

August 20, 2025

Daniel Cohen

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U.S. Department of Transportation

1200 New Jersey Ave, SE

Washington, D.C. 20590

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

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. The Joint Policy Advisory Committee on Transportation (JPACT) and Oregon Metro jointly comprise the Metropolitan Planning Organization (MPO) representing the broader Portland, Oregon region, serving more than 1.7 million people living and working within the urban areas of 3 counties and 24 cities. Guided by a committee of 17 elected officials and agency representatives, JPACT makes strategic recommendations to the Metro Council that ensure federal dollars are invested strategically to deliver transformative projects.

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 supported, and nationally aligned.

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 that support families, workers, and industries.

We applaud USDOT for initiating this Request for Information and offer the following recommendations, based on our direct experience implementing federal surface transportation policy. Our priorities align with the Association of Metropolitan Planning Organizations (AMPO), Local Officials in Transportation (LOT) Coalition, Transportation for America, Association of Commuter Transportation, Intelligent Transportation Society of America, and reflect the needs of our region.

In May 2025, JPACT formally adopted nine proposals for the U.S. Department of Transportation to consider in the development of the next surface transportation reauthorization bill. The proposals are listed below and are not in any priority order.

### **Preserve current funding levels for competitive funding programs.**

The 2021 surface transportation reauthorization bill established a variety of new competitive funding programs that are of importance to the Portland Metro region. JPACT is especially advocating to reauthorize and reappropriate level funding for the following new transportation funding programs:

- National Infrastructure Project Assistance (MEGA)
- Infrastructure for Rebuilding America (INFRA)
- Bridge Investment Program (BIP)
- Safe Streets and Roads for All (SS4A)
- Active Transportation Infrastructure Investment Program (ATIIP)
- Promoting Resilient Operations for Transformative Efficient and Cost-saving Transportation (PROTECT)
- Reconnecting Communities Pilot (RCP)

The prior surface transportation authorization bill also maintained or increased appropriations for multiple existing USDOT grant funding programs, expanding their ability to advance locally important transportation goals. JPACT would like to see the 2021 appropriation authorization levels preserved for the following existing competitive programs:

- Better Utilizing Investments to Leverage Development Grant Program (BUILD)
- Advanced Transportation Technology and Innovation (ATTAIN)
- Federal Transit Administration (FTA) Bus and Bus Facilities
- FTA State of Good Repair
- FTA Capital Investment Grant
- FTA Pilot Program for Transit-Oriented Development
- FHWA Advanced Transportation Technologies and Innovative Mobility Deployment (ATTIMD)
- Maritime Administration Port Infrastructure Development Program (PIDP)

As Congress looks to approve future infrastructure funding, it is important to JPACT that the federal government meet its already committed obligations for federally funded projects.

### **Preserve current funding levels for formula funding programs.**

Sustained funding is important for highway and transit formula programs. The 2021 surface transportation authorization bill increased appropriations for multiple USDOT formula funding programs that JPACT would like to see maintained, including the:

- FHWA Surface Transportation Block Grant (STBG)
- FHWA Highway Safety Improvement Program (HSIP)
- FHWA Carbon Reduction Program (CRP)
- FHWA Congestion Mitigation and Air Quality Program (CMAQ)
- FHWA Bridge Formula Funding, which was created in the prior bill
- FTA Urbanized and Non-Urbanized Area Programs

In addition to maintaining the increased funding level for the FHWA Surface Transportation Block Grant (STBG), JPACT also wants to ensure the program maintains the 10% set aside for the Transportation Alternatives Program, which supports smaller-scale transportation projects. JPACT also wants the reauthorization bill to maintain requirements for state transportation departments to provide suballocations of their STBG funding to MPOs and local jurisdictions. JPACT requests that currently eligible transportation infrastructure for these formula funds are retained to support local and state policy priorities and decision-making and to continue advancing locally important infrastructure and streamlining deployment of federal dollars.

**Maintain funding and policy focus on safety for all road users, especially along arterials and critical corridors.**

JPACT and Metro support the Secretary's call to address the significant safety challenges on our roads, highways, bridges, and transit infrastructure. Federal funding for transportation safety, such as the Safe Streets and Roads for All (SS4A) grant and the Highway Safety Improvement Program (HSIP), is imperative to ensure the transportation system is safe for all roadway users. Federal funding and policies that enable coordinated local and regional transportation safety action planning using the Safe System Approach provide opportunities to identify and deploy cost-effective safety improvements and major safety corridor projects on high crash corridors, arterial roadways, and highways.

The federal funding and Vision Zero policies promulgated in the prior surface transportation bill have had significant results in improving safety outcomes. In Oregon, traffic deaths have declined since 2022 and speeding has decreased in some corridors up to 80%. In some areas serious crashes can decrease 90% or more depending on the countermeasures and context. Recent investments in transportation safety are also benefitting the economy – 75% of locations in the Portland metro region that implemented pedestrian and bicycle safety improvement projects saw measurable economic gains in the food or retail industries shortly thereafter. Prioritizing federal funding and policies centered around safe vulnerable roadway users, safe urban arterials, safe speeds, safe vehicles and safe drivers are cornerstones of a safe transportation system that will ensure our nation continues reducing traffic deaths.

JPACT requests that the next reauthorization bill maintains a National Roadway Safety Strategy; directs USDOT to prioritize funding awards for projects that will reduce fatal and serious traffic-related injuries; and promulgates policies related to Complete Streets, Vision Zero principles, and Safe Systems Approach.

**Streamline permitting and federal requirements to make it more efficient to deliver high-impact projects that have minimal impact.**

There are many examples of small-scale transportation projects that have high impact in improving safety outcomes. Under some scenarios, seemingly simple projects like installing

curb ramps, sheltered bus stops, traffic signals, and pedestrian crossings can have onerous federal requirements that delay implementation, increase project cost, or make the project less viable to deliver. It should be easier to fund and deploy these types of small-scale, high-impact projects.

In addition to tweaking federal permitting requirements to streamline project delivery, it is important that USDOT and Congress ensure adequate staffing levels at regional offices to process and review documents and increase planning funds to support the initial steps in the federal permitting process to reduce environmental and permitting delays. Along those lines, eliminating duplicative or excessively frequent reporting requirements for some USDOT funding would streamline project delivery.

### **Support transportation funding mechanisms that ensure long-term stability and solvency of the Highway Trust Fund.**

Many of the agencies responsible for building, managing, and maintaining transportation and transit systems are facing funding cliffs due to very limited revenue sources. Agencies that were already financially constrained are under more pressure due to inflation and supply chain challenges, which are driving project and staffing costs up. This is affecting local and state government's ability to build, maintain, and operate efficient transportation and transit systems.

These challenges are exacerbated by a lack of adequate funding at the federal level for transportation capital projects, planning, and maintenance activities. The federal gas tax has remained at 18.4 cents per gallon since 1993 and has lost significant purchasing power over more than 30 years of inflation. Further, the vehicle market shift to electric vehicles (EVs) is exacerbating this transportation funding issue by reducing the amount of revenue that the federal gas tax generates. Jurisdictions rely on stable, predictable federal funding to deliver transportation projects. As such, JPACT supports efforts to address the lack of adequate, sustainable, long-term funding mechanisms for transportation and transit infrastructure by increasing the gas tax and/or indexing it to inflation, requiring EVs to pay into the Highway Trust Fund, and/or establishing a national road user charge pilot program such as Vehicle Miles Traveled (VMT). As Congress and USDOT consider new transportation revenue sources, it is critical that the Highway Trust Fund maintains the 80-20% split between the Highway and Mass Transit accounts.

### **Invest in integrated multimodal transportation systems that are well coordinated.**

As each JPACT jurisdiction pursues a transportation system that works best for their citizens and local economies, JPACT supports a multimodal approach that preserves robust federal support for mass transit, freight rail, and intercity passenger and commuter rail in addition to highway programs. JPACT supports investments in multimodal infrastructure that are well integrated with different modes and scales of transportation, such as high-capacity transit,

micro-transit, shuttle services, and active transportation options like bike lanes and shared use paths. JPACT also supports funding programs and policies that promote technology as a tool for a well-integrated system, such as transit signal priority and real time system monitoring. This includes policies related to Transportation System Management Options, a national program that informs Metro's efforts to use technology to make the multi-modal transportation system efficient, and the FHWA Advanced Transportation Technologies and Innovative Mobility Deployment program, which supports projects that use technology to reduce congestion and help buses move through traffic and stay on schedule.

**Maintain a minimum annual authorization of \$4.6B for the Federal Transit Administration's Capital Investment Grant program.**

The outyear funding of the FTA Capital Investment Grant program that has already been committed through Full Funding Grant Agreements ("FFGAs") and proposed FFGAs requires a significant sustained investment in the program. FTA will not be able to meet their existing FFGA commitments if the program doesn't maintain level funding, let alone advance new projects through the multiple phases of the CIG program. Preserving the \$4.6B annual funding authorization is critical given that four regionally significant projects in the Portland Metro area – 82<sup>nd</sup> Avenue, Montgomery Park Streetcar, I-5 Interstate Bridge Replacement, and Tualatin Valley Highway – are currently in the FTA CIG project development phase and targeting this program for a combined \$1.398 billion across multiple fiscal years.

**Make advanced appropriations for competitive programs through multiple federal fiscal years.**

Advanced appropriations provide certainty about the continued availability of federal funding sources for projects as finance plans are developed. This is especially important for large, complex projects that take years to move through planning and project development. It is important to compel agencies to continue the practice of maintaining comprehensive calendars for Notice of Funding Opportunities (NOFOs) so applicants can plan, prepare more competitive applications, secure local matching fund commitments, and position their projects for financial success.

**Increase flexibility of federal funding so it can be used to address critical maintenance backlogs.**

Many locally owned roads, bridges, and transit infrastructure have large maintenance and repair needs, but funding shortfalls and inflexible program requirements make it hard to maintain a state of good repair and weaken the system's long-term safety and dependability. We seek flexibility for federal funding to invest in capital maintenance, repairs, and resiliency retrofits on locally owned infrastructure to promote long-term safety and reliability.

Thank you for your time and consideration of these proposals for the next surface transportation reauthorization. JPACT looks forward to working with USDOT and Congress on the provisions of the next bill.

Sincerely,

A handwritten signature in blue ink, appearing to read "Juan Carlos Gonzalez", with a yellow highlight behind the name.

Juan Carlos Gonzalez  
Chair, Joint Policy Advisory Committee on Transportation