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January 27, 2020

The Honorable Joel Szabat  
Acting Under Secretary of Transportation for Policy  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

**RE: DHS Docket No. DOT-OST-2019-0167**

Dear Under Secretary Szabat:

Thank you for the opportunity to provide public comment on the *Request for Information: Rural Opportunities to Use Transportation for Economic Success (ROUTES)*. To help the Department of Transportation (DOT) identify unmet needs in rural transportation infrastructure and difficulties accessing federal resources, I consulted local transportation experts and stakeholders who similarly understand the unique challenges we face in our Michigan communities. Please consider the following information as DOT works to address the unique needs of our rural roadways.

Michigan's First Congressional District, which is comprised of the Upper Peninsula and northern Lower Michigan, features not only rural communities, but truly remote areas. This coupled with harsh seasonal weather and difficult terrain presents unique transportation infrastructure challenges. Roads with structural distress can cost significantly more money to maintain, yet much of Michigan's more than 120 thousand miles of roads are in need of maintenance and repair. According to a 2018 report produced by the Michigan Transportation Asset Management Council titled "Michigan's 2018 Roads & Bridges Report," 41 percent of Michigan's federal aid-eligible roads and 53 percent of its paved non-federal aid roads are in "poor" condition, which indicates significant structural distress.

Federal aid plays an important role in supporting rural Michigan roads, but the red tape associated with these resources limits their impact, especially for smaller entities like county governments applying for and receiving funds. Approximately 92 percent of Michigan roads are owned by counties or other localities, according to the Michigan Department of Transportation (MDOT). There is a long list of testing, documentation, and other requirements needed to obtain and use federal aid for an eligible road. Such requirements preclude local governments, which

may not have the manpower, time, or financial resources to complete them, especially in the Upper Peninsula, where a declining population of only 300,000 people rely on the upkeep of many miles of roads.

In order to bypass aspects of the federal aid requirements considered duplicative or burdensome, it is common for Michigan counties to swap federal dollars at an initial loss in exchange for money without federal conditions. In fact, these exchanges can present net savings for counties due to the high cost of reviews and documentation stipulated by federal aid. The up-front costs and matching requirements associated with some federal aid programs even necessitate county governments to take out loans in order to utilize these funds. A reliable source of funds with more streamlined regulatory requirements is needed to improve the state of rural transportation infrastructure.

Rural roads in Michigan's First District should not be disadvantaged in any federal funding formulas or decisions. Our transportation infrastructure not only supports our local way of life, but these roads also play a key role for the federal government by serving large national forests and parks, supporting small businesses, and connecting Michigan's agricultural, mining, timber, and other hardworking industries with the world. In order to improve rural transportation infrastructure in Michigan and across the nation, DOT should consider ways to simplify and streamline burdensome requirements on aid recipients in rural and remote areas. Thank you for your attention to these issues facing rural Michigan. Please do not hesitate to reach out to my office if we can further support the ROUTES initiative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jack Bergman", with a long horizontal flourish extending to the right.

Jack Bergman  
Member of Congress