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November 28, 2022

Rear Admiral Ann Phillips
Maritime Administrator
U.S. Department of Transportation
Maritime Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Rear Admiral Phillips:

As you may know, the American Society of Civil Engineers and its constituent 150,000 members is the country's oldest national civil engineering organization, representing civil engineers in private practice, government, industry, and academia, all of whom are dedicated to the advancement of the science and profession of civil engineering.

ASCE is committed to improving the nation's infrastructure to protect the health, safety, and welfare of the public. ASCE members are on the frontlines of dealing with America's infrastructure crisis and know the benefits of making the needed improvements. Modernizing America's infrastructure will continue to play a significant role as part of the nation's economic recovery as well as preparation for a more resilient and sustainable transportation system.

In its January 2021 letter to President Biden's transition team (attached), ASCE prioritized three policy areas: "Prepare for a Sustainable, Resilient Future; Prioritize Asset Management and Operations and Maintenance (O&M) Needs; Restore a Strong Federal Partner in Infrastructure Investment." While all three intertwine in their goals and means, the focus of this letter is on improved asset management in the US port industry.

As stated in ASCE's January 2021 letter:

ASCE supports prioritizing investments that increase safety and resilience, as well as focusing on state of good repair and the operations and maintenance of the current systems. The use of performance-based ownership of infrastructure, which encourages the use of sustainable engineering practices and life-cycle performance, will be critical to the long-term use of our infrastructure systems. ASCE supports the use of best-practice asset management strategies as a way to make the best use of limited infrastructure funding and minimize the total cost of owning and operating these systems.

Following the enactment of the historic Infrastructure Investment and Jobs Act (IIJA), ASCE released a white paper, "Recommendations for Effective Implementation" (attached). In it, ASCE wrote:

(The IIJA) represents a historic bipartisan achievement and the largest investment in our nation's critical infrastructure systems in a generation. ... As (these) new competitive grant

programs are developed across federal agencies, (they) should provide incentives for asset management and life cycle cost analysis as a routine part of the planning process. There are a growing number of state and local governments and private sector infrastructure owners demonstrating the long-term advantages of employing comprehensive asset management practices. However, asset management plans are not required or incentivized by the federal government in many sectors

Among the sectors where such incentives would be productive is the US port industry. The good news is that the business practice of strategic asset management among global ports has been well established over the past quarter century. World ports, such as the ports of Rotterdam, Antwerp, and Melbourne, have advanced the practice of utilizing standards and practices developed under ISO 55000 and its predecessor, PAS 55. In the US, port authorities are becoming increasingly aware of the proven value of strategic asset management in assuring that their capital-intensive operations function effectively to deliver defined levels of service over the lives of critical assets.

Expanding that awareness to achieve widespread asset management practice implementation in the US port industry would be accelerated, in our view, if incentives were built into the now more robust infrastructure grant program within the domain of the Maritime Administration.

As ASCE summarized in its white paper:

... ASCE remains dedicated to ensuring the IJA is implemented efficiently and effectively. The nation is on the precipice of a long-awaited infrastructure decade; however, if we fail to make smart investments, create unnecessary project delays, build to outdated standards, or fail to fill the nation's workforce gaps, we will not realize the full impact of the historic investments made by the bipartisan infrastructure law. The nation's engineers stand ready to maintain, modernize, and build the infrastructure required for the next generation and are prepared to work with federal, state, and local officials to make sure these investments are spent wisely.

To achieve the goals of the bipartisan infrastructure law, ASCE asks for the Maritime Administration to employ the adoption and practice of asset management policies as one criterion in the allocation of the Administration's grant programs for which port agencies and terminal operators are eligible. ASCE's Asset Management Task Committee, whose membership includes representatives of US and global port authorities (including current or former asset-management managers from the ports of Rotterdam and Melbourne), consultants and academia, would be happy to serve as a resource in the development of any such criterion.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink that reads "Thomas W. Smith III". The signature is written in a cursive style with a horizontal line underlining the name.

Thomas W. Smith III, ENV SP, CAE, F.ASCE
Executive Director
American Society of Civil Engineers