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**U.S. Department of Transportation
Docket No. DOT-OST-2025-0468**

Dear Secretary Duffy:

Alabama Arise appreciates the opportunity to comment on the prioritization of transportation purposes pursuant to the reauthorization of funding, DOT-OST-2025-0468. Alabama Arise is a member-directed, anti-poverty organization dedicated to building an economy and society that works for all people in our state. We have worked for better policy for nearly 40 years at the federal, state and local levels. Our members decide yearly what priorities will make life better for individuals and families in Alabama. Overwhelmingly, our members support public transportation as a high priority. And our members' support holds across every demographic, racially, economically and geographically.

This broad support exists because public transportation funding is one of the best ways to improve and secure the well-being of our communities. Transit is fundamental to the economic success of towns, cities and rural areas across Alabama and the entirety of America. Essential workers depend on and operate our state's buses and vans. Employers depend on transit to get workers to jobs reliably. And historically marginalized people and communities depend on transit. When people can count on the bus or train to get where they need to go, they can contribute to their workplace, receive needed medical care and participate in the daily life of their communities. They benefit from greater economic mobility and lower household costs.

Our Legislature has identified transit as one of the primary obstacles to increased workforce participation and as an avenue where investment provides good return. And the Legislature's view is also the view of the business community and community advocates focused on all groups of Alabamians. Disability advocates, worker advocates and groups that support the well-being of children and older Alabamians all understand that transit is important for all of us. But throughout Alabama, our transit riders lack adequate service lines, hours and frequency of service. Many of our transit agencies have significant capital deficits and deferred maintenance. However, the recommendations outlined below would allow our agencies to increase availability and reliability of public transportation in Alabama.

The federal government makes a vital contribution to transit funding, and that contribution helps keep transit viable and available in Alabama, deficiencies notwithstanding. The following recommendations focus on how to increase the return on investments in transit while reducing burdensome requirements on transit agencies.

1. **Federal operating funds would expand capacity and mobility and promote economic growth.** The federal transit program provides funding primarily for capital investments, not operating expenses. Transit agencies can purchase new buses or build new rail lines with federal funds, but often lack sufficient funding

to cover the costs of fuel and wages for operators. In our small, rural communities that use federal funds for operations, resources are insufficient to address both operating and capital needs. A new bus serves no purpose without the money to operate it. The next reauthorization should include a consistent, predictable source of funding for transit operations. The law should include maintenance of effort requirements to ensure that the additional operations funds increase resources to agencies and do not just swap funding sources. With additional operations funding, transit agencies of all sizes would be able to improve and increase service, which would increase access to jobs and other key destinations, improving economic productivity and reducing household costs.

2. **Eliminating outdated policies and requirements and matching funding to program demand would deliver transit projects faster and more efficiently.** Transit is inadequate in America in part because it has been woefully underfunded and subjected to overly burdensome requirements for decades. For example, new transit lines — whether rail or bus rapid transit (BRT) — must undergo an extensive federal analysis to qualify for limited capital investment grant funding, while highways, roads and bridges have no such required analysis. Moreover, transit projects are burdened by disproportionate local match requirements. To meet federal requirements, localities often must provide more than 50% of a new transit project's cost, while those building new highways must provide only 20%. There is far more demand for transit than the current federal transit program can support. According to the American Public Transportation Association, an additional \$36 billion is needed above IJJA levels to build currently planned rail and BRT projects. The Federal Transit Administration and the Volpe Center have estimated that there is a transit state of good repair backlog of more than \$140 billion. The next reauthorization must meet this demand by increasing transit funding and making it easier to deploy those dollars, including streamlining requirements and accepting local match for new transit projects on par with that required for highways.
3. **Federal investments to build transit-ready communities would increase safety and catalyze economic development.** Transit operates most efficiently on roads designed to accommodate it — through transit lanes, traffic signal priority and safe access for all road users, among other features. Transit also contributes to, and benefits from, economic development along transit corridors. To support efficient operation of transit and grow transit ridership, the reauthorization should:
 - Increase flexibility in roadway design standards to support safe travel for transit riders (whether on the bus or train or traveling to/from the bus or train);
 - Dedicate funding for transit-supportive infrastructure such as sidewalks, bus shelters, ADA access, traffic signal priority, queue jumps and bus lanes; and
 - Incentivize mixed-use, mixed-income private development near transit stations and hubs.
4. **Expanded mobility in small and rural communities would stimulate economic growth and reduce household costs.** Transit providers in small and rural areas often struggle to meet their communities' needs due to a lack of funding and staff capacity. Rural Americans are isolated from jobs, health care and other essential needs. The next reauthorization should remove barriers and improve the federal transit program to increase access to quality transit in small towns and rural areas. This means:
 - Authorizing additional funding for rural transit programs;
 - Raising the federal share of rural transit operating funding from 50% to 80%;
 - Incentivizing coordination across jurisdictional boundaries and across multiple funding sources;
 - Incentivizing innovative solutions and partnerships with competitive grant funding; and
 - Expanding the federal procurement clearinghouse to help small and rural transit agencies right-size their purchases, increase efficiency and facilitate lower capital costs.

5. **Prioritizing road maintenance over building new roads would improve infrastructure conditions, increase safety, and reduce families' costs.** The federal transportation program should prioritize existing roads, bridges and highways ahead of roadway expansion. Deferring needed maintenance leads to increased costs down the road and inhibits asset management. Roads in bad repair increase costs for families who drive as well as undermining the reliability and safety of transit.

Sincerely,

Dev Wakeley

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