COMMENTS OF THE NATIONAL ASSOCIATION OF COUNTIES

The National Association of Counties (NACo) writes to offer our response to the Request for Information issued by the U.S. Department of Transportation (DOT) and published in the Federal Register on November 27, 2019 regarding the Rural Opportunities to Use Transportation for Economic Success (ROUTES) Initiative (DOT-OST-2019-0167-0001).

Counties are at the forefront of ensuring that the needs of all Americans are met. We are responsible for community and economic development, education and infrastructure enhancements. We are also tasked with ensuring the stewardship of local resources and protecting the health and well-being of our residents. With roughly two thirds of the nation’s counties considered rural, local officials in these areas face an uphill battle to provide necessary resources to their residents.

NACo applauds the Department’s efforts to increase outreach to rural areas and the administration’s focus on ensuring that rural America has access to important federal resources. We appreciate the strong intergovernmental partnership we have with DOT and look forward to continuing our work together to maximize federal resources in rural America.

On behalf of America’s 3,069 counties, thank you for the opportunity to provide comments on the ROUTES Initiative.

Identifying Unmet Needs in Rural Transportation

A. What infrastructure issues are contributing to high fatality rates on rural roadways and rail-highway grade crossings (e.g., roadway condition or geometry, driver behavior, wildlife collisions)?

Several factors related to the infrastructure of rural areas contribute to a disproportionate number of fatalities when compared to urban settings; however, a lack of adequate federal and state investment remains at the root of the issue. Even federal programs specifically designed to address this problem, such as the High Risk Rural Roads Program, do not present a meaningful resource to rural communities who are largely at the mercy of the state to decide whether or not a road should be classified as high risk and therefore eligible for funding to increase safety measures after a period of time and certain number of fatalities. Increased federal funding to rural areas through flexible, discretionary grant programs will allow counties to invest in badly needed safety countermeasures that they may currently lack, a significant factor that is critical to decreasing the disparate number of individuals killed on rural roads.
Infrastructure issues unique to rural areas that could be mitigated with increased federal funding, include:

- Outdated or inadequate intersection designs;
- Road edge drop-offs;
- Decreased visibility (e.g. trees too close to roadway, utility poles, encroachments and line of sight blockages);
- Lack of delineation at curves;
- Lack of transportation alternatives;
- Poorly maintained rail crossings;
- Inadequate or missing signage;
- Outdated technology at rail crossings; and,
- Lack of coordination between railroads and local road authorities.

B. What unique challenges do rural areas face related to infrastructure condition (e.g., age of infrastructure or equipment, including vehicles, bridge closures or postings, types of freight carried, weather resiliency)?

As mentioned above, counties need strong federal and state partners to help support the significant role we play in the national transportation network. Rural roadways make up 69 percent of America’s transportation system and carry much more than just the citizens who live there. 44 percent of traffic on rural roads is actually urban citizens traveling to work, home and school each day.

Additionally, two-thirds of rail freight originates in rural areas, creating the need for heavy trucks that create significant wear-and-tear on local roadways to transport goods. In fact, 44 percent of truck vehicle miles traveled (VMT) occur on rural roads with 80 percent of bridges in these areas classified as in poor condition. This means that heavy trucks – which, according to a report from the U.S. Government Accountability Office, have the same impact on a road as 9,600 passenger vehicles – must increase their VMT on rural roads in order to find a working bridge to cross, thereby causing additional adverse impacts on infrastructure that is already crumbling.

C. How does infrastructure usage (e.g., access to public transportation, technology deployment) affect the lives of rural Americans?

With significantly less access to transportation alternatives as their suburban and urban counterparts, rural counties rely heavily on driving and therefore on the quality of transportation infrastructure. Many of these areas do not have access to public transportation, making deteriorating, unsafe roads and bridges a quality of life issue for these residents who are left with no option except an automobile to access vital resources. The failure of technologies to deploy in a meaningful way to these areas, such as broadband, creates further challenges that force residents onto the road for longer distances and more vehicle miles traveled. This also presents an additional quality of life consideration for rural residents who want to stay in their home as they grow older but must rely on aging infrastructure that compromises safety to connect them with their families, doctors and the world around them.

D. What types of infrastructure projects are most needed in rural communities to meet national transportation priorities such as safety and economic competitiveness?
According to the results of a poll requesting feedback from members of NACo’s Transportation Policy Steering Committee on which type of infrastructure projects are most needed in their communities, road and bridge projects were prioritized by members the majority of the time. Ensuring our local roads and bridges are safely and efficiently moving people and goods is vital to both the national economy and the country’s global competitiveness.

E. What types of rural transportation projects or services do rural communities find challenging to fund?

All projects in rural areas can be challenging to fund due to a variety of reasons, including a lack of federal and/or state investment, general fiscal constraints on the county and a lack of opportunities or interest for private development.

F. What additional or alternative methods can be used to identify and prioritize rural transportation projects for funding through discretionary grants?

Safety is always at the forefront of local decision-making and is an area where a strong intergovernmental partnership is critical. Consideration for the safety of our communities remains paramount for county officials. The Department should evaluate the condition of an asset for safety as its first and most significant priority in making a determination to award discretionary funding.

Addressing Unmet Needs Through DOT Discretionary Grant Programs

A. What resources or direct assistance could DOT provide to support rural transportation projects or reach communities that may not be aware of DOT discretionary programs?

Increasing outreach and education about federal programs for rural counties is important, though not enough. Providing technical assistance for grants and offering resources that will ease the administrative burdens for rural counties that are often fiscally constrained and understaffed once the grant is secured will help federal dollars go further. Rural counties also face a more difficult challenge – if they are able at all – to find a local match. The Department should consider significantly lowering or removing the local match requirement for economically disadvantaged counties as defined in the U.S. Code.

In addition, counties support creating additional competitive grant programs, like BUILD, that counties may apply for directly through DOT and that provide direct, flexible federal funding.

B. What challenges do rural communities face when applying for DOT grants and financial assistance (e.g., project prioritization, eligibility requirements, funding match)?

As mentioned above, rural counties are often unable to find a local match or attract private investment, and simply administering the grant can be too burdensome due to fiscal and staff constraints. Varying statutory definitions of what is considered “rural” within the grant programs also creates confusion around the eligibility of a county for certain federal funding. This should be consistent and clarified to the best of the Department’s ability, with the understanding that a legislative fix would be necessary to alter the definitions that have already been codified.

C. What types of technical assistance would be effective for navigating the application process?
Providing technical assistance (TA) to rural counties during the application process will ensure better applications with more successful projects. Access to TA would also increase the amount of rural counties willing to apply for a grant, resulting in the funding of critical infrastructure projects that rural areas have been forced to sideline due to funding constraints. TA that would be beneficial to rural counties includes:

- Providing a one-stop resource for counties to contact that assists with the application process and implementation of the grant should the application be successful;
- Streamlining the application process to ensure efficiency and reduce administrative burdens; and,
- Increasing transparency within the selection process.