



August 20, 2025

*Via electronic mail*

Response to Docket No. DOT-OST-2025-0468 RE: Request for Information – Advancing a Surface Transportation Proposal that Focuses on America’s Most Fundamental Infrastructure Needs

Dear Secretary Duffy,

I write in support of certain federal programs that we hope will be included in the Department’s forthcoming surface transportation proposal. In particular, our focus is federal policies that support the roadways and trails infrastructure within and connected to the National Park and National Forest Systems, infrastructure improvements for fish and wildlife movement, and local infrastructure development. The National Forest System (NFS) contains 368,000 miles of roadways with 65,000 miles maintained for passenger use, providing primary roadways systems in large portions of rural America. The National Park System manages 13,900 miles of roadways within its system, of which 6,600 miles are paved and 7,300 are unpaved and many of which are heavily trafficked, especially in the peak visitation season.

The Appalachian Trail Conservancy is the 501(c)(3) organization that coordinates the Cooperative Management System of the Appalachian National Scenic Trail (ANST or Trail), a unit of the National Park System. We work with our trail administrator in the National Park Service (NPS), consulting trail administrator in the USDA Forest Service (USFS), 14 states, and 30 A.T. Club trail operators to provide the necessary care and direction to the ANST. The Trail runs 2,197 miles through over 375,000 acres of land conserved or managed for it (the A.T. Corridor), traversing eight national forests and six other national park units in the process. It is found both in Wilderness Areas and on American Main Streets. The ANST is the backbone of the largest continuous stretch of public land in the eastern United States, connecting people and places and intersecting everything from county roads to interstate highways.

Transportation infrastructure on our public lands is critical not simply for the stewardship of those lands, but for those lands’ contributions to the American society and economy. The Forest Transportation System (FTS) contributes an estimated \$45 billion to the U.S. Gross Domestic Product (GDP) and creates over 410,400 jobs. In receiving approximately 159 million recreational visits per year, the NFS is responsible for approximately \$15.2 billion in the U.S. economy as well as supporting nearly 178,000 full and part-time positions. According to its 2025 National Transportation Strategy, the NPS recorded over 325 million recreation visits in 2023, supporting 415,000 jobs and \$56 billion in the national economy. The USFS also hosts approximately 300 million travelers—those using the FTS for more than access to NFS locations—including on 138 scenic byways that pass through the national forests and grasslands. The NPS transportation infrastructure is similarly used by local communities to move through, rather than to, park units. On the ANST, the Delaware Water Gap National Recreation Area and Great Smoky Mountains National Park are prime examples of units traversed through in addition to destinations in their own right.

By far, for the USFS, recreation contributes more to the American economy than timbering (\$5.2 billion) and mineral commodities extraction (\$9.5 billion). We believe that investment in transportation infrastructure should be based, in part, on the heavy use of the FTS for recreation, and for the resource management that drives recreational visits (robustness of well-managed flora and fauna, scenic vistas, and cultural and historic assets). A significant amount of the deferred maintenance backlog of the ANST’s administering and consulting administering agencies (the NPS and USFS, respectively) is in transportation infrastructure; the USFS’ deferred maintenance backlog is \$10.8 billion, of which is approximately \$6 billion transportation infrastructure. For the NPS, its estimated \$22 billion backlog

includes approximately \$9.6 billion of transportation infrastructure. This percentage of the deferred maintenance backlog is so high in part because of insufficient annual appropriations and lack of full access to those programs administered by the Department.

**Federal Lands Transportation:** Under the Federal Lands Transportation Program (FLTP), funds are available to federal land managers (FLMs) to support transportation facilities adjacent to or enabling access to federal lands (such as the ANST and its connected federal units). Beyond roads, facilities that serve the ANST that are best poised to benefit from this program are our trailheads. Many of our trailheads were developed during times of lower population density around the Trail or in times of less informed visitor use management practices. Due to the narrowness of the A.T. Corridor in states such as Virginia, Pennsylvania, and New York, deficiencies in federal transportation facilities often spread to adjacent state land managers and state roads—often indistinguishable from each other to the public—so addressing federal issues improves state relationships and public safety. The NPS receives approximately \$332–360 million annually under FLTP (\$27,481 per mile of road). The USFS receives \$24–28 million per year (\$400 per mile of road). The current replacement value of NPS transportation assets is \$51.5 billion. For the USFS, it is \$100 billion. Respectively, they report they would require \$730 million and \$635 million per year to maintain their assets at desired standards.

We urge DOT to continue support for the NPS and a larger, and more appropriate, annual distribution to the USFS and support that the allocations be made directly to the FLMs, rather than held at the Department of Transportation. Furthermore, we request DOT to support legislative updates that would allow the NPS to transfer or share responsibility for certain high-traffic parkways which are primarily for transportation and not recreational purposes otherwise consistent with the mission of the NPS with states and localities or alternatively supporting tolling on these parkways, which would free up significant funding dedicated to NPS transportation infrastructure.

**Federal Lands Access:** Under the Federal Lands Access Program (FLAP), supplementary support to the FTLTP is provided to states to improve access to federal lands, or for roads within federal lands. As the federally conserved unit present in more states than any other, there are a high number of state and federal road systems that intersect and enable access to the ANST. Additionally, the ANST traverses 78 distinct conserved units organized under state law, so providing access to Sky Meadows State Park in the Commonwealth of Virginia or to Mount Greylock Reservation in the Commonwealth of Massachusetts improves access to the federal ANST as well. Visitation to all public lands has increased in recent years, particularly in the central and northern Appalachian sections of the Trail, with an influx of visitors to those state-conserved A.T. lands in the densely populated Northeast. Development of these transportation facilities supports and helps manage visitors, which in turn boosts tourism and provides stronger markets for local services like lodging, dining, and retail, generating revenue and supporting local jobs. The outdoor recreation industry across our 14-state region generates \$168 billion in consumer spending.

Continued support of the FLAP commensurate with demand will ensure that our state cooperative management partners have access to an appropriate fund source to help them plan and develop transportation facilities that support and help manage visitors to the ANST. Strong partnerships, such as the one between the City of Roanoke, Botetourt and Roanoke County, Virginia Department of Transportation, the ANST park office, and ATC, are critical to helping visitors and residents safely and easily access public lands. We request the Department support this program's extension, including that the Project Decision Committees selecting projects for FLAP funding involve a representative of the public land area supported by the state infrastructure to increase collaboration and strategic investment.

**Nationally Significant Federal Lands and Tribal Projects:** The Nationally Significant Federal Lands and Tribal Projects Program (NSFLTP) provides competitive grant funding for large-scale, high-cost infrastructure projects on federal and tribal lands with a minimum construction cost of \$12.5 million. In

an era of rising visitation and rising costs, the NSFLTP is extremely important to meet particularly larger projects on our public and tribal lands. We are very supportive of this program and the opportunities it opens up for our FLMs. Under the Infrastructure Investment and Jobs Act (IIJA), at least one project per year from the set-aside for Federal Lands Transportation projects must be awarded to an NPS unit with over 3 million visitors. We recommend that DOT support a similar directive be included for the USFS, which, along the A.T. Corridor, regularly sees visitation at or exceeding 3 million people annually in each of our national forests.

**Emergency Relief for Federally Owned Roads:** The Emergency Relief for Federally Owned Roads Program (ERFO) provides funding to FLMs to repair their roads damaged by natural disasters or catastrophic events. ERFO funding is allocated in response to eligible damage reports and is used to supplement FLMA repair programs. The road systems serving federal lands—particularly those in mountainous and flood-prone areas like the Appalachian Trail Corridor—are especially susceptible to storm damage and washouts. Following the devastation of Hurricane Irene, ERFO was essential for restoring the roads in the Green Mountain National Forest, reconnecting communities that had been cut off from each other. Most recently, we are relying on ERFO funds to rebuild in Virginia, Tennessee, North Carolina, and Georgia following the 1,000-year storm in Hurricane Helene. Quick access to ERFO funds is essential to maintaining public safety, visitor access, and economic activity in communities connected to our public lands. We urge DOT to support implementing the program at its full authorized funding level and to support measures that would expedite the release of ERFO funds, such as vesting the authorization authority in FHWA, rather than the Secretary, and either providing program management funding or streamlining the administrative and reporting requirements to our FLM partners.

**Culverts and Fish Passage:** The ANST is not a mere footpath; rather, it is a federally conserved National Park System unit incorporating forests, wetlands, mountains, riverways, and road walks. The Trail crosses 1,700 streams and approximately 100 rivers, from the mighty Kennebec River in Maine and Fontana Dam of the Little Tennessee River in North Carolina to Virginia’s slow-moving Fox Creek and Massachusetts’ Scenic Hoosic River. The National Culvert Removal, Replacement, and Restoration Grant Program has been a valuable contributor to improving fish passage since its creation in the Infrastructure Investment and Jobs Act. Within the National Park System, culverts that impede fish passage are not eligible for funds to repair or replace them as long as they are enabling water to move through them. On the ANST, we have experienced barriers to fish passage that are ineligible for funding because, although they degrade the natural values contributing to the Trail’s creation, the infrastructure is functioning according to its design; there are an estimated 20,000 road-stream crossings impeding aquatic mobility on NFS lands. We urge DOT to recommend that this program be made permanent and authorized at a funding level commensurate with demand, and to expand eligibility to support projects on federal lands where ecological function is compromised.

**Legacy Roads and Trails:** The USFS has responsibility for over 164,000 miles of trails and 6,700 road and 7,400 trail bridges in addition to the 370,000 miles of roads mentioned above. The Legacy Roads and Trails Remediation Program (LRT) is critical to ensuring needed roads function and less needed roads may be transitioned to trails, better serving recreational opportunities for a variety of users—all done in order to support watershed and source water management which is essential to the USFS’ Congressionally established mission. Much of the road infrastructure of the NFS was developed in the half-century between the Second World War and the turn of the century and is no longer suitable for vehicular traffic; of the 370,000 miles, 103,668 miles are “maintenance level one” roads that are “in storage,” closed to all traffic. Many of these miles are possibly better suited for conversion to trails. Addressing deficiencies in aquatic organism passage improves watershed and source water management as well as improving trail/road resiliency. The LRT is an essential tool for the USFS’ infrastructure asset management. We urge DOT to recommend continued support for the LRT at a level commensurate with demand.

**Wildlife Crossings:** The A.T. Corridor is one of the most ecologically critical corridors for species movement in the country—the most important in the eastern United States—and its north/south trajectory makes it particularly valuable for the long-term adaptation and survival of species, particularly our incredibly ecologically unique southern Appalachians. Connecting so many people and places across such a vast distance, the ANST, its users, and surrounding communities are very familiar with the safety issue presented by wildlife-vehicle collision. Whether on the heavily trafficked I-40 in North Carolina and I-90 in Massachusetts or on the forest roads in the Cherokee and White Mountain National Forests, the possibility of a surprise encounter with an Elk, Moose, or other large animal requires a high degree of care. In addition to the danger presented to motorists, the ANST was created in part to protect the natural values of the Appalachian Mountain Range, requiring that we provide adequate care to the biological diversity and necessity of animal movement (not just for large animals). We encourage DOT to continue and expand the wildlife crossings pilot program and to recommend permanent establishment with increased funding in line with demand and inflation.

**Recreation Trails Program:** The Recreational Trails Program (RTP) provides formula funding to states to support the development and maintenance of recreational trails for both motorized and nonmotorized users. It is incredibly important for both of these user groups to have viable trails as, in the absence of sufficient trails for motorized use, some motorized users will focus their recreation activity on nonmotorized trails, negatively impacting the user experience and creating safety hazards. Funded through a portion of federal fuel taxes collected from off-road vehicle use, RTP is one of the few federal programs dedicated specifically to trail infrastructure and putting the decision-making power in the hands of the states. Both ATC and the A.T. Clubs use RTP as a source of funds for our work, supplementing the more than \$7 million we provide in expert volunteer labor. Particularly for our Clubs that work on more than simply the ANST, RTP is a very useful community informed fund source. Although off-road recreation contributes an estimated \$280 million annually in fuel tax revenue to the Highway Trust Fund, RTP is currently funded at just \$84 million per year. We encourage DOT to support full funding and robust implementation of RTP to better align with the scale of demand and contributions.

We also note that the development of local transportation infrastructure can be for the benefit of both transit and recreation. Multi-purpose transportation approaches are already provided by the NPS and USFS and should be advanced whenever possible, whether in new construction or in the replacement of infrastructure. Additionally, proposed programs to improve public transportation to public lands are very important, as they can help avoid overcrowding at our highly trafficked trailheads and can reduce wear on our rural roads. The Transit to Trails Act (118<sup>th</sup> Congress H.R. 3092 and S. 1440) would provide an excellent opportunity to connect more people to public lands and improve transportation networks.

We are grateful for the attention of the Department of Transportation and appreciate the opportunity to provide these comments. We encourage DOT to incorporate these recommendations in its forthcoming surface transportation proposal. If additional information would be helpful, I may be reached at [bmysliwec@appalachiantrail.org](mailto:bmysliwec@appalachiantrail.org) or 207-370-0540 at your convenience.

Respectfully,



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