



July 13, 2026

Honorable Russ Vought
Director
The Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: RIN 3133–AG07 / OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Director Vought:

For 33 years, the Environmental Law and Policy Center (ELPC) has advocated for policies that protect clean air, safe water quality, and great spaces we are blessed with in the U.S, especially in the Midwest where we are based. We write to express our strong opposition to Office of Management and Budget (OMB)’s proposed *Regulation for Federal Financial Assistance*, released on May 29, 2026, and urge OMB to withdraw the proposal. In addition to joining comments opposing this proposal because it will undermine grants and science important to protecting the Great Lakes and conservation, we are submitting this comment letter specific to the US Department of Transportation.

The goal of federal DOT funding should be to build a transportation system that kills less people, is environmentally and financially sustainable, and increases and improves mobility for all. Fact-based federal grantmaking and consistent funding follow-through are critical to achieving these goals. Subjecting real infrastructure grants to this proposed rule will jeopardize projects by increasing costs and uncertainty. Creating such unstable financial footing will reduce real mobility, business growth, and environmental benefits to communities.

Here are just a few transportation grants at risk that Midwest communities depend on:

- Safe Streets and Roads for All
- Better Utilizing Investments to Leverage Development
- Reconnecting Communities Pilot
- National Electric Vehicle Infrastructure program
- Tribal Transportation Program Safety Fund
- Congestion Mitigation and Air Quality Improvement program
- Transportation Alternatives Program

ELPC stresses the importance of investing in freight and passenger rail. Here are some key federal rail grants that could be undermined:

- Corridor Identification and Development Program
- Consolidated Rail Infrastructure and Safety Improvement Grants
- Federal Railroad Partnership Grant Program
- Rail Crossing Elimination Grants

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- Restoration and Enhancement Grants

Trains build communities, support domestic industry, reduce pollution, and use resources efficiently for the betterment of our nation. Investments in our nation's rail infrastructure are long timeline projects that rely on consistent, reliable funding. These projects take broad partnerships of businesses, railroads, state and local governments coming together in a bipartisan manner to conceive, plan, fund and construct projects with multi-generational benefits. That framework unravels if funding is cut off, so a reliable federal government partnership over many years is vital or these sorts of longevity projects would not happen. Congress has funded passenger rail grant programs for years, including the Consolidated Rail and Safety Improvement and Federal State Partnership for Passenger Rail grants. Projects like Michigan Accelerated Rail, Wisconsin DOT's Milwaukee Airport Rail Station second platform, Gulf Coast Passenger Rail, and the Twin Cities-Milwaukee-Chicago passenger rail project demonstrate the bipartisan and broad geographic support and the understanding that these projects have long horizons.

The proposed rule could interfere with the Midwest's ability to increase safe and sustainable mobility for all. It adds additional administrative burdens and allows agencies to make decisions based on changing administrative policy rather than statutory requirements. We urge you to reject this fundamental change in how long-term investments are realized in the nation.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Brubaker". The signature is fluid and cursive, with the first and last names being clearly legible.

Kevin Brubaker
Deputy Director