AMERICAN ASSOCIATION OF PORT AUTHORITIES

July 8, 2026

The Honorable Russell Vought
Director
The Office of Management and Budget
725 17th Street, N.W.
Washington, D.C. 20503

Re: Docket ID OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Director Vought,

On behalf of the American Association of Port Authorities (AAPA), thank you for the opportunity to comment on this proposed rule and respectfully offer the port industry's perspective. AAPA represents more than 80 deep draft public port authorities across the United States. The U.S. port industry supports $2.89 trillion in economic activity and 21.8 million American jobs.[1] The Federal Government is an important partner of private companies and state and local governments that finance capital improvements to move the freight, energy, and passengers that power America's economy.

AAPA and the port industry greatly appreciates the improvements the Trump Administration has made to reform and expedite grant administration. These reforms to our nation's permitting laws will cut months, or even years, off timelines for key infrastructure projects. AAPA encourages the Administration to continue making common sense reforms that cut unnecessary and duplicative reviews by federal agencies. For example, harmonizing administrative requirements and award reporting software across all federal agencies will further improve grant administration.

The port industry, however, is concerned that the proposed rule to centralize grant review regulations at the Office of Management and Budget (OMB) could have the unintended consequence of delaying traditional port infrastructure projects integral to revitalizing America's maritime industry. The proposed rule would add an extra layer of review at OMB to a grant review process that already includes project review by political appointees at respective agencies responsible for awards.

Infrastructure projects require certainty and predictability to succeed. Even if permitting review time is reduced as much as possible, engineering design, equipment procurement, and construction are still lengthy processes. For projects to be built efficiently, it is critical that the federal award administration process be both swift and predictable. The port industry is concerned that this proposed rule injects an element of unpredictability into the process. OMB is

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[1] AAPA, U.S. Port & Maritime Industry Economic Contribution Report (2024), https://www.ports.org/files/2024%20Economic%20Impact%20Report.pdf (last visited June 29, 2026).

proposing that any federal award can be terminated at any time if the "award no longer effectuates program goals, Federal agency priorities, or the national interest as they exist at the time of the termination."[2] The White House, and by extension, federal agencies, have the prerogative to set policy goals, but both policy goals and agency priorities can change.

Port authorities cannot afford to be in the uncertain position of wondering whether their executed grant agreements will pass the muster of a new agency leader, new policy goals following immediate current events, or new administrations. Injecting such uncertainty into the award administration process will have a chilling effect on ports seeking to partner with the Federal Government. This policy could produce unintended consequences and discourage port developers from seeking federal assistance to further President Trump's policy goals, especially for maritime dominance. If a port seeks federal assistance to develop new energy projects, such as a natural gas export terminal, under this proposed rule, a future administration could easily scuttle the project on ideological grounds even after a grant agreement is executed.

Due to their nature, infrastructure projects require stability to be successful. Even before final codification, the proposal of this rule has caused some ports to reconsider federally funded projects already underway and worry that their awards could be cancelled mid-construction. Therefore, AAPA respectfully requests that OMB modify this rule to make clear that:

- Awards that finance the construction of traditional, hard infrastructure projects like port facilities will not be subject to post-award obligation terminations; and
- Projects that were mandated by previous Presidential Administrations to include certain policy goals that are no longer priorities for the Trump Administration will have an opportunity to amend their project budgets and plans to comply with new goals prior to any award termination.

Thank you very much for the opportunity to comment on this important matter. AAPA supports President Trump's goals of a revitalized American maritime industry and restoring energy dominance. Ports power the American economy and are integral in achieving these goals. Please do not hesitate to rely on AAPA if there is any further information we can provide as you consider this proposed rule.

Sincerely,

Sang Yi
President & CEO
American Association of Port Authorities

[2] Andrew Reisig, Joel Savary, Regulation for Federal Financial Assistance (2026), https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance (Last visited July 8, 2026).