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

Re: Docket No. FHWA-2013-0050

To Whom It May Concern:

The Chicago Metropolitan Agency for Planning (CMAP) appreciates this opportunity to comment on the draft Primary Freight Network element of the National Freight Network (NFN), as published in the Federal Register on November 19, 2013. Goods movement is of critical importance to northeastern Illinois, which is home to seven Interstate highways, six of the seven Class I railroads, the only direct link to the Mississippi River and Great Lakes waterways, and the second busiest U.S. air cargo gateway as measured by value of shipments.

The U.S. DOT has requested comments on numerous aspects of the draft Primary Freight Network (PFN). CMAP has published three guiding principles for the Primary Freight Network, which are presented under the "Policy Comments" below. These principles offer both a critique of the draft PFN and suggestions for improvement. Based on these principles, this letter next offers "Technical Comments" on the draft PFN that recommend the retention, addition, or deletion of specific highway facilities in our region. CMAP consulted with regional stakeholders including the seven counties in our region, the City of Chicago Department of Transportation, the Illinois Tollway, and the Illinois Department of Transportation (IDOT).

Copies of CMAP's geodatabase, which contain our technical edits to the draft PFN, are available via our FTP website: **ftp://ftp.cmap.illinois.gov/pub/data/DraftPFN_CMAP/**. The username is "cmapftpro" and the case-sensitive password is "CMAPread2013".

Policy Comments

Per MAP-21, the purpose of the NFN is to strategically direct resources to the highway corridors that are most critical to freight. The NFN will be composed of the Primary Freight Network (PFN), the remainder of the Interstate system not included in the PFN, and critical rural freight corridors. The PFN will consist of 27,000 centerline miles of roadway that the U.S. DOT will designate, with MAP-21 allowing U.S. DOT to designate an additional 3,000 miles of existing and future roadways. States will then designate critical rural freight corridors. In its Federal Register announcement, U.S. DOT also designated a 41,000-mile PFN network it would prefer to designate in the absence of the 27,000-mile cap.

In light of these national developments in freight policy, CMAP has laid out three guiding principles on how to use and improve the PFN. Discussed as follows, these principles provide the foundation for our PFN comments to U.S. DOT.

Principle 1: Expand the PFN to Include a Multimodal Freight Network

Freight movement encompasses a complex network of truck, rail, water, air, and transfers via intermodal connectors. However, MAP-21 directs U.S. DOT to limit its scope to the highway network. This narrow focus constrains the utility of the PFN, particularly in metropolitan areas. For example, while 67 percent of goods movement in the Chicago region occurs via truck, six of the seven Class I railroads have major terminals in the region, and Chicago remains the only location to directly link the Mississippi and Great Lakes waterways. Further, O'Hare International Airport and Midway International Airport comprise the second busiest air cargo gateway in the U.S. by value of shipments.

Metropolitan areas often serve as critical hubs or gateways for non-highway modes, and these movements will not be captured in either the PFN or NFN. CMAP encourages U.S. DOT and Congress to remain cognizant of this issue and take a broader approach to defining the national freight system in future authorization bills.

Principle 2: Capture Urban Freight Corridors

The draft PFN fails to capture the complex nature of goods movement in metropolitan regions, particularly the "first and last mile." This is partly due to limitations of using national data, which lack the granularity necessary to be useful at the metropolitan level, as well as the restrictive mileage cap. Additionally, by differently weighting the various "freight factors"—criteria and data sources used to develop the network—U.S. DOT could have better reflected the importance of urban freight corridors.

Intermodal connectors provide some of the most important roadway links between the national highway system and intermodal facilities. The CMAP region contains 18 active intermodal terminals, yet many of the routes to these critical terminals are not represented in the PFN. CMAP believes that including these intermodal connectors in the PFN, rather than Interstates, may be more appropriate for large metropolitan areas, especially since all Interstates are already included in the NFN. In efforts to provide U.S. DOT with scenarios that capture more of the urban freight network, CMAP chose to supplement our principal PFN changes and additions with an “Alternative Scenario” described in Appendix D. In both scenarios, CMAP removed

interstate mileage and reallocated it to select intermodal connectors and freight-critical arterial roads.

Principle 3: Utilize Performance-Based Funding
Identifying the roadways that are critical to goods movement is an important first step towards establishing a national freight agenda as advocated in GO TO 2040, the comprehensive regional plan for northeastern Illinois. However, the objective behind the PFN has not been identified, nor has the PFN been attached to a funding source.

As discussed previously, the NFN needs to be expanded to include multimodal freight movement and better capture metropolitan freight movement. With only 27,000 miles of freight roadways across the nation to be identified as critical to goods movement, plus the remainder of the Interstate Highway System, it is vital that the NFN have the greatest impact in improving freight efficiency. Should these elements be addressed so that the PFN reflects the dynamics of metropolitan freight movements, the PFN could be used in a performance-based funding system to select projects. In practice, U.S. DOT could prioritize projects on the PFN or NFN for assistance through discretionary programs like Projects of National and Regional Significance (PNRS), Transportation Investments Generating Economy Recovery (TIGER), and Transportation Infrastructure Finance and Innovation Act (TIFIA).

Further, an appropriately designated PFN and NFN could be **tied to any new freight "core" funding program**, much as the National Highway Performance Program is currently restricted to the National Highway System. Such an approach would steer federal resources to freight-significant highway corridors.

The NFN, particularly in urban areas, should benefit from additional incentives. First, the federal government could **allow larger federal cost participation** on NFN routes, covering up to 95 percent of total project costs. This share would be consistent with the incentive currently offered in MAP-21 for eligible projects identified in state freight plans. This incentive could also apply to all federal funding sources, not only to a future freight core program.

Additionally, the federal government could further incentivize investments in the NFN by **removing barriers to tolling these facilities**. Allowing the tolling of both existing and future capacity on the NFN would enable state and local governments to manage passenger travel demand and also fund additional improvements within these corridors. It is important to note that an *eligibility* to allow tolling is not a *requirement* to allow tolling; state and local governments should have the discretion to implement tolling where it best meets local needs.

Technical Comments

The U.S. DOT requested that freight stakeholders inspect the draft PFN and propose route additions and deletions while providing justification for each action. CMAP made edits to the draft 27,000 mile PFN network, but we also made comments on errors in and expected future changes to an expanded 41,000-mile network, per U.S. DOT's request. This 41,000-mile network was studied by the U.S. DOT when considering the proposed PFN designation.

CMAP used the shapefile provided by U.S. DOT to assess the adequacy of the PFN in capturing urban freight movement in the Chicago region. As mentioned in the Policy Comments, CMAP made changes that emphasize intermodal connectors and the arterial network as opposed to the Interstate network, since all Interstates will be captured in the NFN.

Segments Added, Subtracted and Retained in the Draft PFN

Along with this letter, CMAP is submitting a geodatabase that specifies the recommended additions and deletions to the draft PFN in northeastern Illinois. Appendix A includes a map that provides a regional overview of these changes. Appendix B itemizes CMAP's recommended changes to the draft PFN.

Listed in Appendix B, each segment in the PFN is given a suggested action, an explanation for that action, and any supporting data. The suggested actions include:

- Segment is recommended for addition to the Primary Freight Network.
- Segment is recommended for deletion from the Primary Freight Network.
- Segment is recommended to remain in the Primary Freight Network.

As requested by U.S. DOT, the mileage added to the PFN in the CMAP region was roughly equal to the mileage we deleted from the PFN. See Tables 1and 2 for more details.

Table 1. Changes Made to the PFN in the CMAP Region

Mileage with No Change	Mileage Added	Mileage Deleted
325	53.52	53.55

Table 2. Net Effects of PFN Changes

Original Mileage	Recommended Mileage	Difference in Mileage
379	378	-0.03

In the suggested edits listed in Appendix B, CMAP eliminated Interstate and expressway facilities from the PFN that did not provide connections outside the region, including I-94/Edens Expressway, I-88, I-355, and portions of I-57. CMAP chose to retain Interstate mileage that provides connectivity outside of northeastern Illinois (e.g., I-94/Tri-State Tollway, I-90, I-80, I-57, and I-55), and that accommodates critical through movements and access to major regional industrial corridors (e.g., I-294, I-290). CMAP also noted the Elgin O'Hare Western Access project, a new facility that has broken ground and will be critical to future freight movements (the Elgin O'Hare Western Access project is also identified as a major capital project in GO TO 2040.) CMAP also recommends eliminating US 41/South Lake Shore Drive from the PFN, since trucks are prohibited on this highway except on a short section of auxiliary lanes.

For arterial roads and intermodal connectors, CMAP recommends the addition of full highway corridors on the National Highway System (NHS) providing linkages to NHS Intermodal Freight Connectors and the intermodal connectors themselves. Several of the corridors were only partially included in the FHWA proposal, without logical termini. These additions will provide continuous routes with logical termini providing access to substantial truck trip generators. To support these additions, CMAP provided brief explanations and supporting data, including the number of daily heavy commercial vehicles (HCVs), HCVs as a percent of annual average daily traffic (AADT), and annual intermodal terminal volumes supported by the NHS mainline corridor or connector.

Technical Corrections to the 41K Draft PFN

While not included in its recommended changes to the draft PFN, CMAP wanted to take this opportunity to point out several suggested corrections to U.S. DOT's list of intermodal connectors, which were included in U.S. DOT's expanded 41,000-mile study network. Some of these edits are included in both the 27,000 and 41,000-mile network.

Appendix C lists CMAP's corrections to the expanded 41,000-mile network and expected future updates; these segments are not included in our suggested changes to the PFN. Specifically, these comments include:

- Changes to the status or route of the segment to reflect existing conditions.
- Changes to NHS intermodal freight connectors approved by the Chicago region's MPO Policy Committee that modify the 41,000-mile network.
- Segment represents future construction recommended for future addition to primary freight network. As mentioned earlier, MAP-21 allows for U.S. DOT to designate an additional 3,000 centerline miles of existing and future unbuilt roadways to the PFN. Accordingly, these routes are not included in the 53.5 modified miles, and are assigned 0.0 miles in the detailed table in Appendix C.

CMAP's MPO Policy Committee has approved changes to NHS intermodal freight connectors IL30P_03 (Stony Island, a bridge that doesn't exist), IL122R_01 (West Ave., a relocated terminal gate), IL122R_02 (West, 157th, and Park, a relocated terminal gate), and IL27R_01 (Jefferson and Fort Hill, a closed intermodal terminal). These NHS changes have been approved by IDOT and U.S. DOT and are included in Appendix C. Additionally, CMAP's MPO Policy Committee has approved changes to several additional connectors, which are expected to be approved by IDOT and U.S. DOT in the near future. These changes are also listed in Appendix C.

Conclusion

CMAP applauds the recent and increasing federal interest in freight. Not only is goods movement critical to our nation's economic competitiveness, but it plays a disproportionate role in the Chicago region, which is North America's preeminent freight and logistics hub.

Our policy comments on the draft Primary Freight Network are guided by three principles: (1) expand the PFN to include a multimodal freight network, (2) capture urban freight corridors,

and (3) utilize for performance-based funding. Achieving the first two principles will help to establish a transportation system that could be used to help steer resources to the nation's most critical freight facilities.

Our primary technical comments are included in the first scenario described in this letter and outlined in Appendices A, B, and C. Included in Appendix D is an Alternative Scenario that removes all interstates and instead highlights arterial streets with 1,000 HCV or more per day. While the Alternative Scenario is not a complete picture of the urban freight network, it better captures the urban freight system and highlights connections to the intermodal connectors and arterial roadways that connect freight facilities and major generators of freight activity to the larger Interstate system.

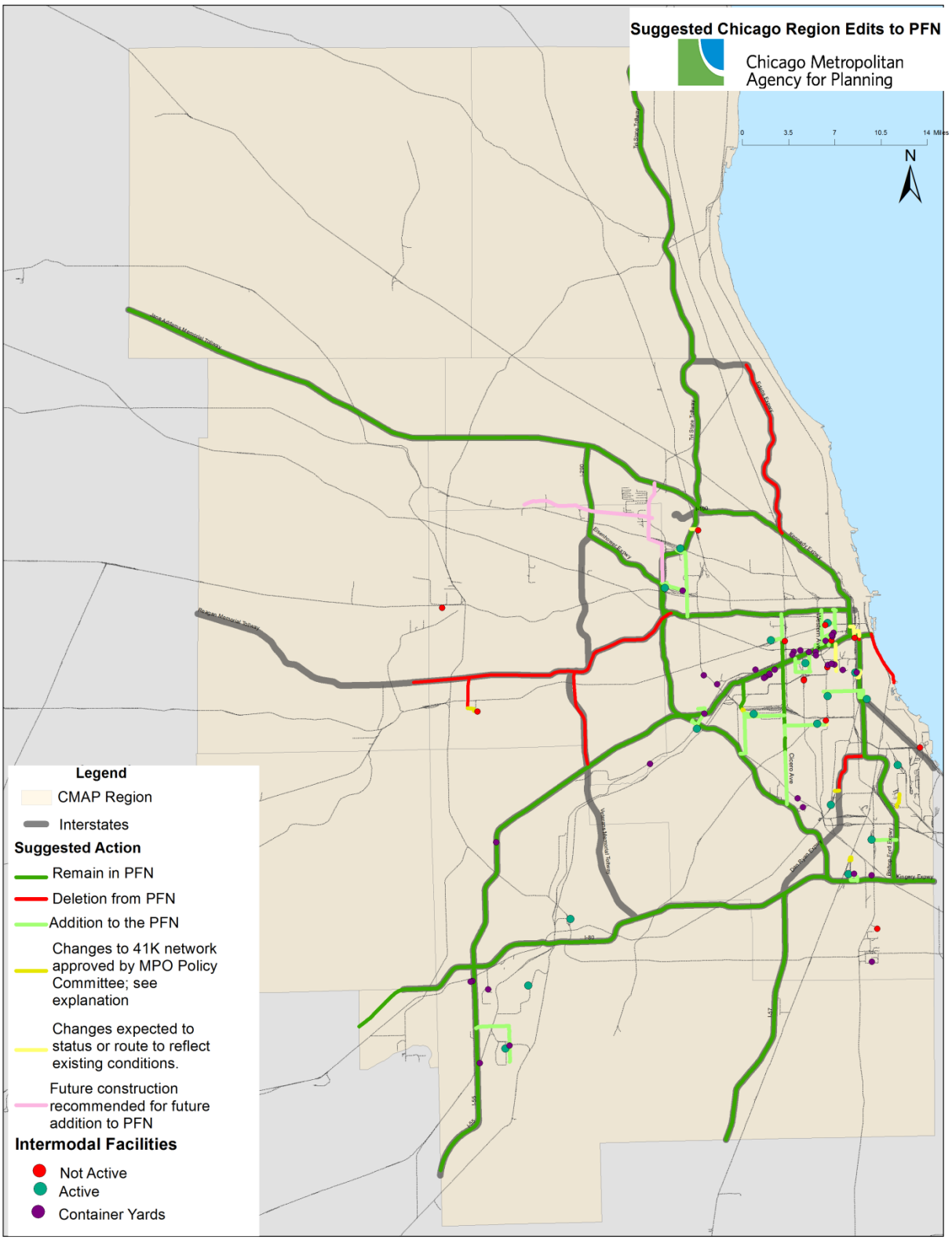
Thank you for this opportunity to comment. Please let us know if we can provide further information.

Sincerely,

Randall S. Blankenhorn
Executive Director

JM:RSB/stk
attachment

Appendix A:
Edits to the Draft PFN, Regional Map



Appendix B:
Segments to Add, Delete and Retain in the PFN

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
I90	Support Primary Freight Network Recommendation	I-90 from DeKalb Co Line to I-94 junction (south)	Serves critical freight infrastructure and high-volume through freight traffic		66.7
I294	Support Primary Freight Network Recommendation	I-294 from I-94 (Deerfield) to I-80 (Hazel Crest)	Serves critical freight infrastructure and high-volume through freight traffic		46.5
I290	Support Primary Freight Network Recommendation	I-290 fromI-90 (Schaumburg) to I-90/94 (at Circle)	Serves critical freight infrastructure and high-volume through freight traffic		28.8
I80	Support Primary Freight Network Recommendation	I-80 from Morris Two Line, Grundy Co to Indiana	Serves critical freight infrastructure and high-volume through freight traffic		45.9
I55	Support Primary Freight Network Recommendation	I-55 from US 41/Lake Shore Dr to Grundy Co Line	Serves critical freight infrastructure and high-volume through freight traffic		58.0
I57	Support Primary Freight Network Recommendation	I-57 from I-80 to Kankakee County Line	Serves critical freight infrastructure and high-volume through freight traffic		19.0
I94	Support Primary Freight Network Recommendation	I-94 from I-90 junction (south) to I-80	Serves critical freight infrastructure and high-volume through freight traffic		14.9

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
S50	Support Primary Freight Network Recommendation	IL 50 from Ogden Ave to 79th Street	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, BNSF Cicero Terminals	IL 50 HCV up to 7650; 14% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	6.3
S43	Support Primary Freight Network Recommendation	IL 43 from I-55 to 71st Street	IL 43 Freight Corridor. Access to CSX Bedford Park terminal	IL 43 HCV up to 4300, 9% HCV. CSX Bedford Park annual lifts 838,168	2.5
S50	Support Primary Freight Network Recommendation	IL 50 from 87th Street to US 12/20	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, BNSF Cicero Terminals	IL 50 HCV up to 9000 21% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	1.0
Pulaski **Rd**	Support Primary Freight Network Recommendation	Pulaski from 0.15 miles south of I-55 to 41st/14R	Access to 14R BNSF Corwith intermodal terminal	4050 HCV; 10% HCV. BNSF Corwith annual lifts: 806,336	0.1
I94	Support Primary Freight Network Recommendation	I-94 from Wisconsin State Line to I-294	Serves critical freight infrastructure and high-volume through freight traffic		24.0
I88	Delete from Primary Freight Network	I-88 from I-290 to 21.54 miles west of I-294	Segment does not provide through connectivity outside of the region. Interstate highways are included in National Freight Network		20.8
S59	Delete from Primary Freight Network	IL 59 from I-88 to Jefferson	BNSF Auto Transload 27R has been closed. Connector deletion approved by MPO, IDOT, and FHWA	N.A.	2.3

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
I57	Delete from Primary Freight Network	II-57 from -94 to 4.06 miles south of I-94	Segment does not provide through connectivity outside of the region. Interstate highways are included in National Freight Network		3.9
I355	Delete from Primary Freight Network	I-355 from I-88 to 0.22 miles north of I-55	Segment does not provide through connectivity outside of the region. Interstate highways are included in National Freight Network		6.9
U41	Delete from Primary Freight Network	US 41 from I-55 to 54th Street	Trucks are prohibited on this section of US 41, except a short section of auxiliary lanes.	Trucks prohibited except for short section.	4.0
La Salle **Ave**	Delete from Primary Freight Network	I-90/94 Chinatown feeder ramp, not LaSalle St	Interstate Ramp, not intermodal connector	N.A.	0.3
I94	Delete from Primary Freight Network	I-94 from US 41 junction to I-90 junction (north)	Segment does not provide through connectivity outside of the region. Interstate highways are included in National Freight Network		13.5

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
US 12/45	Add to Primary Freight Network	US 12/45 from IL 64 to US 20	US 12/45, not IL 21. Mannheim Corr. NHS route serving 3R CP Bensenville and 4R UP Global II intermodal connectors	3350 HCV; 9% HCV. US 12/45, not IL 21. UP Global II lifts: 255,749; CP Bensenville Lifts: 243,322	0.7
US 12/45	Add to Primary Freight Network	US 12/45 from Belmont Ave to IL 64	US 12/45, not IL 21. Mannheim Corr. NHS route serving 3R Bensenville and 4R UP Global II intermodal connectors	2750 HCV varies; 7% HCV. US 12/45, not IL 21. UP Global II lifts: 255,749; CP Bensenville: 243,322	1.9
S50	Add to Primary Freight Network	IL 50 from I-294 to .25 miles north of I-294	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, and BNSF Cicero Terminals	IL 50 HCV up to 4000, 10% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	0.3
S50	Add to Primary Freight Network	IL 50 from 79th Street to 87th Street	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, and BNSF Cicero Terminals	IL 50 HCV up to 3,350; 8% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	0.9
S50	Add to Primary Freight Network	IL 50 from I-290 to Ogden Ave	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, and BNSF Cicero Terminals	IL 50 HCV up to 2900. 9% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	1.8
IL4R_01	Add to Primary Freight Network	US 20 from 4R west to IL 64 and east to US 12/45	Access to UP Global II intermodal terminal	UP Global Two annual lifts: 255,749; Daily HCV: 2,550; 10% HCV	1.9
IL4R_02	Add to Primary Freight Network	Railroad Ave from US 20 to IL 64	Access to UP Global II intermodal terminal	UP Global Two annual lifts: 255,749. Daily HCV: 2000; 21% HCV	0.2

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL121R_01	Add to Primary Freight Network	59th from 121R to Western Ave and e to I-90/94	Provides access to CSX 59th St terminal	1400 daily HCV; 12% HCV; 59th terminal annual lifts: 261,025	2.6
IL3R_01	Add to Primary Freight Network	Franklin, Williams, Belmont from 3R to US 12/45	Access to CP Bensenville intermodal terminal; Schiller Park intermodal consolidated at Bensenville	CP Bensenville intermodal annual lifts 243,322 (with Schiller Park, consolidated into Bensenville)	0.9
IL20R_02	Add to Primary Freight Network	Santa Fe and 67th from 20R terminal to US 45	Provides access to BNSF Willow Springs terminal	BNSF Willow Springs annual lifts 512,604	1.8
IL23R_03	Add to Primary Freight Network	Center, 171st from 122R N to 167th and SE to IL 1	Access to CN Gateway. 23R Moyers has been consolidated into 122R CN Gateway	CN Gateway Intermodal Terminal annual lifts: 440,000	1.1
IL14R_03	Add to Primary Freight Network	41st from 14R gate to Pulaski	Provides access to BNSF Corwith	BNSF Corwith annual lifts: 806,336	0.2
IL9R_01	Add to Primary Freight Network	Damen: Blue Island-29th; Blue Isd: Western-Ashland	Access to UP Global I (8R). 9R BNSF Western Terminal has been closed.	Damen:1000 daily HCV; 7% HCV; Global I annual lifts: 308,097	1.7
IL8R_01	Add to Primary Freight Network	15th, Ashland, Congress/Van Buren from 8R to I-290	Access to UP Global I intermodal terminal	Ashland 1950 daily HCV; 7% HCV; Global I annual lifts: 308,097	1.5
IL19R_01	Add to Primary Freight Network	71st from IL 43 to 19R terminal entrance	Provides access to CSX Bedford Park terminal	CSX Bedford Park annual lifts 838,168	0.2
IL14R_01	Add to Primary Freight Network	Kedzie from 14R north to I-55 and south to Archer	Provides access to and from BNSF Corwith terminal	2600 daily HCV; 9% HCV; BNSF Corwith annual lifts: 806,336	1.0
IL14R_03	Add to Primary Freight Network	Pulaski and 47th from 14R/41st to Kedzie	Provides access to and from BNSF Corwith terminal	Pulaski 4050 daily HCV, 10% HCV; BNSF Corwith annual lifts: 806,336	1.7

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL9R_02	Add to Primary Freight Network	31st and California from Western to I-55	Access to UP Global I (8R). 9R BNSF Western Terminal has been closed.	California:2350 daily HCV; 12% HCV; Global I annual lifts: 308,097	0.9
IL14R_03	Add to Primary Freight Network	Pulaski from I-55 to 0.15 miles south of I-55	Provides access to and from BNSF Corwith	Pulaski 4050 daily HCV, 10% HCV; BNSF Corwith annual lifts: 806,336	0.1
IL5R_01	Add to Primary Freight Network	26th from Central Ave to Ogden Ave	Access to BNSF Cicero intermodal terminal	BNSF Cicero annual lifts: 418,003	1.0
IL20R_01	Add to Primary Freight Network	75th St from I-294 interchange to 20R terminal	Provides access to BNSF Willow Springs terminal	BNSF Willow Springs annual lifts 512,604	0.6
IL22R_01	Add to Primary Freight Network	Indiana Av and IL 83 from 22R terminal to I-94	Provides access to UP Yard Center terminal	IL 83 HCV: 2,500; HCV 8%; UP Yard Center annual lifts: 273,600	2.0
IL19R_03	Add to Primary Freight Network	73rd St and Sayre from IL 50 to 19R terminal	Provides access to and from CSX Bedford Park terminal	CSX Bedford Park annual lifts 838,168	2.9
IL16R_02	Add to Primary Freight Network	61st, State, 59th from 16R N to I-90/94, S to 63rd	Provides access from NS 63rd St terminal	State 2,000 HCV, 13% HCV, NS 63rd annual lifts 312,750	0.8
IL16R_01	Add to Primary Freight Network	Frontage roads and 63rd from I-90/94 ramps to 16R	Provides access to NS 63rd St terminal	63rd 1950 HCV, 14% HCV, NS 63rd annual lifts: 312,750	1.5
IL18R_01	Add to Primary Freight Network	79th from 18R west to IL 50 and east to Western	Provides access to and from NS Landers terminal	79th St 2400 HCV (varies), 10% HCV, NS Landers annual lifts 419,582	2.9
IL123R_1	Add to Primary Freight Network	Baseline and Arsenal from 123R to I-55 (relocated)	Serves 123R BNSF Logistics Park and new UP Joliet terminals	5600 daily HCV; 45% HCV; BNSF Logistics Park annual lifts: 893,306; UP Joliet annual lifts: 347,737	5.1

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL25R_01	Add to Primary Freight Network	Damen from 29th to I-55	Access to UP Global I (8R). 25R IMX Terminal has been closed.	UP Global I intermodal terminal annual lifts: 308,097	0.1
IL19R_03	Add to Primary Freight Network	Narragansett from 19R gate to 73rd St	Provides access from CSX Bedford Park exit gate	CSX Bedford Park terminal annual lifts: 838,168	0.2
S43/U12/ **U20**	Add to Primary Freight Network	IL 43: 71st to US 12/20; US 12/20: I-294 to IL 43	IL 43 Freight Corridor. Access to CSX Bedford Park	IL 43 HCV up to 3760, 9%HCV. CSX Bedford Park annual lifts 838,168	3.3
S50	Add to Primary Freight Network	IL 50 from US 12/20 to .25 miles north of I-294	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Pk, NS Landers, BNSF Cicero	HCV up to 4800, 12% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	3.5
U45/U12 **/U20**	Add to Primary Freight Network	US 12/20/45 from US 20 Lake St to I-290	US 12/20/45, not IL 21. Mannheim Corr. NHS route serving 3R Bensenville and 4R intermodal connectors	HCV up to 3050; 8% HCV. UP Global II lifts: 255,749; CP Bensenville Lifts: 243,322 (with closed Schiller Park, consolidated into Bensenville	1.8
Western **Avenue**	Add to Primary Freight Network	Western Avenue from I-290 to 79th Street	Western Ave Corridor. Serves UP Global I. Global I connectors rely on this NHS mainline.	UP Global I intermodal terminal annual lifts: 308,097. HCV up to 3450, 12% HCV.	2.5
IL8R_02	Add to Primary Freight Network	Ashland Ave from 15th to I-55	Access to UP Global I intermodal terminal	Up to 2400 daily HCV; 7% HCV; Global I annual lifts: 308,097	0.7
IL14R_02	Add to Primary Freight Network	Kedzie and 47th from Archer to Western	Provides access to and from BNSF Corwith and NS 47th terminals	2600 daily HCV; 16% HCV; BNSF Corwith annual lifts: 806,336	1.4

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL14R_02	Add to Primary Freight Network	Kedzie and 47th from Archer to Western	Provides access to and from BNSF Corwith and NS 47th terminals	2600 daily HCV; 16% HCV; BNSF Corwith annual lifts: 806,336	1.4
IL11R_02	Add to Primary Freight Network	47th from 15R NS 47th to I-90/94	11 R CN Railport terminal closed. But this connector serves 15R NS 47th	NS 47th annual lifts: 566,586	1.7
IL23R_01	Add to Primary Freight Network	Halsted from 171st terminal to I-80	Access to CN Gateway. 23R Moyers has been consolidated into 122R CN Gateway terminal	CN Gateway Intermodal Terminal annual lifts: 440,000	1.0

Appendix C:
Technical Corrections to the Draft PFN and Suggestions for Future Additions

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL30P_03	Correction to 41K Network	Stony Island from 122nd to 130th	Road is discontinuous. Section from 122nd to gate north of 130th has been removed from NHS	N.A. No bridge exists as shown on shapefile.	1.0
Il122R_01	Correction to 41K Network	West Ave from 122R CN Gateway to 159th	FHWA approved CMAP/IDOT recommendation to delete connector. Gate relocated.	N.A.	0.1
IL122R_02	Correction to 41K Network	West Av, 157th, Park from 122R CN Gateway to 159th	FHWA approved CMAP/IDOT recommendation to delete connector. Gate relocated.	N.A.	0.4
IL19R_02	Correction to 41K Network	IL 43 frontage roads	MPO Policy Committee approved removal of these roads from NHS; final approvals are pending	N.A.	0.4
IL21R_01	Correction to 41K Network	119th from I-57 to 21R terminal entrance	Small volume of trucks falls below NHS eligibility threshold.	Blue Island annual lifts estimated 40,345. < 100 vehicles per direction per day.	0.3
IL27R_01	Correction to 41K Network	Jefferson and Fort Hill from former 27R to IL 59	BNSF Auto Transload 27R has been closed. Connector deletion approved by MPO, IDOT, and FHWA	N.A.	0.6
Il122R_01	Correction to 41K Network	West Ave from 122R CN Gateway to 159th	FHWA approved CMAP/IDOT recommendation to delete connector. Gate relocated.	N.A.	0.1
IL1R_01	Future 41K MPO Changes Are Expected	Lawrence from US 12/45 to former 1R terminal	1R Schiller Park terminal has closed	N.A.	0.4

Name	**Action**	**Segment Limits**	**Explanation**	**Supporting Data**	**Length (Miles)**
IL10R_02	Future 41K MPO Changes Are Expected	18th and Canal from I-90/94 to 10R UP Canal (26th)	10 R UP Canal Street (26th) terminal has closed; now container yard; connector under review.		1.1
IL15R_01	Future 41K MPO Changes Are Expected	51st from 15R exit to I-90/94	Access from NS 47th; interchange realigned; access changes expected with terminal expansion.	51st 1,850 daily HCV; 9% HCV; NS 47th annual lifts: 566,586	0.2
IL11R_01	Future 41K MPO Changes Are Expected	Ashland and 43rd from I-55 to 11R CN Railport	11 R CN Railport terminal has closed. Now container depot for BNSF Corwith		2.1
IL15R_02	Future 41K MPO Changes Are Expected	Frontage roads from 47th St to I-90/94 ramps	I-90/94 interchanges were substantially redesigned.	N.A.	0.5
IL10R_01	Future 41K MPO Changes Are Expected	Archer from Canal to I-90/94 Chinatown Feeder	10 R UP Canal Street (26th) terminal has closed; now container yard; connector under review.		0.4
IL10R_01	Future 41K MPO Changes Are Expected	I-90/94 Chinatown Feeder from Cermak Rd to I-55	This is an interstate interchange ramp. It is not an intermodal connector.		0.4
IL17R_01	Future 41K MPO Changes Are Expected	79th from 17R to Western Ave	17R CSX Forest Hill has closed	N.A.	0.2
IL11R_02	Future 41K MPO Changes Are Expected	Ashland from 43rd St to 47th St	11 R CN Railport terminal closed.		0.5
Elgin-**O'Hare-Western-Access**	Future Primary Freight Network Recommendation	Elgin-O'Hare from US 20 to O'Hare; West Bypass	Major Capital Improvement serving O'Hare freight hub		0.0

Appendix D:
Alternative PFN Scenario

Because the intended near-term use of the Primary Freight Network (PFN) is unclear, CMAP also developed an alternative PFN to reflect different assumptions. This Alternative Scenario removes all interstates and instead highlights arterial streets with 1,000 HCV or more per day.

As discussed previously, the National Freight Network (NFN) will consist of any remaining Interstate segments not included in the PFN. As such, this alternative network eliminates all Interstate mileage from the draft PFN and substitutes those miles to better describe the urban freight network on the region's arterial system. Doing so helps to better capture the "first and last mile" freight movements in our region and more accurately reflect the reality of goods movement at the local level within a complex metropolitan area. Again, we stress that the entire Interstate system – which plays a vital role in goods movement – is still incorporated into the NFN.

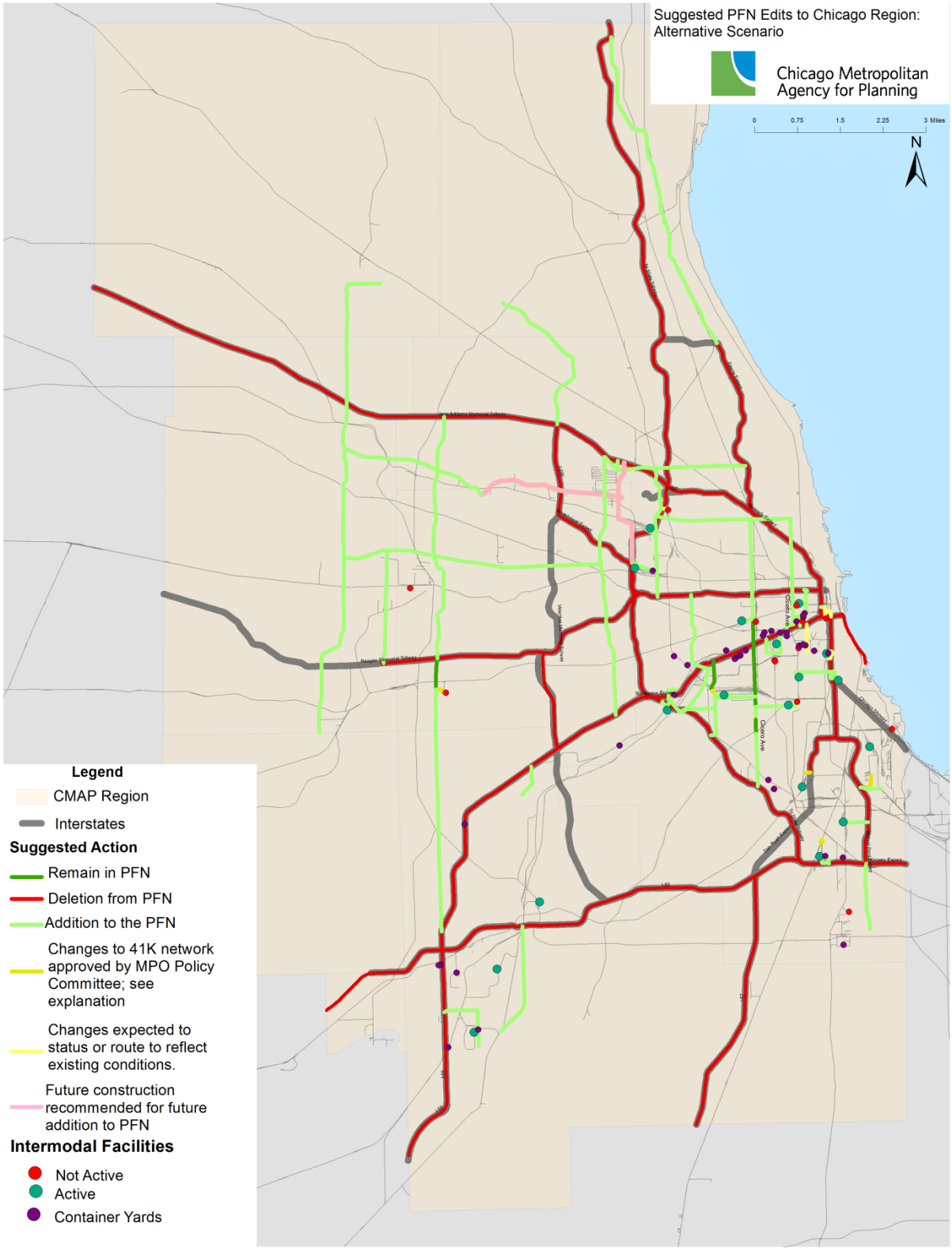
To develop this alternative PFN network, CMAP staff identified arterial routes in the seven-county region with heavy commercial vehicle (HCV) counts of at least 1,000 vehicles per day. We then adjusted these facilities to ensure logical termini and network connectivity. As above, this alternative network resulted in roughly equal mileage to the draft PFN issued by FHWA. Table 3 describes the net mileage under the alternative PFN network.

Table 3. Changes to the PFN under the Alternative Scenario

Mileage With No Change	Mileage Added	Mileage Deleted	Original Mileage	New Mileage	Difference in Mileage
12.7	365.8	366.5	379	378.5	-0.7

Note that this alternative PFN includes the same intermodal freight connectors shown in Appendix A. Further, we offer the same technical corrections to the expanded 41,000-mile network and expected future updates as listed in Appendix C. A map below depicts the alternative PFN. Additionally, a table below itemizes the changes included in the alternative PFN and the rationale for these changes.

Alternative Scenario Regional Map



Alternative Scenario—Segments to Add, Delete and Retain in the PFN

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
US 12/45	Add to Primary Freight Network	US 12/45 from IL 64 to US 20	US 12/45, not IL 21. Mannheim Corr. NHS route serving 3R Bensenville and 4R UP Global II intermodal connectors	3350 HCV; 9% HCV. US 12/45, not IL 21. UP Global II lifts: 255,749; CP Bensenville Lifts: 243,322	0.7
US 12/45	Add to Primary Freight Network	US 12/45 from Belmont Ave to IL 64	US 12/45, not IL 21. Mannheim Corr. NHS route serving 3R Bensenville and 4R UP Global II intermodal connectors	2750 HCV varies; 7% HCV. US 12/45, not IL 21. UP Global II lifts: 255,749; CP Bensenville: 243,322	2.0
S50	Add to Primary Freight Network	IL 50 from I-294 to .25 miles north of I-294	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, and BNSF Cicero Terminals	IL 50 HCV up to 4000, 10% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	0.3
S50	Add to Primary Freight Network	IL 50 from 79th Street to 87th Street	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, and BNSF Cicero Terminals	IL 50 HCV up to 3,350; 8% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	1.0
S50	Add to Primary Freight Network	IL 50 from I-290 to Ogden Ave	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, and BNSF Cicero Terminals	IL 50 HCV up to 2900. 9% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	1.9
IL4R_01	Add to Primary Freight Network	US 20 Lake from 4R west to IL 64, east to US 12/45	Access to UP Global II intermodal terminal	UP Global Two annual lifts: 255,749; Daily HCV: 2,550; 10% HCV	2.0
IL4R_02	Add to Primary Freight Network	Railroad Ave from US 20 to IL 64	Access to UP Global II intermodal terminal	UP Global Two annual lifts: 255,749. Daily HCV: 2000; 21% HCV	0.2
IL121R_01	Add to Primary Freight Network	59th from 121R w to Western Ave and e to I-90/94	Provides access to CSX 59th St terminal	1400 daily HCV; 12% HCV; 59th terminal annual lifts: 261,025	2.7

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL3R_01	Add to Primary Freight Network	Franklin, Williams, Belmont from 3R to US 12/45	Access to CP Bensenville intermodal terminal; Schiller Park intermodal consolidated at Bensenville	CP Bensenville intermodal annual lifts 243,322 (with Schiller Park, consolidated into Bensenville)	1.0
IL20R_02	Add to Primary Freight Network	Santa Fe and 67th from 20R terminal to US 45	Provides access to BNSF Willow Springs terminal	BNSF Willow Springs annual lifts 512,604	1.8
IL23R_03	Add to Primary Freight Network	Center, 171st from 122R N to 167th and SE to IL 1	Access to CN Gateway. 23R Moyers has been consolidated into 122R CN Gateway	CN Gateway Intermodal Terminal annual lifts: 440,000	1.2
IL14R_03	Add to Primary Freight Network	41st from 14R gate to Pulaski	Provides access to BNSF Corwith	BNSF Corwith annual lifts: 806,336	0.3
IL9R_01	Add to Primary Freight Network	Damen: Blue Island-29th; Blue Isd: Western-Ashland	Access to UP Global I (8R). 9R BNSF Western Terminal has been closed.	Damen:1000 daily HCV; 7% HCV; Global I annual lifts: 308,097	1.7
IL8R_01	Add to Primary Freight Network	15th, Ashland, Congress/Van Buren from 8R to I-290	Access to UP Global I intermodal terminal	Ashland 1950 daily HCV; 7% HCV; Global I annual lifts: 308,097	1.5
IL19R_01	Add to Primary Freight Network	71st from IL 43 to 19R terminal entrance	Provides access to CSX Bedford Park terminal	CSX Bedford Park annual lifts 838,168	0.3
IL14R_01	Add to Primary Freight Network	Kedzie from 14R north to I-55 and south to Archer	Provides access to and from BNSF Corwith terminal	2600 daily HCV; 9% HCV; BNSF Corwith annual lifts: 806,336	1.1
IL14R_03	Add to Primary Freight Network	Pulaski and 47th from 14R/41st to Kedzie	Provides access to and from BNSF Corwith	Pulaski 4050 daily HCV, 10% HCV; BNSF Corwith annual lifts: 806,336	1.8
IL9R_02	Add to Primary Freight Network	31st and California from Western to I-55	Access to UP Global I (8R). 9R BNSF Western Terminal has been closed.	California:2350 daily HCV; 12% HCV; Global I annual lifts: 308,097	0.9
IL14R_03	Add to Primary Freight Network	Pulaski from I-55 to 0.15 miles south of I-55	Provides access to and from BNSF Corwith	Pulaski 4050 daily HCV, 10% HCV; BNSF Corwith annual lifts: 806,336	0.2

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL5R_01	Add to Primary Freight Network	26th from Central Ave to Ogden Ave	Access to BNSF Cicero intermodal terminal	BNSF Cicero annual lifts: 418,003	1.0
IL20R_01	Add to Primary Freight Network	75th St from I-294 interchange to 20R terminal	Provides access to BNSF Willow Springs terminal	BNSF Willow Springs annual lifts 512,604	0.7
IL22R_01	Add to Primary Freight Network	Indiana Av and IL 83 from 22R terminal to I-94	Provides access to UP Yard Center terminal	IL 83 HCV: 2,500; HCV 8%; UP Yard Center annual lifts: 273,600	2.1
IL19R_03	Add to Primary Freight Network	73rd St and Sayre from IL 50 to 19R terminal	Provides access to and from CSX Bedford Park terminal	CSX Bedford Park annual lifts 838,168	3.0
IL16R_02	Add to Primary Freight Network	61st, State, 59th from 16R N to I-90/94, S to 63rd	Provides access from NS 63rd St terminal	State 2,000 HCV, 13% HCV, NS 63rd annual lifts 312,750	0.9
IL16R_01	Add to Primary Freight Network	Frontage roads and 63rd from I-90/94 ramps to 16R	Provides access to NS 63rd St terminal	63rd 1950 HCV, 14% HCV, NS 63rd annual lifts: 312,750	1.6
IL18R_01	Add to Primary Freight Network	79th from 18R west to IL 50 and east to Western	Provides access to and from NS Landers terminal	79th St 2400 HCV (varies), 10% HCV, NS Landers annual lifts 419,582	3.0
IL123R_1	Add to Primary Freight Network	Baseline and Arsenal from 123R to I-55 (relocated)	Serves 123R BNSF Logistics Park and new UP Joliet terminals	5600 daily HCV; 45% HCV; BNSF Logistics Park annual lifts: 893,306; UP Joliet annual lifts: 347,737	5.3
IL25R_01	Add to Primary Freight Network	Damen from 29th to I-55	Access to UP Global I (8R). 25R IMX Terminal has been closed.	UP Global I intermodal terminal annual lifts: 308,097	0.1
IL19R_03	Add to Primary Freight Network	Narragansett from 19R gate to 73rd St	Provides access from CSX Bedford Park exit gate	CSX Bedford Park terminal annual lifts: 838,168	0.2
U12	Add to Primary Freight Network	US 12/45 from Touhy Ave to Belmont	Mannheim Corr. NHS route serving O'Hare Airport and 3R Bensenville and 4R intermodal connectors	Up to 4400 HCV; 10% HCV; US 12/45, not IL 21. UP Global II lifts: 255,749; CP Bensenville: 243,322	5.3

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
Elmhurst/ Touhy	Add to Primary Freight Network	Elmhurst: I-90 to Touhy; Touhy: Elmhurst to I-94	Partial NHS route serving O'Hare Airport and high truck volumes	HCV 1-5K; Touhy is on NHS; Up to 14% HCV.	10.4
S43/U12/U 20	Add to Primary Freight Network	IL 43: 71st to US 12/20; US 12/20: I-294 to IL 43	IL 43 Freight Corridor. Access to CSX Bedford Park	IL 43 HCV up to 3760, 9%HCV. CSX Bedford Park annual lifts 838,168	3.4
S50	Add to Primary Freight Network	IL 50 from US 12/20 to.25 miles north of I-294	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Pk, NS Landers, BNSF Cicero	HCV up to 4800, 12% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	3.7
U45/U12/ U20	Add to Primary Freight Network	US 12/20/45 from US 20 Lake St to I-290	US 12/20/45, not IL 21. Mannheim Corr. NHS route serving 3R Bensenville and 4R intermodal connectors	HCV up to 3050; 8% HCV. UP Global II lifts: 255,749; CP Bensenville Lifts: 243,322	1.9
Western Avenue	Add to Primary Freight Network	Western Avenue from I-290 to 79th Street	Western Ave Corridor. Serves UP Global I. Global I connectors rely on this NHS mainline.	HCV up to 3450, 12% HCV. Global I annual lifts: 308,097	2.5
IL8R_02	Add to Primary Freight Network	Ashland Ave from 15th to I-55	Access to UP Global I intermodal terminal	Up to 2400 daily HCV; 7% HCV; Global I annual lifts: 308,097	0.7
IL14R_02	Add to Primary Freight Network	Kedzie from Archer to 47th	Provides access to and from BNSF Corwith and NS 47th terminals	2600 daily HCV; 16% HCV; BNSF Corwith annual lifts: 806,336	0.3
IL11R_02	Add to Primary Freight Network	47th from Ashland Avenue to I-90/94	11 R CN Railport terminal closed. But this connector serves 15R NS 47th and 14R BNSF Corwith		0.4
IL23R_01	Add to Primary Freight Network	Halsted from 171st terminal to I-80	Access to CN Gateway. 23R Moyers has been consolidated into 122R CN Gateway terminal	CN Gateway Intermodal Terminal annual lifts: 440,000	0.3
US 41	Add to Primary Freight Network	US 41 from I-94 (Tri-State) to I-94 (Edens)	NHS route serving high volume of trucks	HCV 5000 to 7000	65.8
IL 53	Add to Primary Freight Network	IL 53 from US 12 to I-90	NHS route serving high volume of trucks	HCV 4000 to 6000	5.7

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
IL 59	Add to Primary Freight Network	IL 59 from Jefferson to I-55	NHS route serving high volume of trucks	HCV 2000 to 3000	18.2
IL 394	Add to Primary Freight Network	IL 394 from I-80 to US 30	NHS route serving high volume of trucks	HCV 5000 to 7000	5.0
130th Street	Add to Primary Freight Network	130th Street from I-94 to Torrence	NHS route serving high volume of trucks	HCV 2-3K	1.6
S171	Add to Primary Freight Network	IL 171 from I-290 to US 12/20/45	State Highway and Partial NHS route serving high volume of trucks	HCV 2-3K	10.7
79th Street	Add to Primary Freight Network	79th Street from US 12/20/45 to IL 43/Harlem Ave	State Highway serving high volume of trucks	HCV approximately 3K	2.8
Western Avenue	Add to Primary Freight Network	Western Avenue from IL 19 Irving Park to I-290	NHS Route serving high volume of trucks	HCV 2-4K	5.4
S50	Add to Primary Freight Network	IL 50 from IL 19 Irving Park to I-290	NHS Route serving high volume of trucks	HCV 2-4K	5.6
S19	Add to Primary Freight Network	IL 19 Irving Park from US12/45 to Western Ave	NHS Route serving high volume of trucks	HCV 2-4K	10.1
US12	Add to Primary Freight Network	US 12 from IL 22 to IL 53	NHS Route serving high volume of trucks	HCV 2-4 K	6.9
US20	Add to Primary Freight Network	US 20 from Randall Road to Elgin-O'Hare Expressway	NHS Route serving high volume of trucks	HCV 2-4K	11.2
IL83	Add to Primary Freight Network	IL 83 from IL 72 Higgins to I-55	NHS Route serving high volume of trucks	HCV 2-7K	19.7
IL72	Add to Primary Freight Network	IL 72 from IL 83 Busse Rd to Elmhurst/Touhy	NHS Route serving high volume of trucks	HCV 2K	1.5
IL64	Add to Primary Freight Network	IL 64 North Ave from Randall Road to IL83	NHS route serving high volume of trucks	HCV 3-5K	19.6
Rekow Rd	Add to Primary Freight Network	Rakow Rd from Randall Rd to IL31	NHS route serves a high volume of freight	HCV 2000 to 3000	3.5

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
Randall/ Orchard Rd	Add to Primary Freight Network	Randall Rd from Rakow Rd to US30	NHS route serving high volume of trucks	HCV 1000 to 3000	63.2
Kirk/ Farnsworth	Add to Primary Freight Network	Kirk and Farnsworth from IL 64 North to I-88	NHS route serving a high volume of trucks	HCV 1000 to 3000	8.5
IL53/Joliet Rd	Add to Primary Freight Network	IL 53 from I-80 to Walter Strawn Drive	NHS route serving high volume of trucks	HCV 3000 to 4000	8.6
US 12/20/45	Add to Primary Freight Network	US 12/20/45 La Grange Rd from 67th St to IL 171	NHS Route serving high volume of trucks	HCV 2-5 K	2.0
IL53/Joliet Rd	Add to Primary Freight Network	IL 53 from I-55 to Normantown Road	NHS route serving high volume of trucks	HCV 2000 to 4000	2.5
IL 59	Add to Primary Freight Network	IL 59 from I-90 to I-88	NHS route serving high volume of trucks	HCV 2000 to 3000	18.8
I90	Delete from Primary Freight Network	I-90 from DeKalb Co Line to I-94 junction (south)	Interstate highways are included in National Freight Network		69.3
I294	Delete from Primary Freight Network	I-294 from I-94 (Deerfield) to I-80 (Hazel Crest)	Interstate highways are included in National Freight Network		48.3
I290	Delete from Primary Freight Network	I-290 from I-90 (Schaumburg) to I-90/94 (Circle)	Interstate highways are included in National Freight Network		29.9
I80	Delete from Primary Freight Network	I-80 from Morris Twp Line, Grundy Co to Indiana	Interstate highways are included in National Freight Network		47.6
I55	Delete from Primary Freight Network	I-55 from US 41/Lake Shore Dr to Grundy Co Line	Interstate highways are included in National Freight Network		60.2
I88	Delete from Primary Freight Network	I-88 from I-290 to 21.54 miles west of I-294	Interstate highways are included in National Freight Network		21.5

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
I57	Delete from Primary Freight Network	I-57 from I-80 to Kankakee County Line	Interstate highways are included in National Freight Network		19.8
I57	Delete from Primary Freight Network	I-57 from I-94 to 4.06 miles south of I-94	Interstate highways are included in National Freight Network		4.1
I94	Delete from Primary Freight Network	I-94 from I-90 junction (south) to I-80	Interstate highways are included in National Freight Network		15.5
I355	Delete from Primary Freight Network	I-355 from I-88 to 0.22 miles north of I-55	Interstate highways are included in National Freight Network		7.2
U41	Delete from Primary Freight Network	US 41 from I-55 to 54th Street	Trucks are prohibited on this section of US 41, except of short section of auxiliary lane	Trucks prohibited except for short section.	4.2
La Salle Ave	Delete from Primary Freight Network	I-90/94 Chinatown feeder ramp, not LaSalle St	Interstate Ramp, not intermodal connector	N.A.	0.3
I94	Delete from Primary Freight Network	I-94 from Wisconsin State Line to I-294	Interstate highways are included in National Freight Network		24.9
I94	Delete from Primary Freight Network	I-94 from US 41 junction to I-90 junction (north)	Interstate highways are included in National Freight Network		14.0
S59	Support Primary Freight Network Recommendation	IL 59 from I-88 to Jefferson	NHS Route serving high volume of trucks BNSF Auto Transload 27R has been closed.	HCV 2-3K	2.3
S50	Support Primary Freight Network Recommendation	IL 50 from Ogden Ave to 79th Street	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, BNSF Cicero Terminals	IL 50 HCV up to 7650; 14% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	6.5
S43	Support Primary Freight Network Recommendation	IL 43 from I-55 to 71st Street	IL 43 Freight Corridor. Access to CSX Bedford Park terminal	IL 43 HCV up to 4300, 9% HCV. CSX Bedford Park annual lifts 838,168	2.6

Name	Action	Segment Limits	Explanation	Supporting Data	Length (Miles)
S50	Support Primary Freight Network Recommendation	IL 50 from 87th Street to US 12/20	IL 50 Freight Corridor. Access to Midway Airport, CSX Bedford Park, NS Landers, BNSF Cicero Terminals	IL 50 HCV up to 9000 21% HCV. CSX Bedford Park lifts 838,168. NS Landers: 419,582, Cicero 418,003	1.1
Pulaski Rd	Support Primary Freight Network Recommendation	Pulaski from 0.15 miles south of I-55 to 41st/14R	Access to 14R BNSF Corwith intermodal terminal	4050 HCV; 10% HCV. BNSF Corwith annual lifts: 806,336	0.1