

Submitted via: www.regulations.gov
RE: DOT-OST-2025-0468
Comment on Surface Transportation Reauthorization RFI

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

Ms. Gloria M. Shepherd, Executive Director
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Priorities for the Surface Transportation Reauthorization

Dear Secretary Duffy and Executive Director Shepherd:

On behalf of millions of our members and supporters, we write today to provide input in response to the Department's Request for Information on the next surface transportation reauthorization. We deeply appreciate DOT's focus on safety, delivery, economic growth, and strong federal-state partnerships. In alignment with this vision, we urge the Department to build on recent momentum by strengthening two programs already delivering exemplary results: the National Culvert Removal, Replacement, and Restoration Grant Program, and the PROTECT Program (Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation).

Across the United States, aging or poorly designed culverts and stream crossings can have adverse effects on healthy rivers and anadromous fish such as salmon, steelhead, and river herring. Damaged culverts can create steep drop-offs, high water velocities, or dry channels that prevent fish from reaching their spawning grounds. While DOT's primary mission is advancing transportation infrastructure, its work can have lasting impacts on river health and recreational access. DOT must continue to strike the right balance between preserving the long-term health of streams and supporting the growing needs of the sportfishing industry – including ensuring anglers can safely access the places they fish. Today, recreational fishing remains a significant driver of economic growth¹, particularly in rural and coastal regions, with one in six Americans participating in fishing activities each year.

Recent polling² also demonstrates that the public, across political affiliations and geographic regions, strongly supports integrating habitat connectivity, wildlife migration route protection, and ecosystem restoration into transportation planning. These approaches not only strengthen natural systems but also mitigate risks from disasters like flooding and wildfires, enhance public safety, and create well-paying jobs – making them win-win investments with measurable conservation, and economic benefits. Below are our recommendations.

National Culvert Removal, Replacement, and Restoration Grant Program

The culvert program has emerged as a model of infrastructure investment that supports public safety, ecological restoration, aquatic connectivity, and economic development. Earlier this year, DOT awarded \$33 million in May 2025 to support eight culvert projects, following FY 2022's \$196 million investment across 169 active culvert replacements.³ To build on this success, we respectfully request:

- Permanent reauthorization and sustained funding to meet national demand.

¹ American Sportfishing Association. (2025, March 12). *New report highlights sportfishing industry's expanding economic impact*. <https://asafishing.org/industry/sportfishing-economic-impact/>

² Nature4Climate. (2024, March). *2023 Impact Report*. <https://nature4climate.org/wp-content/uploads/2024/03/N4C-2023-Impact-Report-FINAL.pdf>

³ U.S. Department of Transportation. (2025, May 14). *U.S. Transportation Secretary Sean P. Duffy approves another 76 grants to Get America Building Again* <https://www.transportation.gov/briefing-room/us-transportation-secretary-sean-p-duffy-approves-another-76-grants-get-america-building-again>

- Streamlined access, permitting timelines, and enhanced technical assistance for rural and tribal applicants to accelerate project delivery.
- Dedicated interagency staff funding (e.g., NOAA, USFWS, FHWA) to expedite technical reviews and integrate smart design.
- Ensure durable project design life and streamflow adaptability, supporting long-term infrastructure and ecosystem function.
- Explicit inclusion of inventories and barrier identification protocols, hydrological modeling, and utility relocation as eligible project costs.
- A national, public-facing dashboard for culvert projects, increasing transparency and public accountability while advancing DOT’s delivery goals.

PROTECT Program

The PROTECT program supports communities in hardening transportation infrastructure against adverse like flooding, drought, and wildfire. In April 2024, the Department awarded nearly \$830 million to 80 resilience projects across 39 states and territories – demonstrating strong cross-sector and bipartisan momentum behind these solutions.⁴ To amplify this impact in the next authorization:

- Preserve both formula and competitive/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 head-room for federal cost share on projects within approved resilience plans—particularly in underserved and vulnerable communities.
- Support coordination and capacity building, especially in rural or tribal areas, through outreach, technical support, and expert partnerships.

Building a Transportation System that is Safer, more Resilient, and Sustainable

Rivers, creeks, and streams serve as superhighways for anadromous fish, yet existing barriers often block these vital passageways. To build a safer, more resilient, and sustainable economy, we can—and must—do better. From culverts to road improvements and pedestrian safety, the next authorization provides an unparalleled opportunity to lead with innovation, job creation, and economic growth while balancing conservation needs.

Recent executive actions by President Trump further underscore the urgency and opportunity for modernizing infrastructure and conservation stewardship. The April 2025 memorandum on Updating Permitting Technology for the 21st Century directs federal agencies to streamline technical reviews through digitization⁵, interagency coordination, and data-driven decision-making – principles that align closely with DOT’s goals for delivery and transparency.

Similarly, the July 2025 Executive Order on Making America Beautiful Again⁶ establishes a federal commission to expand access to public lands, restore aquatic ecosystems, and reduce bureaucratic delays in

⁴ Strupp, J. (2024, April 12). DOT releases \$830 M for resilience projects. Construction Dive. <https://www.constructiondive.com/news/transportation-infrastructure-resilience-830-million/713114/>

⁵ Trump, D. J. (2025, April 15). *Presidential Memorandum: Updating Permitting Technology for the 21st Century*. The White House. <https://www.whitehouse.gov/presidential-actions/2025/04/updating-permitting-technology-for-the-21st-century/>

⁶ Trump, D. J. (2025, July 3). *Executive Order: Establishing the President’s Make America Beautiful Again Commission*. The White House. <https://www.whitehouse.gov/presidential-actions/2025/07/establishing-the-presidents-make-america-beautiful-again-commission/>

conservation efforts. Together, these initiatives reinforce the importance of durable infrastructure and provide a compelling federal framework for advancing programs like PROTECT and the Culvert Grant Program. We encourage DOT to leverage these directives to make permitting more effective and efficient, enhance interagency collaboration, and ensure that resilience investments reflect the full scope of federal priorities.

Thank you for considering these recommendations. We welcome further dialogue in refining these approaches that improve public safety, reduce costs associated with natural disasters, and create good paying jobs.

Sincerely,

350.org

A2/Anthropocene Alliance

American Fisheries Society

American Rivers Action Fund

Amphibian and Reptile Conservancy

Anacostia Riverkeeper

Angler Action Foundation

Appalachian Mountain Club

Appalachian Trail Conservancy

Association of Fish and Wildlife Agencies

Association of Northwest Steelheaders

Association to Preserve Cape Cod

Berkshire Environmental Action Team
(BEAT)

Berkshire Regional Planning Commission

Black Hills Preservation Project

California Environmental Voters

Californians for Western Wilderness

Calm and Mindful LLC

Capital Region Planning Commission

Catawba Riverkeeper

Center for Biological Diversity

Center for Heirs' Property

Center for Large Landscape Conservation

Center for the Blue Economy

Change the Chamber

Charles River Conservancy

Charles River Watershed Association

Clark Fork Coalition

Clean Streams LLC

Clinton River Watershed Council

Connecticut River Conservancy

ConservAmerica Action

Conservation Fisheries, Inc.

Conservatives for Responsible Stewardship

Cumberland River Compact

Dolores River Boating Advocates

Earth Ethics, Inc.

Elders Climate Action

Endangered Habitats League

Endangered Species Coalition

Environmental Protection Information
Center - EPIC

Farmington River Watershed Association

Fish Camp

Fishpond Inc.

FreshWater Accountability Project

Friends of the Big Sioux River

Friends of the Mississippi River

Friends of the Moshassuck

Georgia Conservancy

Grand Traverse Regional Land Conservancy

Great Egg Harbor Watershed Association

Great Salt Lake Audubon

GreenLatinos

Gulf of Maine Research Institute

Hacklebarney Chapter Trout Unlimited

Harpeth Conservancy

Hip Hop Caucus

Hoopa Valley Tribe

Housatonic Valley Association

Howling For Wolves

Idaho Rivers United

Indiana Wildlife Federation

Inland Ocean Coalition

Ipswich River Watershed Association

Izaak Walton League of America

Izaak Walton League Rapid City, South
Dakota Chapter
Jones River Watershed Association
Just Strategy
Kentucky Waterways Alliance
Kettle Range Conservation Group
Kingston Conservation Department
Klamath Forest Alliance
Kua'aina Ulu 'Auamo (KUA)
Levees.org
Los Angeles Audubon Society
Los Padres ForestWatch
Maine Audubon
Maine Council of Trout Unlimited
Maine Rivers
Mass Audubon
Massachusetts Land Trust Coalition
Massachusetts Rivers Alliance
MountainTrue
Move Past Plastic (MPP)
Mystic River Watershed Association
Nashua River Watershed Association
Nashua, Squannacook, and Nissitissit Rivers
Wild & Scenic Stewardship Council
Natural Areas Association
Neponset River Watershed Association
New Hampshire Audubon
Next 100 Coalition
North American Climate, Conservation and
Environment(NACCE)
North and South Rivers Watershed
Association
North Clackamas Watersheds Council
Ohio River Foundation
onWater Fish
Partnership for the National Trails System
Pomperaug River Watershed Coalition
Predator Defense
Resource Renewal Institute
Responsible Alpha
River Collective Co.
Rivers Without Borders
Rockbridge Conservation
Save Our wild Salmon Coalition

Shining Horizons Land Management, LLC
Simetra Sanctuary
Sitka Conservation Society
Society for Conservation Biology North
America (SCBNA)
South Carolina Wildlife Federation
Southern Environmental Law Center
Species Unite
Steep Rock Association
Susitna River Coalition
Sustainable Conservation
Sustainable Southbury
The Nature Conservancy
The Ocean Project
The Piedmont Environmental Council
The Urban Wildlands Group
The Wei LLC
The Xerces Society
Upper Black River Council
Urban & Environmental Policy Institute,
Occidental College
Vermont Land Trust
Virginia Council Trout Unlimited
Voices of the Land
Ward 8 Woods Conservancy
West Virginia Rivers Coalition
Western Pennsylvania Conservancy
Western Watersheds Project
Wetlands Watch
Wild Virginia
Wildlands Network
Wildlife for All
Wildlife Forever
Wisconsin Wildlife Federation
Woonasquatucket River Watershed Council
Working Lands for Wildlife (WLFW)
Yaak Valley Forest Council