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September 18, 2025

The Honorable Marc Molinaro
Administator
Federal Transit Administration
1200 New Jersey Avenue SE
Washington, DC 20590-0001

SUBJECT: Request for Information Concerning the Capital Investment Grants Program, [Docket No. FTA-2025-0069]

Secretary Molinaro,

On behalf of the National Association of City Transportation Officials (NACTO), I am commenting in response to the Federal Transit Administration's (FTA) Request for Information Concerning the Capital Investment Grants (CIG) Program [Docket No. FTA-2025-0069].

Our [member cities and transit agencies](#) across the U.S. have proven, real-world experience delivering transit projects and working within the existing FTA CIG Program.

A strong and collaborative relationship between the FTA and our members is essential to the success of the nation's transit networks. NACTO's priorities are embodied in our [federal policy platform](#) and reflect the needs of our members in different states and regions across the country. They are organized around the questions outlined in the RFI.

[Economic Development Criterion \(New Starts, Small Starts, and Core Capacity Projects\) and Land Use Criterion \(New Starts and Small Starts Projects\)](#)

- The existing criteria (i.e., existing population and employment density) sufficiently capture characteristics that would make a transit project most impactful to the communities it serves. Future population projections are often imprecise and highly variable due to external factors. Their inclusion would not help inform the potential impact of a proposed transit project.

- Additionally, the existing criteria sufficiently capture the potential of transit-oriented development and related growth in economic and population activity.

CIG Process (New Starts, Small Starts, and Core Capacity Projects)

- Simplify review and requirements for transit agencies by reducing federal oversight and bureaucracy. The project justification and financial commitment criteria processes alone can delay projects by years, even after NEPA clearance. Consider simplifying or eliminating aspects of these processes to improve project delivery and create significant cost savings for taxpayers. Additionally, many of the required documents do not directly impact the project yet undergo multiple rounds of updates and approvals.
- The additional costs from federal paperwork are undue and unfairly felt directly by the local taxpayers. The FTA's financial commitment is set very early in the CIG process. All cost overruns from additional federal paperwork and approvals are borne by the transit agency. These agencies should be able to focus their resources on project-related tasks, rather than FTA deliverables.
- Because the region offices must coordinate with headquarters, CIG recipients can see delayed responses to project questions. Clear guidance and documentation for all parts of the CIG process that are available to all FTA staff and CIG recipients will reduce questions and improve coordination.

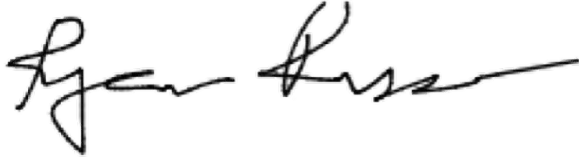
Merits of CIG Projects

- Allow entry into Engineering based on sponsors' demonstration of local financial commitment, project justification, and NEPA completion. Locking in the total CIG amount is not a legislative requirement and should not be an administrative one
- End the practice of evaluating only weekday transit trips and adopt an "access to opportunity" metric to evaluate a project's potential to improve connections across the transit network – not just a specific corridor or route – to amenities and opportunities, including but not limited to jobs and employment.
- Deduct safety improvements from the total project cost as part of the Cost Effectiveness criteria. Cost deductions should also be applied to Core Capacity and Small Starts projects

Thank you for the opportunity to contribute to this process. NACTO and its members look forward to conversations with the FTA about the CIG

Program and other ways the administration can help improve project delivery.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Russo". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ryan Russo
Executive Director
National Association of City Transportation Officials