



U.S. Chamber of Commerce

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September 8, 2025

The Honorable Sean Duffy
The Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Secretary:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to provide input to the Department of Transportation’s (“DOT”) Request for Information as it develops priorities for the next surface transportation and infrastructure funding reauthorization. This forthcoming legislation represents a critical opportunity to address pressing infrastructure challenges impacting millions of American families and businesses. It can enhance the competitiveness of U.S. workers through supply chain efficiencies, alleviate traffic congestion, and improve transportation safety. Additionally, this reauthorization offers a platform to achieve meaningful permitting reform, restore the user fee as the cornerstone of surface transportation funding, and advance the integration of innovative technologies across the transportation spectrum.

Under your leadership, DOT is already making important strides to ensure the business community can rely on our nation’s infrastructure network to deliver long-term. To ensure we seize the opportunities before us, we urge DOT to prioritize policies that:

- Enhance transportation safety, resilience, and reliability;
- Streamline permitting processes and modernize regulatory requirements;
- Focus investment on infrastructure and policies that bolster America’s global competitiveness; and
- Ensure stable funding solutions for long-term investment.

Outlined below are our core priorities on which we look forward to working with DOT to build and sustain a world-class, safe, and efficient transportation infrastructure system in the United States.

Advance Transportation Safety, Resilience, and Reliability

Infrastructure investments must prioritize building a safer, more efficient system that benefits communities, businesses, and the economy. Reauthorization presents the opportunity to strengthen proven safety programs such as the Highway Safety Improvement Program, Consolidated Rail Infrastructure and Safety Improvements (“CRISI”) Program, Section 130 Rail-Highway Crossings Program, and the Railroad Crossing Elimination Grant program that are reducing accidents and improving mobility. In fact, since 2000, railroad grade crossing safety investments have helped reduce collisions by 25%.¹ Ongoing support from DOT of programs such as Operation Lifesaver and the Short Line Safety Institute are also essential to reducing accidents and improving mobility. These safety improvements in both urban and rural areas will not only better our communities but also improve the efficiency of our logistics network.

Addressing the truck parking shortage is critical to highway safety. The trucking industry, which moves 72.6% of the nation’s freight, is vital to the economy.² However truck parking remains a top concern for drivers and state transportation departments.³ DOT’s strategy to expand and improve truck parking and modernize driver resources will enhance safety for truck drivers and all roadway users. Prioritizing these improvements will bolster supply chain resilience and the delivery of goods around the nation.

The Chamber supports smart, resilient infrastructure to mitigate risks to public safety and the economy. A recent report by the Chamber, together with the U.S. Chamber of Commerce Foundation and Allstate, highlights that every \$1 invested in infrastructure resilience yields \$13 in reduced losses and economic savings post-disaster.⁴ Programs like DOT’s “Promoting Resilience Operations for Transformative Efficient, and Cost-Saving Protection (“PROTECT”) have made significant progress in strengthening infrastructure and protect municipalities against weather-related or other disasters. New legislation must reinvest meaningfully in these programs to ensure continued success.

Cut Red Tape and Modernize Regulatory Requirements

One of the most significant challenges to delivering and improving infrastructure is the federal permitting process. New legislation must build on the recent bipartisan progress achieved through the Fiscal Responsibility Act (“FRA”) and

¹ American Association of Railroads, <https://www.aar.org/issue/freight-rail-pedestrian-driver-safety/>.

² American Trucking Association, <https://www.trucking.org/economics-and-industry-data>.

³ American Transportation Research Institute, “*Expanding Truck Parking at Public Rest Areas*”, available at <https://truckingresearch.org/2025/04/truck-parking-index>.

⁴ U.S. Chamber of Commerce “*2024 Climate Resiliency Report*”, available at <https://www.uschamber.com/security/the-preparedness-payoff-the-economic-benefits-of-investing-in-climate-resilience>.

the Federal Aviation Administration Reauthorization Act of 2024 to eliminate bureaucratic barriers and incorporate meaningful permitting reform into the surface transportation and infrastructure reauthorization bill. Without these reforms, delays in implementing critical projects that benefit communities and businesses will persist.

Recent actions by the administration and Congress have introduced measures aimed at improving efficiency. These reforms are essential to meeting the needs of modern society and ensuring America’s infrastructure remains competitive on a global scale. The President’s Executive Order on “Updating Permitting Technology for the 21st Century”, the Interactive Federal Review Act (S.430/H.R.3634), and the ePermit Act, for example, all promote the integration of technology to accelerate the permitting process for transportation infrastructure. Other legislative proposals introduce ways to streamline administrative processes, enhance interagency coordination, and address the role of NEPA—ensuring it no longer is a procedural burden that delays projects. We strongly encourage the adoption measures into reauthorization legislation that reduce delays, lower costs, and deliver safer, more efficient infrastructure projects across the nation.

Further, we urge DOT to adhere to the clarifications on the scope of NEPA review provided by the Supreme Court’s recent *Seven County Infrastructure Coalition* decision.⁵ Agencies should avoid unnecessary delays in initiating reviews and focus on assessing only the reasonably foreseeable environmental effects of proposed actions, as defined by the FRA and clarified by the Supreme Court, to prevent unnecessary litigation and delays.

Facilitating connectivity is essential to modernizing our transportation infrastructure and new legislation should incentivize the deployment of advanced technologies, digital infrastructure, and applications to enhance safety, efficiency, and mobility. DOT’s updating of its regulatory framework and streamlining decision-making can enable safer freight movements, reduce congestion, and leverage real-time data systems to predict and prevent accidents. Modern solutions like smart traffic lights, data-driven transportation planning, all-electronic tolling, and V2X technology will further improve efficiency and safety.

Further, DOT should adopt a unified federal framework to regulate automated vehicle safety that provides regulatory certainty for innovators. This includes supporting policies for the safe integration of automated passenger and freight vehicles into the transportation system and directing the Federal Motor Carrier Safety Administration, National Highway Traffic Safety Administration, and Federal Transit Administration to modernize safety regulation. Any surface reauthorization legislation should include these priorities.

⁵ *Seven County Infrastructure Coalition v. Eagle County, Colorado*, 605 U.S. ___, 145 S. Ct. 1497 (2025).

In addition, legislation should amend Title 49 of the U.S. Code to improve public transit. Doing so will resolve ambiguities in current Federal Transit Administration safety regulations and strengthen public transit agencies' ability to meet Federal safety requirements – benefiting riders and operational efficiency of transit.

Finally, DOT should consider establishing a council of industry professionals and federal, state, and local officials to fast-track exemption requests for emerging technologies. A model for this is the 2018 Vehicle to Infrastructure Deployment Coalition, which successfully guided connected vehicle and infrastructure deployments.⁶ Public-private collaboration can align technology integration with policies, foster education campaigns, and accelerate commercialization, driving mobility, freight efficiency, and economic growth.

Focus Investment on Infrastructure and Policies that Strengthen America's Global Economic Competitiveness

Our nation's roads, bridges, railroads, public transit systems, and ports are essential to our economy and global competitiveness. In 2024, logistics costs accounted for 8.7% of GDP.⁷ Every \$1 invested in public transit generates \$5 in long-term economic returns.⁸ Targeted investments under IIJA have already improved 9 out of 10 of the nation's worst freight bottlenecks, reducing delays and fueling commerce.⁹ New legislation can further fuel economic growth if funding addresses the entire transportation network, from the National Highway System to critical freight and public transit corridors. These investments will strengthen the nation's manufacturing sector, create a world-class supply chain, and meet the mobility demands of our communities.

Investment in ports and waterways are essential to maritime safety and global trade efficiency. Ports contribute \$2.89 trillion to GDP and support over 21.8 million jobs.¹⁰ Despite increased federal funding, ports remain vulnerable to weather-related events and require sustained investment to address outdated infrastructure and the maintenance backlogs. Resources must also support innovation, technology

⁶ National Operations Center of Excellence, "*Vehicle to Infrastructure Deployment Coalition*" available at <https://www.transportationops.org/V2I/V2I-overview>.

⁷ Council of Supply Chain Management Professionals, https://cscmp.org/CSCMP/CSCMP/Educate/State_of_Logistics_Report.aspx.

⁸ American Public Transportation Association, "*Economic Impact of Public Transportation*" available at <https://www.apta.com/research-technical-resources/research-reports/economic-impact-of-public-transportation-investment/>.

⁹ American Road and Transportation Builders Association, "*Status of Federal-Aid Highway Investments*" available at <https://www.artba.org/market-intelligence/highway-dashboard-iiija/>.

¹⁰ American Society of Civil Engineers, "*2025 Report Card for America's Infrastructure*" available at <https://infrastructurereportcard.org/wp-content/uploads/2025/03/Full-Report-2025-Natl-IRC-WEB.pdf>.

adoption, and improved freight and landside connections to enhance efficiency and resilience.

New legislation must prioritize investments in railroad programs to alleviate congestion, enhance supply chain efficiency, and bolster safety. Every \$1 invested in rail transportation generates \$2.50 in economic activity, underscoring the critical role rail investment plays in our nation's economy.¹¹ Sustained and predictable funding focused on freight rail such as through the CRISI program will ensure a strong and resilient rail system that supports economic growth. Public-private innovation and incentivizing use of technology to monitor real-time data can maximize the impact of federal dollars to accelerate safety, efficiency, and economic development. As a nation, we must continue to modernize rail infrastructure, adopt advanced safety technologies, and foster a regulatory and financing environment through DOT that encourages and sustains rail investment.

Transportation projects drive job creation, supporting 4.4 million jobs nationwide. \$1 billion invested in highway and bridge infrastructure supports 13,000 jobs.¹² However, the sector faces a labor shortage of nearly 1.1 million workers without additional training and workforce development.¹³ To address this, new legislation must ensure funding can strengthen workforce training programs and create flexible pathways to careers in construction, engineering, freight operations, logistics, trucking, public transit, and advanced manufacturing. These efforts can deliver cost-effective, scalable training that ensures a skilled workforce for infrastructure investments.

Implement Stable Funding Solutions for Long-Term Investment

The Highway Trust Fund ("HTF") has historically served as a self-sustaining and fiscally responsible mechanism for the federal government to support critical surface transportation projects, with revenues collected through "user fees" on gasoline, diesel, and other sources providing most of the federal funding for the HTF. However, since 2001, HTF expenditures have consistently exceeded revenues, forcing Congress to rely on transfers from the Treasury's general fund to cover the shortfall. In fact, the Congressional Budget Office projects that the user fee shortfall will exceed \$33 billion during the final year of the IIJA (FY 2026), with the HTF becoming insolvent by 2028.¹⁴

¹¹ American Association of Railroads, <https://www.aar.org/wp-content/uploads/2023/04/AAR-Facts-Figures-Fact-Sheet.pdf>.

¹² American Road and Transportation Builders Association, "*America's Infrastructure At-A-Glance*" available at <https://transpoinfo.org/>.

¹³ National Skills Coalition, "*Unprecedented Opportunity: Meeting the Workforce Demands of New Clean Energy, Manufacturing, and Infrastructure Investments*", June 2024.

¹⁴ Congressional Budget Office, "*The Status of the Highway Trust Fund: 2023 Update*", available at <https://www.cbo.gov/system/files/2023-10/59634.pdf>.

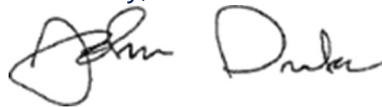
Reliance on deficit spending is unsustainable, underscoring the need for a new approach to funding infrastructure investments. Reforming and restoring the HTF as a cornerstone of the next reauthorization is essential moving forward. We strongly advocate for reforming the user fee model to one where all users contribute to maintaining our nation's highway and transportation system, creating a reliable and fair funding mechanism. The U.S. must move to a fee structure that fully sustains current funding levels and creates certainty of funding – ensuring the future of transportation infrastructure and enabling long-term regional planning to address the growing backlog of infrastructure needs in communities across the country.

New legislation must also broaden opportunities for private investment in transportation while ensuring essential yet balanced federal oversight. IIJA established a strong foundation for public-private partnerships such as the Transportation Infrastructure Finance and Innovation Act. DOT's Build America Bureau and Center for Innovative Finance Support have been instrumental in providing resources and expertise to communities nationwide. To build on this progress, future legislation should enhance these tools by fostering further additional financing opportunities. Key provisions include establishing infrastructure banks, increasing volume caps and expanding the scope of qualified private activity bonds, and reforming project evaluation methods to streamline processes and encourage business-friendly practices. These initiatives will not only supplement federal investment but also drive innovation, efficiency, and economic growth.

Conclusion

Thank you for considering these comments. Reauthorizing surface transportation and infrastructure programs is essential to ensuring U.S. infrastructure remains a world-class system that bolsters America's global economic competitiveness. We look forward to collaborating with you to advance robust, impactful, and comprehensive legislation and to support its successful implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "John Drake". The signature is fluid and cursive, with the first name "John" being more prominent and the last name "Drake" following in a similar style.

John Drake
Vice President
Transportation, Infrastructure
and Supply Chain Policy
U.S. Chamber of Commerce