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U.S. Department of Transportation  
1200 New Jersey Ave SE  
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ATTN: Docket No. DOT-OST-2026-0298

Re: Department of Transportation's Rural Opportunities to Use Transportation for Economic Success (ROUTES) Initiative

The American Society of Civil Engineers (ASCE) is grateful for the opportunity to provide comments to the Department of Transportation (DOT) on rural transportation needs and the Rural Opportunities to Use Transportation for Economic Success (ROUTES) Initiative. The perspective offered in this document is in response to the request for information (RFI) issued by DOT on February 23, 2026.

Founded in 1852, ASCE is the nation's oldest engineering society. ASCE represents more than 160,000 members of the civil engineering profession in 177 countries. Whether they practice in private firms, government offices, or universities, ASCE's members are committed to advancing the profession of civil engineering and protecting public health, safety, and welfare. The wide geographic reach of ASCE's members offers perspective into the specific needs of various communities, whether they are rural, urban, or somewhere in between. As the professionals who plan, design, construct, and maintain critical aspects of our nation's infrastructure, ASCE's members are well suited to comment on the transportation-related needs of rural areas.

In addition to serving as important arteries for commercial activity, rural areas are vital sources of raw materials, such as timber, grain, and minerals. Rural communities face distinct challenges, particularly related to safety and mobility. ASCE commends DOT for creating the ROUTES Initiative and appreciates the program's focus on addressing these challenges by developing informational tools and providing technical assistance and outreach to rural communities. The initiative supports needed infrastructure system

preservation, improvement, operation, and maintenance in these areas. ASCE urges DOT to continue to support the ROUTES Initiative and expand the program to further address critical needs facing rural areas and communities. We also request DOT continue to fund programs geared toward rural transportation at levels achieved through the Infrastructure Investment and Jobs Act (IIJA).

For this comment, ASCE would like to address some of the **questions DOT included in its RFI**.

## **ASCE's responses to DOT's questions**

### A. Identifying Unmet Needs in Rural Transportation

#### 1. *What challenges and opportunities do rural areas face related to the following:*

*(a) infrastructure condition (e.g., age of infrastructure or equipment, bridge closures or postings, weather resiliency);*

- Regardless of community size, infrastructure conditions show room for improvement. Some 39% of major roads in the U.S. are in poor or mediocre condition.<sup>1</sup> Budgetary constraints and competition for funds between rural townships and communities put a strain on local tax bases. These issues present a challenge for communities trying to meet their needs and address deteriorating infrastructure, all while grappling with growing maintenance costs.
- Of the country's 623,218 bridges, 49.1% are in fair condition, 44.1% are in good condition, and 6.8% are in poor condition – a number that has continued to decrease over the past few years.<sup>2</sup> In 2025, some 62,441 of the nation's 624,193 bridges were posted for load, meaning they have restrictions regarding the weight of vehicles that can safely cross.<sup>3</sup>
  - Counties own 48% of the nation's rural bridges.<sup>4</sup> The share of county-owned bridges in poor condition is greater than the share of state- and city-owned bridges in poor condition.
    - Of the country's 226,268 county-owned bridges, 44.2% are in good condition, 46.6% are in fair condition, and 9.2% are in poor condition.<sup>5</sup>

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<sup>1</sup> [https://tripnet.org/wp-content/uploads/2020/04/TRIP\\_Fact\\_Sheet\\_NATL.pdf](https://tripnet.org/wp-content/uploads/2020/04/TRIP_Fact_Sheet_NATL.pdf)

<sup>2</sup> <https://www.fhwa.dot.gov/bridge/nbi/no10/condition24.cfm>

<sup>3</sup> <https://www.fhwa.dot.gov/bridge/nbi/no10/posting25e.cfm#total>

<sup>4</sup> <https://www.naco.org/resource/support-transportation-planning-rural-communities>

<sup>5</sup> <https://www.fhwa.dot.gov/bridge/nbi/no10/owner25e.cfm#total>

- Of the country's 290,912 state-owned bridges, 42.5% are in good condition, 53.1% are in fair condition, and 4.4% are in poor condition.<sup>6</sup>
  - Of the country's 49,932 city-owned bridges, 44.9% are in good condition, 48.6% are in fair condition, and 6.5% are in poor condition.<sup>7</sup>
- Limited long-term condition data and inadequate data organization hinder infrastructure owners' ability to conduct meaningful queries. Accurate, updated data is a key component of judicious infrastructure decisions and must be readily available to local jurisdictions and transportation professionals.
- Bridge closures in rural areas may cause serious travel delays, especially if there are limited alternative routes. In addition to creating an inconvenience for everyday trips, these delays impact emergency services and can affect the cost of moving goods.
- Improving infrastructure resilience could help address long-term needs associated with the preservation, operation, and maintenance of transportation facilities in rural and small communities.
  - With recent changes in weather conditions, upgrades to roadways should include the identification and mitigation of inadequate stormwater drainage on pavements and adjacent roadside areas.
  - Programs should also include upgrades and replacement of culverts, ditches, and other drainage elements.
  - In cold-weather regions, potholes and the costs of related temporary and permanent damage repairs can have a considerable financial impact on local jurisdictions. Efficient and effective snow and ice control measures may help reduce the impact of freeze-thaw cycles.
  - Incorporation of advances in paving material design can improve pavement durability and the life of roadway systems.

*(b) usage (e.g., frequency or availability of public transportation, freight transportation, pedestrian walkways and shoulders);*

- In rural areas with abundant recreational opportunities, there may not be sufficient facilities for walking, hiking, biking, and parking (such as all-terrain vehicle (ATV) trailer lots) on rural roads.
- Provide wider paved or gravel shoulders, or install shoulders if not present, to offer greater separation from vehicular traffic on roadways used by pedestrians and bicyclists, and in cases where only narrow roadway sections exist.

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<sup>6</sup> <https://www.fhwa.dot.gov/bridge/nbi/no10/owner25e.cfm#total>

<sup>7</sup> <https://www.fhwa.dot.gov/bridge/nbi/no10/owner25e.cfm#total>

- Public transportation for residents of small towns and villages is frequently provided through demand-response services, rideshare options, or other shared ride taxi services provided by small communities. The availability of these services is critical for the elderly, people with disabilities, and residents without vehicles for access to shopping, medical services, and other personal needs.
- Intrastate and interregional transit options can often be provided through privately operated bus services in areas where demand is sufficient to economically support these services.
- The movement of freight is critical for the vibrance and economic growth of small communities. To foster the potential of businesses and industries, roadway pavements need to support growth in heavy vehicle traffic. Demand for heavy freight vehicles may exceed the truck traffic levels that roads were initially designed for. This could lead to advanced deterioration of facilities and higher maintenance costs. Truck traffic demand must be monitored and facilities must be designed to accommodate any additional heavy vehicle loading that occurs.
- Adequate facilities must be provided to ensure the efficient modal transfer of freight and agricultural commodities and the safe movement of goods to market by truck, rail, port, air, farm equipment, and other modes of commodity movement. Bottlenecks should be eliminated at points of modal transfer to support efficient movement.
- Systems of continuous routes for heavy trucking should incorporate facilities on rural roadways, with roadway facilities and structures appropriately designed to accommodate loads of this type. Routes should be maintained for oversize/overweight trucks, which may be necessary to support existing and future industry in these areas.

*(c) safety (e.g., transportation-related injuries and fatalities, roadway departure, at-grade rail crossings, railroad trespassing, wildlife, transportation of hazardous materials, motorcycle and all-terrain vehicle safety, experiences of nonmotorized road users, post-crash care);*

- Traffic safety is a particular concern in rural areas, where only 19% of the U.S. population lives and 47% of all roadway fatalities occur. DOT reports that, in 2022, 17,283 motor vehicle traffic fatalities occurred in rural areas and the fatality rate per 100 million vehicle miles traveled was 1.5 times higher in rural areas than in urban areas.<sup>8</sup>

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<sup>8</sup> [https://www.transportation.gov/rural/safety#\\_ftn3](https://www.transportation.gov/rural/safety#_ftn3)

- Challenges with rural roads include a lack of safety features, such as rumble strips, ample shoulders, recoverable slopes, lighting, and a lack of quick access to emergency medical care.<sup>9</sup>
- Low-cost improvements can be an effective means to reduce potential roadway hazards.
  - Run-off-the-road crashes may be common on curves on roadways. Support can be provided through the ROUTES Initiative or the Federal Highway Administration’s (FHWA) Highway Safety Improvement Program to detect high-frequency crash locations on curves.
  - Safety features can include low-cost improvements such as curve delineation signing and markings, guard rails, and other positive guidance treatments.
  - On many rural facilities, addressing low or absent shoulders can improve conditions that contribute to run-off-the-road crashes.
  - Consideration would be appropriate for approval of projects of this type where no local match is required and current project development requirements can be significantly minimized. This could provide opportunities for local agencies that may lack financial resources or dedicated professional staff to participate.
- Recent changes in the federal Manual on Uniform Traffic Control Devices for Streets and Highways on signing and pavement marking visibility are anticipated to improve nighttime roadway safety, and particularly for an aging driver population. New standards for pavement marking and traffic sign retroreflectivity – all with mandatory compliance dates – have recently been approved by Congress and may create issues of affordability for small communities, townships, and other rural agencies to implement the required changes. Financial support for these traffic control element improvements will serve to improve safety of local motorists and the traveling public.
- Safety at rural railroad crossings should continue to be a point of emphasis on rural roadways, which frequently are only controlled with crossbucks instead of more advanced tools such as lowering gates. Nationally, more than 2,000 incidents and 200 fatalities at highway-rail grade crossings occur each year.<sup>10</sup> Emphasis could also be placed on clearing trackside vegetation where electronic devices are not provided to improve visibility of approaching trains.

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<sup>9</sup> [https://www.ghsa.org/sites/default/files/2025-04/rural\\_report.pdf](https://www.ghsa.org/sites/default/files/2025-04/rural_report.pdf)

<sup>10</sup> <https://railroads.dot.gov/railroad-safety/divisions/crossing-safety-and-trespass-prevention/railroad-crossing-safety>

- Rural communities need assistance in establishing emergency centers to reduce response times.
- As noted above, rural roads play a critical role in the movement of freight, which also presents safety implications for individuals who live near them and use them. In 2023, 5,375 trucks were involved in a fatal crash, an 8.4% decrease from 2022, but a 37% increase from 2013.<sup>11</sup> More than half of these crashes – 55.7% - occurred on rural roads.<sup>12</sup>

*(d) technology (e.g., broadband, cellular coverage, backup for GPS time and navigation, automated vehicles, drones, digital infrastructure);*

- According to the Federal Communications Commission, approximately 26 million Americans, mostly in rural communities in every region of the country, lack access to broadband.<sup>13</sup> ASCE recognizes the critical role broadband communications play in economic activity, health care, and education. ASCE believes the private sector and all levels of government have important roles to play in closing the gap in digital access.
- Cell coverage holes still exist and need to be mapped and provided for public information. These maps must be updated in a timely fashion and in close coordination with state, local, and private stakeholders to more accurately reflect current access.
- Advancements in technology related to traffic signal control, traffic warning devices, and traveler information services are continuing to improve the safety and efficiency of traffic operation. While these advancements may effectively be incorporated into the operations and safety efforts of small town, villages, and other rural areas, selection and implementation of appropriate features may be beyond the abilities of local staff responsible for traffic operation.
- Local assistance in selecting appropriate technologies to improve safety and operational needs for all travel modes could assist rural agencies in developing effective systems. Guidance should be complemented by local resources to assist with the continued maintenance of these systems, particularly for detection and communications systems.
- The continued deployment of both connected and autonomous vehicles (CAV) may provide a particular challenge in rural areas and communities. Improvements in broadband and digital communications systems, which are needed in many rural

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<sup>11</sup> <https://injuryfacts.nsc.org/motor-vehicle/road-users/large-trucks/>

<sup>12</sup> <https://injuryfacts.nsc.org/motor-vehicle/road-users/large-trucks/>

<sup>13</sup> <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/seventh-broadband-progress-report>

areas, will be key to supporting CAV implementation and operation. Additionally, traffic control infrastructure upgrades and their maintenance may need to be implemented in rural areas and communities to support vehicle guidance systems. It may be beyond the ability of local agencies to install and maintain these systems as needed without assistance.

*2. What types of infrastructure projects, services, or technology are most needed in rural communities to meet national transportation priorities such as safety and economic competitiveness?*

- The types of infrastructure projects, services, and technologies that would benefit management of transportation infrastructure in rural communities and townships have been addressed in detail in the four elements of question 1 above. As shown in that response, the needs and challenges facing transportation infrastructure systems in rural areas and communities are many. ASCE supports programs that provide assistance and funding to address these challenges, such as the ROUTES Initiative and other federal assistance programs. We ask DOT to continue to build on the successes already achieved through the ROUTES Initiative and expand it to further address many of the needs, challenges, and opportunities seen in rural areas.
- While not specifically mentioned in the response to question 1, air transport services also support commerce and agricultural needs in small communities and rural areas. ASCE commends DOT for operating the Essential Air Service program to support aviation in smaller communities and we request its continued operation.
- Similarly, ASCE applauds the Federal Transit Administration for opening a funding opportunity for the Ferry Service for Rural Communities Program. Continuation of this program would assist with capital, planning, and operating efforts for a mode of transportation that is vital in many rural areas.

*What types of projects or services do rural communities find most challenging to fund?*

- Any project beyond their normal scope of operations is difficult for rural communities to fund.

*What are barriers to funding these projects?*

- Some of the most common barriers are limited funding and limited expertise, both in planning and design. These limitations present the need to procure expert consultation, which is also a cost incurred by rural communities.

*3. How could improved multimodal passenger and freight transportation—including road, rail, transit, aviation, maritime, pipelines, and other forms of transportation—better contribute to the economic competitiveness of rural communities? What industries (including tourism) are most in need of these improvements?*

- The country’s network of roads, bridges, transit systems, and other multimodal facilities keep the economy functioning. These networks support trips for individuals heading to work, children on their way to school, and truck drivers delivering goods to businesses. Improved multimodal transportation would strengthen the economic competitiveness of communities of every size.
- Public transportation is available in every state, both in cities and rural areas, connecting people with work, leisure activities, and medical appointments. In fact, a primary component of public transit service consists of demand-response services, rideshare options, shared ride taxi services, and other means provided for users in rural areas. Of the 2,200 National Transit Database reporting systems, 1,224 were in rural areas and 976 were in urbanized areas.<sup>14</sup>
  - One approach for improving transit performance by agencies that offer on-demand public services in rural areas is providing technology upgrades. These upgrades can assist with the management and optimization of response times for passengers and create efficiencies related to ride scheduling and coordination.
  - Additional funding for user subsidies can help make service more available, accessible, and affordable for users of on-demand transit services in rural communities and towns.
- Additional federal funding support for transit operations is necessary to preserve safe, reliable, and efficient transit service. One of the primary sources of revenue for transit operations by local jurisdictions is the farebox and other user fee revenues, which experienced a steep decline during the COVID-19 pandemic and have been slow to recover. Local revenues needed for transit operations and maintenance to supplement loss of farebox revenues will typically take the form of tax levies, which place transit service in direct competition for funding with other local priorities and needs. Unless addressed through federal support, the continued loss of farebox revenues could further result in less frequent service, reduced hours of operation, less accessibility to jobs, and, in some cases, elimination of service completely in areas of low ridership, particularly in small communities and throughout rural areas.

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<sup>14</sup> <https://www.apta.com/wp-content/uploads/APTA-2025-Public-Transportation-Fact-Book.pdf>

*4. What data has been used to inform rural transportation decision making and grant development, and what additional data would have been helpful but was nonexistent or difficult to access?*

- A wide array of data and other information is available to rural communities through the ROUTES Initiative, federal databases, and resources provided through outreach to state departments of transportation (DOTs). Basic information needed for monitoring system performance and preparing grant applications, such as traffic volume and crash history, has seen increased availability in past years and is generally easy to access as long as local agencies know where to find it.
- Information that is more difficult for local agencies to access for infrastructure system management includes current data used for condition assessment, budgeting, project needs identification and selection, problem identification, and remediation. Some examples of information needed but not necessarily available include data pertaining to age, type, location, and condition for all elements of transportation infrastructure systems that are supported, operated, and maintained by responsible local agencies.
- Particularly noteworthy is that, once this information is collected and databases are established, efforts are necessary to keep all data elements current.

*5. How can rural communities better engage with federal, Tribal, state, and regional entities—such as other federal agencies, state departments of transportation, regional planning organizations, and metropolitan planning organizations—to maintain and upgrade local transportation?*

- A dedicated outreach effort must be sustained by federal agencies and state DOTs to ensure small communities and other rural agencies are aware of the resources, information, services, and support available to them. To be effective, local agencies responsible for transportation infrastructure operation and maintenance must be aware these resources exist and know how to access and use them.
- Technical assistance should be provided by federal, state, and regional agencies to support rural communities and other jurisdictions charged with the management, maintenance, and operation of infrastructure systems under their responsibility.
- Since the availability of trained and experienced staff may often be limited in small communities and rural areas, technical training should be provided through federal, state, and regional resources and in partnerships with professional organizations. Training opportunities for local government representatives should cover basic concepts, principles, and practices in the operation, maintenance, and design of transportation infrastructure and where resources can be located.

- Efforts should be made by federal agencies and state DOTs to provide updates on new developments in statutory requirements, codes, standards, and other technological advancements affecting the transportation infrastructure responsibilities of rural jurisdictions and agencies.
- Annual meetings convening federal, Tribal, state, and regional entities to discuss available programs would be helpful.
- Additionally, regular reports on project failures and successes would provide helpful insight to rural communities considering similar projects.

## B. Addressing Unmet Needs Through DOT Grants and Resources

*1. ROUTES supports rural and Tribal stakeholders through development of technical assistance resources and opportunities, such as toolkits, dashboards, peer exchanges, webinars, and newsletters. What additional resources or direct technical assistance could ROUTES provide to support rural communities? Of the existing resources ROUTES provides, what is most useful?*

- A general summary and discussion of many of the special challenges and needs of rural areas and communities have been provided in Part A of this response.
- The resources currently offered through the ROUTES Initiative have provided significant assistance to rural areas. ASCE requests that the current resources are maintained and the program is expanded to continue assisting with challenges facing rural areas and small communities.
- ASCE recommends further expansion of the ROUTES Initiative to include additional sources of both financial and technical support for rural areas. This should include funding and support for project evaluation, development, implementation, performance monitoring, and transportation infrastructure system operation and maintenance.
- ASCE recommends DOT offer support for local-level transportation asset management efforts in rural areas that link asset management practices to long-term capital improvement planning while incorporating life-cycle cost analysis. This approach could help raise awareness of the full cost of infrastructure to allow communities to make well-informed capital improvement decisions.
- Many of the federal transportation system improvement grants require a local match, which may keep projects out of reach for small communities and towns. The requirement for local matching funds could force communities to make difficult decisions on funding priorities for capital improvements and other needed initiatives.

- DOT should consider making grants available to rural communities and towns with minimal local match requirements.
- For some projects that can be supported through the ROUTES Initiative, costs associated with project development, grant application, and administration can many times exceed the actual cost of the improvement. Programs for low-cost improvement projects in rural areas should be developed to minimize requirements and costs related to project application preparation and the development of plans, specifications, and engineering documents. Categorical exclusions should be offered for these projects as a means to reduce project development and implementation costs.
- Consideration should be given to establishing innovative financing methods specifically directed to rural areas as part of the ROUTES Initiative or other federal programs. These methods could include programs similar to Transportation Infrastructure Finance and Innovation Act (TIFIA) loans and other funding instruments currently in use.

*2. What challenges do rural communities face when applying for DOT grants and financial assistance (e.g., project prioritization, eligibility requirements, data needs, funding match)? What challenges do rural communities encounter after being awarded a DOT grant or financial assistance (e.g., project grant agreements, environmental analyses, permitting, reporting requirements, workforce availability, weather, inflation)?*

- Applying for and receiving federal grants and financial assistance generally requires rural communities to acquire a professional project manager due to the communities' infrequent use and knowledge of federal programs.
- The processes associated with the rollout, review, awarding, and administration of DOT discretionary grant programs have been problematic for state DOTs and local agencies. Rollouts are usually behind schedule, application windows are narrow, and award and project agreements take one-two years to finalize.
  - Even with these challenges, the Federal Highway Administration (FHWA) expects grant recipients to adhere to the original timelines in the applications, resulting in situations where a project is ready for letting without an agreement in place. A standardized process for all grants and programs within the FHWA would provide a realistic, understandable expectation for rural communities (and all other interested parties) considering applying for federal grants and financial assistance.

*3. What types of technical assistance would be effective for navigating the Federal grant process, including pre-award activities, project delivery, and project evaluation?*

- Templates and examples of completed applications and reporting forms would be helpful to communities navigating the federal grant process.

*4. How do the definitions of “rural” across DOT grant programs reflect the reality of rural communities? How do these definitions influence the allocation of rural funding?*

- Across federal agencies, there is no single definition of “rural.” While ASCE does not propose a definition in this response, we recommend that DOT use a consistent definition of “rural” across its programs and initiatives.

### **Conclusion**

ASCE would like to thank DOT for accepting input on the transportation needs of rural communities. Rural areas make up huge portions of the country and are vitally important for economic activity. ASCE looks forward to serving as a source of information and is prepared to answer any questions as DOT collects feedback.