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On behalf of the more than 8,000 members of the American Road & Transportation Builders Association (ARTBA), we respectfully offer comments in response to the U.S. Department of Transportation’s (USDOT) recent request for information as it prepares its National Freight Strategic Plan (NFSP).

ARTBA’s membership includes public agencies and private firms and organizations that own, plan, design, supply and construct transportation projects throughout the country. These include prime contractors, sub-contractors and suppliers, and firms which vary in size across the spectrum. Overall, our industry generates nearly $500 billion annually in U.S. economic activity and sustains the equivalent of 4 million American jobs.

The movement of freight throughout our nation is the embodiment of the federal government’s constitutional responsibility – found in Article 1, Section 8 – to regulate interstate commerce and establish post roads. Moreover, the efficient movement of food, raw materials and manufactured products from place of origin to export facilities is key to America’s competitiveness in the world marketplace.

Currently, trucks on the Interstate Highway System move almost 70 percent of all freight by value. That percentage only stands to increase as e-commerce and domestic energy markets grow. Transportation and transportation-related spending accounts for 9 percent of gross domestic product, with the highway sector accounting for 60 percent of that share. Obviously, a very significant portion of the cost of U.S. goods is directly related to the cost of highway transport. To improve U.S. competitiveness, a high-quality national highway and bridge network is essential.

ARTBA provides the following responses to inform USDOT’s development of the NFSP.

1. What are the three most important challenges facing the U.S. freight transportation system?

Inadequate Investment: Funding improvements to the National Highway Freight Network (NHFN) is the biggest challenge facing U.S. freight transportation. As an example, over 47,000 bridges on the network have been deemed structurally deficient, while nearly 69,000 bridges are “posted for load,” which adversely affects freight shipments that need to be re-routed to arrive safely at their destinations.

In its NFSP, USDOT should position the NHFN as a primary focus of federal-aid capital investments. While it is critical to end the 12-year cycle of insolvency for the Highway Trust Fund (HTF), all federal surface transportation programs also need significant, long-term investment increases, over and above filling the HTF’s perennial “hole.”
**Strained Capacity:** Currently, trucks move 69 percent of freight by value. The total value of freight is expected to double by 2045. By 2045 the total weight of freight across all modes is expected to increase to 69 million tons per day, up from 49 billion tons in 2015.

Given these staggering projections, sustained future economic growth will require investments in the freight network to improve existing capacity and add new capacity.

**Insufficient Clarity of Purpose:** As noted above, the U.S. Constitution includes the origins of what is now the NHFN. USDOT’s upcoming NFSP should underscore the critical importance of this federal role and the federal-aid investment that goes with it. While increased state and local transportation revenues and investment have been welcome developments, they should not be interpreted as obviating the need for federal leadership in freight policy and related investment in the system.

3. *How should DOT measure freight transportation system performance? In your response, consider both safety and efficiency, as well as performance thresholds across multimodal metrics (i.e., hours of delay, infrastructure conditions, planning time index) that represent untenable performance for the public or private sector. Consider how performance metrics could be employed to inform DOT’s discretionary grant programs.*

Freight system performance should be measured by outcomes related to physical conditions, rather than externalities like greenhouse gas emissions or land-use planning. System performance should be data-driven, reflect the causes and consequences of congestion, incorporate economic costs of congestion, and reflect the interplay between roadway conditions and safety.

5. *What should be considered regarding vital operational or equipment innovations, emerging technology advances from research communities, as well as infrastructure or facility concepts in freight transportation?*

Continued support for and implementation of research outcomes will help adoption of innovative concepts for infrastructure and freight facilities. Specifically, USDOT should continue to support and utilize work done by University Transportation Centers and other research institutions. The following programs are just a few examples of freight initiatives that can serve as a resource:

- Carnegie Mellon University, National University Transportation Center for Improving Mobility
- Clemson University, Center for Connected Multimodal Mobility
- Florida Atlantic University, Freight Mobility Research Institute
- Portland State University, National Institute for Transportation and Communities
- University of Wisconsin-Madison, National Center for Freight & Infrastructure Research and Education
• University of Memphis, Intermodal Freight Transportation Institute
• University of North Carolina at Charlotte, Center for Advanced Multimodal Mobility Solutions and Education
• University of South Florida, National Institute for Congestion Reduction

In addition, USDOT’s recent repeal of the Proprietary Products rule, 23 CFR 635.411, which dated to 1916, will enable greater use of new technologies on federal-aid highway and bridge projects. ARTBA anticipates resulting improvements in safety and efficiency on the NHFN as a result.

6. What approach should the federal government use to invest in the multimodal freight system? How would this approach apply to each transportation mode, for freight in general, for specific industries, or for freight assets owned by the private sector (i.e., rail, pipelines, maritime)? What are best practices for identifying projects that involve both public and private sector assets and for encouraging communication between the public and private sector to complete those projects?

The nation’s freight network is comprised of multiple modes, all of which should generate federal user fees derived—at least in part—from freight movement. This is currently the case with airport infrastructure. Revenue generated in this way should ensure significant investment for freight-related assets within each mode and alleviate any perceived competition among the respective modes for scarce dollars.

7. What barriers (such as regulatory, technological, institutional, statutory) are critical to freight efficiency that DOT should better understand? Please consider which of these affect freight origination and/or destination areas, as well as intermodal transfers, and describe the root causes of the inefficiencies.

Intermodal connectors, or the critical “first and last mile” in freight corridors, represent barriers to efficiency given the level of congestion that occurs for truck traffic. In general, congestion throughout the NHFN constitutes a barrier to efficiency and a compromising of safety. As one example of a system improvement, truck-only lanes would ensure more efficient movement of freight in many regions.

8. What information is critical to understanding the unique infrastructure and operational freight impacts faced by local communities? Please detail any best practices in economic development and planning processes that support freight intensive activity or innovative financing. Describe current and prospective infrastructure safety enhancements that should be considered.

The Fixing America’s Surface Transportation (FAST) Act of 2015 requires a focus on identifying bottlenecks which result insignificant congestion of freight movement and can adversely affect local communities. In fact, various research entities are tracking these bottlenecks, enabling the NFSP to encompass an annual metric quantifying the extent to which they have been eradicated, improved or merely relocated along the system.
On safety, current law requires the utilization of positive protection in appropriate highway construction work zones. The NFSP should reinforce the importance of positive protection in any work zone on the NHFN.

10. What else should DOT consider (including the eleven statutory criteria listed above) or do to improve freight transportation in the U.S.?

Given the projected growth of e-commerce and the effect this growth will have on the Interstate Highway System, DOT should include retail or e-commerce as an additional industry in its analysis.

With all 50 states and the District of Columbia developing their own such plans, the National Freight Strategic Plan should pay close attention to regional projects and dynamics that may be outlined by state agencies.

Along with state and regional dynamics, freight intensity, measured by forecasted employment growth, should be considered. A Transportation Research Board study called “Renewing the National Commitment to the Interstate Highway System: A Foundation for the Future” forecasts employment growing at the fastest rates in the South, West, and Mid-Atlantic regions.

Conclusion

ARTBA appreciates the opportunity to provide its priorities for development of the NFSP, just as we have been pleased to participate in periodic discussions with USDOT officials on this topic. We look forward to continuing interaction with USDOT as an engaged stakeholder on freight issues.

Sincerely,

David Bauer
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