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August 19, 2025

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

Re: Advancing a Surface Transportation Proposal That Focuses on America's Most Fundamental Infrastructure Needs (DOT-OST-2025-0468)

Dear Secretary Duffy:

The National Association of Manufacturers appreciates the opportunity to provide comments in response to the Department of Transportation's request for input on surface transportation reauthorization legislation. The NAM urges continued surface transportation infrastructure investment and reforms to our nation's permitting laws as part of a comprehensive manufacturing strategy that will unleash American competitiveness.

The NAM is the largest manufacturing association in the United States, representing manufacturers of all sizes, across all 50 states, and in every industrial sector. Manufacturing employs 13 million people across the country and contributes $2.9 trillion to the U.S. economy annually.[1] Manufacturers in the U.S. depend on reliable, efficient transportation to compete and win across the globe.

Manufacturers commend DOT's commitment under your leadership to pursuing excellence in our nation's transportation system and ensuring that America builds. Dependable surface transportation infrastructure is integral to manufacturers' ability to make and move products that millions of people use every day. Additionally, public infrastructure projects generate productivity gains and induce demand for manufacturing goods—stimulating the economy.[2]

Manufacturers have been leaders in championing continued improvements to America's surface transportation infrastructure, advocating for passage of the Infrastructure Investment and Jobs Act, the Fixing America's Surface Transportation Act, and the Moving Ahead for Progress in the 21st Century Act.[3,4,5] These bipartisan efforts were critical to modernizing our transportation

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[1] National Association of Manufacturers. Key Facts. Available at https://nam.org/mfgdata/#KeyFacts.
[2] John Huntley. Explainer: Economic Effects of Infrastructure Investment. (University of Pennsylvania, The Wharton School, June 15, 2021). Available at https://budgetmodel.wharton.upenn.edu/issues/2021/6/15/economic-effects-of-infrastructure-investment.
[3] National Association of Manufacturers. "Historic Infrastructure Bill Becomes Law." November 16, 2021. https://nam.org/historic-infrastructure-bill-becomes-law-26504/.
[4] Letter in Support of H.R. 22, Fixing America's Surface Transportation Act (FAST Act) (National Association of Manufacturers, December 2, 2015), https://transportation.house.gov/uploadedfiles/kvltr_hr22fast.pdf.
[5] Testimony of Jay Timmons, President and CEO, National Association of Manufacturers, before the Senate Committee on Environment and Public Works on MAP-21 Reauthorization (National Association of Manufacturers,

system and growing the economy. It is vital that Congress—supported and informed by DOT—continue to reauthorize surface transportation programs that support manufacturing in the U.S.

As Congress works to craft the next iteration of surface transportation reauthorization legislation, manufacturers respectfully encourage DOT to consider several policy proposals that will support our efforts to build and grow here at home and compete around the world:

- **Continuing robust investment levels** for federal infrastructure, including by developing long-term solutions for Highway Trust Fund solvency
- **Strengthening transportation supply chains**
- **Reforming burdensome permitting laws and regulations** to ensure federal infrastructure investments are made efficiently and responsibly

Continuing Robust Investment

Manufacturers support continuing robust investments in our nation's surface transportation infrastructure. The IIJA provided for $1.2 trillion in funding, with $550 billion in new spending over the five-year term of the bill.[6] This amount included $350 billion in federal-aid highway funding to invest in roads, bridges, and safety projects, among other uses, the vast majority of which was provided via contract authority.[7,8] This represented an increase of more than 50% from the amount authorized under the FAST Act. Unfortunately, the real value of these dollars was partially eroded by an inordinate increase in inflation.[9]

Manufacturers encourage continuing current spending levels for highway programs, consistent with the scope of the reauthorization language. Surface transportation reauthorization legislation should also continue support for transit and strategic energy technology. While manufacturers understand the importance of ensuring efficiency in government spending, it is important that surface transportation reauthorization legislation maintain robust transportation investments that can help grow the economy through increased commerce. And targeted reforms are needed to ensure such investments are as effective as possible, including changes that would simplify formula funding programs and discretionary grantmaking by removing red tape. It is important that states are provided flexibility to meet their unique transportation needs, and that DOT avoid extraneous requirements or duplication in notices of funding opportunities.

Additionally, manufacturers recognize the growing gap between Highway Trust Fund revenues and expenditures on federal highway and public transportation programs, and we know it is vital

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February 12, 2014). https://www.epw.senate.gov/public/_cache/files/0/7/07b26bf7-c8fe-449c-bf61-ff358a613dcf/BF9D594B66EBA773D15F23EC2FEC547786CB6ADB4C2DD1862C0C90B6D44D8B5A.21214hearingwitnesstestimonytimmons.pdf.

[6] Senate Committee on Environment and Public Works. "Bipartisan Infrastructure Investment and Jobs Act Summary." Available at https://www.epw.senate.gov/public/_cache/files/3/f/3f606d49-bf20-4315-a81d-57e4923d8add/89F2F64BF2A0D902204BE671FE689F3B.infrastructureinvestmentjobsactsectionbysectionsummary.pdf

[7] Federal Highway Administration. "Infrastructure Investment and Jobs Act." Available at https://www.fhwa.dot.gov/infrastructure-investment-and-jobs-act/funding.cfm

[8] Senate Committee on Environment and Public Works. "Investments in Infrastructure Under the Jurisdiction of the Environment and Public Works Committee Made in the Bipartisan Infrastructure Investment and Jobs Act." Available at https://www.epw.senate.gov/public/_cache/files/4/b/4b2277ac-4d52-48a9-a0ce-55d2efcf224f/7109CFD950A3E5FA01F59CA90C04818B.epw-bif-one-pager-final.pdf.

[9] Robert S. Kirck and William J. Mallett. Funding and Financing Highways and Public Transportation Under the Infrastructure Investment and Jobs Act. (Congressional Research Service, May 24, 2023). Available at https://www.congress.gov/crs-product/R47573.

that all transportation stakeholders work together to develop solutions to this long-term issue.[10] Any final agreement should adhere to user-pays-based principles, with fees or taxes charged to all users on a commensurate basis and utilized directly for related infrastructure expenses. Particularly for highway infrastructure funding, user fees or taxes must apply proportionally to all vehicle types. It also is critical that calculations for any fees or taxes be transparent, practical, and utilize reasonably accessible data so as not to create onerous reporting burdens on states or businesses. Alternative financing mechanisms, such as bonds and other private financing instruments, as well as public–private partnerships, should be encouraged where appropriate.

Strengthening Supply Chains

Manufacturers depend on efficient transportation supply chains to compete and to make and move products. More than $18 trillion worth of freight moved in 2023 alone—weighing more than 20 million tons—with tonnage expected to increase by 1.6% every year.[11] Manufacturing goods accounted for the majority of this value. However, industry surveys by the NAM have shown supply chain issues to be a primary business challenge for nearly one-third of manufacturers.[12]

To alleviate supply chain challenges and enhance manufacturing competitiveness, surface transportation reauthorization legislation should continue to expand highway capacity, increase connectivity, and build on the progress made since MAP-21 to improve our nation's freight network. This could be accomplished in part by emphasizing support for projects of national and regional significance that facilitate the movement of freight—including on the National Highway System and connectors—and reaffirming freight movement and economic development as national goals under the federal-aid highway program. Furthermore, it is important that Congress and DOT work to address the critical shortage of truck parking facilities.[13]

Surface transportation reauthorization legislation should also continue support for freight and passenger rail transportation. The movement of freight by rail is a vital component of functioning transportation supply chains for manufacturers, with more than 1.5 million tons moved every year, constituting the greatest share of ton-miles for some of the longest-distance freight hauls.[14] Critical freight and passenger rail transportation programs such as the Consolidated Rail Infrastructure and Safety Improvements Program, the Railroad Crossing Elimination Grant Program, and the Section 130 Railway-Highway Crossings Program strengthen this critical mode of transportation. Furthermore, manufacturers encourage Congress and DOT to help further development and adoption of automated track inspection technology and other advancements that enhance safety and boost efficiency.[15]

Relatedly, manufacturers are concerned and impacted by the increase in organized retail and supply chain theft, which costs the U.S. economy billions of dollars annually and creates safety

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[10] Ibid.
[11] U.S. Department of Transportation, "Moving Goods in the United States." Available at https://data.bts.gov/stories/s/Moving-Goods-in-the-United-States/bcyt-rqmu.
[12] National Association of Manufacturers. Q3 2024 Manufacturers' Outlook Survey. Available at https://nam.org/wp-content/uploads/2024/10/Outlook_Survey_Q3_2024_NAM.pdf.
[13] Lack of parking for semi trucks creates dangerous situations. (CBS, Sept. 25, 2023). Available at https://www.cbsnews.com/video/lack-of-parking-for-semi-trucks-creates-dangerous-situations/.
[14] U.S. Department of Transportation, "Moving Goods in the United States." Available at https://data.bts.gov/stories/s/Moving-Goods-in-the-United-States/bcyt-rqmu.
[15] *Comment Letter on Notice of Petition for Waiver of Compliance* (National Association of Manufacturers, July 8, 2025). Available at https://documents.nam.org/ERP/NAM%20Comments%20on%20AAR%20Petition%207.8.2025.pdf.

risks for employees and consumers.[16] A coordinated approach between federal, state, and local government officials is necessary to address this national problem. Manufacturers appreciate recent efforts to provide DOT with enhanced authorities to prevent supply chain fraud, and we support the bipartisan Combatting Organized Retail Crime Act of 2025 to increase penalties for supply chain theft, strengthen reporting of such crime, and encourage a multi-agency response to this evolving threat to our nation's supply chains.

Reforming Burdensome Permitting

Manufacturers create good jobs that grow our economy and the American middle class, all while developing and deploying technologies that build a modern transportation system. But right now, cumbersome and overreaching permitting laws and regulations are holding back progress, delaying investments, and making it harder to compete globally. It is no surprise that in a 2024 survey of manufacturers, 72% of respondents said that the length and complexity of the permitting process affected their investment decisions.[17]

Permitting delays, complicated bureaucracy, and litigation make it difficult to complete infrastructure projects that benefit communities across the country. One study found that appeals of environmental assessments and environmental impact statements for infrastructure projects take an average of 1,250 days to resolve.[18] Manufacturers appreciate recent actions by DOT to update its National Environmental Policy Act implementing procedures and encourage state assumption of NEPA to cut red tape, and permanent solutions will help advance the kind of bold investments that will increase manufacturing competitiveness.[19]

Manufacturers request that DOT work with other agencies and the committees of jurisdiction in Congress to undertake separately or as part of any final surface transportation reauthorization legislation commonsense permitting reforms that will make it possible to grow manufacturing operations, modernize infrastructure, shore up supply chains, create jobs, and ensure responsible American energy dominance. Such reforms should include:

- Expediting judicial review
- Creating enforceable deadlines
- Increasing the use of categorical exclusions to the environmental review process
- Streamlining project approvals under the Clean Water Act, the Clean Air Act, the Endangered Species Act, and the National Historic Preservation Act
- Accelerating needed energy infrastructure, including more transmission lines, pipelines, and permanent carbon sequestration sites
- Unlocking access to domestic minerals, including on federal lands

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[16] *Letter in Support of Combatting Organized Retail Crime Act of* 2025 (National Association of Manufacturers, July 18, 2025). Available at https://documents.nam.org/ERP/07.18.25%20NAM%20CORCA%20Letter.pdf?utm_source=779250&utm_medium=email.

[17] National Association of Manufacturers. Q1 2024 Manufacturers' Outlook Survey. Available at https://nam.org/2024-first-quarter-manufacturers-outlook-survey/.

[18] Nikki Chiappa et al. Understanding NEPA Litigation. (Breakthrough Institute). Available at https://thebreakthrough.imgix.net/Understanding-NEPA-Litigation_v4.pdf.

[19] U.S. Department of Transportation. "U.S. Transportation Secretary Sean P. Duffy Unveils Sweeping Updates to NEPA at USDOT to Fast Track Roads, Bridges, & Other Key Infrastructure." June 30, 2025. Available at https://www.transportation.gov/briefing-room/us-transportation-secretary-sean-p-duffy-unveils-sweeping-updates-nepa-usdot-fast.

Streamlining America's broken permitting process will unlock growth potential across manufacturing. With respect to our nation's transportation infrastructure, putting an end to seemingly interminable permitting delays will empower the investments needed to help manufacturers make and move products.

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The NAM appreciates DOT's commitment to continue surface transportation infrastructure investments that support manufacturing competitiveness. Manufacturers look forwarding to continuing working with you to advance bipartisan reauthorization legislation that empowers manufacturers to move and create innovative products that drive the American economy.

Sincerely



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