



April 25, 2016

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

Re. Draft National Freight Strategic Plan

Dear Secretary Foxx:

The Mid-America Freight Coalition (MAFC) is pleased to provide comments on the U.S. Department of Transportation's "Draft National Freight Strategic Plan" (Docket Number DOT-OST-2015-0248). MAFC works with the freight practitioners and planners in the ten states of Mid-America Association of State Transportation Officials to advance freight development within the states and across the region. We appreciate the opportunity to provide input on the development of the planning, policy and programs that will support and guide our freight systems.

MAFC recognizes the strong linkages between the efficient, multimodal movement of freight and our economy that are detailed in the draft plan. We also realize the importance of the State Departments of Transportation and their local as well as federal partners in maintaining and improving our freight systems. The draft NSFP provides a foundation to move forward with improving our freight system and is comprehensive and well balanced. However, there are several areas of concern in the draft NSFP that MAFC provides comments on below. MAFC worked with the State freight practitioners and planners to review the draft plan. We also reviewed the comments to be submitted from AASHTO and echo their work in our comments. We request the USDOT consider our comments in finalizing the NSFP and National Multimodal Freight Network (NMFN).

We appreciate this opportunity to provide the perspective of the MAFC to the USDOT and look forward to using the NSFP to advance our freight systems and economy. If you have questions regarding our comments please contact: Ernie Perry, Program Administrator, MAFC at (608) 890-2310. Or at [ebperry@wisc.edu](mailto:ebperry@wisc.edu)

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## MAFC comments on Draft NSFP

- 1) State Departments of Transportation should be heavily involved in identifying the multimodal freight network. Identification of this multimodal system is critical, and as all 10 of the MAFC states have completed significant work in understanding their multimodal freight systems, this knowledge should be incorporated into the national network. In our review of the plan and network with the Coalition member states, there were numerous missing highways, ports, connectors and rail facilities that the states have documented for USDOT. This grounded awareness of state multimodal freight systems should be incorporated in the national effort.
- 2) The draft NSFP focuses freight investments predominantly on the NMFN. It should be recognized that in most cases, these facilities are shared by both freight and passenger vehicles so these benefits are beyond freight. Secondly, many facilities not on the NMFN are critical to freight movement. Formula funding addresses the 65,000 miles on the NMFN as well as these other system components.
- 3) It should also be recognized that much of the freight moving through the ten states of MAFC region, is pass through traffic. In this sense, the states are providing service to the nation in addition to servicing state and regional needs. Further there are multiple examples of cross state benefits or congestion from freight development that flow across state lines. Given the mobility of freight and the impacts, even greater attention should be given to understanding these impacts and ensuring programs support the multistate needs. Multistate coalitions such as the MAFC can provide a bridge to understand and support multistate work in these areas and should be encouraged by the USDOT. Dedicated funding should also be provided to encourage multistate efforts and projects.
- 4) With a focus on high volume freight facilitates in developed areas, and lessor recognition of urban and rural facilities outside of the NMFN, diligence is needed to ensure these urban and rural facilities are maintained and improved along with the higher volume facilities. These facilities provide vital connections and redundancy to the system, and the rural portions are in fact the upstream source of the volume we see at the major facilities. Without these rural and urban system, the high volume network components would not exist.
- 5) The USDOT should avoid additional reliance on discretionary and competitive grant programs to fund freight programs. Stability and a long term vision are needed in freight funding. Additionally, as states are continually battling budget reductions, programmatic approaches provide stability and avoid the significant demand of preparing competitive grant applications with an unknown outcome.
- 6) USDOT should recognize the importance of the state freight planning efforts and how the state role not only links local facilities to the overall network, but ensures state to state connectivity. Most notably, the dilution of State authority in the case of MPOs with 500,000 people or more limits the State's ability to ensure system connectivity and access for business and industry. USDOT should continue the current planning roles and relations between States and MPOs and not dilute the states authority over federal transportation funding.
- 7) USDOT should work closely with States to define freight performance measures, provide accurate data, and the specifics of the measures should be defined during the rulemaking process. Further it should be made clear that there will be no requirements for the measures listed in Appendix B of the draft NSFP. The data in most case does not exist sufficiently to support these measures and some would have questionable impact in helping to improve the system. Of special note, the call for reducing freight transportation delay and variability on the NMFN for all modes by 10% per decade by 2045 is unrealistic. That is a 30% reduction in delay for a system that is so far underfunded and already congested, and with a 40% increase in tonnage expected. Also more specifically, reliability should be defined through travel time, not speed, as is the case with the probe vehicle dataset.
- 8) Ensure the NMFN retains flexibility to address changes in the economy, production locations, natural resource demand and new technologies that could change how and where freight is moved.
- 9) Greater attention should be given to newer concepts of consumer direct ordering and personal freight that rely on rapid home delivery. Christmas 2015 was heralded as the first time web sales exceeded storefront sales and most of these sales rely on rapid home delivery. These freight vehicle typically

travel local routes in smaller trucks that are not addressed in any data collection process. This trend is expected to continue and should be addressed in greater detail in the NSFP.

- 10) The NSFP remains truck and highway centric and USDOT should work to remove the barriers to managing the entire system rather than distinct separated modes. Most notably in the discussion on freight bottlenecks it seems the text reverted to focusing on highways and trucks.
- 11) The USDOT should provide greater emphasis on the Mississippi River system and the Great Lakes St Lawrence Seaway as freight gateways. Given the predicted demand at coastal ports, bringing cargo closer to its final destination on underutilized waterways supports our economy, the freight system and our quality of life.
- 12) On page 50 in the discussion on freight stakeholders, the Mid-America Freight Coalition is cited with its former name of the Mississippi Valley Freight Coalition. The name change occurred with the MAASTO renaming in 2010. MAFC appreciates the notation as a multistate coalition in the draft NSFP.
- 13) On page 23, six-subsections are identified and discussed as the driving forces affecting freight transportation. All six listed are certainly drivers, however environmental constraints and events are not mentioned as drivers and are likely to drastically change the way freight moves over the next several decades. USDOT should include environmental considerations in greater depth in the NFSP.