



January 11, 2014
Via Electronic Docket

U.S. Department of Transportation
1200 New Jersey Avenue, Southeast
West Building Room W12-140
Washington, D.C. 20590-0001

Federal Highway Administration

RE: Notice; Request for Comments – Designation of the Primary Freight Network
Docket No. FHWA-2013-0050

I. Introduction

The Association of Metropolitan Planning Organizations (AMPO)¹ submits these comments in response to the Federal Highway Administration, U.S. Department of Transportation, Request for Comments - Designation of the Primary Freight Network, Vol. 78 Fed. Reg. 69520 (revised date, December 11, 2013), regarding the draft initial designation of the highway Primary Freight Network (PFN), information about designation of Critical Rural Freight Corridors (CRFC) by the States, and the establishment of the National Freight Network (NFN). The notice indicates that many highway freight bottlenecks and chokepoints are located in urbanized areas, which challenges critical freight movement. If we are to make progress on moving freight through cities and across the nation, investments must be made in these areas. As a national association representing the interests of federally established metropolitan transportation planning organizations, AMPO appreciates the opportunity to provide comments.

II. Comments on the Draft Designation of the Primary Freight Network

(A) Concern and Recommendation

Concern:

MPOs and States are most familiar with freight flows and bottlenecks within their jurisdictions and are best able to identify solutions to improve freight movements. The top down approach of the PFN selection process results in the identification

¹ AMPO is the transportation advocate for metropolitan regions and is committed to enhancing MPOs' abilities to improve metropolitan transportation systems. AMPO is a nonprofit, membership organization established in 1994 to serve the needs and interests of metropolitan planning organizations (MPOs) nationwide.

of facilities that may have a small role in freight mobility improvement. Additionally, the approach may not recognize more important facilities such as first and last mile bottlenecks.

Recommendation:

MPOs and States should select appropriate facilities for inclusion on the PFN within their jurisdictions to be approved by USDOT. This is similar to the process for the selection of NHS facilities and functional classification of highways.

(B) Concern and Recommendation

Concern:

Although Moving Ahead for Progress in the 21st Century (MAP-21) does not specify that the PFN be utilized to allocate funds for any specific program or purpose, this may not be the case for successor authorizations and/or extensions of MAP-21.

Recommendation:

Federal funds should retain sufficient flexibility. The most important regional and statewide priorities, as determined by MPOs and States, may be programmed with these funds.

(C) Concern and Recommendation

Concern:

AMPO recognizes that due to the wide diversity of the types and value of freight, the transport of freight within the United States utilizes a variety of modes in order to make deliveries in the most timely and cost effective means. The statutory language in MAP-21 focuses exclusively on the highway mode. Highways, depending upon the type and/or value of the freight, the distance traveled or the final destination may be the most inefficient, energy-consuming and expensive method of transport. Additionally, the statutory cap of 27,000 centerline miles will not adequately develop a network for the highway mode.

Recommendation:

Statutory language should be written to be corridor based, mode neutral and either eliminate or propose ample mileage caps in future federal authorizations.

(D) Concern and Recommendation

Concern:

The PFN was developed primarily by ranking independent roadway segments with the highest current truck volumes and freight value and/or tonnage. As a result, the draft PFN contains a questionable number of disconnected segments and facilities, and, in some cases, bypasses a number of significant ports of entry and large metropolitan areas.

Recommendation:

AMPO believes that the selection process identified by USDOT should be corridor based, starting with identifying the most important freight origins and destinations. Corridors should then be prioritized based on future freight volumes and/or value, irrespective of mode.

(E) Concern and Recommendation

Concern:

Data utilized for the draft PFN is somewhat limited and results in various remarkable inclusions and omissions. For example, the quality of Highway Performance Monitoring System (HPMS) data, which was used to identify truck Average Daily Traffic, varies greatly from state-to-state, depending upon the quantity and location of counts, the age and frequency of counts, and the age and upkeep of counting equipment.

Recommendation:

USDOT should work with MPOs and States to improve the quality and consistency of existing data sources. In addition, Congress should provide adequate resources ensuring that data, such as HPMS, is maintained consistently and is up to date.

(F) Concern and Recommendation

Concern:

Data utilized for the draft PFN focuses exclusively on current conditions and does not estimate future freight generation or future flows between nodes.

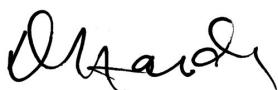
Recommendation:

Many larger MPOs and States have developed freight models to estimate future intrastate and interregional flows. The USDOT should work with MPOs and States to link together these models and fill gaps where models do not currently exist and estimate future flow between major freight destinations. These estimates would provide a better method of prioritizing corridors than the current methodology.

III. Conclusion

Thank you for the opportunity to provide our input and comments. We look forward to working with USDOT as it moves forward on designating future freight networks. Should you have any questions or seek further input from AMPO on the information above, please contact me at (202) 624-3680.

Respectfully submitted,



DeLania Hardy, Executive Director
Association of Metropolitan Planning Organizations