



# STATE OF CONNECTICUT

## DEPARTMENT OF TRANSPORTATION



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February 14, 2014

Docket Number: FHWA-2013-0050  
Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
W12-140  
Washington, D.C., 20590-0001

Subject: Federal Highway Administration Docket No. FHWA-2013-0050, Designation of the Primary Freight Network

To whom it may concern;

The Connecticut Department of Transportation (CT DOT) is grateful for the opportunity to provide comments on the designation of the Primary Freight Network (PFN) (Docket No. FHWA-2013-0050) issued on November 19, 2013. On behalf of Commissioner James Redeker, CT DOT would like to provide the following comments:

### **Overview and Background**

Congress, through MAP-21 sec. 1115 directed the secretary of US DOT to establish a National Freight Network (NFN). The NFN will consist of three components: 1. The highway Primary Freight Network (PFN), 2. Portions of the Interstate System not designated as part of the highway PFN, and 3. Critical Rural Freight Corridors. The purpose of the NFN is to assist States in strategically directing resources toward improved system performance for efficient movement of freight.

US DOT seeks comments on five areas by February 15, 2014:

1. Specific route deletions, additions, or modifications to the draft PFN
2. The methodology for achieving a 27,000 mile designation
3. How the NFN and its components could be used by freight stakeholders in the future
4. How the NFN may fit into a multimodal National Freight System
5. Suggestions for an urban-area route designation process

Congress limited the number of centerline lane miles of the PFN to 27,000, with an additional 3,000 centerline miles available to be designated at the discretion of the US DOT. The original methodology to identify those 27,000 resulted in a much larger number of centerline miles being 41,518. In an effort to reduce the number to the required 27,000 the US DOT applied a reduction factor with only the highest annual average daily truck traffic (AADTT). When using this reduction factor the remaining 27,000 were disjointed and not connected. Both maps are available for comment and for comparison purposes. In Connecticut, the difference between the two is less than 2 miles.

## **Comments**

### **Comments on Notice**

Congress has not stated the purpose of the PFN beyond “strategically directing resources”. It may be that additional performance measures may be required of PFN designated routes. Extending the PFN in Connecticut may result in an increase of costs related to maintenance, repair, and monitoring of PFN routes.

### **Comments on Draft Network**

The draft PFN for Connecticut does encompass most of the critical freight routes. The methodology of achieving the 27,000 mile designation works well to account for freight traffic passing through Connecticut. In 2013, the Connecticut Department of Energy and Environmental Protection (DEEP) estimated that truck traffic associated with freight in Connecticut is divided into about half through traffic and half local traffic.<sup>1</sup> Through traffic tends to stay primarily on the Interstate routes included in the PFN. However, freight delivered by air and port to Connecticut needs to be picked up by truck, both for local and through delivery. Regarding such intra-state movements, CTDOT believes that the AADTT methodology casts several key routes out of consideration. Although truck volumes on I-691, I-291, the Charter Oak Bridge on US-15, and Route 20 may not meet US DOT’s minimums, the routes are critical to inter and intra state freight movement. For example, I-291 connects I-91 to I-84 across the Connecticut River; and I-691 carries east and north bound freight traffic from I-84. A critical portion of Route 20 connects Bradley International Airport with I-91. I-691 allows freight traffic to divert away from congested Hartford, where traffic bottlenecks can cause significant delay.

To assess performance of its roads, Connecticut monitors volume to capacity ratios and traffic bottlenecks. Volume to capacity ratios can indicate levels of service and congestion.<sup>2</sup> When traffic volumes are less than 0.90 of a road’s capacity, the road is considered to be operating under capacity. Traffic volumes more than 1.0 of a road’s

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<sup>1</sup> *Development of A Strategic Plan for Reducing Emissions Associated with Freight Movement in Connecticut*. 2013. Prepared by De la Torre Klausmeier Consulting, Inc. for Connecticut Department of Energy and Environmental Protection.

<sup>2</sup> FAF<sup>3</sup> Freight Traffic Analysis. 2011. Compiled by Battelle Memorial Institute for Oak Ridge National Laboratory.

capacity indicate a road that is operating over capacity. However, volume to capacity ratios at or above 0.75 can indicate delays and unstable traffic flows. Bottlenecking of freight traffic can occur when roads, particularly freeways, operate above capacity. Overall, Connecticut achieves a high percentage of roads that operate below capacity, but some localized areas, including most of the key routes noted above, operate above capacity. In 2011, the most recent year for which data is available, peak hour volumes on I-291 and Route 20 were over capacity, with volume to capacity ratios of 1.02 and 1.14, respectively. I-691 had an acceptable volume to capacity ratio along all sections. The Charter Oak Bridge and the US 15 connector between I-84 and I-91 are locations of significant freight bottlenecking, with volume to capacity ratio of 1.18. The chart below illustrates the seven Connecticut freight bottlenecks that are ranked in the Top 100 freight bottlenecks nationwide, as reported by the American Transportation Research Institute for 2013.<sup>3</sup> The Charter Oak Bridge is the only ranked bottleneck in Connecticut not represented in the PFN.

<b>Congestion Ranking 2013</b>	<b>Location Description</b>	<b>State</b>	<b>Avg Speed</b>	<b>Peak Avg Speed</b>	<b>Non-Peak Avg Speed</b>	<b>Non-Peak/ Peak Ratio</b>
18	<a href="#">Hartford, CT: I-84 at I-91</a>	CT	48	38	51	1.34
35	<a href="#">New Haven, CT: I-95 at I-91</a>	CT	47	42	49	1.17
38	<a href="#">Stamford, CT: I-95</a>	CT	45	38	47	1.27
43	<a href="#">Norwalk, CT: I-95</a>	CT	47	42	48	1.15
78	<a href="#">Bridgeport, CT: I-95 at RT 8</a>	CT	52	45	54	1.19
87	<a href="#">Waterbury, CT: I-84 at SR 8</a>	CT	50	46	52	1.12
94	<a href="#">Charter Oak Bridge, CT: I-91</a>	CT	53	49	55	1.10

Below are the most recent heavy truck volumes on the potential additional routes, as supplied by CTDOT's Traffic Monitoring Unit:

Route 20- Hamilton Rd S. Windsor Locks Tuesday-Thursday March 15-17, 2008	Number of Vehicles	Percentage
Single Unit Trucks	2161	2.89%
Single Trailer Trucks	2358	3.16%
Multi Trailer Trucks	69	0.09%
Heavy Vehicle Totals (Includes buses)	4625	6.19%

<sup>3</sup> Freight Performance Measures: Monitoring Congestion at 100 Freight Significant Highway Locations. 2013. American Transportation Research Institute.

I-291 Between Exit 4 & 5 South Windsor Monday-Wednesday April 22-24 2013	Number of Vehicles	Percentage
Single Unit Trucks	3459	3.49%
Single Trailer Trucks	2385	2.40%
Multi Trailer Trucks	168	0.17%
Heavy Vehicle Totals (includes buses)	6088	6.14%

I-691 Between Exit 2 &3 Cheshire Monday-Wednesday September 23-25 2013	Number of Vehicles	Percentage
Single Unit Trucks	4391	3.91%
Single Trailer Trucks	6643	5.91%
Multi Trailer Trucks	302	0.27%
Heavy Vehicle Totals (includes buses)	11507	10.24%

Charter Oak Bridge, SB East Hartford Tuesday-Friday September 7-10 2010	Number of Vehicles	Percentage
Single Unit Trucks	3205	3.08%
Single Trailer Trucks	6772	6.5%
Multi Trailer Trucks	455	0.44%
Heavy Vehicle Totals (includes buses)	10677	10.25%

\*I-291 could potentially add 6.4 miles to the PFN, I-691 could add 8.9 miles, 5/15 Connector 2.13 miles, and Route 20 could add 2.3 miles.

Freight stakeholders in Connecticut, particularly in the trucking industry, have indicated in the recent past that they have varying and conflicting needs<sup>4</sup>. Local freight companies and goods producers have expressed opposition to tolling, as they may need to repeatedly cross state lines for fairly short distance deliveries. Additionally, many companies operate at peak volume times to accommodate end user needs. Through truck traffic stakeholders have requested better rest areas and more parking, as well as having identified a need for state authorities to mitigate congestion on the Interstate system. Ideally, a NFN could take into account these two distinct types of stakeholders, which both utilize PFN routes, but in differing ways.

The trimming of the original PFN to the 27,000 mile version cut out connectors to the Bridgeport and New London ports. Connecticut, as part of congestion management and climate change initiatives, and in tandem with DEEP projects, would like to move towards a reduction in VMT (DEEP 2013). Transferring truck traffic to multi modal

<sup>4</sup> *Intermodal Transportation Inventory: A Synopsis of Trucking and Warehousing, A Cross Section of the Industry in Connecticut*. 2003. Connecticut Department of Transportation, Office of Intermodal Planning.

freight movements is crucial to improving economic and health outcomes. A useful NFN would account for multimodal connectors as a priority.

To continue lowering emissions, Connecticut would like to divert as much through freight traffic as is feasible out of urban cores. Urban area route designation could perhaps focus on routes that cross through the edges of urban areas, ideally near existing industrial land uses.

We thank you for the opportunity to provide comments on the PFN. If there are any questions regarding CTDOT's comments, please contact Freight Planning at 860-594-3160.

Sincerely,

*Commissioner James Redeker*

*Deputy Commissioner Anna Barry*