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Montana Department of Transportation

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Greg Gianforte, Governor
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December 9, 2021

Dockets of Management Facility
US Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington D.C., 20590

Subject: DOT Docket No. FHWA-2020-0010 - Designation of the Primary Highway Freight System (PHFS)

The Montana Department of Transportation (MDT) appreciates the opportunity to provide comments on the subject Request for Information.

First, please note MDT fully endorses the comments filed jointly by the state transportation departments of Idaho, Montana, North Dakota, South Dakota, and Wyoming.

Since the establishment of the National Multimodal Freight Network (NMFN), which includes the National Highway Freight Network (NHFN) and subsequently the Primary Highway Freight System (PHFS), MDT has expressed concerns to the USDOT (MDT Comment Letter, Sept. 1, 2016, Docket No. DOT-OST-2016-0053) that the amount of Congressionally designated highway mileage are not enough to provide for a sufficiently connected and resilient system and do not capture a significant portion of freight moving by highway.

When the PHFS was designated in 2016, approximately two-hundred and fifty miles of interstate in Montana were not included. Montana was classified as a "high mileage" state, and interstates not on the PHFS were excluded from eligibility for funding under the National Highway Freight Program (NHFP) and Infrastructure for Rebuilding America (INFRA) grants. MDT encourages FHWA to prioritize existing segments of the Interstate System for inclusion in the PHFS to better connect the existing missing components. In Montana, I-94 is an equally important link for freight movement along the northern tier as I-90 (junction with I-94 to Wyoming) and should be included in the PHFS.

The initial 41,518 miles designated to be PHFS by Congress was based on an inventory of national freight volumes in 2015 and by taking key factors into consideration as identified in 23 U.S.C. 167 (d)(2)(E). Since this original evaluation, there have been changes in freight movement and demand both from a social and economic standpoint. The currently proposed options in the Docket do not recognize these changes, which may ultimately lead to critical portions of the interstate being overlooked. Therefore, MDT is requesting that FHWA consider re-evaluating the PHFS based on the criteria established in 23 U.S.C. 167(d)(2)(E) and by using current data to provide a network that best serves the country.

Lastly, MDT encourages FHWA to consider comments from state departments of transportation equal to state freight advisory committee comments given establishment of such committees is not required per statute (49 USC 70201).

Sincerely,

Malcolm D. Long
Director

copies: Carol Strizich, Multimodal Planning Bureau Cheif