



August 20, 2025

Sean Duffy  
Secretary, Department of Transportation  
1200 New Jersey Avenue SE, West Building, Ground Floor, W12-140  
Washington, DC 20590-0001

Dear Secretary Duffy:

The American Lung Association offers the following comments in response to the U.S. Department of Transportation's (USDOT) Request for Information (Docket No. DOT-OST-2025-0060) regarding the next surface transportation reauthorization legislation. Due to the outsized share of harmful air pollution caused by the transportation sector, investments that aim to improve access to alternative modes of transportation, expand safe access for pedestrians and build out infrastructure for more efficient vehicle travel ultimately dictate health and wellbeing for communities across the United States. We urge you and lawmakers to consider public health as a key principle for determining program reauthorization, and offer the following recommendations:

**Pollution impacts must be incorporated into policy design.** Unhealthy levels of air pollution affect nearly half of the population - 156 million people - of the United States according to the American Lung Association's "State of the Air" 2025 report.<sup>1</sup> Breathing air pollution can contribute to short-term and long-term health harms such as asthma attacks, worsening of Chronic Obstructive Pulmonary Disease (COPD), heart attacks, strokes and premature death. Children, seniors, people living with heart and lung diseases, people with lower incomes and people of color are at greater risk from breathing unhealthy air. Driven by pollution from the transportation sector, ground-level ozone pollution is one of the most dangerous and widespread pollutants in the nation, affecting over 125 million people.

The Health Effects Institute's most recent review of hundreds of published, peer-reviewed transportation-related air pollution health studies re-confirmed the unique health harms associated with transportation pollution, including asthma onset in children and adults, increased risk of respiratory infection in children and deaths due to all causes, due to cardiovascular illness and due to lung cancer.

**Differences in health outcomes for populations near transportation hubs must be acknowledged.** Diesel exhaust is a known carcinogen that is often highly

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<sup>1</sup> American Lung Association, "State of the Air", April 2025. [lung.org/sota](https://lung.org/sota)

concentrated in communities near transportation corridors. The US EPA has noted that there are approximately 72 million Americans living in close proximity to major trucking routes. These people are at greater risk for diesel-pollution-related health emergencies, which compound on other socioeconomic factors that carry worsened health outcomes. Communities with the most to gain (meaning greatest health burden) should be prioritized for efficient, zero-emission charging infrastructure and vehicle programs to build healthier American freight corridors that reduce the burdens of over-concentration of diesel exhaust in many communities.

**Prioritize investments that improve health and air quality; prioritize maintenance of existing infrastructure over expansion; and focus on non-polluting transportation options.** The Infrastructure Investment and Jobs Act, signed into law in 2021, provided funding to address a wide range of transportation needs and must be maintained to ensure American communities benefit from the ongoing investment in mobility options that reduce harmful emissions while promoting affordable transportation choices.

- **Maintenance of the existing system must take priority over highway expansion projects.** Expanding highways invites additional vehicle traffic, pollution and health harms. Highway, bridge and roadway infrastructure must be maintained and prioritized over expansions that induce demand.
- **Support increased funding for Congestion Management and Air Quality programs that meaningfully mitigate pollution.** CMAQ funds are a crucial tool to advancing local programs in communities that currently fail or previously failed to meet National Ambient Air Quality Standards. Funding eligibility must be tied to projects that meaningfully reduce, rather than increase, harmful emissions and vehicle travel. Recently added eligible projects will support ongoing efforts to build charging stations, conduct diesel engine replacements and retrofits, offer transit improvements, expand bicycle and pedestrian facilities and demonstrate cleaner technologies in the transportation sector. Similarly, we support ongoing investment and alignment of the Carbon Reduction Program to ensure consistent, meaningful public investment to mitigate all harmful pollutants caused by the transportation sector.
- **Reauthorize the Safe Streets and Roads for All Program.** Invest in the development of safe, non-polluting transportation modes that do not require personal vehicle travel that will open up additional choices for individuals. Reauthorizing this program will advance the implementation of safe, accessible pedestrian infrastructure, safe routes to schools and transit stations for travelers of all ages and abilities.
- **Ensure both capital and operating funds are available to urban and rural transit agencies to support transit-access and readiness.** Increasing federal funding ratios and reducing local start-up funds required for projects will serve to reduce congestion while making travel more accessible and affordable for children, seniors, people living with disabilities and those who do

not drive or have access to personal vehicle options. Increasing federal funding levels for rural transit will support greater access in these underserved regions. Increasing access to operating funds for all transit agencies will expand capacity to connect people with jobs, schools and economic opportunities while curbing traffic emissions.

- **Reauthorize the Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation (PROTECT) Program.** Given the clear patterns of extreme climate-related emergencies (flooding, landslides, fires, extreme weather events) impacting communities across America, resilient transportation resources must be a national priority. The PROTECT projects provide for planning, infrastructure investment and resilience in the face of climate change risks to community health and safety.

The design and direction of investments in surface transportation must consider air quality and pollution reduction impacts to ensure no communities are left behind when it comes to public health.

We also underscore here our commitment to a zero-emission future. There have been enormous strides in zero-emission technologies in recent years, making a pollution-free future within reach. And the public increasingly wants that future. A poll from the American Lung Association in 2021 found that 70% of the public supports federal policies to transition to zero-emission vehicles<sup>2</sup>; a 2024 poll found similar support (72%) for strong greenhouse gas standards for heavy-duty trucks, and 83% of those polled support focusing stronger policies to relieve burdens on heavily-impacted communities.<sup>3</sup> Wherever possible, priority should be given to building out infrastructure that promotes a zero-emission future.

Additionally, we are concerned about reports of lawmakers attempting to include prior proposals imposing fees on electric or hybrid vehicles as part of surface transportation reauthorization. Previous proposals from this Congress would have imposed a \$250 tax on people who drive an electric vehicle and a \$100 tax on people who drive hybrids. Those levels are far greater than what drivers of internal combustion engine vehicles are taxed. We support a conversation around the solvency of the Highway Trust Fund and encourage the agency and lawmakers to examine how all drivers can contribute to the Fund in a balanced and transparent way.

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<sup>2</sup> American Lung Association. “Two-Thirds of Voters Nationwide Support Investments in Zero-Emission School Buses;”, July 15 2021. <https://www.lung.org/media/press-releases/zero-emissions-school-buses>

<sup>3</sup> American Lung Association. “New Poll Shows 7 in 10 Voters Support EPA Action to Clean Up Truck Pollution”, March 1 2024. <https://www.lung.org/media/press-releases/new-poll-shows-7-in-10-voters-support-epa-action-t>

We thank the Agency for the opportunity to provide comment and to share the health perspective.

