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**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**

To 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) regarding the development of the next surface transportation authorization.

As the designated Metropolitan Planning Organization serving the Spokane region, we encourage policies that promote efficient, safe, and responsible transportation decision-making. We are active in planning and programming transportation solutions at the local level in addition to providing state and federal support. SRTC operates under the federal and state laws, rules and Executive Orders to coordinate comprehensive transportation plans using Congressionally mandated performance measures, in collaboration with local governments, transit agencies, state DOTs, and the public. This strategic approach 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 streamlined system is needed to reduce red-tape and maximize the effectiveness of tax dollars collected for transportation. 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. Many of our priorities align with industry organizations including 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

SRTC wholeheartedly supports Secretary Duffy's call to address the significant safety challenges on our roads, highways, bridges, and infrastructure. MPOs are uniquely positioned to identify and respond to systemic and specific safety challenges, such as dangerous intersections, distracted driving and high-crash corridors.

Roadway fatalities and the fatality rate declined consistently for 30 years, but progress has stalled over the past decade and recent years the United States has recorded more than 40,000 fatalities annually. More broadly, a report issued by the National Highway Traffic Safety Administration estimated the societal costs of motor vehicle crashes in 2019 to be approximately \$340 billion.

During the next transportation reauthorization, we encourage our federal partners to:

- ***Continue funding programs such as the Safe Streets and Roads for All that allocates funding directly to local governments that are implementing mitigation strategies identified through a data driven action plan; and***
- ***Support the continuation and expansion of the Highway Safety Improvement Program (HSIP) to implement data-driven safety improvements on our highways.***
- ***Encourage a strong and integrated decision-making framework between state departments of transportation and MPO's so that financial resources at all levels can be better leveraged and we can avoid redundancies in data analysis and decision-making.***

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. Expanded MPO eligibility and decision-making authority for federal safety programs will help ensure investments are guided by local data and regional safety action plans. By recognizing and supporting regional priorities, local funding can be deployed more effectively in leveraging and supplementing federal resources.

### Theme 2: Accelerating Project Delivery

As the federally designated entity responsible for comprehensive transportation planning in the Spokane region, SRTC supports efforts to improve project delivery by reducing governmental bureaucracy and streamlining processes that fund the transportation systems that support a thriving economy.

- ***Expand Direct Recipient Status to MPO's and Local Governments for Certain Federal Funding Programs to avoid unnecessary delay and reduce administration costs.***
- ***Better utilize and/or expand the regional project prioritization process implemented by MPO's to ensure that federally funded projects reflect regional priorities that deliver the greatest transportation and economic development benefits to communities, while also supporting national goals.***
- ***Shift from Discretionary to Formula-based Funding for certain programs to create a more stable and predictable funding stream that can lead to more efficient programming strategies.***

Each of these recommendations seek to streamline bureaucratic layers of project selection and funding by allowing funds to flow more directly to the agencies responsible for constructing or implementing the transportation improvements. Additionally, these recommendations reduce administrative overlap and redundancy by more effectively utilizing activities already in place to identify the most beneficial projects supporting economic vitality. And, finally, creating stable and predictable funding streams helps to reduce overall costs and reassigns decision-making away from federal staffers that have no real connection to the projects they're reviewing.

### **Theme 3: Increasing Opportunities Through Investment in Transportation Infrastructure**

Planning provides the foundation for effective project delivery. Despite expanding responsibilities, Metropolitan Planning funds (PL) remain below 1% of total formula dollars. Additionally, the federal formula used to distribute these funds is based on data from outdated census counts. At SRTC, we are responsible for efforts such as freight coordination, congestion management, data collection, safety planning, travel demand forecasting, integration of technology and much more. These activities require sophisticated modeling and GIS analysis, public engagement, and interagency coordination that many of our communities are not staffed to provide. Strong and capable MPOs are better positioned to carry out the mandates of the federal administration and develop transportation systems that foster economic growth, improve safety, and reduce or manage congestion.

- ***Modernize the federal funding formula to ensure funding equitably supports population centers***
- ***Increase Planning Funds to Meet Federal Planning Requirements.***
- ***Continue funding transportation system maintenance & preservation***

SRTC supports federal efforts to strengthen the 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. We support continuing the Bridge Formula Program and converting it to a suballocated program so that local and regional governments can have the authority to prioritize and program bridge funds based on regional needs.

Everyday people, communities and businesses throughout our Nation rely on the existing network of highways, roads and bridges. At all levels, the transportation system gets goods to market, people to work, students to school, and the STRAHNET is vital in supporting our military. Recently, however, FHWA estimated a \$1 trillion backlog in repairs and maintenance needed to improve the condition of more than 619,000 bridges and 4 million miles of public roads. SRTC recognizes and supports the need to keep our existing infrastructure in a state of good repair.

### **Theme 4: Strengthening Partnerships with States and Other Key Stakeholders**

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.

- ***Continue federal investment in public transportation***



- ***Establish Dedicated Formula Funding for Rural Transportation Planning Organizations to strengthen rural project evaluation and selection, delivery, regional coordination, and safety outcomes.***

By acting as a convener and leader, MPO's ensure decision-making involves and serves the business community, military installations, freight operators and other personal and commercial interests. Likewise, by partnering with mass transit and aviation providers, MPO's ensure all modes of transportation are effectively integrated to provide seamless travel.

SRTC supports continued federal investment in public transportation through the new surface transportation bill, including the Capital Investment Grant (CIG) program, which helped fund the region's first Bus Rapid Transit (BRT) project, City Line. Spokane Transit plans to seek CIG funding for Division Street BRT, a project identified herein as a regional priority.

### **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 encourage USDOT and Congress to strengthen the role of MPOs, RTPOs, and local governments as co-implementers of the federal transportation program. Where established, regional agencies work with partners to implement programs that deliver on federal initiatives including improved safety, economic growth, and the acceleration of project delivery.

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,

Lois Bollenback, Executive Director  
Spokane Regional Transportation Council (SRTC)