

**MEMORANDUM**

**TO:** Genesee Transportation Council Members & Alternates  
**FROM:** James Stack, Executive Director JS  
**DATE:** August 21, 2025  
**SUBJECT:** USDOT's Request for Information on the Next Surface Transportation Reauthorization

The Association of Metropolitan Planning Organization (AMPO) staff have been working with the AMPO Policy Committee, the AMPO Board, and members of the Local Officials in Transportation (LOT) Coalition to identify priorities for the next surface transportation reauthorization. The LOT Coalition consists of AMPO, the National Association of Counties (NACo), the National Association of Development Organizations (NADO), the National Association of Regional Councils (NARC), and the National League of Cities (NLC). The LOT Coalition has been collaborating on transportation issues and opportunities of mutual concern for several years.

On July 21, 2025, the Office of the Secretary within the Department of Transportation (DOT), published in the Federal Register a request for information (RFI) in preparation for the next surface transportation reauthorization bill. The RFI provided for a 30-day comment period, closing on August 20, 2025. Given the other demands leading to the August 14, 2025 Planning Committee meeting, staff did not pursue preparations of comments for consideration. As such, the Planning Committee has not made any recommendation on providing comments to USDOT.

On August 20, DOT determined that an extension of the comment period until September 8, 2025 is appropriate. This provides an opportunity for GTC to provide comments in advance of the DOT and Congress finalizing a new surface transportation bill in 2026.

The efforts of the LOT Coalition to consider and strategize priorities for the next reauthorization resulted in a template that I used to develop a draft comment submission for your consideration. While GTC has an excellent working relationship with New York State DOT, this is not the standard across the country. MPOs are looking for fair and consistent relationships across the Country and feel that Congress can facilitate this. Nothing in the attached comments would impair the work of GTC and would only strengthen our connections with member agencies and other stakeholders.

If the GTC Board concurs with these comments, the letter can go under Chairperson Ingalsbe's signature or mine.

Encl.

**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 the Genesee Transportation Council (GTC), we plan for the future of transportation across 9 counties, with 4 cities, 125 towns, and 60 villages, serving approximately 1.2 million residents in the Genesee/Finger Lakes region of western New York. In coordination with the New York State Department of Transportation (NYSDOT) – Region 4, we oversee approximately \$129 million annually in federal transportation funding, working to improve safety, reduce congestion, and support economic development. Guided by a board of local elected and appointed officials and supported by a professional planning staff, we ensure federal dollars are invested strategically to deliver transformative projects to the Genesee/Finger Lakes 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.

**Continue eligibility for Bridge Preventive Maintenance.** Our region has successfully utilized Bridge Preventive Maintenance techniques to extend the useful life of many bridges without the need more intense and expensive interventions. In essence, Preventive Maintenance provides "more bang for the buck." By emphasizing Preventive and Corrective maintenance over "worst first", this approach has had the effect of increasing the condition of the overall bridge network in the region. However, Preventive Maintenance has a limited window of opportunity so predictable federal funding is essential this approach.

**Continue eligibility for Bridge removal.** Our region has successfully utilized Bridge removal as a cost-effective alternative to replacing bridges at the end of their useful life. This includes low volume bridges with nearby alternatives and bridges that could be converted to at-grade intersections while serving the transportation need. By removing bridges from the National Bridge Inventory, future inspection, maintenance, and repair costs are no longer necessary. Bridge removal is an effective strategy when the transportation need can be met through less costly approaches and fall into an approach we call Strategic Divestment. Strategic Divestment allows us to look at aging facilities with a fresh perspective rather than being beholden to design decisions that were made more than 50 years ago.

## **Theme 2: Accelerating Project Delivery**

**Modernizing Funding Mechanisms for Effective Regional Delivery.** As the federally designated entity responsible for regional transportation planning, GTC 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 GTC's projects, such as the Route 96 over Route 14 Strategic Divestment Analysis, the Genesee-Finger Lakes Regional Thruway Detour Route Management Plan, the I-490 Center City Interchange Operations Mobility Study, and the Genesee-Finger Lakes Regional Freight Plan Update, 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. We are fortunate that New York State, as the fiscal agent for these funds, has capacity to manage annual fiscal expenditures in a way that provides us flexibility to continue projects past the fiscal year. This flexibility should be codified such that all MPOs inherently have this flexibility and are not dependent on the capacity of their State to support this approach.

**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 can 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. Such an increase can support MPO capacity to provide services to small project sponsors so that environmental reviews can be conducted in a timely manner.

## **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 GTC, we are responsible for a broad range of regional transportation planning efforts such as: safety planning; congestion management planning; Intelligent Transportation Systems operations and deployment; freight planning; corridor and community transportation planning; transit service coordination; active transportation planning; and housing and land use integration. We also develop and maintain a regional Long Range Transportation Plan (LRTP) with a 25 year horizon to guide future transportation

investments that are responsive to resident's needs and desires. Similarly, we work with NYSDOT – Region 4 to develop and maintain a regional Transportation Improvement Program (TIP) that identifies the locations, scope, schedule, and cost of various transportation projects using federal transportation funds.

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.

At GTC, we are fortunate that the New York State Department of Transportation works well with its 14 MPOs. This relationship has resulted in strong collaboration that gives MPOs the decision of how PL and FTA Metropolitan Planning Program (MPP) funds will be distributed via an agreed upon formula. This predictability allows us to better anticipate future planning efforts. We understand that this is not consistent across the Country and encourage USDOT to require States to more closely collaborate with MPOs on the fair distribution of FHWA PL funds and FTA MPP funds such that MPOs have a predictable funding stream to support planning activities in accordance with local needs.

**Reducing Local Match for Federal Transportation Programs.** GTC 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, this requirement poses a recurring challenge. We must rely on local communities to provide matching support (cash and/or in-kind) to conduct transportation planning to address the needs of their residents. These planning activities ensure the community needs are met and any potential implementation projects are well considered before they are designed.

Implementation is further hindered when considering the non-federal share of designing and constructing capital projects. Reducing local match requirements for federal transportation funds allows projects to move faster to construction, supporting American jobs throughout the construction industry. Reducing match requirements also supports rural, small, and economically distressed communities that struggle to access critical federal funds for lack of matching 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.

#### **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.

### **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 relevant 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]

DRAFT