



February 13, 2014

United States Department of Transportation
Docket Management Facility
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Subject: Federal Highway Administration Docket No. FHWA 2013-0050
Designation of the Primary Freight Network (PFN)

To Whom It May Concern:

The I-95 Corridor Coalition is a partnership of the State Departments of Transportation and related public agencies, working together to accelerate improvements to the region's transportation system. The Coalition provides a forum for key decision and policy makers to address transportation management and operations issues of common interest.

The I-95 Corridor Coalition region extends from Maine to Florida and includes the following: Connecticut, Delaware, District of Columbia, Florida, Georgia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Vermont and Virginia.

Annually, more than 5.3 billion tons of freight are shipped within/through the I-95 Corridor region. Efficient freight movement that supports cost-effective supply chains for the region's businesses and industries is critically important to the Coalition region.

The Coalition has been working with our 16 State Department of Transportation members and a number of MPOs within the Corridor, along with other stakeholders to review and assess the proposed Designation of the Primary Freight Network. These comments provided reflect the Coalition's substantial experience with multistate freight transportation and its review of the proposed PFN designation with its members. ***The Coalition's comments are intended to complement, not supplant, the responses submitted by our individual member agencies, authorities and associations.***

PFN Network

In its Notice, the FHWA provided two possible designations of the PFN: a 27,000 centerline-mile network as mandated by MAP-21; and a 41,000 centerline-mile network developed by applying the MAP-21 selection criteria and then adding additional highway segments to close the major gaps in the 27,000 network.

The FHWA asked for responses to a number of specific questions about the PFN designation and designation process. The Coalition's comments address those questions that are most relevant to viewing freight and any network designations in particular from a multistate/corridor perspective.

Foremost among our members' concerns was the lack of a stated application for the PFN and NFN. State Departments of Transportations and Metropolitan Planning Organizations were in concurrence that they need to understand the stated application of the PFN in order to best determine whether the final PFN route selections and designations would adequately address the needs of the states and our nation to maintain a robust and viable freight transportation system that would enhance our competitiveness in a global market.

Although the rulemaking does not indicate the final purposes or uses of the PFN designations, in order to ensure input to this decision-making, our agencies are providing these comments to the Designation of the PFN as outlined in the proposed rulemaking as a Coalition of states working together to enhance freight and operations across a multi-state corridor.

Question: Do the proposed PFN networks adequately define the Coalition region's primary freight network?

Response: The 27,000 centerline-mile network does not adequately cover the region's major freight corridors. It omits many of the major trade corridors serving New York State and Northern New England and leaves extensive gaps in the corridors serving the Southeast and Florida. The 41,000 centerline-mile network begins to address these shortcomings, but still is not adequate as it omits Interstates and state highways connecting major metropolitan areas, such as Boston and Montreal, and roads serving important resource areas, such as those connecting the New York State and Pennsylvania gas and oil fields to the region's processing and population centers. The network also inadequately addresses some significant international border crossings in the region that are a gateway for freight to and from the United States and Canada.

Question: What route deletions, additions or modifications are needed from the Coalition's regional perspective?

The Coalition member states are submitting detailed comments on needed route deletions, additions or modifications. The Coalition defers to the states on the particulars of the routes within their jurisdictions. From a multistate perspective, the Coalition would strongly emphasize the need for designation of continuous routes in any primary or national freight network, such as FHWA has attempted to do with the 41,000-centerline-mile alternative. Such considerations do not necessarily lend themselves to set limitations. FHWA and Congress should consider whether setting a mileage limitation for the network (whether 27,000 or 41,000 centerline-miles) before fully establishing all relevant components of a primary network – interstate routes, connectors, urban/rural elements, international border crossings that serve major U.S. freight corridors/trading partners – hinders the establishment of a Primary (or National) Freight Network that adequately reflects and serves supply chains that link shippers and receivers. A patchwork of discontinuous road segments is not a freight network that adequately speaks to the vital importance of continuity and connectivity in national or regional supply chains and trade lanes.

The Coalition suggests that FHWA discuss with Congress a set of broader designation criteria with less restrictive thresholds. Those criteria should explicitly consider supply chains and the need for redundancy in freight routes. An industry supply chain may be critical to a region and the nation, but it

may not generate an especially high volume of trucks on the road. Relying primarily on truck volumes and basic connectivity between major metropolitan centers is not sufficient for designating a PFN or providing for a robust NFN. Designation must consider the structure and dynamics of the businesses and industries that the freight transportation system serves.

Application of PFN and NFN

MAP-21 mandates the designation of a 27,000 centerline-mile network for the purpose of identifying "... existing roadways that are most critical to the movement of freight...." However, the legislation is largely silent on how the PFN designation is to be used.

Similarly, MAP-21 calls for the designation of a National Freight Network (NFN), which is defined as the PFN plus the remainder of the Interstate Highway System and the state-designated Critical Rural Freight Corridors. The stated purpose of the NFN is "... to assist States in strategically directing resources toward improved movement of freight on highways." Again, MAP-21 is largely silent on the specifics of whose resources are to be allocated and how they are to be directed. These questions must be answered for state DOTs and MPOs to adequately consider PFN and NFN designations.

FHWA asks three closely-related questions about the future uses of the PFN and NFN:

Questions: How should the PFN designation be used? How should the NFN designation be used to "strategically direct resources...?" And, should the NFN be expanded to include other freight transportation modes?

Responses: The designation of the PFN *appears* to be following the general approach used in the designation of the Interstate Highway System and the subsequent designation of the freight-oriented National Highway System. These precedents suggest that Congress will eventually use the PFN to allocate federal funding, set standards for operating performance and target regulatory requirements.

If this is the case, the Coalition suggests that the FHWA consider among the uses of any PFN and the NFN designations the following:

1. Frameworks to fund, encourage and support multistate freight planning and freight performance reporting;
2. Considerations in prioritizing multistate projects for funding under the Projects of National and Regional Significance Program (or similar programs); and,
3. Justifications for helping states provide access between the multistate freight networks and important local distribution centers, industrial zones, ports and resource areas.

The economy and the freight transportation system are organized and operated at the level of multistate regions. The state and federal governments need comparable multistate platforms for effective freight transportation planning, investment and regulation. This is especially important in cases where one state would incur all the costs of a major project while many states would benefit. The PFN and NFN, if properly and adequately defined, could be used to as platforms to develop approaches that support State DOTs' efforts to continue to work collaboratively with MPOs, and related agencies and stakeholders in their states and across jurisdictional boundaries for effective planning and investment in the freight transportation system.

The Coalition agencies believe that the NFN should be expanded to provide incorporation of other freight transportation modes. This is important so that all modes may be adequately considered with respect to their connectivity in a national freight network and to allow for a comprehensive approach by States and MPOs in freight planning and project development/prioritization. Trucking is the dominant freight transportation mode, but is increasingly integrated with rail, water and air freight transportation networks. With many sections of the highway and the rail networks operating at capacity, we must focus on the total performance of the freight system. It is critical that all modes be able to be viewed as part of a system to ensure an effective and efficient freight network.

Centerline or Corridor

The PFN is limited to 27,000 highway centerline miles. This has resulted in the designation of a single highway within corridors that have two or more parallel highways.

Question: Should PFN designation be by “freight corridor” to include more than one highway freight route within a corridor? By “freight corridor” to include parallel highways, rail lines and waterways within a corridor?

Response: The Coalition recommends that FHWA and Congress consider the PFN (and eventually the NFN) designation by freight corridors. There are numerous locations within the Coalition region where freight highways parallel each other or where a freight highway parallels a freight rail line. A prominent example is the corridor between New York City, Philadelphia, Wilmington, Baltimore, and Washington DC, where I-95 is paralleled by US Routes 1, 9 and 130 and by rail lines carrying CSX and NS freight trains. However, only I-95 is included in the draft PFN designations. The states should have the flexibility to plan, improve and operate across all the major highways, including linkages to rail lines and waterways in a corridor, to maximize efficient and cost-effective freight movement. Accordingly, the PFN designation should allow inclusion of more than one highway route within a corridor as well as the ability to include relevant parallel highways, rail lines and waterways within a corridor.

Urban Freight Routes

MAP-21 is silent on designation of critical urban freight routes and first-mile/last-mile connectors.

Question: Should there be provision for designation of urban freight routes and connectors?

Response: Designation of the PFN and reauthorization of MAP-21 should make provision for designation of urban freight routes and connectors. Our metropolitan areas are the economic engines of the 21st Century economy. Most of our population and most of our high-value and high-tech manufacturing are now in our metropolitan areas. Moreover, much of the cost of moving freight is the result of the congestion encountered in getting freight into and out of urban areas. The Port Authority of New York & New Jersey, working with New York State DOT and New Jersey DOT, is close to completing a bellwether goods movement plan for the greater New York metropolitan area that identifies primary urban freight routes and intermodal connectors. Other states and MPOs in the I-95 Corridor Coalition region have taken the initiative to have similar plans completed or underway. The national freight strategy and networks should not ignore the first and last miles needed to make a complete freight trip. It is strongly urged that State DOTs and urban representatives be solicited to provide input on what factors might drive urban designations within the PFN.

Rural Freight Corridors

MAP-21 says that “A State may designate a road within the borders of the State as a critical rural freight corridor...” and provides basic volume thresholds for qualifying roadways and freight generators.

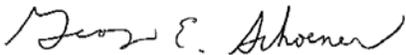
Question: How should States coordinate designation of critical rural freight corridors that cross state lines?

Response: The Coalition recommends that FHWA encourage and promote dialogue with states on the designation of rural freight corridors, including and particularly where these cross through multiple states. Across the Coalition region, but especially in the Northeast and Mid-Atlantic, major rural freight routes may cross two or three or more states. As with the PFN, continuity and consistency in the designation of rural freight corridors are important if they are to be seen as key parts of the freight transportation system.

Conclusion

We thank you for the opportunity to comment on the draft initial designation of the PFN. We emphasize that a key driver in the composition of our comments has been viewing the rulemaking from a “multi-state, corridor” perspective. ***Our comments do NOT supplant/negate our member state/agency individual comments and, if in conflict, we would yield to our member’s individual positions to be weighed appropriately. We appreciate the complexity of this task and are ready to provide clarification of our comments or additional information that may be of help to you.***

Sincerely,



George E. Schoener
Executive Director
I-95 Corridor Coalition