



April 25, 2016

Honorable Anthony Foxx
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Notice of Opportunity to Comment – Draft National Freight Strategic Plan
Docket No. DOT- OST-2015-0248

Dear Secretary Foxx:

The Association of Metropolitan Planning Organizations (AMPO) is pleased to offer the following comments and recommendations to the proposed plan on a National Freight Strategic Plan (NFSP) to the U.S. Department of Transportation (U.S. DOT). AMPO thanks the U.S. DOT and its dedicated staff for their hard work and coordination with stakeholders. Freight planning is an important component of statewide and metropolitan transportation planning processes. Input from a variety of public and private stakeholders—State DOTs, MPOs, freight modes, general public—must be considered to successfully integrate freight planning into these existing transportation planning processes. The comments contained herein are mainly focused on the role of MPOs and the coordination necessary to address the aim of Moving Ahead for Progress in the 21st Century (MAP-21) and the Fixing America's Surface Transportation (FAST) Act.

Critical Urban Freight Corridors

On page 51, the text discusses trends in decision-making. While there is a critical role for freight planning at the state level, MPO's and metro areas in general are critical to the gross domestic product (GDP) of the nation. These areas account for some 85% of the GDP. It is in the metropolitan areas that the ability to coordinate land use as well as protect right-of-way for rail occurs. Therefore, AMPO supports the role of MPOs over 500,000 taking the lead, in consultation with the States, for responsibility in designating Critical Urban Freight Corridors. In fact, multistate coalitions, such as the I-95 Corridor Coalition, are critical for queuing projects and for pooling money essential to complete projects with the private sector.

Freight Corridors

On page 97, there is text relating to *A.4 identify major trade gateways and multimodal national freight networks/corridors* - the NSFP should include MPO's in addition to Federal agencies, State, and local governments, as well as private sector stakeholders, to coordinate strategies and investments for major trade gateways and other important freight routes and facilities both on and off the Multimodal Freight Network (MFN).

Resilience

On page 93, there is text relating to *Identify and promote strategies that support more resilient supply chains. Seek legislative authority to require that infrastructure vulnerability and resilience be part of state and MPO long-range*

planning – U.S. DOT should provide guidance on how MPO’s can meet this requirement given limitations on specifics for projects in long-range plans as well as tools and techniques to evaluate vulnerability and resilience.

Performance Measures

AMPO is concerned with the performance objectives for delay and reliability that are outlined in the NFSP. The plan’s goal to reduce delay and variability by at least 10 percent per decade through 2045 (a 30 percent reduction) is unrealistic. Further, many smaller MPO’s do not have the resources to collect, or pay for, data on delay and reliability measures to report on performance on sections of the NMFN, especially for modes such as rail, air and water. AMPO is in agreement with AASHTO’s assessment of the definitions of freight delay and freight reliability.

Safety

The draft NFSP proposes a freight-related fatalities and serious injuries per freight vehicle miles traveled (VMT). U.S. DOT should provide guidance on how freight fatalities and injuries are to be defined given the multimodal nature of the NFSP. Also, MPO’s do not have data for freight-specific VMT, making it difficult to calculate a rate-based measure. Several states also have approved Strategic Highway Safety Plans (SHSP) that are based on a comprehensive approach to addressing safety on the surface transportation system, regardless of mode, vehicle, or crash type.

Conclusion

For half a century, metropolitan transportation planning has been rooted in a cooperative and collaborative relationship with our partners at the State level, with partners in the freight movement and logistics arena, as well as with many other stakeholders in metropolitan areas. MPOs have a long history of working with private sector partners around freight issues and look forward to the expanded emphasis and additional funding provided by the National Freight Strategic Plan. Thank you for the opportunity to provide our input and comments. We look forward to working with the U.S. DOT in implementing the provisions of MAP-21 and the FAST Act.

Should you have any questions or seek further input from AMPO on the information provided above, please contact me at (202) 634-3680 or at dhardy@ampo.org.

Respectfully submitted,



DeLania Hardy, Executive Director