



AMERICAN PUBLIC WORKS ASSOCIATION

**Your Comprehensive
Public Works Resource**

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August 12, 2025

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

Docket No. DOT-OST-2025-0468

Dear Secretary Duffy,

The American Public Works Association (APWA) represents 32,000 public works professionals across North America who serve in both the public and private sectors providing expertise at the local, state and federal government levels. On behalf of our members, we thank you for the opportunity to submit input on surface transportation reauthorization and what may follow the Infrastructure Investment and Jobs Act expiring on September 30, 2026. As background, our members are responsible for planning, designing, building, operating, and maintaining, America's vast infrastructure network that is so fundamental to our economy, environment, public health, and safety, and APWA is the only association representing and serving all aspects of public works—the professionals who work in the industry and those who provide products and services to those professionals.

Outlined below are APWA's priority areas for surface transportation reauthorization.

Safety

Safety is a key pillar of APWA's transportation reauthorization priorities, and our members are committed to ensuring safety related transportation programs are strongly supported so we can work to continue decreasing the deaths and injuries that happen far too often on our nation's transportation network. APWA strongly supports the increased investment IIJA authorized in pre-existing transportation safety programs and the establishment of new programs with a significant safety component—specifically targeted to safety improvements to local and rural roads, work zones, traffic incident management practices, public transit, railroads and railroad crossings. It is imperative that the next surface transportation bill allow for the greatest level of flexibility and accommodations to local entities who know their communities and populations best and can make the most informed decisions and create efficiencies in completing transportation projects that will protect the traveling public and our public works workforce.

Public works professionals play a vital role in safeguarding our communities, and when weather events, cybersecurity vulnerabilities, or manmade disasters disrupt our transportation networks and endanger our communities. Therefore, it

PRESIDENT
Dominick A. Longobardi

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE



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is essential the next surface transportation bill provides robust support and funding to continue building upon the success and increased resiliency of our transportation systems. APWA supports an approach that incentivizes resiliency measures in infrastructure design and planning, and the development of tools to build more resilient transportation systems and encourage continual focus on present and future use. These objectives can be achieved through strategic replacement and retrofitting that includes increased safety elements through hardened construction methods and by more broadly encouraging and utilizing asset management.

Streamlining

Continuing the success of recent years by responsibly streamlining regulatory requirements and permitting processes that seek to protect our environment and support the economic strength and public health of our communities. It is especially important that small, rural, and historically disadvantaged areas have direct access to technical experts and can leverage resources to assist in these processes. Additionally, it is essential for local governments to have a seat at the table and be fully engaged in rulemaking and permitting processes.

APWA supports continued improvements to processes for the National Environmental Policy Act (NEPA) environmental clearances and permit approvals, including expanding categorical exclusions, specifically to include small projects that receive \$5 million or less in federal funding; especially for projects aligning with safety and resiliency goals. We greatly appreciated the efforts made during the first administration of President Trump with One Federal Decision, and the current efforts being made by the Department of Transportation and other involved federal agencies working to update and improve NEPA.

Additional recommendations to continue streamlining efforts include:

- Not subjecting state and local projects to federal laws and regulations until federal funding has been approved for a project, and these laws and regulations should not be retroactive to past project phases.
- Require states to allow Federal Fund Exchange (swap of federal funds for state or local funds) between a state and its local agencies, and among local agencies.
- Oppose unfunded mandates and oppose limiting local governing authorities' ability to appropriately control use of public rights-of-way.
- Allow states with regulations exceeding federal law to use their procedures as evidence of compliance with national standards and remove the 2-year window for environmental lawsuits.

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Support for the Transportation Workforce

Public works professionals are indispensable to building, operating, and maintaining our entire transportation network and it is important we continue to grow this cadre of experts. As a leader in public works education, credentialing, and accreditation of agencies, APWA believes strongly in partnering with our federal allies to support and grow a transportation workforce that is well-trained and on the cutting-edge of their roles and responsibilities which best support our nation's infrastructure needs, economy, and quality of life. We know there is a shortage across multiple sectors of the public works and transportation sectors and would very much like to work with your agency on strategies to address these challenges.

Please count on APWA as a committed partner in the surface transportation reauthorization process. For more information, contact Andrea Eales, APWA's Director of Government and Public Affairs at aeales@apwa.org or 202-218-6730.

Sincerely,

A handwritten signature in black ink, reading "Dominick A. Longobardi". The signature is written in a cursive style with a prominent "D" and "L".

Dominick A. Longobardi
APWA President

A handwritten signature in black ink, reading "Scott D. Grayson". The signature is written in a cursive style with a prominent "S" and "G".

Scott D. Grayson, CAE
APWA Chief Executive Officer

PRESIDENT
Dominick A. Longobardi

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE