



CMAP Update

February 26, 2025

Last updated: March 6, 2025

CMAP is providing this update to key partners, including the region's Councils of Governments (COGs), planning liaisons, county transportation stakeholders, IDOT and others.

CMAP aims to keep partners informed about federal transportation funding, grant disbursements, regulatory information, transportation programming, other related transportation news and information in response to recent executive orders and federal directives.

Local FHWA staffing

What's Happening: CMAP received confirmation that of the 34 staff members from the Illinois Division of the Federal Highway Administration (FHWA) office only 19 staff members remain due to the loss of staff that were in their probationary period and those who took the Deferred Resignation Program option. It is expected that number could be further reduced. Currently, there are only three members directly supporting Northeastern Illinois activities for CMAP, IDOT and our partners.

Why it matters: CMAP relies on local FHWA staff to provide review of MPO work products, including the TIP. They also provide guidance and contribute to regional conversations through non-voting participation in CMAP committees and participation in bi-weekly calls with the planning liaisons, IDOT and CMAP. Without these staff in place, CMAP and our partners will have to submit products for federal review earlier in order to account for potential delays and we may have to wait longer than we anticipate for answers to important questions.

January 29th USDOT Memorandum and DOT Order

What's Happening: USDOT issued two documents on January 29, 2025 to all USDOT officers and operating administrators providing preliminary guidance to modal administrators and officers of USDOT.

One was a memo titled [Implementation of Executive Orders Addressing Energy, Climate Change, Diversity and Gender](#) and details a process for reviewing all activities under USDOT purview.

- Within 10 days all administrators were asked to identify *“all DOT orders, directives, rules, regulations, notices, guidance documents, funding agreements, programs, and policy statements... which are subject to the relevant executive orders.”*



- Within 10 days following the report, administrators were required to begin to initiate action to “rescind, cancel, revoke and terminate” anything identified “not required by clear and express statutory language.”
- “Office of the General Counsel and Office of Under Secretary for Policy shall be responsible for overseeing compliance with this Memorandum and within 30 days of the date hereof shall submit a written report to the secretary regarding the status of compliance by each OA and OST component.”

A DOT Order was issued on the same day, titled "[Ensuring Reliance Upon Sound Economic Analysis in Department of Transportation Policies, Programs and Activities](#)" stated purpose is to update and reset the principles and standards for USDOT. The memo includes direction that all funding initiatives be “based on sound economic principles and analysis supported by rigorous cost-benefit requirements and data-driven decisions.”

Furthermore, the Order states all DOT supported or assisted programs and activities prioritize projects and goals that “utilize user-pay models; direct funding to local opportunity zones; mitigate the impact of activities on families – families with young children – and give preference to communities with marriage and birth rates higher than the national average; prohibit recipients of DOT support/assistance from imposing vaccine and mask mandates; and require local compliance or cooperation with Federal immigration enforcement with other goals and objectives specified by the President or Secretary.”

Next steps listed in the DOT Order include the delegating the authority to the USDOT General Council to implement activities, which includes development and issuance of guidance, revision of NOFOs, and review existing grant agreements. A requirement to prepare a report describing efforts to comply with this order must be submitted in six months and every six months thereafter.

Why it matters: As USDOT continues to review and revise policy direction, ongoing grant agreements and projects may be disrupted as new direction is provided to remove or adjust current tasks in grant agreements. To date, no formal guidance has been provided; however, changes are being made to current processes as illustrated by the next item on review of Statewide Transportation Improvement Program (STIP) amendments and review process. MPOs and others are awaiting more direct guidance on how to implement priorities like supporting families with higher than the national average birth rate and marriage rate. It remains to be seen whether these new policies will impact the distribution of federal funds or grants across the nation.



Statewide Transportation Improvement Program (STIP) amendments and review process

What's Happening: FHWA Headquarters issued new guidance to its field offices requiring all division offices to forward all STIP amendments to the Office of General Counsel (OGC) at USDOT for review and approval. *Update: as of February 26, 2025, USDOT has reversed this policy and plan reviews are proceeding as normal.*

FHWA divisions are continuing to accept STIP amendment submissions; however, an added layer of review has been placed on all projects requiring a STIP amendment. If an extended review period continues, project implementation schedules could face significant disruptions. Potential impacts include delays in project letting, contract awards, construction start dates, and the obligation of federal funds—jeopardizing the ability to meet fiscal year deadlines and potentially risking the lapse of funds.

The Association of Metropolitan Planning Associations shared with CMAP and its other MPO members that FHWA Headquarters issued new guidance to its field offices stating:

"This message clarifies the process for FHWA and FTA planning approvals. As has been standard in every transition, documents affecting the public are reviewed prior to issuance to ensure compliance with current Administration priorities. An administrative review is now underway, with the FHWA and FTA assessing documents for this purpose.

In the meantime, there is no pause. FHWA and FTA planning actions continue and all FHWA Division Office and FTA Regional Office are working quickly to ensure that planning actions on Statewide Transportation Improvement Program (STIP) approvals, STIP amendments, State Planning and Research Work Programs (and amendments), Unified Planning Work Programs (and amendments) and Transportation Management Area Certification Review letters and reports, and conformity determinations are in compliance with the DOT Orders. FHWA will provide further clarification once administrative review and written guidance are complete."

Why it matters: No timeline has been provided for how long OGC reviews will take, raising significant uncertainty and concern among MPOs and industry partners.

Given the required consistency between STIP and TIP amendments, we are actively assessing how the additional layer of review could affect the TIP. In areas with large-scale projects or narrow construction windows, even short delays can cascade into prolonged setbacks, increased project costs, and missed opportunities to address critical transportation needs.

After being approved by the region, CMAP TIP amendments are forwarded to IDOT for incorporation into the STIP. STIP amendments must be approved by USDOT. Federal funding cannot be authorized for any phase of a project if the project and its funding are not included in the approved TIP and STIP. For decades, CMAP's TIP amendment schedule has been developed to correspond to the state's construction letting schedule, allowing flexibility in programming based on the most realistic



estimates available for projects prior to letting. If approvals are delayed by a new layer of federal

review projects are likely to be underfunded or delayed to a point where an entire construction season may be missed.

National Environmental Policy Act (NEPA) rule

What's Happening: The White House Council on Environmental Quality (CEQ) has issued an Interim Final Rule to remove the long-standing regulations guiding how agencies implement the National Environmental Policy Act (NEPA). This shift gives agencies like USDOT greater flexibility in shaping their own NEPA procedures. While USDOT has established NEPA regulations, this change could lead to revisions that would affect how the environmental impacts of transportation projects are assessed. This EO revoked three prior Executive orders noting that NEPA documents should not include an environmental justice analysis, to the extent that this approach is consistent with other applicable law.

Read AMPO's [analysis](#).

Why it matters: While we await any new direction from USDOT, impacts to projects under environmental review are unknown at this time. However, as NEPA regulations are revised, the reduction in local FHWA staffing and relevant expertise to provide necessary guidance will add further delay to the project approval process.

Other

There are a number of other questions, concerns and issues that our partners have identified. CMAP is actively following developments around these topics and will provide updates when we have more clarity on these issues.

- Availability of federal funds that are programmed, authorized for federal participation, or already obligated by US DOT.
- Impacts to the region's Air Quality Conformity status and procedures, particularly regarding greenhouse gas emissions.
- Impact to environmental justice and equity in our work.
- Impact of changing policy priorities and funding availability on the project selection process currently underway for CMAQ, CRP, STP Shared Fund, and Local TAP programs and the local STP project selection that is scheduled to begin in October 2025.

Resources:

The **Association of Metropolitan Planning Associations (AMPO)** continues to update its members



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on key developments that impact funding, policy, and compliance, including legal cases and other policy updates.

[2.20.25 The National Beat](#) -- Stay informed with AMPO's latest insights, including updates from federal agencies, Capitol Hill developments, and key national transportation news.

[2.21.25 The Friday Docket](#) - A weekly legal briefing that highlights key legal developments affecting funding, policy, and compliance. While some cases may not seem directly related to transportation, they often have far-reaching implications for federal funding, agency authority, and compliance—potentially impacting MPO access to transportation funding, long-term planning, and program administration.

Infra Insight Blog - Nossaman's 30+ infrastructure attorneys offer practical experience, insider insight and thoughtful analysis on local and national policy developments that affect the market and their clients.

[2.24.25 Infra Insight](#) - New Transportation Secretary Gets to Work with New Directives, Diversity, Equity, and Inclusion and more

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