harm). Additionally, 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).

Theme 3: Increasing Opportunities Through Investment in Transportation Infrastructure

Planning is the Foundation: If it doesn't get planned, it doesn't get built. Smart MPO planning ensures federal transportation dollars are invested in solutions that help people get to work, deliver goods, and build strong American communities. Planning is a blueprint that guides every step from design to delivery, aligns investments with local and national priorities, and ensures that every project is built for long-term success.

Strong planning is also a streamlining force multiplier. By identifying environmental, community, and engineering challenges early in the project development process, MPO-led planning helps avoid costly redesigns, accelerates project delivery, and reduces risk for state and local partners. Planning also strengthens public trust by engaging communities upfront and aligning projects with clear long-term goals. Without adequate planning resources, projects risk cost overruns, delays, or misalignment with community needs. Investing in planning is one of the most cost-effective ways to ensure every federal transportation dollar delivers maximum value.

MPOs provide the blueprints for smart transportation, but they cannot deliver on their full potential without adequate resources and authority. Metropolitan Planning (PL) funding is currently less than 1% of total federal formula allocations and has not kept pace with MPOs' rising responsibilities. The current structure makes this work harder than it needs to be. MPOs rely on state DOTs to pass through funds, which can add extra steps and delay access. The 20% local match requirement also leaves small or fiscally distressed regions struggling to access available funding.

On the capital side, the required match is especially burdensome for small, rural, and fiscally constrained communities, which often lack the tax base or staff capacity to meet the 20% requirement. Match requirements can delay projects when local governments need time to assemble their share or when inflation drives costs higher, requiring additional local funds. In some cases, these pressures force communities to make difficult tradeoffs between essential local needs, such as choosing whether limited dollars go to water or wastewater infrastructure, housing, or transportation projects. These challenges slow the delivery of needed improvements, leave federal funds underused, and reduce the overall efficiency of investment.

Streamlining access and modernizing PL and allowing for more flexible match requirements will help MPOs and their local partners deliver results faster and with greater impact. AMPO recommends:

- **Increase PL Funding:** Increase to 3% of total formula allocations and establish a funding floor to support small and rural regions.
- **Streamline Access:** Grant all MPOs the option to serve as direct recipients of PL funds, with an opt-out option for those that prefer the current state-administered model.
- **Remove Barriers:** Eliminate the local match requirement for PL funds, recognizing that federally mandated planning should not create an unfunded mandate for local governments.
  - Additionally, lower the local match requirement for suballocated capital programs and allow in-kind services or other flexible approaches, benefiting small, rural, and fiscally constrained communities.
- **Modernize Eligible Uses:** Expand and update PL eligibility to include implementation activities that reflect today's needs and are aligned with the full project lifecycle, maximizing the impact of every federal dollar.

By modernizing planning funds, MPOs will be better equipped to support local governments, anticipate challenges, keep projects moving, and meet national goals. Strong planning delivers tangible results: safer roads, quicker commutes, and faster project delivery that benefits every community, from urban centers to rural towns.

Strengthen Predictable and Accessible Funding. Expand formula-based programs with guaranteed regional access to provide communities with a more stable and reliable funding pathway. At the same time, retain and refine certain competitive grant programs to streamline application, award, and implementation processes. A more balanced mix of funding tools will ensure all communities can effectively access federal transportation programs while reducing administrative burdens and improving delivery timelines. (see "Enhancing Transportation Safety" recommendations above for proposal).

Theme 4: Strengthening Partnerships with States and Other Key Stakeholders

Empower Regional Decision-Making: Municipal, county, and regional governments are on the front lines of the nation's transportation system. They plan for, own, and maintain more than 75% of the nation's road miles, yet on average receive only 14% of federal transportation funds through suballocations. Despite this critical responsibility, local and regional entities are often sidelined when it comes to deciding which projects advance with federal funds. This disconnect means that the communities responsible for most of the system do not always have a clear voice in shaping the investments that impact daily travel, safety, and economic activity.

Transportation investments are most successful when federal, state, and local partners work together. MPOs provide the regional voice in this partnership. They bring together towns, cities, counties, transit providers, state officials, and other key stakeholders to identify shared priorities and plan for regional growth. MPOs contribute local knowledge, data, and community input that ensures projects meet real-world needs.

Currently, the process for advancing regionally prioritized projects can lack transparency and consistency. Projects that MPOs have already programmed into their Transportation Improvement Programs (TIPs) may face delays or reprogramming due to complex administrative steps or shifting priorities. These challenges can result in unobligated balances, slow project delivery, and uncertainty for local partners, even when MPOs have fully prepared projects for advancement.

Strengthening the role of MPOs in project selection and programming will create a process that is more transparent, accountable, and aligned with community priorities. A clearly defined regional role allows federal dollars to move efficiently to projects that are ready to advance, have local support, and will deliver lasting benefits. Clear expectations and stronger coordination also build public trust, reduce duplication, and make the most of limited federal funds.

AMPO supports reforms that modernize funding mechanisms and strengthen processes for effective regional delivery. These changes would enhance local accountability, improve project delivery, and streamline the process. We recommend:

- **Clarify and Strengthen Project Selection Roles:** Ensure MPOs and RTPOs have a clearly defined role in selecting federally funded projects in their regions, improving transparency, accountability, and alignment with local and regional priorities.
- **Enhance Coordination and Transparency:** Strengthen requirements for state coordination with MPOs and RTPOs in all aspects of planning and programming. Clear coordination requirements reduce duplication, encourage partnership, and support smoother project implementation.
    - **Ensure transparent MPO engagement in State Transportation Improvement Program (STIP) development:** Accountability and shared decision-making ensure federal funds reflect both state and regional priorities.
- **Pilot Streamlined Regional Funding:** Create a pilot program for select MPOs with Transportation Management Areas (TMAs) to receive suballocated capital funds directly through a simplified process that allows ready-to-go projects to move forward quickly.
- **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.
- **Recognize local governments as co-owners of the national transportation system with authority to lead regional investment decisions:** Local governments know their communities best. Empowering them supports responsive governance, local economic development, and effective use of taxpayer dollars.

AMPO and our members respectfully urge USDOT and Congress to empower municipal, county, and regional governments as co-implementers of the federal transportation program. With the appropriate authority, flexibility, and funding, MPOs can accelerate project delivery, advance national safety goals, and ensure that transportation investments deliver measurable value to communities across the country.

We appreciate the opportunity to provide input and welcome continued dialogue on these recommendations. AMPO stands ready to support the Department and Congress as they advance the next generation of federal transportation policy. Please contact Katie Economou, Legislative Director, at keconomou@ampo.org for any additional information or questions.

Sincerely,

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