

June 4, 2024

The Honorable Pete Buttigieg  
Secretary  
US Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

Subject: Comments on the US Department of Transportation Request for Information on Goals, Criteria, Thresholds, and Measurable Data Sources for Designating the National Multimodal Freight Network (Docket Number DOT-OST-2024-0047)

Dear Secretary Buttigieg:

The American Association of State Highway and Transportation Officials (AASHTO) appreciates the opportunity to provide input to the US Department of Transportation (USDOT) response to the Request for Information (RFI) on Goals, Criteria, Thresholds, and Measurable Data Sources for Designating the National Multimodal Freight Network (NMFN) published in the Federal Register on April 12, 2024.

AASHTO is a nonprofit, nonpartisan association representing the state transportation departments (state DOTs) in the 50 states, the District of Columbia, and Puerto Rico, with the mission to support state DOTs in connecting America with the transportation system of today and tomorrow. AASHTO and the state DOTs have a long history of successful partnership and collaboration with USDOT and its modal administrations, and we look forward to continuing this important work together. Given the state DOTs' role as primary stewards of the federally-supported state transportation program, AASHTO is pleased to provide the following input for consideration.

### **General Comments**

Supply chains in the United States are essential for delivering critical goods to Americans everyday such as food and medicine as well as the numerous goods that move throughout the country supporting our national economy. State DOTs are well-aware of the important role that safe and efficient infrastructure plays in keeping the American economy—composed of both people and goods—on the move. More broadly, the public at large has come to better appreciate the need for a well-supported freight network as supply chains have been strained and tested to their limits in recent years. The development of the NMFN aligns with my AASHTO Presidential Emphasis Areas on advancing safety, workforce development, and maximizing federal investments together. Freight infrastructure considerations are essential to each of these focus areas.

Designating the NMFN is important in understanding how each component of the supply chain is connected across all modes of transportation. AASHTO is pleased that the RFI takes a multimodal approach to analyzing the nation's freight network. State DOTs look forward to supporting the development of the NMFN and reviewing the initial map developed later this year to help meet critical infrastructure needs. Once designated, AASHTO members believe the NMFN can be a useful tool for freight planning and prioritizing of state and federal resources. AASHTO is pleased to provide general comments to the RFI on behalf of the state DOTs.

### **NMFN Goals**

For determining the goals that are most important to “ensuring the NMFN provides a foundation for the U.S. to compete in the global economy,” AASHTO believes that all of the goals identified in the RFI have significant value when considering a multimodal approach. AASHTO recommends ensuring that consideration is given toward connectivity between the modes of transportation and freight facilities in development of the NMFN map.

State DOTs play a key role in implementing federal investments in US infrastructure, particularly through the State Freight Plans and State Freight Advisory Committees. As such, “assisting States and local governments with strategically directing investments towards overall improved freight system performance” is a priority for AASHTO members as well as “prioritizing federal formula or discretionary grant investment.” That said, state DOTs have concerns about linking the NMFN directly to funding. It would be beneficial for USDOT to clarify explicitly how these funding-related goals may factor into the development of the NMFN map.

The RFI outlines that under the current statutory authorization, the NMFN and the National Highway Freight Network (NHFN) have similar goals, but that the NMFN does not have an impact on the NHFN or the use of National Highway Freight Program (NHFP) formula funding. State DOTs are concerned about how the inclusion of the NHFN will factor into the development of the NMFN map. The NMFN should take into account other federal highway network designations, as well as key facilities across the modes identified in the RFI. State DOTs request additional clarifications on the relationship of the NMFN, NHFN, and NHFP, as well as any additional funding implications of that relationship in this process to develop and implement the NMFN map.

### **Statutory Factors**

The RFI identifies twelve potential factors important for identifying network components critical to the US economy, but these may not be directly correlated to a measure of volume or monetary value. State DOTs appreciate the ease of measuring factors like volume, tonnage, and other metrics, but are concerned that relying too heavily on these measurements may overlook key considerations for evaluating and supporting a comprehensive freight system. The twelve factors identified in the RFI are outlined below; areas that were identified as most important by state DOTs are designated in **bold**:

1. freight origins and destinations;
2. freight volumes and their strategic importance;
3. access to and impacts on various modes of transportation, border crossings, agriculture, manufacturing, distribution centers, inland ports, natural resources, and energy sources;

4. economic factors;
5. **access to major areas for manufacturing, agriculture, or natural resources;**
6. access to energy exploration, development, installation, and production areas;
7. **key intermodal connections;**
8. **freight chokepoints;**
9. impacts on all modes of freight that share significant infrastructure;
10. **key freight facilities identified by states and local governments, including existing State Freight Advisory Committees;**
11. major distribution centers, inland intermodal facilities, and first- and last-mile facilities;
12. the overall significance of the movement of goods in global and domestic supply chains.

Prioritizing these focus areas in developing the NMFN will support local economies and strategic priorities identified in each state. Other considerations USDOT could include: (1) corridor level analysis and trade lanes based on origin and destinations; (2) available capacity, rather than focusing solely on tonnage moved. While this may be more difficult to assess, identifying available capacity (for example, overall tonnage capacity at port facilities) may assist with USDOT's strategic goals in overall global economic competitiveness and support future growth and development of the freight system.

### **Measurable Thresholds, Criteria, and Data**

Assessing the statutory focus areas based on factors such as volume, value, and tonnage will vary among the states as will the types of modes of transportation that are used to move freight. However, AASHTO believes that connectivity across the modes is critical for moving goods in addition to the volume of freight that passes through a state on a particular mode of transportation.

For additional resources, use of the State Freight Plans would be helpful to supplement the potential data sources that USDOT has identified for each of the 12 factors listed in the RFI. These plans provide a broad range of state and local information in addition to the federal and national resources identified in the RFI. Such plans may identify resources that have more granular levels of data than those identified in the RFI. Within existing freight planning processes, state DOTs consider a variety of measurable thresholds, criteria, and data that are integrated into State Freight Plans, many of which have been updated to comply with the new Infrastructure Improvement and Jobs Act (IIJA) requirements. AASHTO supports USDOT use of State Freight Plans to examine the compilation of industry standards and modal data.

### **Additional Factors**

State DOTs support the consideration of factors such as safety, climate and sustainability, equity, national defense, consistency with other federally designated networks in development of the NMFN, and transformation in the NMFN. State DOTs appreciate the identification of truck parking as a safety factor in the RFI. State Freight Plans and Federal Highway Administration Jason's Law Surveys provide important information addressing this vital safety concern. AASHTO supports ensuring consistency with STRAHNET, STRACNET, and the US Department of Defense/Strategic Ports as identified in the RFI.

These important considerations are currently being addressed in various ways in the State Freight Plans, particularly with regard to climate, sustainability, and transformation. These plans offer a wealth of state information that will provide a broad array of perspectives on how to address these issues. USDOT also may wish to incorporate resilience into the climate and sustainability factors.

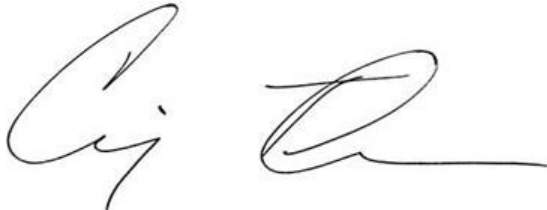
### **Conclusion**

As noted throughout these comments, AASHTO and the state DOTs support the development of the NMFN to help prioritize resources to enhance the nation's existing freight networks and facilities to provide greater connectivity, efficiency, and safety to keep goods on the move. Doing so will help meet shared goals of state DOTs and USDOT on safety, workforce development, and maximizing federal investments in infrastructure.

AASHTO greatly appreciates the opportunity to provide input on the RFI on Goals, Criteria, Thresholds, and Measurable Data Sources for Designating the National Multimodal Freight Network. We encourage USDOT to carefully consider the input provided herein, as well as in the detailed comments submitted by individual state DOTs.

If you have questions on these comments and recommendations, please contact Susan Howard, Director of Policy and Government Relations at (202) 624-3698 or [showard@aaashto.org](mailto:showard@aaashto.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Thompson', with a stylized flourish at the end.

Craig Thompson  
President, American Association of State Highway and Transportation Officials  
Secretary, Wisconsin Department of Transportation