



August 20, 2025

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

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

Dear Secretary Duffy:

On behalf of the more than 16,000 members of the American Society of Landscape Architects (ASLA), I am writing to provide policy and funding recommendations for inclusion in the next surface transportation reauthorization law. ASLA's suggestions will strengthen the U.S. Department of Transportation's (U.S. DOT) goals of ensuring safety, expanding capacity and mobility, and strengthening partnerships, while also promoting the health and economic well-being of communities nationwide.

Founded in 1899, ASLA is the professional association for landscape architects in the United States, with 49 chapters representing the 50 states and the U.S. territories. Landscape architects are design professionals licensed in all 50 states and the District of Columbia who plan and design multimodal transportation corridors, water and stormwater management projects, parks and outdoor recreation spaces, community master plans, and other public infrastructure. As STEM professionals, landscape architects use science, technology, and design to create multimodal transportation networks that provide users with cost-effective transportation options, while also addressing other community needs.

The current authorization for federal surface transportation programs is set to expire on September 30, 2026, requiring Congress and the administration to renew policy and funding goals for America's rights-of-way. ASLA believes that our nation's transportation systems should be safe, efficient, and convenient for all people. ASLA supports the design, construction, and management of transportation corridors and facilities that enhance public health and safety and promote interconnected transportation options for transit riders, pedestrians, bicyclists, and other micromobility users.¹

¹ ASLA Policy Statement (2022). "Transportation Corridors and Facilities."
https://www.asla.org/uploadedFiles/Transportation_Public_2022.pdf



ASLA urges U.S. DOT and Congress to work together on a final surface transportation reauthorization measure that will:

Enhance Transportation Safety.

The American Society of Civil Engineers' 2025 Report Card on America's Infrastructure states that "aging infrastructure systems are increasingly vulnerable to natural disasters and extreme weather events, creating unexpected and often avoidable risks to public safety and the economy."² Sustained investments in strategies and techniques to make streets and roads more resilient and safer are needed to address our nation's aging infrastructure. Further, the National Highway Traffic Safety Administration estimates that 39,345 traffic fatalities occurred in 2024.³ NHTSA's most recent data also shows that in 2023 there were more than 7,300 pedestrian deaths and 68,000 pedestrian injuries by motorists.⁴ Designing safer "Complete Streets" is critical to reversing this epidemic. ASLA proposes that the next surface transportation bill includes the following recommendations to make our transportation systems more resilient while also protecting the people who use it:

Vegetation Management Systems: Ensure that all surface transportation projects benefit from the inclusion of vegetation management systems (also known as green infrastructure and nature-based solutions). Vegetation management systems mimic characteristics of natural features and processes but are created by human designers like landscape architects. Many highways, roads, and streets require the inclusion of green infrastructure to stabilize the project and prevent erosion, thereby making the project safe and resilient. As severe flooding continues to plague communities and make their transportation networks unsafe, vegetation management systems in rights-of-way help prevent flooding by absorbing, treating, and managing stormwater.

Complete Streets: Include the Complete Streets Act of 2025 (S. 1953, H.R. 3712),⁵ which would call on states to direct a portion of their federal highway funding toward the creation of a Complete Streets program. A "Complete Street" provides safe and accessible transportation options for all, including children, seniors, and people with disabilities by prioritizing infrastructure for pedestrians, bicyclists, and public transit users. Under the Complete Streets Act, eligible local and regional entities can use funds from their state's

² American Society of Civil Engineers (2025). *2025 Infrastructure Report Card*. Full report. <https://infrastructurereportcard.org/wp-content/uploads/2025/03/Full-Report-2025-Natl-IRC-WEB.pdf>

³ National Highway Traffic Safety Administration (2025, April 8). *NHTSA Estimates 39,345 Traffic Fatalities in 2024*. U.S. Department of Transportation. <https://www.nhtsa.gov/press-releases/nhtsa-2023-traffic-fatalities-2024-estimates>

⁴ National Highway Traffic Safety Administration (2025, June). *2023 Traffic Safety Data*. U.S. Department of Transportation. <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813727>.

⁵ U.S. House of Representatives (2025, June 4). *H.R. 3712—Complete Streets Act of 2025*. <https://www.congress.gov/bill/119th-congress/house-bill/3712>



Complete Streets program for technical assistance and capital funding to build safe street projects such as sidewalks, bike lanes, crosswalks, and bus stops.

Safe Streets and Roads for All Grant Program: Continue and expand funding for the Safe Streets and Roads for All grant program. This discretionary grant program provides funding to communities to prevent roadway fatalities and serious injuries, including planning grants that will allow landscape architects to work with communities on specific transportation designs to prevent harm.

Promote Economic Growth Through Expanded Capacity and Mobility, and Congestion Relief.

Today, many families and communities want less costly and more convenient active transportation options like bicycling, walking, and transit, among others. Dedicated bicycle and pedestrian infrastructure helps millions of Americans commute to work, provides young people safe routes to school, and creates healthy recreational opportunities. Studies have shown that communities with enhanced bicycle and pedestrian infrastructure enjoy significant economic benefits, including increased retail and restaurant usage, increased disposable household incomes, and increased property values.⁶ Dedicated bicycle and pedestrian infrastructure provides a safe, reliable form of transportation for families across the nation. ASLA urges the inclusion of the following programs in the next surface transportation bill. Together, these programs expand capacity and mobility options and promote congestion relief and economic growth for communities nationwide:

Transportation Alternatives: Increase funding for the Transportation Alternatives (TA) program—the nation’s largest dedicated federal funding source for walking, biking, and trails—which will provide expanded low-cost transportation options for millions of families and for communities.

Recreational Trails Program: Provide the Recreational Trails Program (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. RTP has been a vital complement to TA 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.

⁶ Darren Flusche (2021). *Bicycling Means Business: The Economic Benefits of Bicycle Infrastructure*. League of American Bicyclists. <https://bikeleague.org/sites/default/files/Bicycling%20Benefits%20Business.pdf>



Safe Routes to Schools: State departments of transportation (DOTs) should designate a Safe Routes to School (SRTS) program coordinator,⁷ which will serve as a point of contact for local governments, school districts, and others looking to navigate the SRTS program and receive funds for projects in their communities. The SRTS program, established nearly two decades ago, was created to make it safer and easier for students who walk or bike to school. In addition to providing safety education to children and caregivers, it also funds infrastructure improvements including sidewalks, crosswalks, and bike lanes. All 50 states and Washington, D.C., have SRTS programs, which serve millions of students across the nation.

Congestion Mitigation and Air Quality: Increase and expand funding for the Congestion Mitigation and Air Quality (CMAQ) Improvement program, a flexible funding source for state and local governments for transportation projects that reduce congestion and improve air quality.

Strengthen Partnerships with Stakeholders.

America's more than 4.1 million miles of public rights-of-way form an interconnected system of roads, sidewalks, dedicated lanes for transit vehicles, and bike lanes. The road network is maintained by federal, state, and local governments and private-sector entities.⁸ ASLA applauds U.S. DOT for seeking to strengthen partnerships with states and other key stakeholders to improve transportation outcomes, including prioritizing the federal interest, greater efficiencies, and research. ASLA proposes that the next surface transportation measure take critical steps to strengthen the relationship between U.S. DOT and the National Parks Service (NPS), a critical federal partner.

Partnering with the National Park Service: Provide NPS with increased dedicated funding through the Highway Trust Fund or other sources to improve park transportation assets to ensure that visitors can enjoy the parks and that park resources are preserved for future generations. NPS owns and maintains 6,600 miles of paved roads, 7,300 miles of unpaved roads, 6,300 paved parking areas, 1,800 bridges and tunnels, around 1,000 miles of trails, and 100 transit and ferry systems.⁹ But as visitors enjoy our parks, they find that the roads, bridges, and pathways throughout parks and nearby communities need major repair after decades of use. Specifically, increased funding should be provided to the Federal Lands

⁷ U.S. Senate (2025). *S. 1828—Safe Routes Improvement Act*. <https://www.congress.gov/bill/119th-congress/senate-bill/1828>

⁸ American Society of Civil Engineers (2025). *2025 Infrastructure Report Card*. "Roads" (p. 153). <https://infrastructurereportcard.org/wp-content/uploads/2025/03/Roads.pdf>

⁹ National Park Service (2025). *National Transportation Strategy* (DRAFT). https://www.nps.gov/subjects/transportation/upload/NPS_NTS_2025update_DRAFT5_508_reduced.pdf

Transportation Program; Federal Lands Access Program; Nationally Significant Federal Lands and Tribal Projects Program; and Emergency Relief for Federally Owned Roads.



ASLA appreciates the opportunity to provide these recommendations for the next surface transportation reauthorization bill and looks forward to partnering with U.S. DOT and congressional leaders on drafting the measure. Landscape architects are leaders in planning and designing safe, efficient, cost-effective transportation systems and should be included in the development of our nation's next comprehensive surface transportation policy. Please do not hesitate to contact ASLA at governmentaffairs@asla.org about collaborating on these and other policy recommendations.

Sincerely,

A handwritten signature in black ink, which appears to read "Torey Carter-Conneen". The signature is fluid and cursive, with a long, sweeping underline.

Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer
American Society of Landscape Architects