



U.S. Department of Transportation
1200 New Jersey Avenue SE, West Building,
Ground Floor, W12-140,
Washington, DC 20590-0001

August 20th, 2025

Re: Docket No. DOT-OST-2025-0468

To whom it may concern:

On behalf of the Natural Resources Defense Council (NRDC) and Sierra Club, we thank you for the opportunity to provide input on the future of surface transportation reauthorization. NRDC is one of the nation's largest environmental organizations, founded in 1970 with the mission of safeguarding the earth—its people, its plants and animals, and the natural systems on which all life depends. Smart transportation policies are key to advancing this mission. Sierra Club is one of the nation's oldest, largest, and most enduring grassroots environmental organizations. It is led by its 600,000 active members, and its influence is powered by millions of volunteers and supporters in every state, Puerto Rico, and Washington, DC.

Our comments highlight key priorities that the next reauthorization bill should embody. Our specific recommendations are outlined below.

Prioritize lowering transportation costs for households

The average cost of owning and operating a car in 2024 was \$12,296, a heavy burden for many families.¹ This means that families, especially low-income families, must spend a significant percentage of their household budget on transportation. To alleviate this economic burden, the federal government must shift investments toward modes of transportation that offer mobility to everyone, including those who are too old or young to drive and those who do not have access to a car. People need cheaper options to travel and investing in transit and active transportation including walking and biking does just that.

¹ "Average Cost of Owning and Operating an Automobile," Bureau of Transportation Statistics, <https://www.bts.gov/content/average-cost-owning-and-operating-automobilea-assuming-15000-vehicle-miles-year>, accessed on April 28, 2025.

To that end, U.S. Department of Transportation (USDOT) must encourage Congress to:

- Increase transit funding to meet demand, including addressing the \$140 billion state of good repair backlog;
- Reauthorize critical programs for active transportation such as Safe Streets and Roads for All at higher funding levels; and
- Put a fix-it-first policy in place to prioritize maintenance of existing roadways, where poor conditions add to vehicle repair costs and reduce safety for all road users.

Invest in electrification as an economic tool development tool

Americans are buying electric vehicles in growing numbers—over 3.2 million EVs had been sold in the U.S. by the end of 2022, and that number is only rising². It's clear the American people want EVs and will continue to buy more in the future. To support this demand the next reauthorization bill should continue to support vehicle electrification by reauthorizing and increasing funding for the National Electric Vehicle Infrastructure program (NEVI) and the Charging and Fueling Infrastructure Grant program (CFI). These programs are essential to building out a reliable national charging network that meets the needs of drivers and supports broader adoption. On top of these benefits, EVs are delivering real economic returns. Increased EV adoption has generated more revenue for utilities than it has added in costs, helping reduce electricity rates for everyone—not just EV drivers.³ In short, electrification isn't just a cleaner option—it's a smart, cost-effective one too.

Drive economic growth by investing in public transit

Public transit connects workers to jobs, customers to businesses, and communities to services—making it a powerful economic growth engine in rural, urban, and suburban communities. While federal programs help state and local agencies buy buses or build rail lines, they don't fund operating costs. Without funding for operations, agencies struggle to hire drivers, maintain reliable service, or expand routes to meet local demand. The Moving Transit Forward Act⁴ introduced by Senators Van Hollen and Fetterman and Stronger Communities through Better Transit Act⁵ introduced by Representative Henry C. "Hank" Johnson, Jr. would establish a federal operations funding program and should be included in reauthorization. This program would enable transit agencies to provide the necessary service to meet demand in their communities. Reliable transit isn't just a public good—it's a smart economic investment.

Strengthen the Carbon Reduction Program

The U.S. transportation system must move people and goods in an efficient, reliable, and low-cost manner. The Carbon Reduction Program (CRP), created under the Infrastructure Investment and Jobs Act, funds projects to do exactly that. States and local governments are

²"Electric Vehicles Are Driving Rates Down for All Customers," Synapse Energy Economics Inc, accessed July 28, 2025

³ Ibid

⁴ S. 4316 in the 118th Congress

⁵ H.R.7039 in the 118th Congress

using CRP dollars to improve infrastructure including upgrading traffic signals and roundabouts, and improving transit. However, some states have undermined the CRP by transferring its funds to other uses, undercutting the program's purpose. These actions underscore the need for stronger protections in the next reauthorization to ensure CRP funds serve their intended purpose. To that end, reauthorization should:

- Increase funding for the CRP;
- Add CRP to the list of programs exempted from transfer rules in 23 U.S.C. §126(b);
- Limit the scope of NEPA assignment to apply only to CRP-eligible projects, with the federal government retaining authority over other project types, to ensure that projects with both efficiency and environmental benefits are prioritized by project sponsors; and
- Direct that larger CRP projects be included on the Federal Permitting Dashboard with an expedited review timeline.

Increase Transparency and Data Accessibility on Transportation Spending

Every American deserves to know how their tax dollars are being spent—and whether those investments are delivering results. To ensure greater accountability and improve federal decision-making, we urge USDOT to include strong data transparency provisions in the upcoming surface transportation reauthorization bill. Making this information publicly available in a user-friendly format will increase public trust, strengthen government-wide decision-making; improve program effectiveness and efficiency; and enable the American people to track progress. Specifically, we propose USDOT to regularly publish clear, accessible, and reliable data on:

- The status, use, and outcomes of both formula and discretionary grant programs;
- The amount of funding that is transferred from one program to another; and
- The impact of federal transportation funds on critical national priorities such as emissions reductions, road safety, public transit access, and infrastructure conditions.

Targeted investment in economically distressed communities

Low income and high poverty communities need investments that spur economic growth. Strategic infrastructure funding in these areas is a key way to create jobs, strengthen local economies, generate opportunities for the private sector, and ensure that working families isolated from public parks have transportation options to enjoy leisure outdoors. However, to deliver those impacts, funds must actually reach economically distressed communities. As such, USDOT should prioritize grant evaluation criteria—such as income level, poverty rate, and unemployment—to ensure programs like BUILD, PROTECT, and any new competitive grants reach these communities. These metrics provide a clear and objective way to ensure investments reach targeted areas- rural and urban alike.

Expand Technical Assistance to Communities

Many small, rural, and low income communities often lose out on federal dollars because they lack technical capacity to navigate complex federal grant processes. This puts them at a

disadvantage when competing for funding. The next reauthorization bill should strengthen and scale federal technical assistance programs like the Rural and Tribal Pilot Program and the Thriving Communities Program. These existing initiatives should be permanent, well-funded, and embedded into the next bill. A well established technical assistance framework will ensure that every community—regardless of size or staffing—can access the resources that meet their economic and community goals.

Unlock community knowledge for better project outcomes

Local communities know their needs best. Community members and community-based organizations (CBOs) bring local knowledge and insight to transportation planning. When they're involved early and often, projects better reflect local priorities and are more likely to succeed. Community buy-in helps avoid delays and speeds up project delivery—ensuring federal dollars are used wisely. Public participation is a crucial part of federal transportation planning and should be preserved in the next bill. Moreover, discretionary grant programs should require applicants to demonstrate meaningful participation by CBOs and community members in the development of the application to ensure community support and project implementation success.

Fund Research and Development Programs for Innovative Transportation Materials

Research, development, and demonstration programs for transportation materials, like, cement and steel, can help spur manufacturing technology breakthroughs to help cut costs for state and local governments while increasing resilience to extreme weather events. The bipartisan Concrete and Asphalt Innovation (CAIA) Act of 2025 alongside the Innovative Mitigation Partnerships for Asphalt and Concrete Technologies (IMPACT) Act would establish research and development programs for production of low-emissions cement in collaboration with industry partners. Including research and development funding in the Surface Transportation Reauthorization bill creates an opportunity for the U.S. to lead in resilient and innovative transportation materials.

Fund a Low Carbon Materials Procurement Program

Funding to procure advanced, low-carbon transportation materials creates a strong market signal that encourages manufacturers to innovate. The Inflation Reduction Act funded programs at EPA, FHWA, and GSA to facilitate and pilot low-carbon procurement. Congress should build upon and formally authorize these programs in Surface Transportation Reauthorization. Congress should also provide funding for technical assistance programs for state DOTs to increase the adoption of performance based specifications as opposed to chemistry-based prescriptive specifications. Not only would this unlock market access for innovative American materials but it would also streamline regulations and allow cement, asphalt, and concrete producers to optimize mixes thereby reducing cost for transportation infrastructure projects. Funding should also be set aside to assist suppliers of low-embodied carbon materials with validating their lifecycle emissions in the form of Environmental Product Declarations. FHWA is well positioned to oversee grants that would assist these suppliers with measuring and reporting

the quantity of embodied carbon in construction materials and products like cement, asphalt, and steel. And FEMA, which is already authorized to procure materials in this fashion, should receive specific funding for this work so that inundated and devastated American communities can more readily benefit from resilient infrastructure made by the leading American innovators.

Authorize States to engage in Advance Purchase Commitments for Innovative Low emissions, high-performance Materials

Advanced purchase commitments (APCs) allow states to guarantee direct purchase of innovative materials, even if such materials are not yet on the market. Having previously been used to successfully develop everything from microchips for computers to the COVID-19 vaccine under Operation Warp Speed, APCs are proven tools for bringing new technologies to market. American manufacturers and State DOTs alike benefit from advance multi-year contracts that de-risk investments in scaling up production, create market certainty, and bring innovative materials to the transportation sector faster. The Transportation Reauthorization bill could authorize APCs thereby accelerating innovation and uptake of cleaner construction materials like cement, asphalt, and steel for transportation infrastructure. APCs for transportation infrastructure result in valuable synergies across additional critical sectors. A sustained, reliable market for advanced transportation materials—as afforded by APC’s if included in a multi-year package like Surface Transportation Reauthorization—will grant American producers the runway they need to avoid idling and workforce reductions that jeopardize their ability to quickly meet less predictable defense, technology, and energy needs. Authorizing APCs are proposed in both the CAIA and the IMPACT Act 2.0.

Continue to Fund American Industrial Demonstrations

To keep pace with foreign competitors and ensure that manufacturers investing in innovation, clean air, and good jobs in the United States are rewarded, this reauthorization bill must sustain funding for industrial emissions demonstration projects. The last Surface Transportation bill included \$7 billion for advanced demonstration programs originally signed into law by President Trump. This reauthorization is an opportunity to continue this important work so that innovative American producers investing in breakthrough technologies and a skilled workforce domestically are best positioned to outfit American infrastructure.

Preference Low-Carbon, High-Performance Materials in Non-Highway Infrastructure

From charging stations to rail, Surface Transportation touches many sectors critical to creating demand for innovative and low-carbon materials such as cement, aluminum, and steel. Surface Transportation Authorization can turbocharge demand for innovative clean domestic products across sectors. Incentivizing the purchase of American-made clean, renewable, and emission-free energy products for federal, state, and local use and investing in clean manufacturing at home will not only grow our clean economy, but also ensure transportation sector procurement is both sustainable and socially responsible.

Sincerely,

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On behalf of our more than three million members and online activists, the Natural Resources Defense Council is writing to provide input in response to the Department's Request for Information on the next surface transportation reauthorization bill. NRDC is one of the nation's largest environmental organizations, founded in 1970 with the mission of safeguarding the earth—its people, its plants and animals, and the natural systems on which all life depends. Smart transportation policies, safeguarding nature, and protecting community health are key to advancing this mission.

We appreciate DOT's invitation to provide insight and suggestions to support the development and improvement of programs designed to address the nation's infrastructure needs. In response to your solicitation, we urge the next reauthorization to build on and strengthen programs designed to build a transportation system that is safer, more resilient, and sustainable. From culverts, to wildlife crossings, to road improvements that increase community resilience, the next authorization provides an unparalleled opportunity to lead with innovation, job creation, and economic growth while balancing conservation needs.

To that end, we urge U.S. Department of Transportation (USDOT) to encourage Congress to reauthorize and improve programs that are already delivering exemplary results for people, communities, and nature. Below, we outline the need for such programs, the benefits they provide, and suggestions to strengthen program delivery.

Addressing Undersized and Failing Culverts

The National Culvert Removal, Replacement, and Restoration Grant Program (Culvert Program) provides much-needed support to States, Tribes, and local governments to address undersized and failing culverts where roads cross streams. Many culverts across the country are failing — either because they're too small to handle increasingly larger floods or simply breaking down structurally with age. Undersized or failing culverts increase the risk of flooding, compromising road safety and transportation reliability; cause damage to people's homes, businesses, and agricultural lands, posing a serious risk to community safety and local economies; and impede the passage of fish and other aquatic organisms.

The Culvert Program provides needed support to update and properly size culverts to support community and roadway safety while providing additional public benefits through better water quality, healthier fisheries, and preparedness for increasingly frequent and heavier storms. The program makes economic sense, too. The Culvert Program increases community disaster preparedness by reducing the risk of flooding from a backed-up or failed culvert — an investment that, according to the U.S. Chamber of Commerce, can save an average of \$13 in damage and recovery costs for every \$1 spent.¹ The barriers that under-sized culverts pose to fish passage are particularly critical to the recreational fishing industry which is a significant economic driver — especially in rural and coastal regions — with one in six Americans participating in fishing activities each year.² Improving culvert safety also creates local jobs. For every \$1M in watershed project investments, 15 full-time living-wage jobs are created on average.³

Congress should strengthen the Culvert Program in the following ways:

- Provide permanent reauthorization and at least \$200 million annually to meet the national demand.
- Enhance technical assistance, automatically enable alternative funding arrangements, and allow pass through of funds for rural and Tribal applicants to increase access to funding and accelerate project delivery.
- Provide minimum project design standards in Notices of Funding Opportunities (NOFOs). Additionally, the program should require a minimum project design life and sizing that is climate resilient.
- Dedicate interagency staff funding (e.g., NOAA, USFWS, FHWA) to expedite technical reviews and integrate smart design.
- Include culvert inventories, barrier identification protocols, hydrological modeling, and utility relocation as eligible project costs.
- Maintain a national, public-facing dashboard for culvert projects, increasing transparency and public accountability while advancing DOT's delivery goals.

Wildlife Crossings as Fundamental Transportation Infrastructure

Wildlife vehicle collisions are a persistent threat to public safety, economic vitality, and wildlife populations nationwide. They result in more than 200 human fatalities, 26,000 injuries, and over \$10 billion in costs to society each year, while killing millions of animals.⁴ Fortunately,

¹ T. Swanek, "Being Prepared for the Next Disaster Pays Off, New Study Shows," U.S. Chamber of Commerce, June 25, 2024, <https://www.uschamber.com/security/being-prepared-for-the-next-disaster-pays-off-new-study-shows>.

² American Sportfishing Association, "New Report Highlights Sportfishing Industry's Expanding Economic Impact," American Sportfishing Association, March 12, 2025, <https://asafishing.org/industry/sportfishing-economic-impact/>.

³ G. Samonte et al., "Socioeconomic Benefits of Habitat Restoration," National Marine Fisheries Service, Office of Habitat Conservation, May 2017, <https://repository.library.noaa.gov/view/noaa/15030>.

⁴ M.P. Huijser et al., "Wildlife-Vehicle Collision Reduction Study: Report to Congress," FHWA-HRT-08-034 (Fed. Hwy. Admin., Office of Safety Research & Dev't, Aug. 2008) <https://www.fhwa.dot.gov/publications/research/safety/08034/>; ARC Solutions, "Inaugural Round of \$110 Million in Wildlife Crossings Pilot Funding Marks Landmark Investment in Solving a \$10 Billion Problem,"

well-sited and fenced wildlife crossing structures can reduce collisions by up to 97% and can pay for themselves in avoided damages on thousands of U.S. roadway segments.⁵ In addition to cost savings and safety benefits to society, wildlife crossings provide other direct and indirect benefits to the communities they are built in. These include local jobs, intact migration corridors for big game species, and stronger wildlife populations. While wildlife underpasses are primarily designed for terrestrial animals, they can also benefit populations of fish and other aquatic organisms by maintaining stream connectivity and reducing habitat fragmentation caused by roads. By allowing for the passage of water and creating space for the natural stream bed, these structures can facilitate fish movement and improve overall stream health.

In the last infrastructure bill, Congress made strides to provide dedicated funding for standalone wildlife crossing projects while also making wildlife vehicle collision reduction measures an eligible expense under existing transportation grant programs. We commend Congress for their innovation and foresight and applaud the USDOT for working hard to implement these programs over the last four years.

Congress should strengthen the integration of wildlife collision reduction measures in transportation programs in the following ways:

- Make the Wildlife Crossings Pilot Program permanent and increase funding to at least \$200M annually to better address the backlog of demand.⁶
- Continue to include wildlife-vehicle collision reduction measures as eligible expenses in discretionary grant and statutory and formula allocation programs.
- Eliminate the Wildlife Crossings Pilot Program's required match for Tribes and authorize a funding set-aside to support Tribal technical assistance.
- Make maintenance of wildlife infrastructure eligible for federal funding under Title 23.
- Provide flexibility to integrate wildlife infrastructure into emergency relief projects.

Increasing Resilience of Transportation Infrastructure

The Promoting Operations for Transformative, Efficient, and Cost-Saving Transportation (PROTECT) Program helps increase surface transportation resilience to natural hazards, like flooding, through planning activities, strengthening community resilience and evacuation routes, and improving coastal and natural infrastructure. PROTECT provides funding through a discretionary grants program as well as a formula program. The PROTECT Formula Program is designed for State agencies to help communities and first responders prepare for natural disasters and extreme weather. The PROTECT Discretionary Grants Program funds projects on a competitive basis by improving the resilience of the surface transportation system, including highways, public transportation, ports, and intercity passenger rail. In both programs, nature-based solutions, such as protective wetland buffers and culverts, are eligible for funding.

ARC Solutions, Dec. 5, 2023, <https://arc-solutions.org/article/inaugural-round-of-110-million-in-wildlife-crossings-pilot-funding-marks-landmark-investment-in-solving-a-10-billion-problem/>.

⁵ M.P. Huijjer et al., "Wildlife-Vehicle Collision Reduction Study."

⁶ National Parks Conservation Association, *Wildlife Crossings Pilot Program Initial Demand* (ARC Solutions, 2025) [Story Map], <https://npca.maps.arcgis.com/apps/instant/basic/index.html?appid=2e97bc297e164e1f8312ce1d1a66c0fc>.

Congress should build on and strengthen the PROTECT Program in the following ways:

- Preserve both formula and discretionary grants, ensuring reliability for planning and flexibility for innovation.
- Require integration of resilience improvement plans into long-range and metropolitan planning to prioritize high-impact investments.
- Increase the federal cost share on projects within approved resilience plans – particularly in underserved and vulnerable communities.
- Support coordination and capacity building, especially in rural and Tribal areas, through outreach, technical support, and expert partnerships.
- Ensure PROTECT funding is used exclusively for investments designed to help communities prepare for natural hazards and extreme weather by removing the ability for local and state agencies to transfer PROTECT grant money to other highway programs.

Thank you for considering these recommendations.

Sincerely,

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