



April 24, 2026

To: U.S. Department of Transportation

Re: Request for Information: Rural Opportunities to Use Transportation for Economic Success Initiative (DOT-OST-2026-0298-0001)

To whom it may concern:

The Association for Commuter Transportation (ACT) appreciates the opportunity to comment on the Rural Opportunities to Use Transportation for Economic Success (ROUTES) Initiative. ACT is the premier national organization representing Transportation Demand Management (TDM) professionals working to expand travel options and reduce single-occupancy vehicle travel across the United States. Our mission is to create an efficient multimodal transportation system and our vision is a better journey for everyone - including the 66 million Americans living in rural communities.

The term 'Transportation Demand Management' means the use of strategies to inform and encourage travelers to maximize the efficiency of a transportation system, leading to improved mobility, reduced congestion, and improved air quality. Key TDM strategies include vanpool and carpool, transit, commuter tax benefits, micromobility, behavior change incentives, and more.

Below are responses to the questions posted in the Request for Information.

Part A: Identifying Unmet Needs in Rural Transportation

1. What challenges and opportunities do rural areas face related to:
 - a. *Infrastructure Condition?* Rural transportation infrastructure is often aging and lacking key pathways to success by incorporating multimodal travel options. TDM presents an opportunity to reduce wear on rural infrastructure by shifting trips to shared modes or a variety of modes. Vanpool and carpool programs, for example, reduce vehicle miles traveled on rural roads, extending pavement life. Investing in better infrastructure for travel options, such as buses or bikes, can also shift travel off of aging roads. This is particularly important for roads serving heavy agricultural and freight traffic. ROUTES should highlight this demand-side benefit in its infrastructure policy guidance.
 - b. *Usage?* Forty-five percent of the country lacks access to reliable public transportation, and rural areas bear a disproportionate share of that gap. To make matters worse, the high cost of owning a personal vehicle often creates a barrier for people in rural communities. This results in the majority of zero-car counties being in rural areas. Rural TDM strategies, including vanpooling, carpooling, on-demand shuttles, and telework support, offer scalable, low-capital solutions to rural usage gaps. ROUTES should convey TDM

- programs as a tool for filling the gaps in travel for those without personal vehicles, providing valuable trips for residents to jobs, healthcare, town centers, and other necessary services.
- c. *Safety?* Despite comprising only 20 percent of the U.S. population, rural communities account for 60 percent of the nation’s traffic fatalities. TDM directly improves rural safety by reducing the total number of vehicle trips on rural roads. Every vanpool or carpool removes multiple single-occupancy vehicles from rural highways, reducing crash exposure. ROUTES should recognize trip reduction as a rural safety strategy, not merely a congestion tool.
 - d. *Technology?* Approximately 22.3 percent of rural Americans lack access to reliable high-speed internet, limiting the use of telework as a commute-reduction strategy and hindering the deployment of digital TDM tools such as rideshare matching platforms and real-time transit information. As rural broadband expands, TDM programs can capitalize on improved connectivity.
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?* Based on ACT’s research and member experience, the following are most critically needed in rural communities:
 - a. Operational TDM programs: Vanpooling, carpooling, bus service, telework availability, employer transportation benefits, and on-demand shuttle services are high-priority needs to give rural residents access to jobs and for rural businesses to broaden their talent pool.
 - b. Park-and-ride facilities and first/last-mile connections: These enable rural residents to access regional transit hubs and vanpool meetup points.
 - c. Pedestrian and bicycle infrastructure in rural town centers: Low-cost investments with significant safety and mobility benefits.
 3. *How could improved multimodal transportation better contribute to rural economic competitiveness? What industries are most in need?* Improved multimodal transportation is foundational to rural economic competitiveness. Research shows that every dollar invested in public transportation generates four dollars in economic return. A 2020 Minnesota DOT study found that rural transit generated approximately \$127.9 million in monetary benefits. Furthermore, longer commutes are directly correlated with reduced economic mobility for low-income families. Sixty-three percent of rural transit-dependent riders in Minnesota reported they believe they would lose their job without transit access. Connecting workers to employment is an economic development strategy.
 4. *What data has been used to inform rural transportation decision making, and what additional data would be helpful?* Rural transportation decisions have historically relied on vehicle count data, road condition inventories, and crash statistics. TDM program planning requires different data: information on where people work, what hours they travel, whether they have vehicle access, and what transportation options they would use if available. ROUTES could add significant value by supporting the development of a rural TDM data toolkit, including standardized data collection guidance, model survey instruments, and links to existing federal data sources, to help rural communities build the evidence base needed for grant applications and program evaluation.
 5. *How can rural communities better engage with Federal, Tribal, State, and regional entities to maintain and upgrade local transportation?* Rural communities frequently lack the staff capacity

and institutional relationships needed to effectively engage with federal, state, and regional transportation agencies. The most effective engagement models ACT's members have observed share several features:

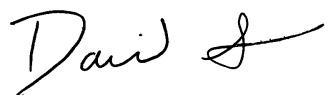
- a. Transportation Management Associations (TMAs) as regional intermediaries: TMAs can aggregate demand across multiple small rural jurisdictions, provide professional program administration, and create public and private partnerships.
- b. Regional planning organizations: MPOs and rural planning organizations (RPOs) are connectors between rural communities and federal resources. ROUTES should engage these entities directly as force multipliers for rural TDM outreach.

Part B: Addressing Unmet Needs Through DOT Grants and Resources

1. *What additional resources or direct technical assistance could ROUTES provide? Of existing resources, what is most useful?* The ROUTES program could benefit from providing information on TDM-specific funding pathways. The following additions would significantly enhance ROUTES' value to rural communities:
 - a. A rural TDM resource module: Model program templates for vanpooling, rideshare matching, employer TDM, and on-demand services, with specific guidance on FTA Section 5311, CMAQ, and STBG eligibility for operational TDM uses.
 - b. A rural TDM case study library: Documented examples of successful rural TDM programs - including program structure, funding sources, ridership, and outcomes - to help communities understand what is possible and how to replicate it.
 - c. Direct one-on-one technical assistance for rural TDM program development: Many rural communities need individualized help translating TDM concepts into fundable program proposals. ROUTES' existing technical assistance model could be extended to cover this need.
2. *What challenges do rural communities face when applying for and implementing DOT grants?* Challenges include limited grant writing capacity, difficulty meeting local match requirements, inability to demonstrate prior program performance, and lack of awareness of which programs allow TDM-eligible uses. Specifically defining TDM can assist in easing the application process. The following definition can be used: "The term 'transportation demand management' means the use of strategies to inform and encourage travelers to maximize the efficiency of a transportation system, leading to improved mobility, reduced congestion, and improved air quality, including strategies that use planning, programs, operations, policies, marketing, communications, incentives, pricing, data, and technology."
3. *What types of technical assistance would be effective for navigating the federal grant process?* To help rural communities navigate federal grants, assistance in finding grant opportunities for TDM programs or direct one-on-one technical assistance for rural TDM program development would be beneficial.
4. *How do the definitions of "rural" across DOT grant programs reflect the reality of rural communities? How do these definitions influence funding allocation?* ACT recommends that ROUTES advocate for greater consistency in rural definitions across DOT programs, or at minimum develop clear guidance to help applicants understand which definition applies to each program.

TDM is a practical, proven, and cost-effective tool for rural communities underserved by fixed-route transit and with large populations of car-less households. ACT urges ROUTES to formally recognize TDM as a core component of its mission and technical assistance portfolio, update its grant guidance to highlight TDM-eligible funding pathways, and develop dedicated resources to help rural communities design, fund, and operate TDM programs.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "David Straus". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Straus
ACT Executive Director