BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF THE UNDER SECRETARY OF TRANSPORTATION FOR POLICY

America's Great Corridors of Commerce
Request for Information
Docket No. DOT-OST-2026-3269

COMMENTS OF THE ALLIANCE FOR INNOVATION AND INFRASTRUCTURE

The Alliance for Innovation and Infrastructure (Aii) respectfully submits these comments in response to the U.S. Department of Transportation's Request for Information on America's Great Corridors of Commerce (AGCC), published on August 18, 2026, and republished with an extended comment period on September 11, 2026. 91 FR 53479; 91 FR 57959. Aii is an independent, national research and educational organization dedicated to advancing innovation across industry and public policy to improve the safety, efficiency, and resilience of America's infrastructure.

Aii congratulates and supports the Department's efforts to draw more economic and infrastructure value out of existing transportation rights-of-way. Highway and rail corridors are valuable and substantial national assets. Where technically and legally feasible, those corridors can carry additional capacity for energy, communications, water, and other linear infrastructure. This avoids duplicative land acquisition, supports coordinated development, and can generate new revenue for the transportation owner, creating a win-win solution.

The opportunity is broader than placing utilities alongside transportation facilities. Designed well, AGCC could become a repeatable model for developing transportation, power, communications, water, and industrial capacity together on corridors where joint development costs less than separate development. Aii therefore recommends that the Department proceed with AGCC while preserving flexibility in three respects.

First, the program should remain modal and technologically flexible. DOT should consider whether other transportation rights-of-way, particularly transit and other appropriate surface transportation assets, can also participate where doing so is compatible with their primary transportation purpose.

Second, AGCC should be market-driven. Federal coordination can reduce development, permitting, and financing risks, but it cannot create sustainable commercial demand. Initial corridors should demonstrate credible demand, ROW-owner commitment, technical feasibility, and a reasonable path to financial close.

Third, the federal government should focus on the risks it can best address, such as fragmented federal decision-making, permitting uncertainty, inconsistent processes, federal financing coordination, and cross-jurisdictional complexity. The federal government may be best positioned to act as a convener, unifier, and champion of commerce. By enabling the safe and efficient movement of people, goods, energy, and information, the federal government creates the conditions for commerce to expand. With those principles in mind, Aii respectfully offers the following individual responses to the Department's questions.

I. Deployment Challenges and Barriers

Engineering is not the principal challenge confronting AGCC. The more complex undertaking involves managing demand, development, regulatory, and financial risks concurrently. The Federal Government can help States mitigate several of these challenges. Existing transportation rights-of-way (ROW) can reduce the difficulty and expense of assembling new linear corridors. Coordinated environmental reviews can enhance schedule certainty. Federal credit and financing programs can decrease capital costs for qualifying investments. Standardized agreements and technical guidance can minimize transaction costs.

Government cannot substitute for a bankable customer. For the initial AGCC corridors, DOT should therefore give significant weight to demonstrated, creditworthy demand. Applicants should provide credible evidence of market demand, name anchor utilities, offtakes, industrial users, data center or manufacturing clusters, or other credible revenue sources or independent market analysis sufficient to support the proposed investment. Federal financing should complement market validation rather than replacing it entirely.

Evidence sufficient to support a designation decision may take several forms, including executed memoranda of understanding, letters of intent, capacity reservations, or independent market studies prepared for financing purposes. Aii recommends that the Department identify the categories of evidence it will accept, while declining to prescribe a single instrument or a uniform minimum contracted capacity.

The Department should also consider stating plainly that it will decline, defer, or discontinue corridors that do not satisfy these tests. A designation process without a backstop conveys the wrong market signal.

DOT should give greater weight to financially meaningful commitments as projects advance while avoiding uniform requirements for minimum contracted capacity, which may not translate across different infrastructure sectors.

Aii also recommends that AGCC remain **technology neutral**. Underground infrastructure earns its cost where ROW is constrained, or where resilience, safety, land-use, or community considerations justify the added expense. Elsewhere, above-ground construction may be cheaper, and many corridors will be best served by a hybrid of the two.

DOT should therefore evaluate underground, above-ground, and hybrid alternatives based on **risk-adjusted lifecycle cost, safety, operational compatibility, resilience, and commercial feasibility**, rather than by a standing preference for any single configuration.

The Department should also avoid assuming that an existing right-of-way is inherently simpler to develop than a new one. Legacy corridors frequently contain utilities installed over many decades, drainage systems, structures, environmental features, access restrictions, and capacity that the transportation owner has reserved for future widening, interchange modification, or rail expansion. Records of subsurface occupancy are often incomplete. In some corridors, these conditions will make colocation more difficult and more expensive than construction on open ground.

Aii therefore recommends that the Department screen crowded legacy corridors and comparatively open corridors under different assumptions, and that early subsurface investigation and utility records research be treated as a standard element of corridor readiness rather than a later design task. This is a matter of accurate expectations. The program will lose credibility quickly if corridors are designated on the premise that an existing right-of-way is available and that premise fails during construction.

Aii also believes that the AGCC should integrate infrastructure resilience strategies from the beginning. Incorporating distributed fiber optic sensing (DFOS) and other technologies during initial construction can improve damage prevention and provide valuable data for maintenance and safety. Coordination through shared conduits and infrastructure can help spread costs and improve resilience. It is recommended to include state or regional facility notification centers (811 centers) as relevant stakeholders and, in another setting, to eliminate governmental exemptions from the One-Call System.

AGCC presents an opportunity to establish strong damage-prevention practices from the outset. Designated corridors should require accurate digital records of existing facilities and standardized, regularly updated records for newly installed infrastructure. These records should be integrated, where appropriate, with state record systems and maintained in formats that support future construction, maintenance, and emergency response. Building reliable asset information from the beginning can prevent excavation damage while avoiding fragmented and incomplete records that complicate work in many existing ROW.

State Legal Authority to Host and Monetize Utility Occupancy

The most significant barrier in this proceeding may be neither technical nor financial. Several State departments of transportation have advised the Department that their existing statutory authority does not currently accommodate long-term leasing, concession, or revenue-sharing structures that AGCC contemplates, and that State legislative action may be required before a corridor of this kind could proceed. Federal coordination cannot cure that condition, and Federal designation alone cannot create a State law power that the right-of-way owner does not hold.

Aii recommends three responses:

1. The Department should publish model State enabling language addressing authority to grant longitudinal occupancy of transportation right-of-way for non-transportation purposes, authority to retain and apply resulting revenue to transportation purposes, relocation and reversion obligations, and the reservation of capacity for future transportation needs.
2. The Department should treat demonstrated or pending State authority as an element of corridor readiness rather than assuming that designation confers capability.
3. The Department should allow corridors whose sponsors are actively pursuing enabling authority to receive early-stage technical assistance, so that States are not required to legislate before they know whether a corridor is viable.

This approach is consistent with a limited federal role. It asks the Department to supply drafting resources and predictability rather than to preempt State property law.

II. Cross-Jurisdictional Projects

Multistate corridors may offer AGCC's greatest benefits but may also add institutional complexity. A single physical corridor may cross several State DOTs, utility commissions and service territories, procurement and P3 regimes, tax structures, and differing environmental and utility-accommodation policies.

Aii recommends that DOT use AGCC designation and access to federal assistance as incentives for participating jurisdictions to establish a **corridor-level governance agreement** before projects advance to final designation or procurement.

Such agreements should address, as appropriate:

- lead-jurisdiction responsibilities;
- common technical standards;
- coordinated permitting schedules;
- cost and revenue allocation;
- liability and indemnification;
- future transportation expansion and utility relocation;
- change-control procedures;
- dispute resolution; and
- the interface between participating governments and the Corridor Manager.

The objective should be a fully coordinated commercial structure and decision process for the corridor, with jurisdiction-specific annexes where applicable law requires them. By developing model frameworks and common technical, commercial, and procedural standards wherever practical, standardization can help reduce transaction costs, limit regulatory fragmentation, and accelerate project delivery.

Model multistate governance agreements or memoranda of understanding that participating jurisdictions can adapt to state law may be an effective path forward. Participating jurisdictions should also confirm that they hold the statutory authority necessary for the instrument they select and should determine whether that instrument implicates the Compact Clause of Article I, Section 10. Separately, and as a distinct question, sponsors should assess the availability of federal permitting mechanisms, including Title 41 of the FAST Act, which Section IV addresses.[1,2]

Broad federal preemption should not be the first tool. Conditioning federal support on coordinated State processes is more practical. Jurisdictions seeking AGCC designation, priority federal coordination, or federal financing should show that their processes are coordinated enough to support the project.

[1] https://constitution.congress.gov/browse/essay/artI-S10-C3-3-1/ALDE_00013531/
[2] https://uscode.house.gov/view.xhtml?edition=2023&num=0&req=granuleid%3AUSC-2023-title42-section4370m-3

III. Public-Private Partnerships and the Corridor Manager

Aii supports the Department's consideration of flexible public-private partnership structures and particularly the proposed Corridor Manager concept.

AGCC projects require capabilities in areas beyond construction. Depending upon the project, a Corridor Manager may need to handle commercial origination, engineering, permitting, financing, and construction, and then manage utility coordination, tenants, operations, maintenance, and financial administration over the life of the corridor.

DOT should not prescribe a single P3 model. Risk allocation should reflect the corridor's characteristics, participating utilities, transportation owner, applicable law, and available revenue sources. The Department should also permit **private-sector origination**. Developers, utilities, investors, railroads, and technology companies may identify commercially viable opportunities before a State or other ROW owner does. Limiting initial proposals to ROW owners would cut off that source of projects.

Aii recommends allowing developer-, utility-, and consortium-originated expressions of interest, while requiring the affected ROW owner's concurrence before formal designation.

Private origination also raises legitimate procurement issues. States and DOT should protect competition and the public interest without eliminating the incentive for private entities to invest in project development. DOT should therefore consider best practices for unsolicited proposals, competitive challenge procedures, development-cost reimbursement, intellectual-property protection, development agreements, exclusivity periods where lawful, and transparent procurement.

Existing P3 programs provide useful models for privately originated projects. DOT should encourage procedures that permit unsolicited concepts while preserving competition through public notice and a meaningful opportunity for competing proposals.

For example, Virginia's Public-Private Transportation Act, Va. Code § 33.2-1800 et seq., provides a well-established framework. That State permits private entities to submit unsolicited proposals for qualifying facilities, requires public notice and a period of at least 120 days during which competing proposals may be submitted, authorizes review fees to defray the public entity's evaluation costs, and conditions advancement on a finding of public interest. Several other States maintain comparable procedures.

In other words, the Department does not need to create a new unsolicited proposal regime. It needs to identify the State frameworks that already function, and to clarify how federal coordination and financing will align with them.

AGCC should also be framed as an opportunity for transportation owners rather than an expectation. State departments of transportation and railroads are, for example, prospective commercial partners with a direct interest in the performance of the corridor. The Department should preserve right-of-way owners' ability to negotiate lease, concession, and revenue-sharing terms that produce a positive return applied to transportation purposes, while retaining control of the right-of-way and the primacy of its transportation function.

IV. Federal Technical Assistance

Aii recommends defining federal technical assistance more broadly than environmental review alone. Each designated AGCC corridor should have a **single senior federal project lead** responsible for coordinating the relevant federal agencies and programs.

Federal assistance should include:

- an integrated federal permitting plan;
- early environmental scoping;
- identification of lead and cooperating agencies;
- concurrent reviews where legally permissible;
- agreed information requirements and target decision dates;
- an escalation mechanism for unresolved interagency issues;
- coordinated assessment of applicable DOT, DOE, EPA, and other federal financing programs;
- model corridor and ROW agreements;
- model multistate coordination agreements;
- common standards for digital mapping, asset records, and data maintenance;
- common technical guidance; and
- appropriate market-sounding assistance.

Government may not be able to guarantee that a permit will be granted, but it can make the process far more predictable. For private investors, reducing ambiguity by knowing who decides, what information is required, and when a decision will come significantly reducea project risk.

AGCC should seek to utilize existing federal project delivery mechanisms rather than recreating yet another process. Where applicable, projects should make use of FAST-41, the Federal Permitting Dashboard, and existing DOT and Permitting Council resources for coordination.[3] Individual components of corridor projects may fall under different permitting regimes, so an AGCC federal project lead can identify appropriate mechanisms for each project and coordinate through a unified permitting plan.

The Department should be precise about which mechanism applies to which element of an AGCC corridor, because the available tools are not interchangeable and may not overlap. Coverage under Title 41 of the FAST Act requires that a project fall within a designated sector, be subject to review under the National Environmental Policy Act, involve a total investment likely to exceed $200 million, and not have all of its required authorization and environmental-review processes qualify as abbreviated under applicable law. FAST-41 also provides other eligibility pathways, including a discretionary pathway for projects whose size and complexity make them likely to benefit from enhanced federal coordination. FAST-41 separately excludes any project subject to 23 U.S.C. 139.

Two consequences follow. AGCC-related projects involving infrastructure within designated FAST-41 sectors, including electricity transmission, broadband, pipelines, manufacturing, semiconductors, and data storage and data management, may qualify under FAST-41's standard

[3] https://www.permitting.gov/projects/eligibility

pathway where they are subject to NEPA, meet the investment threshold and, under current federal guidance, do not have all of their authorizations and environmental-review processes qualify as abbreviated. Transportation components subject to 23 U.S.C. § 139 are expressly excluded from FAST-41 and instead proceed under the applicable Title 23 process. The FAST Act's savings clause also generally excludes programs administered by DOT or its operating administrations under Titles 23, 46, or 49, subject to its specified exceptions.

More significantly, this RFI anticipates that AGCC projects will frequently qualify for one or more categorical exclusions. Application of an applicable categorical exclusion is treated as an abbreviated environmental review for FAST-41 purposes where no extraordinary circumstances require preparation of an EA or EIS, but its use does not by itself make the entire project ineligible; current guidance excludes a project on that ground only when all of its authorizations and all of its environmental-review processes are abbreviated. These mechanisms may apply differently to separate components of an AGCC corridor and should not be treated as interchangeable.

Aii does not raise this as an objection. Both mechanisms have value. Aii recommends that the Department publish, as part of its technical assistance materials, a short decision framework showing which element of a representative corridor proceeds under which authority, and that the federal project lead apply that framework at the outset of each designated corridor. Sponsors and their lenders need to know which process governs before they commit development capital.

V. AGCC Designation Process

Aii generally supports the factors identified by DOT, including market demand, corridor readiness, financial feasibility, stakeholder support, State and local commitments, and regional significance. The Department should, however, distinguish between **threshold requirements and comparative policy preferences**.

Aii recommends a stage-gate process. Before receiving full designation, a candidate should demonstrate:

1. **Market demand:** credible anchor customers, offtakers, or demand clusters.
2. **ROW-owner commitment:** willingness and legal ability to accommodate the proposed project.
3. **Technical feasibility:** compatibility with existing and reasonably foreseeable transportation requirements.
4. **Commercial and financial feasibility:** a credible revenue model, risk allocation, and capital plan.
5. **Institutional readiness:** adequate governance and coordination for multijurisdictional projects.

Projects satisfying those threshold conditions can then be evaluated on regional significance, resilience, economic-development benefits, national-security considerations, and other policy objectives.

Aii recommends adding legal authority to that list. A sponsor should demonstrate that the right-of-way owner holds, or has a credible path to obtaining, the State law authority required for the

transaction contemplated. Corridors that depend on pending legislation can still receive early technical assistance, but the Department should not treat the question as resolved by designation.

DOT should also avoid treating **corridor length as a proxy for value**. A shorter corridor connecting generation, major industrial demand, transportation infrastructure, and developable land may be worth more, and be far easier to finance, than a much longer corridor resting mainly on anticipated future demand.

Aii also recommends considering a two-stage designation:

Development Designation: providing federal coordination and technical assistance to promising concepts.

Full AGCC Designation: provided after specified commercial, technical, and institutional milestones are met.

This would permit DOT to assist promising projects while avoiding premature commitment of limited federal resources.

Finally, AGCC should be built as a durable platform rather than as a series of individual transactions. Private capital underwriting a concession of 30 to 50 years prices in uncertainty about the rules as surely as it prices uncertainty about demand. The Department should therefore publish its designation criteria, evaluation methodology, model agreements, and technical standards, and should apply them consistently, so that later corridors are evaluated against the same framework as the first. Predictability of this kind costs the Department very little and materially lowers the cost of capital for every corridor that follows.

VI. Infrastructure Deployment and Economic Development

AGCC can speed infrastructure development relative to traditional greenfield projects because it addresses the hardest part of building linear infrastructure: assembling and permitting a new corridor.

The economic-development value of AGCC extends well beyond avoided ROW acquisition. **Transportation access, reliable power, high-capacity communications, water where needed, and developable land** increasingly determine where major private investment can occur.

This is particularly relevant to data centers and artificial intelligence infrastructure, advanced manufacturing, semiconductor production, logistics, defense-industrial facilities, and other energy- and infrastructure-intensive industries.

In Santa Clara, California, two completed data center developments representing approximately 100 MW of design capacity remain unenergized while the municipal utility carries out system upgrades scheduled for completion in 2028. The utility reports that data centers account for

roughly 60 percent of its energy sales against a system peak of 746 MW.[4,5] Similar transmission constraints have delayed planned data-center connections by several years elsewhere in the country.[6]

AGCC could therefore build transportation corridors to sites ready for large industrial investment. DOT should consider this when selecting corridors. The question is where coordinated investment would permit private activity that infrastructure limits now prevent, and not only where utility service is short today.

This does not justify speculative overbuilding. AGCC should facilitate infrastructure where credible demand exists or can reasonably be demonstrated, not shift speculative commercial risk to taxpayers or utility ratepayers.

Corridor readiness is also not the same as site readiness. A corridor may clear federal review and still sit beside parcels that remain subject to local platting, zoning, drainage, water, and utility connection approvals. The Department should encourage designated corridors to engage counties and municipalities early and should avoid representing that federal designation by itself delivers development-ready land.

VII. Utility Ratepayer Affordability

AGCC can support utility affordability, but infrastructure colocation does not inherently reduce rates. Projects should therefore follow clear shared-benefit and cost-causation principles. Transparency over costs and benefits will be essential in maintaining public confidence in the program.

Potential savings arise from several sources:

- avoided or reduced ROW acquisition;
- shared civil works;
- coordinated environmental review and permitting;
- shorter development schedules;
- reduced uncertainty and associated risk premiums;
- economies of scale;
- greater competition; and
- sharing common corridor infrastructure among multiple users.

The appropriate metric is therefore **risk-adjusted lifecycle delivered cost**, not initial construction cost alone.

A “dig once” approach offers benefits beyond shared trenching and building in with excess capacity. Some of the greatest long-term savings will come from avoiding repeated excavation

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[4] https://santaclara.legistar.com/View.ashx?GUID=b151d18b-4e0e-44dc-b1a1-4adcc60e4ae1&ID=172291&M=AO&N=U3VwcGxlbWVudGFsIE1hdGVyaWFsIC0gUmVzcG9uc2UgdG8gQ291bmNpbCBRdWVzdGlvbnMgSmFudWFyeSAyNywgMjAyNg%3D%3D

[5] https://www.siliconvalleypower.com/svp-and-community/about-svp/utility-fact-sheet?navid=1

[6] https://www.datacenterdynamics.com/en/news/dominion-to-resume-connecting-new-loudoun-data-centers-but-capacity-still-limited/

and development as future infrastructure needs change. Coordination and effective communication will be essential. A true "dig once" strategy also requires knowing what was installed, where it was installed, and what capacity remains available for future use.

DOT should, however, distinguish between **future-proofing a corridor and speculative overbuilding**. Where practical, corridors can reserve physical space or be engineered for future expansion (such as through conduit) while capital deployment is staged to contracted or reasonably demonstrable demand. Current utility customers should not be required to finance excessive capacity principally in anticipation of customers who may or may not materialize years later.

State utility commissions and other economic regulators should be engaged early when regulated utility revenues are expected to support a corridor. Regulatory treatment of lease payments, shared infrastructure, utilization risk, and related costs can materially affect project bankability. Costs directly attributable to a particular user should follow that user, while costs of sufficiently shared infrastructure should be allocated according to expected benefits. Speculative risk should not be shifted to existing utility customers or taxpayers.

Aii recommends that the Department articulate four principles for corridors in which regulated utility revenues are expected to participate.

First, cost causation should govern. Costs incurred to serve an identifiable user or entity should be assigned to that user. Second, allocate genuinely shared facilities according to expected benefit, using a method disclosed at the outset rather than negotiated after construction. Third, utilization risk should rest with the party best able to control or absorb it; where a Corridor Manager or an anchor customer determines the pace of take-up, that party should bear the consequences of slower take-up. Fourth, capacity built in advance of demand should be funded by the party seeking the option, through reservation payments or comparable instruments, rather than be absorbed by ratepayers.

These principles do not resolve any particular rate proceeding. They give State commissions, corridor sponsors, and lenders a common starting point, which is what a federal program can usefully supply.

VIII. Eligible Transportation Rights-of-Way and Infrastructure

Aii recommends that DOT use the initial AGCC process to examine whether the program's eligible transportation asset base should ultimately extend beyond the highway and railroad ROW emphasized in the RFI.

In particular, **transit rights-of-way warrant consideration**. Transit agencies control substantial linear property in major metropolitan regions where new utility ROW can be especially difficult and expensive to obtain. Certain transit corridors may provide opportunities for compatible communications, power, water, or other infrastructure.

Existing federal policy provides some precedent for this approach. The Federal Transit Administration permits certain compatible "incidental use" of federally assisted transit property,

including leases of rights above or below transit facilities and use of spare utility capacity.[7] Additionally, its joint-development framework permits broader private development where statutory transit-benefit, revenue, and control requirements are satisfied.[8] DOT should examine how these existing authorities could accommodate AGCC-type projects.

Aii offers this recommendation with a clear boundary. Some of what is contemplated appears achievable within existing administrative authority. Incidental use of federally assisted transit property is permitted where the transit purpose and the grantee's continuing control are preserved, and joint development is available where the statutory transit benefit, revenue, and control requirements are satisfied. Other elements may not be. An arrangement that would impair satisfactory continuing control, alter the federal interest in grant funded property, or extend beyond the scope of those authorities would require action by the Federal Transit Administration or by Congress rather than by the Department alone.

Aii does not ask the Department to resolve that boundary in response to this RFI. Aii recommends instead that the interagency task force publish, within its first year, a determination identifying which categories of utility colocation on transit and other federally assisted transportation property are available under existing authority and which would require further action. That determination would be a concrete and inexpensive contribution, and it would allow transit agencies to evaluate participation on an informed basis.

Transit accommodation will not be appropriate everywhere. Passenger safety, transit operations, system security, emergency access, future capacity, maintenance requirements, and applicable federal and State law must remain controlling considerations.

The same principle should apply to other transportation assets, potentially including **ports, intermodal facilities, and other strategically situated surface transportation property**.

DOT should not presume that every transportation corridor should become a utility corridor. Nor should it presume that every AGCC should contain every infrastructure category.

Instead, the program should permit compatible infrastructure where the transportation owner, market, engineering, safety, and economics support it.

That principle also counsels against establishing a closed list of eligible infrastructure. Power, communications, and water are the obvious applications. Other compatible linear infrastructure may emerge as technology, energy markets, industrial demand, and transportation systems evolve.

[7] https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf
[8] https://www.transit.dot.gov/funding/funding-finance-resources/joint-development/joint-development-frequently-asked-questions

IX. Conclusion

Aii supports America's Great Corridors of Commerce as a potentially important innovation in the development and stewardship of America's infrastructure.

Its value is not in any particular utility, construction method, or financing program. Rather, Aii believes it is in creating a repeatable recipe for bringing together transportation owners, utilities, developers, investors, regulators, and federal agencies around projects that cost less to deliver as one coordinated corridor than as separate undertakings.

Aii therefore recommends that DOT apply several principles as the initiative moves forward:

1. **Preserve modal and technological flexibility.**
   Highway and rail ROW are appropriate starting points, but other transportation assets, including transit, should be considered where conditions support compatible use.

2. **Allow the market to originate opportunities.**
   Developers, utilities, and consortia should be able to bring concepts forward, subject to ROW-owner concurrence and appropriate procurement safeguards.

3. **Make demonstrated demand a threshold consideration.**
   Federal coordination and financing can improve viable projects but cannot replace creditworthy customers.

4. **Use federal authority to create predictability.**
   Coordinated permitting, federal financing assistance, model agreements, common standards, and effective escalation can reduce development uncertainty.

5. **Address multijurisdictional governance before procurement.**
   A multistate corridor requires a coherent commercial and decision-making structure.

6. **Protect transportation's primary purpose.**
   Utility accommodation must remain compatible with safety, operations, maintenance, resilience, and reasonably foreseeable transportation expansion.

7. **Measure affordability and value over the lifecycle.**
   The preferred solution should deliver the strongest risk-adjusted economic result, not necessarily the lowest initial construction cost.

8. **Treat corridors as potential economic-development assets.**
   Where transportation, energy, communications, water, and industrial demand converge, AGCC can do more than accommodate utilities; it can help make whole regions ready for private investment.

9. **Confirm legal authority before designation.**
   Federal coordination cannot make up for the absence of an authority a State law does not provide to the right-of-way owner. Where enabling legislation is required, strongly consider the delay and probability of success.

The Nation's transportation rights-of-way are valuable assets. Thoughtfully managed, some can support substantially more infrastructure and economic activity without compromising their transportation mission.

Aii appreciates the opportunity to comment and looks forward to working with the Department and other stakeholders as the AGCC initiative develops.

Respectfully submitted,

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