August 20, 2025

The Honorable Sean Duffy

Secretary

U.S. Department of Transportation

1200 New Jersey Avenue SE

Washington, DC 20590

Response to [Docket No. DOT-OST-2025-0468](https://www.federalregister.gov/documents/2025/07/21/2025-13663/advancing-a-surface-transportation-proposal-that-focuses-on-americas-most-fundamental-infrastructure)

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

Dear Secretary Duffy:

Thank you for the opportunity to submit comments in response to the Request for Information [(Docket No. DOT-OST-2025-0468)](https://www.federalregister.gov/documents/2025/07/21/2025-13663/advancing-a-surface-transportation-proposal-that-focuses-on-americas-most-fundamental-infrastructure) to share with the U.S. Department of Transportation (USDOT) the perspective of [CITY] on the most fundamental infrastructure needs in the next surface transportation authorization. We would like to join in supporting the recommendations of the National League of Cities as well as the Local Officials in Transportation (LOT) coalition. The LOT coalition represents thousands of counties, cities, towns, planning agencies, and regional economic development organizations across the United States and includes voices from every Congressional district. Together, we want to provide the essential local and regional perspective USDOT needs about the challenges faced across the nation’s transportation network in every corner of America.

Local governments like [CITY] play a pivotal role in maintaining and operating the nation’s transportation system. Collectively, we own more than 75 percent of the nation’s public road miles—including 44 percent of the federal-aid highway system. We have nearly half of all the nation’s bridges and operate the majority of public transit systems. We also operate the airports and seaports that connect communities with the global economy and host the nation’s rail and freight connections. Yet, the vast majority of federal formula funding for transportation flows to states, and a [recent analysis from the Brookings Institution](https://www.brookings.edu/articles/connecting-the-dots-a-survey-of-state-transportation-planning-investment-and-accountability-practices/) affirms that only 14 percent of those dollars are then passed through to local entities on average.

[Add city information here regarding current USDOT grants in progress, additional transportation infrastructure needs in your city and region in the next 5-7 years, and include references on how these needs impact the region’s economic capability for businesses and families as well as the nation. How will they be: improving safety, streamlining Federal processes, promoting economic growth, and strengthening partnerships? ]

This imbalance between infrastructure ownership and access to federal capital decisions led to decades of real consequences in [America’s D+ roads to C- bridges](https://infrastructurereportcard.org/). When communities lack both adequate access to federal funding and a meaningful voice in how those dollars are prioritized, project delivery faces unnecessary delays, purchasing power erodes due to inflation, and opportunities for economic growth, enhanced safety, and improved quality of life are lost. When locally owned but nationally significant infrastructure is underfunded or unfunded, the effects ripple through the economy: freight slows, consumer costs rise, safety risks increase, and infrastructure liabilities grow. Delays in project delivery further erode the value of each federal dollar and diminish public trust in government.

The current approach also runs counter to long-standing Congressional intent. Since the passage of the Intermodal Surface Transportation Efficiency Act (ISTEA) (Pub. L. 102–240) in 1991, Congress has directed state departments of transportation to meaningfully coordinate with local and regional partners in the planning and programming of federal transportation dollars. While federal law requires coordination with Metropolitan Planning Organizations (MPOs) and, to a lesser extent, Regional Transportation Planning Organizations (RTPOs), states retain control over the timing of funding obligation for regionally selected projects. In practice, coordination requirements are applied with varying consistency, and opportunities remain to strengthen federal oversight and support for these processes.

To modernize America’s surface transportation system, the federal government must strengthen the balance in decision-making by recognizing local governments and regional planning organizations as core partners in implementing the federal transportation program. Drawing on their expertise and close understanding of community needs—and ensuring statutory requirements for coordination are enforced—will help deliver infrastructure that meets the needs of the American people. Building this partnership means providing these entities with the tools, funding, and authority to improve safety, support economic growth, and deliver results.

**Local Officials in Transportation Coalition Priorities for Surface Transportation Reauthorization**

USDOT has the opportunity to realign federal transportation policy with the realities of infrastructure ownership and delivery in the United States. Local governments and regional planning organizations have shown through the most recent federal programs they are willing to support [thousands of substantial rebuilding projects](https://www.nlc.org/resource/rebuilding-america-tracking-federal-investment-in-local-infrastructure-projects/). They bring the expertise, accountability, and public trust necessary to deliver investments that are community-driven and nationally significant. By empowering the entities that own and manage most of the nation’s transportation assets, these policies directly support national objectives: strengthening supply chains, improving freight and goods movement, reducing congestion, enhancing safety, and unlocking economic opportunity in both urban and rural areas. They also align closely with DOT’s policy goals for reauthorization—enhancing safety, accelerating project delivery, promoting economic growth, and strengthening intergovernmental partnerships.

**Priority 1: Streamline Delivery of Key Formula Funds Directly to Regional Organizations and Local Governments**

The LOT Coalition recommends the next surface transportation bill expand opportunities for local governments and regional planning organizations to directly control formula-based funding, ensuring that allocations better reflect the proportion of infrastructure they own and operate. Local and regional leaders consistently demonstrate the capacity to deliver significant projects effectively and efficiently. With deep knowledge of community priorities, technical expertise, and long-term planning perspectives, they are uniquely positioned to ensure investments meet real-world needs and maximize public benefit.

Increasing local control—particularly through MPOs and RTPOs—would accelerate project delivery, reduce administrative inefficiencies, and direct resources to the assets most in need of repair or modernization. Restoring the intergovernmental coordination envisioned by Congress through regional project selection is essential. MPOs and RTPOs must be empowered as true partners in decision-making, not simply consulted. Federal oversight should ensure that collaboration, coordination, and transparency are the norm.

Furthermore, the LOT Coalition recommends the following enhancements to formula programs:

* Increase funding for the Surface Transportation Block Grant (STBG) program and expand the percentage of suballocation to local areas. STBG is the most flexible core highway funding program and a vital tool for local governments. These enhancements to the program would better align funding with ownership, improve accountability, and generate higher returns on federal investment.
* The Safe Streets and Roads for All (SS4A) program should either continue as a discretionary program or be integrated into the Highway Safety Improvement Program (HSIP) formula—while preserving local governments’ access to this imperative funding. SS4A’s proactive, preventative approach complements HSIP’s more reactive model, together forming a stronger, more comprehensive safety framework. Eliminating discretionary programs like SS4A without ensuring local governments and regions retain access to critical safety funding would significantly reduce the federal government’s ability to deliver impactful projects and improve safety.
* Expand local control in the Bridge Formula Program. Local governments own about half of all bridges, and locally owned bridges are twice as likely to be in “poor” condition as state-owned bridges. Granting local governments greater authority over these funds will target dollars where they are most urgently needed.
* Promote innovation by directing funding to local and regional governments for deploying smart infrastructure solutions that enhance safety, efficiency, and resilience. Suballocating such funds ensures investments are responsive to on-the-ground needs and support region-specific technology adoption.

**Priority 2: Maintain Competitive Federal Funding Access for Local Governments and Regional Organizations**

The LOT Coalition recommends that Congress and the Department of Transportation maintain and expand local and regional eligibility for competitive federal grant programs, while reducing administrative burdens and enhancing technical assistance to ensure equitable access for all communities. Local and regional governments are core partners in thousands of federally funded projects, and preserving their eligibility is essential to meeting national transportation goals. Competitive programs such as Better Utilizing Investments to Leverage Development (BUILD), Safe Streets and Roads for All SS4A, the Bridge Investment Program, the Railroad Crossing Elimination Program, and Strengthening Mobility and Revolutionizing Transportation (SMART) have a proven track record of enabling local governments to make transformative infrastructure investments. These programs not only deliver critical safety, mobility, and economic benefits, but also drive innovation and unlock economic potential in communities of all sizes.

To accelerate project delivery and ensure federal taxpayer dollars achieve the greatest possible impact, the LOT Coalition recommends streamlining the administrative requirements for competitive grant programs and expanding technical assistance—particularly for rural and small communities that often face capacity constraints. Making competitive grant programs more accessible and easier to administer will help ensure their benefits reach the full spectrum of America’s communities, from the largest metropolitan areas to the most remote rural regions. While many local governments have successfully navigated complex application and grant requirements, others would benefit from technical assistance that strengthens their capacity to compete for and deliver federally funded projects. Furthermore, by simplifying application processes and aligning project delivery requirements to the scale and complexity of each project, the federal government can stretch investments further and accelerate project timelines.

**Priority 3: Strengthen Transportation Planning, Performance, and Project Delivery**

The LOT Coalition recommends increasing Metropolitan Planning (PL) funding to reflect the central role MPOs play in the federal transportation program and to equip them to meet expanding responsibilities. MPOs are the primary conveners of regional transportation decision-making—bringing together local governments, state agencies, transit providers, freight interests, and the public to shape a unified vision for the future. MPOs were established by Congress to ensure that local governments have a formal, collaborative voice in deciding how federal transportation dollars are invested in their communities. By linking on-the-ground priorities with a long-term regional vision, MPOs help ensure that funding decisions are grounded in data and deliver projects that both meet immediate community needs and support sustained regional growth.

Planning is the foundation of effective project delivery. MPOs build consensus among diverse stakeholders, identify high-impact investments, ensure transparency in decision-making, and streamline the project delivery process. MPO-led planning also positions projects to compete successfully for discretionary funding and to advance quickly when formula dollars become available. Yet, despite the benefits of MPO-led planning, PL funds account for less than one percent of Federal Highway Administration formula apportionments.

Increasing PL funding would strengthen local project development, improve readiness for construction, and accelerate project timelines. Additional resources would enable MPOs to expand their impact, better assess system performance, target investments to areas of greatest need, and adapt plans to emerging needs. In short, increased PL funding would not just support planning—it would directly improve the effectiveness, efficiency, and accountability of the entire federal transportation program.

**Priority 4: Dedicated Formula Funding for Rural Transportation Planning**

The LOT Coalition recommends the next surface transportation reauthorization bill establish dedicated formula funding for RTPOs to ensure rural communities have consistent, predictable resources for long-term planning. Like MPOs, RTPOs were established to give local governments—particularly in rural and small-town America—a formal, coordinated voice in shaping how federal transportation dollars are invested in their regions. RTPOs are designed to help ensure investments not only address immediate transportation challenges, but also position rural regions for sustained growth and connectivity.

In many rural areas, RTPOs are the only institutions capable of conducting coordinated, cross-jurisdictional transportation planning that reflects local priorities and supports regional economic opportunity. Yet, unlike MPOs, RTPOs lack a stable federal funding source, limiting their ability to sustain operations or build technical capacity. Providing predictable, dedicated resources would ensure rural communities are fully represented in state and federal decision-making, improve project prioritization, and enable investments that promote connectivity, safety, and economic opportunity in rural areas.

**Priority 5: Streamline Environmental Processes and Permitting for Smaller Projects**

The LOT Coalition recommends targeted reforms to federal environmental review and permitting processes so that requirements are appropriately scaled to the size and complexity of each project. This calibrated approach would preserve essential environmental safeguards while reducing unnecessary delays and costs, enabling faster delivery of vital infrastructure improvements and ensuring federal taxpayer dollars go farther.

Many local and regional transportation projects—such as roadway safety upgrades, bridge repairs, transit facility improvements, and active transportation connections—have minimal environmental impact, yet they are often subjected to the same level of review and documentation as large-scale, complex projects. This “one-size-fits-all” approach consumes valuable staff time and financial resources, slowing project delivery and diminishing the return on federal investment. By right-sizing requirements to match the scope and potential impact of a project, the federal government can expedite delivery, reduce administrative burdens, and better focus environmental review resources where they are most needed.

**Additional Local Government Priorities for USDOT Consideration**

**Priority 6: Support for Sufficient Revenue and Appropriate Distribution:** NLC supports the preservation of current federal fuel and other user fees to fund the Highway Trust Fund (HTF) and encourages Congress to raise sufficient revenue through new and expanded user fees. The following principles should guide federal efforts to achieve this objective:

1. *Reliability*: Revenue streams must be reliable and sufficient to meet the diverse and growing transportation infrastructure needs of the nation.
2. *Revenue Generation*: Able to generate more revenue than collected currently.
3. *Administrative Ease*: Improve administrative ease, effectiveness and efficiency.
4. *Seamless Transition*: Provide for a seamless, gradual transition to ensure stable revenue collections, tax fairness, administrative ease, and policy stability.
5. *Technology Improvements:* Fuel-efficient vehicles can be offset with alternative revenue sources, but revenue stability should be balanced with encouraging reductions in vehicle emissions.
6. *Privacy*: Integrate reasonable privacy protections.
7. *Fairness*: No single segment of the population bears an inequitable financial burden.

New revenue proposals must also come with more appropriate federal distribution because locally-owned and maintained roads make up 75% of road miles and host 34% of all vehicle miles traveled in the U.S. while [only a meager 16%](https://www.brookings.edu/articles/highway-shakedown-how-local-road-users-are-subsidizing-state-highway-investments/) of state and federal transportation funding comes back to this large part of the nation’s road network. Balancing both sufficient revenue and better distribution are necessary.

**Priority 7: Continued Support for Public Transportation:** Mobility is central to individual prosperity, as well as to commerce and to the growth of communities. Public transportation can contribute to the viability of the nation’s cities by helping to reduce congestion, protect the environment, stimulate economic development, and create employment opportunities. Transit investment is in the national interest especially where it alleviates congestion and increases economic productivity. To that end, NLC supports the recommendations of America’s 6,800 organizations that provide public transportation and serve American communities of all sizes.

**Priority 8: Support for Rail Safety and Improvement:** The U.S. has made tremendous progress on forward-looking passenger rail investments and improvements for the safe and efficient movement of freight rail through the IIJA, and we encourage Congress to build on that momentum. More than 12,000 cities, towns and villages across the country are impacted by our nation’s 140,000-mile rail network crossing through neighborhoods and downtowns. Unfortunately, [more than 4,000 trains have derailed since 2020 with nearly 70 percent of derailments happening in cities](https://usafacts.org/articles/are-train-derailments-becoming-more-common/). The Norfolk Southern train derailment in East Palestine, Ohio, was a jarring reminder for all local governments of how quickly any one of these rail incidents in their backyards can dissolve the economic potential of the communities they represent and serve. Unlike other modes of transportation, Congress is the only entity with authority to establish the safety improvements that are needed and to ensure the safety of the rail system for American communities, emergency first responders, rail workers, and railroad customers. To advance the safety and efficiency of the nation’s rail system in coordination with road and pedestrian systems, we request the following rail priorities be included in the surface transportation reauthorization:

* **Provide Long-Term Rail Funding Certainty:** Almost all other modes of transportation benefit from the long-term budgeting certainty of federal Trust Funds – the Highway Trust Fund, Airports Trust Fund, Harbors Trust Fund, and Waterways Trust Fund, but rail does not have access to a federal trust fund. However, in the IIJA, Congress used advance appropriations to provide multiyear certainty for passenger and freight rail projects in a similar manner to a federal trust fund. NLC supports creation of a rail trust fund, allowance of rail in an existing trust fund, or continued use of advance appropriations that can ensure multi-year rail investment that aligns with the necessary capital construction demands of infrastructure projects. We also encourage Congress to not waste the investment momentum of the Corridor Identification and Development (Corridor ID) program, especially in areas where highways alone cannot meet demand and ease congestion.
* **Invest in Rail Crossing Improvements:** The Rail Crossing Elimination (RCE) program has proven incredibly valuable for communities to work directly with railroads to complete rail improvement projects and improve the flow of rail traffic and local transportation traffic at crossings and should be prioritized in a limited funding environment. Planning eligibility is an essential part of the RCE program to develop viable capital projects. Eligibility should also be clarified to ensure that pedestrian access bridges and bridge modifications can be included in these grants. Notably, the Safe Streets program could also include pedestrian rail crossing eligibility.
* **Lower the Cost of Rail Infrastructure Materials and Structures**: The costs for rail crossing infrastructure improvements have [increased by double](https://www.kansascity.com/news/business/article269676406.html) along with often volatile railroad project expenses. Congress should provide innovation and experimentation funding for new and lower cost materials to be tested and incorporated into the rail section of the Manual on Uniform Traffic Control Devices (MUTCD) by encouraging states to use Section 130 program funds or providing additional funds for this purpose. Additionally, FRA should be empowered with investment tools for encouraging innovative technology in rail on a range of warning devices and crossing designs that use human factors science for limiting pedestrian and rail interaction including quick-build pedestrian bridge structures.
* **Modernize Safety Data and Blocked Crossing Reporting:** TheBureau of Transportation Statistics, FRA, FHWA and NHTSA should be tasked to integrate all federal and state [rail](https://chrome-extension/efaidnbmnnnibpcajpcglclefindmkaj/https%3A/highways.dot.gov/sites/fhwa.dot.gov/files/2022-06/fhwasa16075.pdf) crossing and road safety data and planning efforts into publicly available safety dashboards that solicit public input and allow for improved Congressional oversight and research on transportation safety. Because blocked crossings create safety incidents, train operators should be required to provide FRA a standardized report for all stoppages exceeding an hour in length or alternatively, empower states to collect crossing data and enforce blocked crossing incidents as they would on any other mode of transportation. All rail data that is collected in a standardized manner should be able to be utilized by federal agencies to inform safety and regulations without exception.
* **Adopt and Fund Expert Recommendations on Rail Safety:** The National Safety Transportation Board has provided expert analysis and recommendations to Congress on the East Palestine derailment and [many other important and revealing rail safety incidents](https://www.ntsb.gov/investigations/AccidentReports/Pages/Reports.aspx) that should be followed to ensure we respond to the safety gaps exposed and that we make the most of taxpayer investment to have independent safety analysis. Notably, this includes vent-and-burn and bearing failure research, retiring DOT-111 tank cars as soon as possible, communication and preparation for emergency responders to be able to confirm the contents and consist of the train, and much more. Many of these solutions are found in bipartisan rail safety legislation before the Committee.

**Priority 9: Planning at the Ground Level for Advanced Aviation:** Congress should establish a competitive regional ground-to-air transportation planning program to begin to align advanced air mobility (AAM) integration planning into existing ground-based, long-term surface transportation plans. By developing local AAM operational ground concepts and planning for future capital needs, cities and towns can bring separate transportation mode-based plans together to more quickly integrate the land-to-air services that meet pressing community needs like emergency response, essential air service and remote air delivery.

**Priority 10: Modernize the MUTCD for Practitioners and Encourage Innovation:** The federal Manual on Uniform Traffic Control Devices (MUTCD) must be modernized as a trusted resource for federal, state and cities’ transportation personnel to select appropriate road safety devices for all road types. Congress should establish a federal advisory rulemaking committee to recommend changes to the MUTCD in lieu of any entity having preferential access or treatment. FHWA can also provide MUTCD experimentation funding for grantees for new and lower cost materials to be tested and incorporated expeditiously with positive results.

**Priority 11: Support for Pipeline Safety:** NLC also supports the inclusion of pipeline safety improvements being included in upcoming legislation. Our nation’s pipelines keep hazardous materials off of our roads, waterways, and rail lines, making those modes of transportation safer for all users. Unremitting attention to the safety of this system is vital to communities, due to the hazardous nature of these materials, the proximity of many pipelines to homes and businesses, and the potential environmental impacts of any failure in the system. To that end, we support the continuation of the Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant program and flexibility for states and local governments to impose and enforce safety requirements beyond federal requirements when they determine it is necessary.

**Conclusion**

These priorities align closely with DOT’s goals of enhancing safety, accelerating delivery, increasing infrastructure investment, and strengthening partnerships. By increasing funding and decision-making authority for local governments and regional planning organizations, we can ensure federal investments reflect community-driven needs while advancing national economic competitiveness and safety objectives.

[OPTIONAL: Add a paragraph here highlighting how your CITY would be impacted by these policy priorities and how they relate to improving safety, streamlining Federal processes, promoting economic growth, and strengthening partnerships.]

America’s transportation challenges—whether related to safety, connectivity, economic opportunity, or infrastructure condition—do not end at the interstate. Local and regional governments manage a large share of the nation’s transportation system and are indispensable to delivering better outcomes. Strengthening the federal partnership with these entities will maximize taxpayer value, improve performance, and ensure the transportation system meets the needs of all Americans.

We thank USDOT for its leadership and look forward to working together to advance a more efficient, accountable, and locally responsive federal transportation program.

Sincerely,

[CITY]