

North American Concrete Alliance

August 20, 2025

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

RE: Docket No. DOT-OST-2025-0468

Dear Secretary Duffy:

The North American Concrete Alliance (NACA), a coalition of twelve concrete-related trade associations, appreciates the opportunity to submit comments to the *Advancing a Surface Transportation Proposal that Focuses on America's Most Fundamental Infrastructure Needs* Request for Information. The cement and concrete industries look forward to working with the U.S. Department of Transportation in developing priorities for a long-term surface transportation reauthorization bill.

As you may know, NACA is a coalition of concrete-related trade associations dedicated to addressing industry-wide priorities in the areas of research, education, and government affairs. The cement industry, directly and indirectly, employs approximately 600,000 people across the country, and our collective industries contribute over \$100 billion to the nation's economy. Not only are cement and concrete essential construction materials and basic components of our nation's surface transportation infrastructure, but our members also rely on a well-functioning transportation system to efficiently move our product to market. Specifically, our members rely on a well-functioning freight network, including rail, waterways, and roadways.

Cement and Concrete Use in Surface Transportation

Concrete is made by mixing cement, aggregates, and water into concrete mix. Concrete is critical for constructing highways, bridges, tunnels, sidewalks, culverts, and transit, and rail. Due to its durability, concrete is essential to building long-lasting and resilient transportation infrastructure, especially in the face of increasing natural disasters. Understanding the role of cement and concrete in transportation assets is crucial to recognizing the importance of continued investment and policy support to enhance and sustain our nation's surface transportation infrastructure.

Annually, 36.1 million metric tons of cement are used to build a range of different types of transportation infrastructure. Concrete is a major material in bridge construction, with over 400,000 concrete bridges in the United States – 235,000 are built with concrete reinforcing steel and over 100,000 utilize prestressed concrete. Further, concrete pavements are a key element to our nation's road infrastructure by providing multiple pavement solutions for the needs of federal-aid surface transportation projects. Additionally, concrete pipes are critical to the collection of stormwater runoff on our roadways.

Addressing the Long-Term Solvency of the Highway Trust Fund

Critical to reauthorization of the surface transportation program is addressing the long-term solvency of the Highway Trust Fund to ensure federal-aid highway program recipients can plan, engineer and design, and build highway and transit projects across the country. The Congressional Budget Office projects that by Fiscal Year 2028, the Highway and Transit Accounts of the Highway Trust Fund will be exhausted, and expenditures will exceed revenue by approximately \$40 billion annually by Fiscal Year 2029.

These numbers demonstrate the need for the surface transportation reauthorization to address the long-term solvency of the Highway Trust Fund. Members of NACA support an electric vehicle fee and a hybrid fee, whether at the point of sale or annually, where the revenue collected would be dedicated to the Highway Trust Fund. Additionally, it is critical to index these fees to inflation. This would maintain the user-fee concept of the Highway Trust Fund. While the projected revenues from these fees would not cover the whole difference in authorized expenditures, it is an important step to addressing the solvency of the Highway Trust Fund.

Resilience

Surface transportation infrastructure – including roadways and stormwater management – built with concrete has a service life of 30 to 50 years, reducing the frequency of resurfacing, repairs, and patching. This longevity not only reduces maintenance costs but also minimizes disruption in the movement of goods and people. The resilience of concrete transportation infrastructure is vital in the face of increasing natural disasters, providing robust transportation infrastructure that can ensure it remains operational in extreme weather events. It is estimated that every \$1 invested in resilience saves \$13 in damages, demonstrating that investing in resilience saves money over the long run. An essential component of improving the resilience of transportation infrastructure is the precast concrete underground infrastructure, including pipes for stormwater, especially as the structures often surpass 100 years of service life.

The cement and concrete industries support the surface transportation reauthorization maintaining a focus on investing in resilient transportation infrastructure both when it is first built and when it is repaired after a disaster. Doing so reduces the cost of repairing and rebuilding infrastructure after a disaster. Reauthorization should support engineer discretion, and ensure engineers are able to consider the interplay of various project components to improve the resilience of transportation infrastructure.

Bridge Investments

One in three bridges nationwide requires repair or replacement, underscoring the need for continued dedicated investment in bridges in the surface transportation reauthorization. As part of this, it is critical to invest in both large bridge projects and smaller projects in states and communities across the country. Continuing dedicated bridge investments will enable states and communities to plan, design, engineer, and build critical bridge projects to maintain the efficient movement of goods and people.

Research and Deployment

The Accelerated Implementation and Deployment of Pavement Technologies (AID-PT) program plays a vital role in transforming innovative technologies and strategies into practice. As concrete pavement technologies evolve, AID-PT is essential for deploying these technologies in roads, bridges, and tunnels. The surface transportation reauthorization should support this program.

Conclusion

We appreciate the opportunity to share the perspective of the cement and concrete industries on the importance of passing a long-term surface transportation reauthorization that advances the use of cement and concrete in the construction of surface transportation assets across the country and the importance of addressing the long-term solvency of the Highway Trust Fund. We look forward to working with the U.S. Department of Transportation in developing priorities and passing a long-term reauthorization of the surface transportation program.

Sincerely,

American Cement Association
American Concrete Pavement Association
American Concrete Pipe Association
American Concrete Pressure Pipe Association
American Concrete Pumping Association
Concrete Foundations Association
Concrete Masonry & Hardscapes Association
Concrete Reinforcing Steel Institute
National Precast Concrete Association
National Ready Mixed Concrete Association
Precast/Prestressed Concrete Institute
Tilt-Up Concrete Association