

National Capital Region Transportation Planning Board

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DRAFT January 9, 2014 ***DRAFT***

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue S.E., W12-140
Washington, DC 20590-0001

Item #6 TPB Technical Committee January 3, 2014

Via Electronic Submission to: www.regulations.gov

RE: *Federal Register*; Request for Comments – USDOT-FHWA Docket No. FHWA-2013-0050 – Designation of the Primary Freight Network – Comments from the National Capital Region Transportation Planning Board

To Whom It May Concern:

The National Capital Region Transportation Planning Board (TPB) is the metropolitan planning organization (MPO) for the metropolitan Washington, D.C. area, including the District of Columbia as well as portions of the states of Maryland and Virginia. The TPB hereby submits the following comments regarding the November 19, 2013 *Federal Register* publication of the Designation of the Primary Freight Network (PFN). The TPB also anticipates that the District of Columbia, Maryland, and Virginia departments of transportation will submit comments to the docket including specific state concerns.

The primary concern of the TPB regarding the designated PFN relates to the constraints caused by its unduly low 27,000-mile statutory limit, which is significantly less than even the 41,000 miles of Interstate highways nationally. This limit, allowing for less than 200 miles of the several thousand miles of major roadways in the National Capital Region, precludes the PFN from accurately reflecting the breadth of roadways (and non-roadway facilities) critical to the region's freight movement and economy. Of particular concern are the designated PFN's omission of access roadways serving Dulles International and Ronald Reagan Washington National Airports, as well as the almost total omission of roadways in the District of Columbia. Furthermore, future performance measurement based upon the designated PFN will not be able to give an accurate picture of the National Capital Region's freight conditions and needs.

The TPB asks more clarity regarding future uses of the PFN designation, especially regarding performance measurement and funding decision making. Data sources on designated facilities will have to be sufficient for the performance measurement required for those facilities. Flexibility will be essential in how the designated PFN facilities are considered in future funding eligibility and decision making in contrast to non-PFN facilities. Future enhancements to both the statutory and regulatory aspects of the PFN designation should be made based upon experience and lessons learned.

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The TPB appreciates the opportunity to comment. Please feel free to contact me or Andrew Meese of my staff, at ameese@mwkog.org or (202) 962-3789, if we can provide any additional information.

Sincerely,

Gerald Miller
Acting Co-Director
Department of Transportation Planning
National Capital Region
Transportation Planning Board