

January XX, 2014

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE, W12-140
Washington, D.C. 20590-0001

RE: Federal Highway Administration (FHWA), [Docket No. FHWA-2013-0050]; Designation of the Primary Freight Network

Dear Sir or Madam,

On behalf of the undersigned major Metropolitan Planning Organizations (MPOs), we appreciate the opportunity to comment in response to the U.S. Department of Transportation's (U.S. DOT) draft initial designation of the highway Primary Freight Network (PFN), published in the Federal Register on November 19, 2013.

Our metropolitan regions serve as critical trade gateways and key nodes in the national distribution of freight with the physical capacity, including extensive warehousing and logistics centers, to handle large freight volumes and the ability to seamlessly transfer shipments between modes. Together, XX tons of freight valued at over \$XX billion traverse our regions annually to serve the national freight system. Planning for freight movement is a critical issue in our regions and we have taken a great interest in the designation of the PFN as a result.

As requested in the Federal Register, we are submitting our comments pertaining to the following key aspects of the National Freight Network (NFN):

- Specific Route Modifications to the Highway Primary Freight Network
- Methodology for Achieving a 27,000-Mile Final Designation
- How the National Freight Network May Fit into a Multimodal National Freight System
- Suggestions for an Urban Area Route Designation Process
- How the National Freight Network and Components Could Be Used in the Future.

Detailed comments are provided below for each of these areas. We recognize that the PFN will continue to evolve beyond MAP-21 with future opportunities for the designation of routes and potentially corridors. As such, we thank you for this opportunity to provide early input and to collaborate in this very important process.

Specific Route Modifications to the Highway Primary Freight Network

We appreciate the detailed work conducted by FHWA. We recognize the difficulties in identifying a highway network representative of the most critical national freight routes, particularly given the challenges in designating a highway PFN under the criteria identified by Congress and the imposed cap of 27,000 centerline miles of roadway. In addition, as acknowledged by FHWA and stated in the Federal Register, the currently available national data do not fully capture the complexity of freight

movement in metropolitan regions. We recommend that FHWA work directly with MPOs to overcome the known limitations in the national databases by leveraging local knowledge about freight routes and goods movement.

It is imperative to capture the many “first and last mile” connections serving freight facilities in our metropolitan regions, including seaports, airports, intermodal yards, and land ports of entry. A functioning freight network must include critical freight intermodal connectors that link to the national highway system and handle large volumes of trucks moving between terminals and transferring shipments between modes.

Methodology for Achieving a 27,000-Mile Final Designation

We concur with FHWA’s assessment that each of the factors defined by Congress yields different networks. We understand that the aggregation of multiple factors results in a network coverage with numerous gaps and some illogical segments. Despite FHWA’s best efforts to employ a technically objective methodology, we believe that the resulting national network coverage will necessarily have shortcomings given the criteria and mileage constraints if only technical factors were applied. As such, we urge FHWA to continue soliciting input and collaborating with major metropolitan regions to help prioritize the miles for final PFN designation.

Local knowledge of actual use on the highway system is critical to help FHWA prioritize the final PFN. MPOs and their local stakeholders are closest to the daily impacts from goods movement and understand the complexities of how multiple routes are used to serve the national freight system. We believe that the limitations in national data and the resulting gaps require FHWA to use a bottom-up process to define the final PFN.

How the National Freight Network May Fit into a Multimodal National Freight System

We support efforts to expand the PFN and more broadly designate a multimodal network. Although we understand that statute currently limits the highway PFN to 27,000 centerline miles, we suggest starting with the FHWA’s initial 41,518 centerline mile highway network to develop a more comprehensive, multimodal freight network that encompasses highways, key arterials, freight rail, navigable waterways, inland ports, seaports, land ports of entry, freight intermodal connectors, and airports. A highway focused PFN misses the intricacies of how multiple modes are used in the distribution of freight, particularly in metropolitan regions where high volumes of transfers between modes often occur to service the national system.

Further, we are very supportive of FHWA’s suggestions for a more comprehensive corridor-based approach to the PFN to allow for the designation of multiple parallel routes in each region. A corridor-based approach would provide an opportunity to encompass adjacent rail lines, intermodal facilities, as well as critical local arterial routes. This also allows for redundancies to ensure the continuous movement of goods.

Suggestions for an Urban Area Route Designation Process

We support establishing a formalized process for designating critical urban freight routes, including first and last mile critical intermodal connectors. We believe that MPOs and their local stakeholders are best positioned to identify and prioritize these routes. We strongly recommend establishing a formalized process to ensure that MPOs and their local stakeholders, representing major gateways and trade hubs, are consulted with in addition to State Departments of Transportation (State DOTs)

in designating critical urban freight routes. A formalized process for MPOs also encourages urbanized areas to develop metropolitan freight plans and to assess freight bottleneck locations and chokepoints as part of the designation process.

How the National Freight Network and Components Could Be Used in the Future

Moving Ahead for Progress in the 21st Century (MAP-21) identifies for the first time a national interest in freight. The PFN designation process serves as a major step in recognizing a national priority network for investment. However, the value of the PFN is limited without dedicated resources to address freight needs. With the future designation of a more broadly defined multimodal network, we recommend that dedicated funding be made available to support freight projects included in an approved Regional Transportation Plan or Transportation Improvement Program. These projects should be prioritized on the basis of demonstrable contribution to the performance and efficiency of the PFN and NFN, as well as to mitigate adverse freight movement impacts on surrounding communities.

Although MAP-21 provides modest funding, subject to appropriation, for the Projects of National and Regional Significance (PNRS), the PNRS program should be expanded to provide funding support to a more robust, multimodal PFN. An expanded PNRS program should build on considerable past efforts, including the freight corridor designations and funding program established under the previous federal transportation authorization, SAFETEA-LU.

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We hope that these comments will help FHWA designate a national PFN and look forward to continuing collaboration between the federal government and metropolitan regions that serve as critical freight gateways and trade hubs.

Sincerely,