



# New York State Association of Metropolitan Planning Organizations

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January 3, 2014

Docket Number FHWA-2013-0050

*Re: Notice Soliciting Comments on the draft initial designation of the Highway Primary Freight Network*

I am pleased to submit these comments on behalf of the New York State Association of Metropolitan Planning Organizations (NYSAMPO), representing the 13 MPOs in New York. We support FHWA providing the user community with an opportunity to comment on this proposed designation, as well as other aspects of the National Freight Network (NFN).

NYSAMPO submits comments in the following areas:

- Gaps in the Draft Primary Freight Network (PFN) that represent critical facilities and freight corridors in New York State.
- Shortcomings in the methodology employed by USDOT to designate the networks.
- Use of Network designations as a basis for future federal funding decisions for freight-supportive investments.
- Lack of inclusion of key local facilities in each MPO region.

Comments:

- We understand that the 27,000 mile limitation on the PFN, with the potential to add 3,000 miles, is imposed by legislation. Nonetheless, it is apparent that the constraint has resulted in a proposed highway network that has critical gaps and lacks connectivity.
- A 30,000 mile Primary Freight Network is insufficient. At a minimum, the 41,000 miles identified as candidates for the Comprehensive PFN should be the starting point, even though this network leaves out important freight corridors.
- The Draft PFN, perhaps as a consequence of the mileage constraint, leaves out key facilities in New York State, including (for example) most of Interstate 90 and Interstate 87, which comprise key freight routes linking New York with key origins and destinations in the Northeastern United States and Canada.
- Border crossings are critical freight facilities, but the Lewiston-Queenston bridge and its Interstate connections are omitted.
- A major unknown is what purpose the PFN and NFN will serve in terms of future funding and programmatic designations. NYSAMPO strongly urges USDOT to advise Congress not to use the PFN as part of any future funding formula until the inadequacies caused by the insufficient size of the system are addressed.

- We understand that the PFN is intended to be a highway component of the National Freight Network, but emphasize how important it is to move ahead with the concept of multimodal freight corridors. Logistics supply chains very often rely on intermodal transfers, and on competition among modes. Manufacturers often look at network resiliency when siting a facility; access to multiple modes and routes supports resiliency.
- Regarding the methodology used to determine the PFN, the Federal register notice states that the USDOT “did not presume a truck freight correlation” regarding the locations of energy exploration, development, installation, and production areas, with this correlation being at the discretion of State DOTs through the designation of Critical Rural Freight Corridors (CRFC). Freight traffic, especially on highways, will increase significantly if hydraulic fracturing for natural gas is approved in New York State. NYSAMPO therefore recommends that USDOT give further consideration to this issue in the forthcoming CRFC guidance. There is concern that CRFC designation is based primarily on existing rather than forecasted truck volume.
- USDOT should require that State DOTs consult with MPOs in the process of designating the CRFC.
- USDOT should support the creation of Critical Urban Area Freight Corridors. MPOs would use the USDOT methodology for this designation, which would include first-and-last mile connections. This designation should distinguish between urban through-routes and intra-urban corridors.
- The National Freight Network will have value if it serves as the basis for programmatic and funding decisions that:
  - Improve freight movement and reduce bottlenecks
  - Mitigate the externalities of truck traffic to local communities
  - Encourage economic development
  - Redirect heavy trucks from local highways to the Interstate/National Highway System
  - Provide a basis for assigning priority to freight projects in MPO programming decisions.

Sincerely,



Richard Perrin, AICP

Chairman

New York State Association of Metropolitan Planning Organizations