



September 5th, 2025

VIA ELECTRONIC SUBMISSION ON REGULATIONS.GOV

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

RE: Advancing a Surface Transportation Proposal that Focuses on America's Most Fundamental Infrastructure Needs [Document ID DOT-OST-2025-0468-0001]

Dear Mr. Secretary,

The National Lumber and Building Material Dealers Association (NLBMDA) appreciates the opportunity to share its surface transportation priorities with the U.S. Department of Transportation (hereafter, "the Department") as it seeks gather stakeholder input in advance of Congress' reauthorization of expiring surface transportation programs.

NLBMDA, with its state and regional association partners represent over 6,000 building material retail locations nationwide who operate single and multiple lumber yards and component plants serving homebuilders, subcontractors, general contractors, and consumers in the new construction, repair and remodeling of residential and light commercial structures.

Lumber and building material (LBM) dealers are essential partners to the residential construction industry, providing a broad range of products needed for single-family and multifamily homebuilding across the United States. A reliable and efficient U.S. transportation network is essential for NLBMDA dealers to meet customer needs and support their communities, ensuring inventory arrives on time and deliveries are made without delay.

The Infrastructure Investment and Jobs Act (Pub. Law 117-58) provided historic levels of investment towards our nation's infrastructure. NLBMDA applauds Congress for the investments outlined in IIJA and commends the Department for its expedient efforts to award and distribute federal funding so that meaningful progress can be made towards addressing deferred maintenance across America's surface transportation network. As

funding for these important grant programs is scheduled to expire on September 30th, 2026, NLBMDA recommends that Congress pursue a surface transportation bill that provides similarly robust, long-term funding, which is critical both to repairing the nation’s aging transportation systems and to developing a forward-looking transportation network that can sustain future economic growth.

Addressing the CDL Driver Shortage through Streamlining Processes

For generations, NLBMDA members have reliably supplied contractors, home builders, and homeowners with jobsite deliveries that keep residential construction sites moving. A persistent challenge facing LBM dealers, however, is a shortage of qualified drivers. To address this issue, NLBMDA urges the Department to recommend that Congress include provisions in the upcoming surface transportation reauthorization bill that streamline the CDL process, enabling LBM dealers and their transportation partners to hire new drivers more efficiently.

In recent legislative sessions, lawmakers have introduced the *Licensing Individual Commercial Exam-takers Now Safely and Efficiently (LICENSE) Act*, which would build on Federal Motor Carrier Safety Administration (FMCSA) waivers issued during the COVID-19 pandemic. The bill is designed to simplify and modernize the CDL testing process while preserving rigorous safety standards.

Among its provisions, the LICENSE Act would allow states to administer driving skills tests to applicants from outside their state, making the credentialing process more accessible and practical. This reform would enable prospective drivers to test closer to where they live, rather than being restricted to the state where they completed training. By removing unnecessary barriers, the legislation would help put additional safe, qualified drivers on the road faster.

Ensuring a strong, well-trained workforce of drivers is essential to supporting the residential construction supply chain and the broader economy. Streamlining the CDL process through legislation like the LICENSE Act will not only strengthen workforce development but also provide LBM dealers with the tools needed to continue delivering building materials safely, efficiently, and on time.

Supporting Workforce Development

NLBMDA strongly believes that investments in infrastructure must be partnered with a robust and strategic investment in our nation’s workforce. The American Trucking

Association estimates the trucking industry will need to hire roughly 1.2 million drivers over the next decade to keep pace with an expanding economy and aging workforce.¹

NLBMDA encourages the Department to recommend that Congress take meaningful steps to ensure that a workforce exists to support a growing economy and increasing supply-need in the residential construction industry. NLBMDA supports FMCSA's Safe Drive Apprenticeship Pilot Program, authorized under IIJA, which allows qualified drivers 18-20 to explore careers in interstate trucking. NLBMDA recommends that the Department and Congress identify ways to expand program participation to incentivize the next generation to pursue careers in trucking and the transportation sector.

Maximizing Efficiency on Interstate System

In developing priorities for surface transportation reauthorization, NLBMDA recommends that Congress and the Department evaluate revising the current gross vehicle weight (GVW) cap for commercial trucks on the U.S. Interstate system. Mandated in 1982, The federal cap of 80,000 pounds was established when vehicle safety systems and logistics demands were far different than today. Current trucks are engineered with advanced braking, suspension, and stability systems that can safely accommodate higher weights, especially when using six-axle configurations that distribute loads more evenly across infrastructure.

Increasing GVW limits would create immediate efficiency gains. Heavier loads would allow businesses to maximize the full capacity of a truck, reducing the number of trips required to transport a shipment. This adjustment would result in lowered shipping costs, reduced total fuel consumption, and an easing of congestion on U.S. Interstate system. These benefits would ripple throughout the economy, especially for small businesses and LBM dealers that often face disproportionately high transportation expenses. Savings on logistics would allow these businesses to redirect resources toward growth, workforce investment, and reinvestment into their local communities.

NLBMDA supports bipartisan legislation introduced by Reps. Dusty Johnson and Jim Costa that would establish a 10-year state opt-in pilot program intended to determine the potential impacts and benefits of increasing the GVW limit to 91,000 pounds.

Supporting a Robust Freight Rail Network

While a majority of goods shipped and received by NLBMDA members are transported via truck, the U.S.'s freight rail network is a central part of the transportation network supporting LBM dealers and the residential construction industry. In 2021, U.S. railroads

¹ American Trucking Associations, Economics Department. (2022, October 25). *Driver shortage update 2022*. American Trucking Associations, Inc. <https://www.trucking.org>

hailed approximately 420,000 carloads of lumber and its derivative products.² Additionally, Class I and short line railroads play an essential role by providing direct service to lumber mills, ensuring rural facilities remain connected to the national freight rail system. NLBMDA supports continued funding for federal grant programs which promote reinvestment into the freight rail system.

NLBMDA supports continued appropriations in the next surface transportation bill for the FRA's Consolidated Rail Infrastructure and Safety Improvements (CRISI) Program and the Railroad Crossing Elimination Grant Program, two initiatives critical to ensuring a safe and efficient rail network. NLBMDA also strongly supports renewal of DOT's Nationally Significant Multimodal Freight and Highway Projects (INFRA) Grant Program. Additionally, NLBMDA recommends Congress continue to pursue legislative solutions that reduce congestion and promote the efficient movement of goods across transportation modes.

Conclusion

Once again, NLBMDA appreciates the opportunity to submit its surface transportation priorities to the Department as it evaluates and prepares to submit its priorities to Congress as they prepare the next surface transportation bill. We look forward to continuing to work with the Department and Congress to ensure that the next surface transportation bill supports growth, safety, and efficiency for the building materials industry and the broader economy.

Respectfully submitted,



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President & CEO
National Lumber and Building Material Dealers Association

² Association of American Railroads. *Freight Rail & Construction, Pulp & Paper*. AAR, July 2020.
<https://www.aar.org/wp-content/uploads/2020/07/AAR-Construction-Fact-Sheet.pdf>.