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

Subject: Federal Highway Administration
Docket No. FHWA-2013-0050
Designation of the MAP-21 Primary Freight Network
Comments from the Mid-America Freight Coalition

The Mid-America Freight Coalition (MAFC), in collaboration with its ten member states, has reviewed the methodology, corridors, and connections included in the draft Primary Freight Network (PFN) as designated under the Moving Ahead for Progress in the 21st Century (MAP-21) Act. We are providing the following comments in support of the stated purpose of the National Freight Network (NFN) to “assist states in strategically directing resources toward improved system performance for the efficient movement of freight on highways, including the national highway system, freight intermodal connectors, and aerotropolis transportation systems.” Additionally, these comments and recommendations are based on the draft PFN and related discussion as published in the November 19, 2013 Federal Register (Vol. 78, No. 223). Our comments are provided below.

MAFC concurs with FHWA’s initial comments in the Federal Register notice concluding that there are five challenges associated with the initial establishment of the PFN. These challenges or opportunities to the PFN implementation as identified in the document are:

- 1) The process and criteria to define the system are complex and it is difficult to allocate and balance the function and connections within the mileage limits.
- 2) The lack of a stated application for the highway PFN and NFN introduces uncertainty into the designation process.
- 3) The mileage limit of 27,000-30,000 centerline miles of PFN excludes many freight-significant facilities. A freight corridor approach better captures the movement of freight and provides for a broader and more inclusive approach than the centerline miles approach.
- 4) The national data utilized to identify the PFN is not sufficient to understand the full system and how it functions.
- 5) The current approach does not consider critical urban freight routes and the importance of these facilities.

Addressing these five areas in the legislation will provide for a more informed approach for defining the PFN and the NFN and to ultimately ensure this network supports its stated purposes. The following comments further reflect these cited issues and identify policy and analysis techniques that support advancement of these policy initiatives.

The Methodology for Achieving a 27,000-mile Final Designation

1. The PFN must recognize corridors that move freight through the entire United States. These corridors must connect the export centers on the Great Lakes, as well as on the western, southern, and eastern coasts of the United States and our major trading partners in Canada and Mexico. As such, the whole of I-80 should be added to the PFN to facilitate nationwide movements along a complete east-west corridor. Similarly, the entirety of I-35 should be added to the PFN to provide a complete north-south corridor.



2. U.S. DOT should remove the language requiring NHS Freight Intermodal Connectors in the NFN to be within cities with a population over 200,000. Intermodal freight shipments interface in both urban and rural locations. Additionally, there are regional trends for the placement of intermodal facilities outside of cities to avoid congestion.
3. Stakeholder involvement is inherent in most of the MAP-21 freight provisions. The U.S. DOT process for defining the PFN is a notable exception to this informed approach to policy and system management. The data-driven process for designating the PFN fails to include adequate stakeholder input for conceptualizing and identifying the network. The PFN is crucial to the nation's economy; therefore the development of the PFN should rely heavily on thorough and complete stakeholder input in addition to data-driven analysis. This is particularly important given the stake that business, industry, and state and local governments have in freight movement.
4. The methodology used for creating the PFN relies on Highway Performance Monitoring System (HPMS) data from 2011 and intermodal connector data. U.S. DOT should coordinate with states and their planning partners to ensure the currency and validity of the data sources that support the analyses conducted over the course of MAP-21 policy development and implementation.

Use of the NFN and Its Components

1. The NFN has the opportunity to be a comprehensive freight network following a robust comment period and legislative changes to network constraints. The final NFN will derive much of its value from its inclusion in the National Freight Strategic Plan. The assessment of bottlenecks, infrastructure condition, and performance from a national point of view will allow for multistate corridor management that can increase efficiencies and harmonize freight movements across the nation. Additionally, multistate organizations and collaboration should be encouraged to support implementation and sustainable planning and operation of multistate and multimodal freight corridors.
2. Research is needed to understand the policy, operational, and economic implications of a defined freight network. Research should seek to understand and address changes brought about by the NFN classifications. This research should also document the multistate impacts of bottlenecks, infrastructure condition, and performance to facilitate interstate cooperation. The research should also examine the consequences and development opportunities afforded by inclusion in the NFN, and conversely, by not being included in the network.
3. Development of a PFN and NFN are important steps to defining and supporting the nation's freight network. Implementation of the PFN and the NFN must provide program and development opportunities across the full range of NFN system components.
4. Any new programs to advance freight should be based on new funding, as opposed to placing additional constraints on already limited funding. Additionally, states should be given flexibility to use any future freight funds to maximize the impact of funds.
5. The ten-year time frame for PFN designation is too long to ensure policy and program relevance. The freight logistics world adapts quickly to their environment. In order to adjust to the resultant changes in freight movement, the PFN needs to be reassessed on a more regular basis. Re-evaluation of the PFN every three years would more readily address changes in the economy and freight systems.
6. Policy development and implementation of the PFN and NFN must address the evolving nature of new corridors and corridors with decreased volumes as the economy responds and moves. For example, how will the PFN address emerging corridors such as I-69 while limited to 27,000-



30,000 miles? U.S. DOT should clearly define the criteria that will be used to identify corridors that no longer meet the PFN criteria and the process that will be used to update the PFN.

The NFN and PFN as a Multimodal Freight System

1. As currently written, the PFN does not support access to important intermodal connectors in rural areas. The Critical Rural Freight Corridor (CRFC) network will address connections to intermodal connectors with 50,000 TEUs or 500,000 tons in bulk commodities, but there is no assurance that these connections will make the appropriate links with the interstates or the PFN. U.S. DOT should work with state DOTs to assess the NFN once the PFN and CRFCs are designated and analyze spatial gaps in access to intermodal connectors.
2. The U.S. DOT should pursue the definition and development of a fully connected and intermodal freight system. Integration of the NFN, marine highways, freight aviation facilities, pipelines, and major rail corridors provides the true picture of the U.S. economy and freight movement.
3. U.S. DOT should evaluate the purpose and definitions of intermodal connectors for freight movements (versus passenger movement) and ensure currency in the list of intermodal connectors. State DOTs should be given at least 90 days to submit additions to the list of intermodal connectors. The underlying data used for the PFN and NFN development is as critical as the analysis techniques; therefore U.S. DOT should give states the opportunity to update the data. It is important to note that these freight facilities develop rapidly and outpace current data collection and provision.
4. Connectivity to marine ports should be included in the PFN. The third step of the draft PFN methodology explicitly adds routes connecting land borders of entry to the PFN, but MAP-21 specifies that both land and maritime ports of entry should be considered as criteria for designation. Therefore, U.S. DOT should add water ports of entry that have comparable truck counts entering and exiting the port facility.

Urban-Area Designations and Future Legislative Action Regarding the PFN

1. The NFN and PFN should include an additional urban routing designation—a Critical Urban Freight Network—to provide a comprehensive network. In the context of the NFN, there is a significant gap in the current framework within urban areas. The PFN should address nationwide connectivity, while CRFCs should address first and last mile connections and the proposed CUFC should highlight the connections in urban areas. Each system serves a portion of the network and as written the PFN addresses only two portions of the network. Additionally, the urban PFN mileage currently assigned from the 27,000-30,000 miles of the PFN should be redistributed through the final PFN designation. CUFC routes should be a distinct component of the NFN to clearly indicate the different parts of the network and allow for additional network miles and connectivity across the United States.
2. State DOTs and MPOs are best able to define and designate CUFCs. State DOTs and their planning partners have domain knowledge on the important connections within urban areas. These groups should be included in the development and implementation of a CUFC network.
3. PFN designation is heavily reliant on the Freight Analysis Framework (FAF) for tonnage and value data for freight moving by truck in the United States. Unfortunately, the timing of the initial designation of the PFN is occurring towards the end of the current FAF cycle. Therefore, the tonnage and value data was collected in 2007 and likely does not produce accurate estimates of current tonnage and value. The optimum policy and network development opportunities would exist if designation of the PFN immediately follows the release of FAF. This allows immediate use of this economic data while its currency provides the best guidance for network definition. In



many cases the data used in the PFN designation undergoes annual updates; therefore FAF is the constraining factor for timely data. The timing for the collection of these data sources as well as the PFN re-designation should be unified to utilize the most accurate and current information to support these decisions.

4. Future freight policy and program development should address three critical strategic considerations. As the nation's freight system is a multistate, multimodal, economic network, the next round of policy development should explicitly include the following:
 - Increased freight stakeholder participation. The performance and extent of the freight network infrastructure is critically important to U.S. business and industry. Identification of the system components such as the PFN should be based on stakeholder input in addition to the data-driven approach of the PFN.
 - Increased implementation of a connected multimodal freight network. A multimodal system will increase efficiencies, provide for economic development opportunities, and provide modal alternatives and system redundancy.
 - Implementation of a multistate, regional, and national approach to operation and management of freight corridors. Greater levels of structured collaboration, policy, and programs are needed to develop and optimize multistate freight corridors.

We appreciate the opportunity to provide comments on the draft PFN and related activities. If you have questions regarding comments from the Mid-America Freight Coalition, please contact Ernie Perry, MAFC Program Administrator, at 608-890-2310 or ebperry@wisc.edu.

Sincerely,

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