

In November, the Federal Highway Administration (FHWA) published the draft initial designation of the highway Primary Freight Network (PFN). The Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21, P.L. 112-141) required the Secretary of Transportation to designate up to 27,000 centerline miles of existing interstate and other roadways as a Primary Freight Network.

In the Federal Register notice published last month, FHWA published one map illustrating two networks. The first network (the Primary Freight Network) consists of roughly 27,000 centerline miles to meet the statutory cap. In addition, FHWA included another network map (the comprehensive PFN) consisting of 41,518 centerline miles. While MAP-21 limits the PFN to 27,000 centerline miles, FHWA felt it was necessary to illustrate what a comprehensive, connected freight network would need to look like in order to transport goods efficiently on highways throughout the nation. FHWA is seeking comments from the public to help finalize the PFN.

The PFN proposal is based on the origins and destinations of freight movement, shipment tonnage and values, truck traffic volumes, and population. Under MAP-21, the highway PFN will become part of a larger highway National Freight Network that includes all interstates and rural highway routes designated by states (Critical Rural Freight Corridors) that make up essential highway portions of the nation's multimodal freight system.

Maps of the PFN by state are available [here](#) and the original Federal Register notice can be viewed [here](#). On December 11, USDOT issued an extension of the original comment period deadline for 30 days (notice can be viewed [here](#)). Comments on the notice will be accepted until January 17, 2014.

NADO members are encouraged to submit public comments on the proposed Primary Freight Network. Below is some sample language you may use in your comments.

### **Sample Language**

I am submitting comments on the Federal Highway Administration's (Department of Transportation) Designation of the Primary Freight Network (Docket No. FHWA-2013-0050) on behalf of ***name of your organization*** and as a member of the National Association of Development Organizations (NADO). I commend the Federal Highway Administration (FHWA) for producing an illustrative map of the proposed Primary Freight Network and appreciate its effort to arrive at a comprehensive overview of critical freight routes in the United States.

Freight goods movement is essential to economic development in rural and small metropolitan communities. A comprehensive national freight policy must focus not just bottlenecks and chokepoints in urban areas, but on improving connectivity within entire corridors.

I also want to lend my support for the designation of Critical Rural Freight Corridors to be undertaken at the state level. As Congress recognized in drafting MAP-21, the network of rural roads that connect to the Interstate are vital to the movement of freight, especially in the case of "first mile" access at the very beginning of commodity movement.

### **Additional Suggestions for Comments**

There are several aspects of the proposed PFN that FHWA is seeking input on that will be of interest to NADO members. Below are several key issues along with guidance on some specific topics you might include in your comments.

- 1) **Specific route deletions, additions, or modifications to the draft initial designation of the PFN.** FHWA is seeking comments on the routes identified in the draft initial highway PFN including the specific identification of roadways that freight partners and stakeholders believe should be included or removed.
  - It may be helpful to look at your regional development plans and see where there is overlap (or gaps) between corridors you have identified as critical to freight movement in your region and the draft initial PFN.
- 2) **The methodology for achieving a 27,000-mile final designation.** The Federal Register notice describes an 8-step methodology USDOT employed to develop the draft initial highway PFN. The methodology uses the Freight Analysis Framework and High Performance Monitoring System data sets to arrive at the 41,518 centerline miles identified as the draft initial highway PFN.
  - USDOT is seeking feedback on the proposed approach and how it takes into account issues such as connectivity, border crossings, and the adequacy of the network to identify bottlenecks and other freight infrastructure or operational needs.
- 3) **How the National Freight Network and its components could be used by freight stakeholders in the future.**
  - Does the identification of corridors within a National Freight Network provide new opportunities for economic development initiatives in your region?
  - If your organization has looked at the nexus between freight improvements and economic development/jobs, how does a National Freight Network influence that calculation?
- 4) **How the National Freight Network may fit into a multimodal National Freight System.**
  - It might be helpful to provide feedback to USDOT on existing intermodal facilities (or those planned for the future) in your region and how those relate to a National Freight Network.

### **How to Submit Comments**

Please include the agency name and docket number at the beginning of your comments. All comments received will be posted online.

Comments may be submitted online [here](#).

You may also mail comments to :

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

