

**Congress of the United States**  
**Washington, DC 20515**

January 31, 2014

Honorable Anthony Foxx  
Secretary  
U.S. Department of Transportation  
West Building  
1200 New Jersey Ave. SE  
Washington, D.C. 20590

Dear Secretary Foxx:


As members of the Interstate-69 Congressional Caucus, we have supported the development of Interstate 69 as a critical component of our nation's multi-modal freight system. As the Department of Transportation moves forward in designating the "National Freight Network," we feel strongly that Interstate-69 should be a vital part of that designation. While traffic volumes are already strong and growing on I-69 due to booming energy development and trade activity, it is clearly anticipated that once the Interstate-69 is complete, traffic volumes will significantly increase as I-69 provides the most direct interstate access to principal North American trade routes and multiple Gulf Coast Ports.


In response to the request for comment from the DOT, the enclosed white paper summarizes our comments and we ask that it is included in your considerations of the National Freight Network designation.

We appreciate your leadership and commitment to ensure that efficient freight movement is a recognized factor in the federal government's role in transportation. We ask that Interstate-69 be included in the designation of the National Freight Network.

Respectfully,

  
**BLAKE FARENTHOLD**  
Member of Congress

  
**LARRY BUCSHON**  
Member of Congress

  
**PETE OLSON**  
Member of Congress

  
**RUBEN HINOJOSA**  
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**ED WHITFIELD**  
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**LOUIE GOHMERT**  
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**TODD YOUNG**  
Member of Congress



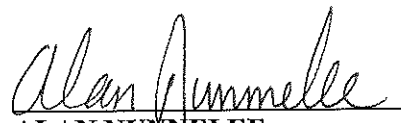
**ANDRE CARSON**  
Member of Congress



**GENE GREEN**  
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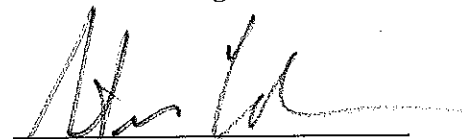
**TODD ROKITA**  
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**STEVE COHEN**  
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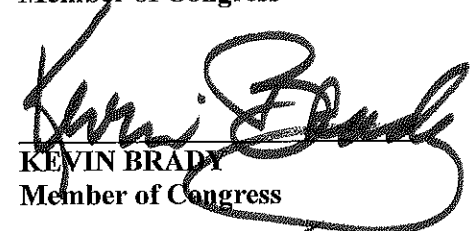
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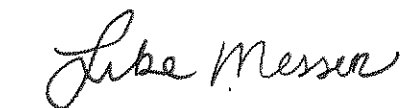
**CANDICE S. MILLER**  
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**SHEILA JACKSON LEE**

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**AL GREEN**

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## **I-69 and the National Freight Network Designation**

As DOT advances the designation of the Primary Freight Network and the National Freight Network, we offer the following points to support the **inclusion of I-69 in the National Freight Network**.

### National Freight Network

- Designation of the National Freight Network is a strategic opportunity to help direct federal and state investment in highway infrastructure to enhance the movement of freight throughout the United States. As such, it is important to recognize not only the critical elements of the highway freight system based on current volumes, but also to identify areas of expected growth and ways to enhance the current highway system to carry freight.
- Per MAP-21, the National Freight Network will be comprised of the Primary Freight Network, the remainder of the Interstate system not included in the Primary Freight Network and the Critical Rural Freight Corridors as designated by each state.
- MAP-21 further specifies that FHWA shall designate up to 3,000 miles that are critical to the future efficient movement of goods.
- The greatest value of designating the National Freight Network should not be to affirm that the majority of freight currently travels along the interstate system and that resources are needed to maintain the interstate system, but to identify non-interstate roadways that need to be improved or built in order to enhance the movement of freight.
- Designation of a National Freight Network should consider key multi-modal connections in the movement of freight to/from seaports, border ports of entry, airports and rail lines.
- Designation of the freight network should also ensure connectivity of highway segments and other modes of transportation critical to the movement of freight.

### I-69

- The multi-state I-69 corridor serves or can serve the freight needs of three countries, eight states directly and more than a dozen states through interconnections with 16 key pieces of the Interstate Highway System serving the eastern half of the nation. It connects eight international ports of entry. It will serve much of the freight needs of key ports and waterways including Great Lakes ports, the Ohio and Mississippi River ports and 10 deepwater ports on the Gulf of Mexico. It provides direct or nearby connectivity to air freight hubs at Houston, Memphis, Louisville, Indianapolis, Dallas-Fort Worth and Chicago. It provides ready access for truck/rail intermodal terminals all along the corridor.
- I-69 has consistently been a national priority over the past twenty years with designations including the following: High Priority Corridors, Future Interstate, Environmental Streamlining Executive Order and Corridor of Future.
- States along the I-69 route have made significant progress in recent years utilizing a variety of funding sources, including state formula funding to complete sections of I-69. Inclusion of I-69 in the National Freight Network could bring additional resources and strategies to advance the completion of I-69.

- DOT should ensure that designation of the National Freight Network, including the additional 3,000 miles of future highways as well as the Critical Rural Freight Corridors, are complete and considered as part of the reauthorization of MAP-21. Consideration of the Primary Freight Network alone is insufficient to direct needed future investment in freight infrastructure.

### **Comments on Specific Route**

- As defined by Congress in MAP-21, the Primary Freight Network is based largely on current levels of freight activity, thus a snapshot of current system demands. However, the US government needs to look strategically at what roadways and other modes of transportation need to be enhanced in order to efficiently move freight and compete in the global market.
- While some sections of I-69 today carry high volumes of freight, it is understood that once the interstate is complete, traffic volumes will significantly increase as I-69 provides the most direct interstate access to principal international border crossings and multiple Gulf Coast Ports.

### **Methodology for Achieving a 27,000 mile final designation**

- Designation of the Primary Freight Network should not be tied to an arbitrary number (27,000 miles) but based on a thorough analysis of multi-modal freight movements to determine a comprehensive freight network that provides seamless highway freight corridors that connect directly to other freight modes.
- Designating isolated segments of roadways without consideration of corridors or movement of freight between modes is not practical when the end goal is to ensure the seamless movement of freight throughout the United States.
- Designation of the 3,000 miles that are critical to the *future* efficient movement of goods represents a strategic opportunity for the nation to enhance its freight transportation network. The identification of roadways that will be major freight thoroughfares when built to interstate standards should be of equal importance to designation of the Primary Freight Network. Furthermore, criteria for selection should not be based on current traffic volumes but factors such as strategic multi-modal connections to other primary freight infrastructure, access to international border crossings, and previous designation as national priority corridor.
- DOT correctly recognizes that the multitude of factors that Congress directed be considered for the PFN designation, coupled with the 27,000 mileage cap does not “yield a network that is representative of the most critical highway elements of national freight system.” It is recommended that DOT impress upon Congress the importance designating a National Freight Network, including a Primary Freight Network, that is multi-modal and provides seamless transportation routes for freight and is not restricted purely by a mileage cap.

### **How the National Freight Network may fit into a multimodal National Freight System**

- It is critical that the National Freight Network be designated as part of a holistic, multi-modal National Freight System.

### **Suggestions for an Urban-Area Route Designation Process**

- Designation of Urban-Area components of the National Freight System should be designated in consultation with local MPO's.