

Comments of the Montana Department of Transportation
Regarding the Draft National Freight Strategic Plan
To the United States Department of Transportation
Docket No. DOT-OST-2015-0248
April 23, 2015

The Montana Department of Transportation (MDT) takes this opportunity to file comments to supplement December 11, 2015 comments filed jointly in this docket with the transportation departments of Idaho, North Dakota, South Dakota, and Wyoming. And express general support of comments submitted by the American Association of State Highway and Transportation Officials (AASHTO).

MDT is supportive of safe, efficient freight transportation systems critical to the success of our state and region, while understanding a national interconnected freight network is necessary to maximize economic benefits and limit environmental impacts. The draft NFSP includes strategies to reduce infrastructure, institutional, and financial bottlenecks. MDT's comments fall within these categories.

Infrastructure bottlenecks

Montana fails to achieve the national congestion metrics for high freight volumes and truck percentages, yet plays a vital role in the regional and national economy. Montana is predominantly a resource state with its transportation infrastructure linking resources and commodity flows to the Pacific Northwest, Midwest, Gulf States, and international ports in the US and Canada. Highways in rural areas provide essential connections for freight between major metropolitan areas and movements that originate or terminate some distance from the NMFN. The draft NFSP and final designation must do more to recognize the importance of system connectivity. The proposed NFSP leaves rural states with very large geographic regions, which are deemed nationally significant for resources, (Bakken oil, agriculture, minerals, timber, etc.) many miles from a designated highway freight corridor. Designation of US-2 and I-94 would go a long way toward closing these gaps in connectivity. USDOT should work with individual state DOTs in developing the NMFN and finalizing the NFSP. In addition, the plan should also address the dual nature of the Nation's multi-modal infrastructure in serving both passenger and freight mobility.

Financial bottlenecks

Formula funding provides rural states with predictable financial resources, while administrative strain is added when developing comprehensive discretionary grant applications within short response timeframes. Additional pressure of discretionary funding is caused by the proportionally high non-federal match requirement and scoring based on national metrics not particularly fit for critical rural freight movements and connectivity. The draft plan overemphasizes federal discretionary grants for a limited number of high volume facilities and does not give adequate weight to the need for investment in the much larger transportation system, including connections in and across rural states. Though Montana is a vital resource state with limited freight network congestion and lower-than-minimum percent trucks, it is challenged when competing for funding optimized for high-volume, congested facilities. MDT urges the US DOT to maintain programmatic flexibility for states to address regional freight needs.

Institutional bottlenecks

Freight is considered within Montana's long-range transportation policy plan and within subject or area-specific plans such our state rail plan, rail-highway grade separation study, Bakken area studies, and border crossing studies. MDT is urging US DOT to maintain program flexibility which allows states the ability to address freight issues relative to each individual state's scope, scale and relationship with freight stakeholders.

In summary, we appreciate the opportunity to comment on the draft National Freight Strategic Plan and respectfully request sustained programmatic flexibility for freight focus and additional highway infrastructure designation and eligibility for rural states' infrastructure.