



## **NADO Request for Information Response on DOT ROUTES Initiative**

The National Association of Development Organizations (NADO) appreciates the opportunity to submit comments on the U.S. Department of Transportation – Office of the Secretary’s request for information concerning the Rural Opportunities to Use Transportation for Economic Success (ROUTES) initiative as published in docket no. DOT-OST-2026-0298.

Founded in 1967, NADO promotes regional solutions, partnerships, and strategies that enhance the long-term economic competitiveness and quality of life across America’s local communities. NADO’s member organizations serve the national network of more than 500 Regional Development Organizations across the country —known locally as councils of governments, economic development districts, local development districts, and regional councils—who provide valuable professional and technical assistance to thousands of cities, counties, and towns.

NADO members also have programmatic responsibilities for various aspects of rural and regional transportation. Many of these organizations house and staff Regional Transportation Planning Organizations (RTPOs) or similar rural multimodal transportation planning programs. These programs generally operate in non-metropolitan areas to conduct outreach and support coordination with members of the public and local elected officials. Often these organizations provide transportation planning support to local communities in partnership with state departments of transportation.

The ROUTES program and the resources associated with it are of increased importance to NADO and its members, as it is one of the only federal transportation programs providing focused support and assistance to rural communities.

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

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

In the programmatic body of interaction with the NADO membership, which comprises over 300 multijurisdictional regional planning organizations that represent rural (and small metro) communities across the country, several common themes regarding unmet transportation needs are recurring;

- Rural and Tribal transportation infrastructure is often older and increasingly distressed, especially facilities owned, operated, and maintained by units of local government (cities, villages, counties);
- Local sources of funding to repair or replace these critical assets are rapidly dwindling, increasing the demand on state and federal funding resources;
- State and federal public funding sources are becoming increasingly competitive with escalating application requirements, minimum project amounts, and match rates;
- Preliminary project design and engineering costs are often beyond the fiscal capacity of local funding resources and are typically not eligible expenses in public funding applications;

These items all describe a setting where rural and Tribal communities are struggling to meet the responsibilities of maintenance and upkeep that contribute to a safe traveling environment. These challenges primarily refer to transportation networks for vehicular or automobile travel, but these challenging conditions are also observed for active transportation assets including sidewalks, bike facilities, trails/paths, and related items. As economic factors that contribute to the ability of an individual to own and/or operate a motor vehicle continue to escalate (vehicle prices, fuel prices, insurance costs), reasonable and safe access to alternative methods of personal transportation are increasingly important. These options are typically limited in rural and small metro communities even in the best of economic environments.

Availability of public transportation options in rural and Tribal areas is also generally very limited. Many existing transportation services are demand response programs where rides are scheduled and requested in advance. While this does provide a sense of ‘coverage’, it does not always provide a level of service that is suitable for regular ongoing transportation needs. In areas where even demand response service is not available, there may be limited service provided to specific populations like veterans, older adults, and disabled riders—leaving few or no options for the general travelling public outside of these demographics. In the most rural locations, transportation isolation has a major impact on the quality of life for existing residents, and seriously harms the competitive nature of these areas in improving the residential and business environments. Rural communities are often the source of many critical resources used by all including agricultural products, minerals, and

energy. Improving transportation resources and services available to rural communities will help to ensure that these critical products remain available at the level required to sustain or increase economic competitiveness of these areas.

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

Significant expansion of public transportation services in rural and Tribal areas is needed to enhance economic competitiveness. Current funding programs provided by FTA (section 5310 and 5311) that provide funding to public transportation systems in rural communities are typically inadequate to start up and/or maintain transit services and require 50% match for operating costs and 20% for capital investments. In these calculations, fares collected do not count toward the required matching funds, making access to available funding increasingly challenging. Multiple transportation providers and community leaders have shared with NADO staff that while FTA funding is available in many cases, generating enough match to access these funds is difficult or impossible.

Rural and Tribal communities also face significant safety challenges. USDOT FARS data from 2023 indicates that rural fatalities increased by 50% from 2014 to <sup>1</sup>[1](https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813728). It was also noted in this report that 31% of all vehicle miles travelled (VMT) were recorded in rural areas, while 41% of all traffic fatalities in 2023 occurred in rural locations.

To meet national goals related to safety and economic competitiveness, additional support is also needed to assess and inventory local transportation assets and their contribution to the status and performance of the overall transportation network. For example, many state and federal roadways are well inventoried with traffic data collection, pavement condition ratings, and other quantitative data that allows for advanced analysis that supports project planning and prioritization. Many local roadways (municipal, township, county) lack this data making it challenging for local officials to prioritize improvements that would benefit the overall performance of the network in their regions.

*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?*

Having a reliable, affordable mobility option such as transit improves rural and Tribal residents' ability to attend education and training or commute to job sites. This can result in businesses experiencing improved access to labor, leading to better economic outcomes for both the business and the worker. Reliable transportation options also benefit

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<sup>1</sup> <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813728>

economic competitiveness by increasing the residents' opportunity to access the goods and services offered within or near their region. Services like vanpool programs that serve employers (individually or in groups) and similar supporting services have been shown to provide positive benefits where they have been able to be sustained. Increasing opportunities to pilot tailored programs targeted to specific locations and conditions would be a benefit to many communities as they work to increase their overall economic competitiveness.

*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?*

As was introduced earlier, transportation project decision making is often based on observable physical condition of assets utilizing measures like pavement condition rating (PCR), or other measures of usage like vehicle miles traveled (VMT), annual average daily traffic (AADT), bridge condition ratings, and similar measures. Often this data is not collected or recorded for local infrastructure, making a complete assessment of network conditions challenging to create. Expansion of resources or programing to capture metrics like traffic could be critical in helping local governments prioritize maintenance and replacement needs. This could even be accomplished through the provision of resources to extend of state data capture programs and procedures that are already in existence and operation.

For safety, transportation practitioners are dependent on crash incident data provided by various local law enforcement agencies which can be inconsistent and incomplete. This tends to be more problematic in rural areas and impacts both assessing transportation safety needs and competing for funding with areas with more robust data. A lack of complete and/or accurate reporting does not equate to a lack of safety challenges. Providing clarity and flexibility in how rural safety needs are evaluated and how resources are allocated based on statistical data are priorities for rural areas.

Mechanisms for engaging local communities in planning for transportation projects vary greatly from state to state. Some states rely heavily on departments of transportation and their district offices to generate annual project schedules and communicate these project needs to local communities in an informational manner not necessarily rising to the level of coordination or consultation. Other states have taken a more proactive approach to this in creating and supporting Regional Transportation Planning Organizations (RTPOs), who focus on convening local officials and stakeholders in an effort to create an environment where communities have agency in the determination of transportation needs and the projects that may be conceptualized to address those needs. Information on how states engage with rural and small metro communities is available in past research from the NADO Research Foundation and in an upcoming NCHRP report (NCHRP 20-05/56-11) scheduled for publishing on April 20, 2026.

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

Many rural communities are well served by regional transportation planning organizations (RTPOs or RPOs) that serve as a convening venue for local officials to participate in regional and statewide transportation planning conversations. While there are over 300 such organizations in operation across the United States, the funding structures and matrix of responsibilities for these organizations varies greatly from state to state.

The involvement of RTPOs and their member local jurisdictions provides tremendous value to infrastructure planning and development. They inherently facilitate a much higher level of local and public engagement on transportation planning and projects. Regions and local jurisdictions are also formally responsible for land use planning, community and economic development, and law enforcement. The input resulting from these functions should play an intrinsic role in the development of our transportation infrastructure. Local governments also develop, build and maintain 74% of the Nation's transportation infrastructure including their local road networks. Coordination is vital between all levels of government so that the use of the infrastructure, regardless of federal, state or local ownership, is seamless to end users. Such coordination would be enhanced from a more prominent role for regional and local officials in transportation planning efforts. Providing RTPOs with resources to increase technical capacity to assist and support their member rural communities would greatly enhance local engagement and ultimately, the input that is factored into infrastructure development.

While some of these relationships are still nascent (especially between local communities and federal agencies directly), relationships with DOTs and other regional planning or development organizations seem robust. Navigating these relationships can be challenging as most entities engage only on the level of their jurisdiction and resource availability; for example, federal agencies like FHWA tend to only engage around federal aid route concerns and state DOTs tend to only engage around state route assets. A local official may not know or understand these resource distinctions and seek assistance from any willing partner who could possibly provide assistance.

Institutional relationships can increase engagement: for example, encouraging metro representation on RTPO boards (such as ex officio membership), rural representation on MPO boards, or relationships between RTPOs or MPOs and Tribal Nations.

Improving data systems for Tribes, such as reducing barriers for Tribal employees and leaders to access the National Tribal Transportation Facility Inventory and to manage their roadway inventory, would benefit more stakeholders than just Native Nations. Tribal, state, and RTPO practitioners alike have reported that having basic facility information more readily available would increase opportunities for coordination. Priority corridors and issues of concern are often shared across Tribes, RTPOs and the rural communities they

serve, as well as state and federal agencies. The 2024 National Tribal Transportation Facility Inventory showed county and local government ownership of more road miles in Tribal inventories than the combined amount owned by BIA and Tribes. States also own large amounts of roads and bridges on Tribal lands, and state routes often are significant corridors connecting Tribal communities to each other, to outside communities, and to job centers, services, and freight and logistics hubs.

## **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. (See <https://www.transportation.gov/rural> for more information on ROUTES activities.) What additional resources or direct technical assistance could ROUTES provide to support rural communities? Of the existing resources ROUTES provides, what is most useful?*

Ongoing and close technical assistance to communities has been especially impactful, as provided by programs like Thriving Communities. In our experience as a direct TA provider in multiple cohorts of this program, rural and Tribal communities often have transportation goals and objectives but are not well equipped to meet these goals on their own. Technical assistance has helped build the client communities' internal capacity to support future efforts while simultaneously introducing them to key concepts, data sources, and creating a network of partners they can connect with if they have questions in the future. This assistance has also allowed communities to compete for funding opportunities that would have otherwise gone unrealized. The technical assistance has facilitated access to programs like SS4A, Safe Routes to School, and HSIP by helping communities assess the scale of project needs, interpret grant language including NOFO's and related policy documentation, and facilitate relationships with agency representatives directly.

ROUTES and FHWA have cosponsored a series of rural safety peer exchanges beginning in 2024; in NADO's experience, these have been high quality events that bring together practitioners across states and a variety of disciplines in ways that spark actionable ideas. Ongoing emphasis and support for similar peer exchange opportunities, whether on safety or other pressing transportation issues, would be welcome among rural and Tribal transportation practitioners.

Self service toolkits and other resources are generally well received as they provide a measure of self sufficiency for small and rural communities in learning about important topics like grant applications, maximizing awards, and identifying funding opportunities. Additional offerings of toolkits and topics would be welcome, especially on topics like federal project administration, procurement, and related concepts. Maintaining examples of past projects and successful applications is also a valuable asset to communities

working to expand their knowledge in order to build capacity to submit more competitive applications.

*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)?*

Rural and Tribal communities face common challenges when applying for DOT grants. High minimum project amounts, challenging match rates, and pre-requisites like benefit cost analyses all create barriers for rural communities. Some local communities retain professional services to complete DOT grant applications, but those communities that cannot support these efforts in-house or afford third party professionals are often left on the outside when these opportunities arise.

Reimbursement style grants require grantees to cash flow awards while project work is ongoing. This could require bridge loans or other sources of liquid funding to address ongoing project costs that could put a strain on local resources, including credit. While this can be workable in many cases, any programmatic disruptions that would result in delays for reimbursement put the grantees at risk.

It is also difficult for rural communities to compete directly with larger communities that have greater resources to prepare their applications and offer greater local contributions to enhance their competitiveness. Rural set-asides or other mechanisms that ensure that smaller communities are not always in direct competition with larger communities will continue to be vital for rural inclusiveness in federal programs.

A major obstacle for project delivery after a federal award is the prevalent reliance on states to administer local projects. State DOTs are resource challenged and will naturally prioritize the delivery of their own projects. This can delay project grant agreements, environmental reviews, and other requirements that can significantly delay project delivery and jeopardize satisfying funding obligation timing requirements. Local governments also lose a certain level of control over a state-administered project including decisions to modify the scope or cost of their local project.

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

Supporting programs that allow for or provide technical assistance that is paired with sub-award funding that communities can use for early project development funding has been observed to be highly effective in programs like Thriving Communities. The technical assistance activities requested could be specific to transportation topics (data analysis,

best practices, concept exploration), but also general administrative topics like procurement, RFP development, and bidding. This two-part approach of targeted assistance builds capacity in communities to take on programs and projects, while the sub-award funding allows them to advance community needs into projects that can realistically be funded and delivered in the near term.

A more direct approach to transportation-related technical assistance through dedicated funding to RTPOs would provide a broader capacity to provide increased technical assistance to rural local jurisdictions including navigation through the federal aid process, both with discretionary grants and state-administered federal formula programs. This approach would maximize the RTPOs intimate familiarity with the infrastructure needs of their member communities and region and could assist in identifying funding opportunities to address those needs.

*4. How do the definitions of “rural” across DOT grant programs <sup>[11]</sup> reflect the reality of rural communities? How do these definitions influence the allocation of rural funding?*

There are multiple active and accepted definitions of ‘rural’ across federal programs, and within DOT. While all adhere to the core urban/rural framework utilized by the Census Bureau, programs like FTA, FRA, and SMART utilize a population threshold of 50,000; TIFIA utilizes 150,000; RAISE and INFRA utilize a value of 200,000. In many regions across the NADO membership, even a modest eligibility definition of rural as locations of 50,000 population or lower still creates a challenge of competition. For many NADO member organizations, a city of 50,000 would be a major population center at the relative scale of the region. Technical assistance that NADO has completed over the past several years has been completed in communities of less than 15,000 – often far less as they exhibit the greatest need for assistance. The functional difference in self-sufficiency and resource availability between a community of 50,000 and 5,000 is significant. A community of 50,000 could operate with a local budget that may afford professional staff including development, planning, and finance positions that can dedicate time, energy, and expertise to topics like fiscal administration, grant management, and reporting. A community of 5,000 (or less) is unlikely to have these professional positions, thereby diminishing their likelihood of accessing federal funding and programming without assistance from regional planning organizations or others. Protecting programs with specific rural set asides can have positive impact on ensuring that the most rural communities have an opportunity to benefit from DOT funding programs in an effort to enhance economic competitiveness.