

November 29, 2021

Stephanie Pollack
Acting Administration
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Re-Designation of the Primary Highway Freight System (PHFS); Docket No. FHWA-2020-0010

Dear Acting Administrator Pollack:

The American Association of State Highway and Transportation Officials (AASHTO) is pleased to provide comments on the U.S. Department of Transportation's "Re-Designation of the Primary Highway Freight System (PHFS)" (Docket Number FHWA-2020-0010). Notice of the opportunity to comment was published in the Federal Register on August 26, 2021. Representing all 50 states, the District of Columbia, and Puerto Rico, AASHTO serves as a liaison between state departments of transportation and the federal government. In response to the Request for Information (RFI), AASHTO is providing three main comments.

1. The limited mileage available leads to gaps in identifying crucial freight routes.
AASHTO acknowledges that it is important for the US Department of Transportation to focus limited freight investment funding on crucial assets and that these assets need to be identified and prioritized. The components of the National Highway Freight Network (NHFN) play an important role. However, the limited mileage of the PHFS presents gaps in the designation when the Interstate Highway system is not able to be fully designated on the PHFS. AASHTO understands that this is not something that can be fixed due to how the NHFN is codified into law with the FAST Act, but it is important to consider for future reauthorization or other legislation. States feel that there is insufficient PHFS mileage to identify the critical freight network overall. Additionally, the system of both PHFS miles and non-PHFS NHFN is complicated when identifying miles eligible for funding and when seeking to identify mileage that is appropriate to designate as PHFS.
2. Due to the limited amount of additional miles, any of the three options outlined in the RFI are viable.
The opportunity for AASHTO and state DOTs to weigh in on the approach of FHWA in designating the additional miles is appreciated. FHWA is consistently accommodating to work with and AASHTO and the state DOTs are grateful for the information, support, and flexibility provided by FHWA in identifying and designating various freight networks. The flexibility in designating Critical Urban Freight Corridors and Critical Rural Freight

Corridors on the NHFN is helpful and necessary in providing states and MPOs the appropriate discretion for their needs. Due to the very limited scope of additional miles to add to the PHFS, any of the three options outlined in the RFI are viable. AASHTO does not believe that any option selected will limit the ability for states to spend their funds.

3. The role of State Freight Advisory Committees in providing comments on this and other similar issues is burdensome.

The necessity of convening State Freight Advisory Committees (SFAC) is onerous for the amount of new mileage being considered. While AASHTO and the state DOTs recognize that this process is outlined in federal law and that the SFACs provide important insights, the benefits of convening these community and industry leaders to discuss 18 to 53 new additional miles for their state strains the limited staff capacity and resources available to engage on this question that is limited in scope and possibility. For future reauthorization or legislative changes, AASHTO would encourage the consideration of soliciting feedback from state DOT and MPOs directly.

We appreciate the opportunity to provide comments on this matter. If you would like to discuss this issue further, please contact Kyla Elzinga, Associate Program Manager for Planning and Data at kelzinga@aaashto.org or (202) 624-7797.

Sincerely,

A handwritten signature in black ink that reads "Shawn D. Wilson, Ph.D." with a stylized flourish at the end.

Shawn D. Wilson, Ph.D.
President, American Association of State Highway and Transportation Officials
Secretary, Louisiana Department of Transportation and Development

cc:

Caitlin Hughes at caitlin.hughes@dot.gov
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