January 27, 2020

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor
Room PL-401
Washington, DC 20590

Re: Docket No. DOT-OST-2019-0167

The American Society of Civil Engineers (ASCE) is pleased to submit the following comments to the U.S. Department of Transportation (DOT) Request for Information (RFI) to Docket No. DOT-OST-2019-0167 – Rural Opportunities to Use Transportation for Economic Success. ASCE applauds DOT’s efforts to address challenges facing rural transportation infrastructure networks, and opportunities to address critical challenges. Through these actions, ASCE is eager to provide input to ensure rural transportation infrastructure improvements enhance safety, improve economic competitiveness, and strengthen our national infrastructure network.

Founded in 1852, ASCE is the oldest engineering organization in the nation and represents more than 150,000 civil engineers in private practice, government, industry, and academia. ASCE members are dedicated professionals who hold paramount public health, safety, and welfare as they design, build, construct, operate, and maintain the built environment. It is through this commitment that our members recognize the important impacts of improving rural transportation infrastructure to ensure we have a national transportation infrastructure system fit for the 21st century.

As DOT continues to develop a framework to enhance national transportation connectivity in rural communities across our nation, ASCE encourages the following:

- **Increase Leadership in Infrastructure Renewal.** Our nation’s transportation infrastructure needs an overarching vision which includes strong and bold leadership from all levels of government and the private sector. Leadership must recognize the unique transportation infrastructure challenges facing rural communities, what is best needed to address challenges, and ensure that each rural community is properly connected to a larger, national system.

- **Robust Investment.** In ASCE’s 2017 Infrastructure Report Card, a $2.0 trillion 10-year national infrastructure investment gap had been identified. To meet the future needs of all communities, and restore our global competitive advantage, we must increase investment from all levels of government and the private sector from 2.5% to 3.5% of U.S. Gross Domestic Product (GDP) by 2025. To ensure rural communities have access to increased funding, there needs to be higher emphasis placed on gaining access to federal grant programs through increased education, having accessible federal agency representatives, and recognizing the unique challenges facing each rural community.
• **Promote Sustainability, Resiliency and Innovation.** Sustainability and resiliency must be considered as integral to rebuilding our nation’s infrastructure. To prepare for the future, all communities should include system-wide life-cycle cost analysis as part of every new or renewed infrastructure project and emerging technological advances must be properly incorporated to enhance personal mobility.

• **Develop and Prioritize Plans to Sustain and Enhance Infrastructure.** While infrastructure investment is needed at all levels and across all sectors, it must be prioritized and executed according to well-conceived plans that complement the national vision and focus on system wide metrics.

ASCE’s 2017 Infrastructure Report Card, which gave our nation’s aviation system, bridges, roads, and transit a “D,” “C+,” “D,” and “D-;” states that infrastructure challenges remain significant, but solvable. We can address our infrastructure deficit through strategic and sustained investment, bold leadership, thoughtful planning, and careful preparation for the needs of the future. As we seek opportunities to rebuild our national transportation infrastructure system, it is imperative that unique community infrastructure challenges are addressed to ensure we have a connected national system.

ASCE supports the DOT’s efforts to improve rural transportation infrastructure challenges. Furthermore, the Society encourages DOT to address the transportation infrastructure needs of rural communities across our nation through increased leadership and robust funding; promote sustainability, resiliency and innovation; as well as develop and prioritize Plans to sustain and enhance infrastructure. As DOT reviews comments submitted for the RFI, ASCE urges thoughtful leadership and continued commitment for improving transportation in all communities across the nation.