MEMORANDUM

TO: Genesee Transportation Council Members & Alternates

FROM: James Stack, Executive Director JS

DATE: December 4, 2025

SUBJECT: Local Officials in Transportation (LOT) Coalition Communications regarding Surface Transportation Reauthorization

On November 4, 2025, the Local Officials in Transportation (LOT) Coalition sent a letter to the leadership of the House Committee on Transportation and Infrastructure and the Senate Committee on Environment and Public Works. The purpose of this letter is to support expanding and strengthening local governments' access to federal-aid transportation funding in the next surface transportation reauthorization.

The LOT Coalition includes the Association of Metropolitan Planning Associations (AMPO), the National Association of Counties (NACo), the National Association of Development Organizations (NADO), the National Association of Regional Councils (NARC), the National League of Cities (NLC), and the U.S. Conference of Mayors (USCM). The LOT Coalition has been collaborating on transportation issues and opportunities of mutual concern for several years.

The LOT Coalition is asking that others that share the sentiments of this letter reach out to their Congressional delegation to reiterate support for federal investment in local and regional transportation needs.

A copy of this letter has been included in the meeting package for reference and will be discussed under Item 4.a.2. in the agenda.

November 4, 2025

The Honorable Sam Graves
Chairman, Committee on Transportation and Infrastructure
United States House of Representatives
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member, Committee on Transportation and Infrastructure
United States House of Representatives
Washington, DC 20515

The Honorable Shelley Moore Capito
Chair, Committee on Environment and Public Works
United States Senate
Washington, DC 20510

The Honorable Sheldon Whitehouse
Ranking Member, Committee on Environment and Public Works
United States Senate
Washington, DC 20510

Dear Chairs Graves and Capito, Ranking Members Larsen and Whitehouse:

On behalf of the Local Officials in Transportation (LOT) Coalition, representing cities, counties, regional, and metropolitan planning organizations, we urge your Committees to expand and strengthen local access to federal transportation funding in the next surface transportation reauthorization.

Federal transportation funding must reflect the vital role local governments play in owning and maintaining the majority of America's infrastructure. Local governments and regions plan for, build, and manage **more than 75 percent of road miles and over half of public bridges**. Their elected leaders are directly accountable to the people and businesses that rely on these facilities. Federal investments are most effective when decisions and dollars reach the entities that own, plan, and operate most of America's infrastructure. Strengthening local control improves project delivery, accountability, and outcomes for taxpayers in every state. It saves lives, time, and money.

The strength of the national network depends on its local roads. They are the arteries of America's economy, connecting interstates to ports, workplaces, schools, and main streets. **Locally owned roads make up 43 percent of the federal-aid highway system, yet only receive 16 percent of federal-aid highway program dollars**. Carrying over one-third of all vehicle miles travelled in the United States, these local roads form the first and last miles of nearly every trip. Yet the drivers and users paying into the Highway Trust Fund (HTF) rarely see those dollars return to the local networks they rely on every day. The consequences of underinvestment are clear: **nearly half of locally owned principal arterials are in poor condition, compared with just 7 percent of similar state-owned arterials roads.** To truly serve the American economy and our national interests, federal policy must invest where people and businesses rely on the road network—including on locally owned roads and bridges.

Congress created Metropolitan and Regional Transportation Planning Organizations (MPOs and RTPOs, respectively) to ensure regional coordination and accountability in federal investment. The next reauthorization should reaffirm that purpose by giving local and regional governments greater authority over the federal funds that support their responsibilities and the assets they manage.

Research shows that reliable, direct access to federal funds at the local level improves transparency, efficiency, and delivers infrastructure projects that are on time, on budget, and with minimal need for repairs. A Brookings Institution analysis found that **local governments obligated 100 percent of their State and Local Fiscal Recovery Funds on transportation projects within one year, matching or exceeding state performance.** In contrast, in some states, Surface Transportation Block Grant (STBG) program funds remain unobligated largely due to state-level delays in programming and project approval and a lack of transparency.

The same is true for safety. More than **85 percent of roadway fatalities** occur off the interstate. Congress must close that gap by supporting safety funding for local roads and priorities. Local governments are first responders to safety challenges and can implement effective, low-cost improvements quickly when funding is direct and predictable. To reach zero deaths, safety dollars must reach the roads where most fatalities occur.

Preserving and Strengthen Local Access

The Infrastructure Investment and Jobs Act (IIJA) increased the local share of federal highway funds to just over 20 percent. That progress must be preserved and strengthened. Given inflationary pressure, **no less than 25 percent of HTF highway account dollars should be suballocated or made directly available to local and regional governments in the next surface transportation reauthorization legislation.** Any proposal below this threshold would undermine progress being made on safety and improving the full system. Additionally, **new flexibilities for states must not come at the expense of existing suballocated or locally directed funds,** which remain the foundation of accountable investment. Suballocated funds should not be subject to stricter timelines or requirements than those applied to state-controlled programs, nor should they revert to state control based on differing obligation schedules. When local and regional entities have stable, predictable access to funding, they deliver timely and cost-effective results.

To reinforce this, Congress should establish the following principles **as a floor** for the next authorization:

- No less than 25% of all HTF highway account dollars should be suballocated or otherwise made directly available to local and regional governments. States may not transfer suballocated portions of programs.
- Dedicate 25% of any new or existing bridge, safety, and innovation formula programs to regions and local governments.
- If any IIJA discretionary grant program available to local or regional governments is consolidated or eliminated, its funding and eligibilities must be distributed to STBG to preserve local access.
- Increase PL funding to 3% of total HTF highway account apportionments and eliminate the local match on PL to strengthen the capacity of MPOs to deliver on federal goals.
- Establish a Rural Transportation Planning Program, either as a stand-alone program or a set-aside within the State Planning and Research (SPR) Program to ensure that rural regions have a consistent voice in transportation planning and project selection.
- Standardize and improve transparency on suballocated portions, project selection, and advancement of projects selected by local governments. States must honor locally selected projects in MPO Transportation Improvement Programs for funding obligation.

These provisions would ensure that the next authorization strengthens local access, efficiency, and safety while maintaining accountability to taxpayers. **The LOT Coalition stands united against any effort that reduces or redirects suballocated funding away from regions and local governments**.

Locally owned infrastructure is the backbone of America's transportation system. **The federal interest is local. Local control drives efficiency. Efficiency saves taxpayer dollars. Safety depends on it.**

Thank you for your leadership and partnership. We look forward to working with you to ensure the next surface transportation bill empowers the communities that deliver America's infrastructure every day.

Sincerely,

The Local Officials in Transportation (LOT) Coalition
Association of Metropolitan Planning Organizations (AMPO)
National Association of Counties (NACo)
National Association of Development Organizations (NADO)
National League of Cities (NLC)
National Association of Regional Councils (NARC)
The U.S. Conference of Mayors (USCM)

CC:

The Honorable Ted Cruz, Chair, Committee on Commerce, Science & Transportation
The Honorable Maria Cantwell, Ranking Member, Committee on Commerce, Science & Transportation