



## BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

Monica Tibbits-Nutt, MPO Chair | Secretary and CEO, Massachusetts Department of Transportation  
Tegin Leigh Teich, Executive Director, MPO Staff

### 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**

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#### **I. Introduction**

Dear United States Department of Transportation,

Thank you for the opportunity to submit comments in response to the Request for Information (RFI) (Docket No. DOT-OST-2025-0468) on the development of the next surface transportation authorization.

At the Boston Region Metropolitan Planning Organization (MPO), we plan for the future of transportation across 97 municipalities, serving more than three million residents. We oversee approximately \$150M annually in federal transportation funding, working to improve safety, reduce congestion, and support economic development. Guided by a board of local elected officials along with state and regional agency representatives, and supported by a professional planning staff, we ensure that federal dollars are invested strategically and efficiently to deliver transformative projects to the Boston area.

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 departments of transportation (DOTs), and the public. **This ensures that federal investments are cost-effective, locally informed, and nationally aligned.**

A strong and collaborative relationship between the United States 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 that safety investments lead to substantial improvements, helping Americans travel safely to work, school, and home to their loved ones. Supporting expanded MPO eligibility and decision-making authority for federal safety programs would ensure investments are guided by local data and regional safety action plans.

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

**Modernizing Funding Mechanisms for Effective Regional Delivery.** As the federally designated entity responsible for regional transportation planning, the Boston Region MPO supports reforms that grant MPOs the option to serve as direct recipients of Metropolitan Planning (PL) funds, with an opt-out option. This approach would be most successful if combined with the additional changes to PL funds identified in Theme 3. 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.). If the pilot program were successful, future iterations should continue to have an opt-out option for MPOs who feel the current suballocation structure better serves their needs.

In addition, 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.

**Developing Standardized Processes for Carryover of Federal Funds.** MPOs plan complex, regionally significant projects. Oftentimes, project timelines do not align neatly with the federal fiscal year. While federal law allows states to carry over unobligated funding for three years, this is not extended to MPOs in statute. As a result, each state creates its own processes for carrying over MPO-programmed, but not yet obligated, federal funding. Creating consistent expectations for the carryover of federal funds from

one fiscal year to the next ensures that there is uninterrupted progress on projects and reduces red tape to deliver infrastructure faster.

**Streamlining 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 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**

**Increase Planning Funds to Meet Federal Planning Requirements.** Planning is the foundation of effective project delivery. **Despite expanding responsibilities, Metropolitan PL funds remain below one percent of total formula dollars.** At the Boston Region MPO, we are responsible for efforts such as congestion management, regional safety planning, and performance-based planning measures. 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.

**Reduce Local Match for Federal Transportation Programs.** The Boston Region MPO 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 state or local funds in order to access the resources needed to carry out these obligations. Reducing match requirements for federal transportation funds removes administrative burdens and helps ensure that federal funding is directed towards regional projects without delay.

**Shift Certain Discretionary Funding to Formula Funding.** While competitive grant programs play an important role and have expanded access for many jurisdictions, municipalities 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 United States. An example of this would be funding for safety improvements previously invested through the Safe Streets and Roads for All competitive grant program.

## **Theme 4: Project Selection Coordination Between Government Partners**

**Clarify and Strengthen Project Selection Roles.** In the upcoming reauthorization bill, we advocate for MPOs to have a clearly defined role in selecting federally funded projects in their regions. Currently, there is wide variation nationwide in how DOTs and MPOs decide on projects in MPOs' own Transportation Improvement Plans (TIPs). While it is important for every region to do what is most efficient given their resources, having more clearly defined roles for MPOs would provide predictability in project selection and streamline the project selection process. We also believe that ensuring transparent MPO engagement in the State Transportation Improvement Program (STIP) development would increase accountability and shared decision-making to ensure that federal funds reflect state, regional, and national priorities.

### **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 diverse 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 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.

Sincerely,

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