



**National Headquarters**  
2445 M Street, NW, Suite 650  
Washington, DC 20037  
202-331-9696

August 1, 2025

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

**RE: Response to USDOT Request for Information (RFI) entitled: Advancing a Surface Transportation Proposal That Focuses on America's Most Fundamental Infrastructure Needs (Docket No. DOT-OST-2025-0468)**

The Honorable Sean Duffy:

Thank you for your commitment to a safe and efficient transportation system and for the opportunity to respond to this Request for Information (RFI) regarding surface transportation reauthorization proposals. As the nation's largest trails, biking and walking organization, Rails to Trails Conservancy (RTC) is pleased to respond to the RFI. We appreciate your consideration of our recommendations and look forward to ongoing and productive engagement with the Department. RTC encourages Congress to enact these reforms to provide clarity and certainty. However, RTC further encourages the Department to adopt these reforms wherever possible within existing law.

The next surface transportation authorization must provide Americans with the safe, affordable, and convenient transportation system we deserve. That includes providing the policy and resources necessary for Americans to have the option to safely walk, bike or use a wheelchair to access routine destinations as well as for recreation. A safe, efficient, and affordable system is one that provides multi-modal options so Americans have choices about how they will travel, and available alternatives should a mode of travel become unavailable or unaffordable. While RTC's core focus is trails and active transportation, we support multi-modal investments benefiting all system users that ultimately enable more people to walk, bike, and be active outdoors.

RTC provides the following in response to the RFI.

1. *Enhancing transportation safety—including bridges, safety for transportation workers and pedestrians, truck parking, and autonomous vehicles.*

About 40,000 Americans are killed on our roadways every year and many more are seriously injured, with pedestrians and bicyclists suffering a disproportionate and growing share of these

fatalities and injuries. The USDOT has emphasized the safety benefits of protecting vulnerable road users by separating these people from motor vehicle traffic. Separating vulnerable road users is a proven safety countermeasure that is aligned with the safe system approach. RTC supports a continued federal emphasis of the safe systems approach, and investments to create safer roads for all road users.

RTC encourages the Department to maintain a National Roadway Safety Strategy and to take all actions available to it to reach a goal of zero roadway fatalities. RTC further supports extending and improving the Safe Streets and Roads for All (SS4A) program which funds local data collection and planning to inform and implement a variety of roadway safety investments including active transportation infrastructure.

As the Department considers proposals to improve bridge safety, RTC encourages consideration of bicycle and pedestrian safety on bridges and associated approaches. Bridges provide essential connections, and the Department must continue to support the safe passage of bicyclists, pedestrians and persons with disabilities.

We acknowledge the Department's interest in automated vehicles (AVs) and the potential roadway safety benefit of the technology. RTC encourages the Department to prioritize proven safety investments such as separated bicycle and pedestrian infrastructure that can save lives and reduce injuries immediately. We strongly encourage the Department to carefully assess the risks of AV technology to vulnerable cyclists and pedestrians and road users and to support deployment of the technology only when it is proven to be safe. Finally, RTC supports vehicle safety technology and designs such as automatic emergency breaking (AEB) and encourages the Department to ensure that this and future vehicle designs and technology will affirmatively protect bicyclists and pedestrians.

In 2022, the FHWA delivered a report to Congress entitled [“Moving to a Complete Streets Design Model: A Report to Congress on Opportunities and Challenges”](#). This report included numerous recommendations for how the Department can improve roadway safety through Complete Streets, including guidance and data collection. RTC recommends that the department undertake all recommended activities within existing authorities, and that the Department ask Congress to provide the resources and additional authorities necessary to satisfy the recommendations in this report.

2. *Increasing opportunities through investment in transportation infrastructure that promotes economic growth, including through expanded capacity and mobility, congestion relief, and more private sector investment.*

RTC encourages the Department to consider the economic growth, mobility, and congestion reduction impacts of providing all Americans with safe, multi-modal transportation options, including active transportation.

A 2019 RTC study found that active transportation infrastructure was contributing more than \$34.1 billion to the U.S. economy annually. As infrastructure connectivity improves, the economic contribution of active transportation infrastructure has been growing and has the potential to contribute more than \$138.5 billion annually, a return on investment many times the cumulative historic federal investment in active transportation infrastructure each year.

This infrastructure is also a proven strategy for creating mobility options for families and children, workers, seniors and others who lack access to vehicles. With more mobility options, the transportation system will have more capacity and allow people to travel however is most convenient and affordable for them. Mobility options also make the system more resilient should one mode of travel become unavailable or unaffordable. This infrastructure will also reduce health costs and further improve quality of life by increasing physical activity due to active transportation.

Congestion is a critical issue in many communities and active transportation infrastructure is a proven strategy to reduce congestion given the prevalence of short trips. The majority of trips taken in this country are within a 20-minute bike ride, more than one in four trips are within a 20-minute walk, and 11.5 percent of all trips are already made by walking and biking. Current federal transportation policy underinvests in bicycle and pedestrian projects given an outsized return on investment. By providing people with the option to travel by walking or biking we make it safer and more convenient for people to take some of these shorter trips by walking or biking, while reducing congestion and pollution at the same time.

### *3. Accelerating project delivery for transportation projects*

RTC supports identifying ways to improve and expedite project delivery, including for trail projects, that are consistent with environmental protection goals and requirements. Today, Federal Highway Administration (FHWA) division offices vary in how they implement categorical exclusions (CEs) for trail projects. FHWA or Congress should require consistent application of CEs for trail projects to reduce costs and expedite project delivery for this critical infrastructure that contributes positively to a range of environmental outcomes, including preservation of greenways and emissions reduction. RTC recommends that FHWA headquarters survey whether division offices apply similar criteria in implementing CEs under 23 CFR 771.117(c)(3). Shared use paths, whether paved or unpaved, off-street or on-street should always be included among the sorts of projects eligible for CEs under this provision. FHWA should review whether

division offices invoke the “unusual circumstances” provisions at 23 CFR 771.117(b)(1) and (2) consistently for active transportation projects otherwise eligible under (c)(3).

Capacity building and technical assistance is another critical component of project delivery. Across the country, the ability of communities to manage federal funding and projects of all sizes varies and can lead to delays and increased costs. Through the Thriving Communities program, USDOT has conducted a robust and successful technical assistance process that has educated communities through best practices and peer to peer exchanges, creating more opportunities for investment and federal, state, and local partnership. RTC served as a technical assistance provider through this program, gaining first-hand perspective on how to enable rural communities to fulfill their need for safe walking and biking infrastructure. RTC recommends that the Department request of Congress sufficient resources to continue providing robust technical assistance.

*4. Strengthening partnerships with States and other key stakeholders to improve transportation outcomes, including prioritizing the Federal interest, greater efficiencies, and research.*

Whether funds are distributed by formula or discretionary grants, or managed by states or localities, it is critical that there be clear goals and funding recipients are held accountable to achieving intended outcomes. The federal government has been a founding and ongoing partner to states and localities in delivering transportation funding and policy to create our transportation system. Today, with federal support highways connect all communities, however essential walking, biking, and multi-modal aspects of our transportation system remain incomplete. All trips begin and end as a pedestrian yet far too many Americans live in communities where it is not safe or convenient to walk or bike to routine destinations as well as recreation. This is particularly harmful for the 30 percent of Americans who do not drive. Without adequate infrastructure, those who do not drive are not able to fully participate in our economy and many more Americans suffer from a lack of system resilience and choice should driving become unavailable or unaffordable. Active transportation and multi-modal infrastructure is essential and it is a core federal responsibility to complete these unfinished elements of our transportation system.

Despite progress towards a more connected active transportation network, existing infrastructure remains far short of what is needed to make it safe and convenient for American families to walk and bike to the places they need to go.

The Transportation Alternatives program is the nation’s largest dedicated source of funding for trails and active transportation. To further promote effective partnership that delivers outcomes, the Department should support and implement measures to limit transfers out of

the program. Transfers from the Transportation Enhancements Program (TE) during its twenty-year history were rare. Under MAP-21 and the FAST Act (2012-2021), the program (renamed Transportation Alternatives) experienced transfers of nearly \$2 billion, 22 times the rate of the TE era. Congress sought to limit transfers in IIJA, requiring that states run competitions and show a lack of demand before transfers could be approved. While IIJA requires states to think before transferring funds, we are concerned by data showing that transfers under IIJA remain substantial and are once again growing rapidly. Effective and consistent Departmental oversight of these transfers, including making all transfer requests public and requiring documentation to explain how the request complies with statutory requirements, would help to hold states accountable to deliver these funds as expected.

To achieve a safe, convenient, and efficient multi-modal system with active transportation, RTC recommends investments in dedicated programs including [Transportation Alternatives](#), the [Recreational Trails Program](#), and the [Active Transportation Infrastructure Investment Program](#) and multi-modal programs including Safe Streets and Roads for All, BUILD, and Reconnecting Communities. More details on these recommendations are provided below and is also available online at: [railstotrails.org/reauthorization](http://railstotrails.org/reauthorization).

## 1. Invest in Dedicated Active Transportation Programs

This trio of programs is critical to funding the nation's network of trails and other walking and biking infrastructure. Looking ahead, Congress needs to address important funding and policy changes to ensure these programs are able to meet surging demand for this infrastructure nationwide.

### *Transportation Alternatives*

This essential program is the nation's largest dedicated federal funding source for trails, walking and biking— RTC's top priority is to grow and strengthen it. To ensure that the funding set-aside for Transportation Alternatives is maximally effective, it needs to be easier for applicants to meet matching fund requirements, and harder to transfer funds to unrelated purposes. What's more, the program can build on successful outcomes from IIJA and encourage larger, highly strategic grants that create safe, connected walking and biking routes to places people need to go.

### *Recreational Trails Program (RTP)*

This program has been a vital complement to Transportation Alternatives for more than 30 years. It directs off-road vehicle gas taxes to pay for trails and has been responsible for building and maintaining more than 30,000 trail projects including innumerable nonmotorized trails. It is essential that Congress provide RTP funding to match relevant tax revenue and add these resources to the TA set-aside such that TA also grows and becomes more secure.

### *Active Transportation Infrastructure Investment Program (ATIIP)*

RTC recommends \$250 million in annual highway trust fund contract authority for ATIIP, the only program dedicated to investing at sufficient scale in projects that connect active transportation networks and spines by filling in multiple infrastructure gaps within and between communities, and across states and regions. This approach accelerates implementation of state, regional and local plans to create safe and convenient walking and biking routes to everyday destinations, which are being pursued in communities of every size and type in all 50 states. The only funding round for ATIIP thus far drew requests for forty times the dollars made available.

## 2. Strategically Deploy Multi-Modal Federal Discretionary Grants

Discretionary grants can catalyze innovation and support critical projects that address limitations of formula programs, such as interstate projects. Under IJA, trails and other walking and biking infrastructure were eligible under multiple discretionary programs enabling progress of regional active transportation networks across rural, suburban and urban areas. Grant programs like Better Utilizing Investments to Leverage Development (BUILD), Safe Streets and Roads for All (SS4A), and the Reconnecting Communities Program align with core federal goals, including reducing traffic fatalities and serious injuries and improving mobility and access to economic opportunity. By identifying and supporting new and more effective ways to make transportation safer, more efficient and more impactful, these programs shed light on how larger formula funding programs can improve outcomes.

## 3. Modernize Formula Programs to Deliver on Goals

As described earlier, all federal funds should be delivered with clear goals and there must be meaningful mechanisms to hold all funding recipients accountable to achieve them.

Formula funds distribute the largest share of federal surface transportation funding, yet too often do not deliver on goals set by Congress or the outcomes that Americans want. Such goals and accountability measures will ensure that taxpayer dollars are maximized and that some of the largest and most flexible programs, like Surface Transportation Block Grants, are aligned with America's unmet transportation needs. Goals should include substantially reducing fatalities and serious injuries, including for vulnerable road users such as pedestrians and cyclists, and providing affordable and convenient mobility options for all Americans, including the estimated 30% who do not drive. While states and funding recipients should have flexibility to address their unique needs, there must be accountability to achieve outcomes by setting performance targets and granting USDOT additional enforcement authority if outcomes are not achieved.



**National Headquarters**  
2445 M Street, NW, Suite 650  
Washington, DC 20037  
202-331-9696

#### 4. Optimizing Programs to Increase Impact

Too often, outdated guidance and gaps in research create challenges to improving safety and getting the most out of infrastructure investments. Congress has previously required USDOT to take important steps to address these challenges. Reauthorization presents opportunities to make further progress including modernizing the Manual on Uniform Traffic Control Devices, codification of the Safe Systems Approach, providing technical assistance in support of accessing grants and project implementation, and improved data to track progress towards goals.

Thank you for your consideration.

Sincerely,

Kevin Mills  
Vice President, Policy  
Rails to Trails Conservancy