



125 EAST 11TH STREET, AUSTIN, TEXAS 78701-2483 | 512.463.8588 | WWW.TXDOT.GOV

September 6, 2016

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Ave., SE  
W12-140  
Washington, DC 20590-0001

**Re: Establishment of Interim National Multimodal Freight Network,  
Docket No. DOT-OST-2016-0053**

The Texas Department of Transportation (TxDOT) is pleased to submit comments on the Interim National Multimodal Freight Network (NMFN), published in the Federal Register on June 6, 2016. We believe this is a great opportunity to establish a strategic national freight network that enhances efficient movement of freight throughout our nation and facilitates our global economic competitiveness. We look forward to working with the United States Department of Transportation (USDOT) to develop robust and objective criteria for defining the NMFN and to ensure that the network is fully connected and reflects a national freight system.

#### **General Comments**

Our comments and recommended additional segments to the Final NMFN took into consideration the two goals of designating a Final NMFN: (1) improving the network and intermodal connectivity; and (2) using measurable data as part of the assessment of the significance of freight movement, including consideration of points of origin, destinations and linking components of domestic and international supply chains. All additional segments recommended by TxDOT comply with both goals as well as one or more of the twelve factors outlined in 49 USC 70103(c)(2) and Federal Register page 36383 for consideration when designating the NMFN.

USDOT requested that “any proposed corridor or facilities be submitted with shapefiles, to the extent possible.” However, ArcGIS format shapefiles are unable to be uploaded at [www.regulations.gov](http://www.regulations.gov). We have therefore created a web based map with our proposed corridors and facilities which is available at <http://arcg.is/2bDPMCT> and upon request, we can provide a zipped gdp or shapefile file via email to acquire these layers.

Our review of the Interim NMFN showed a lack of landside connections from Texas sea ports to the interstates. These first mile/last mile connections are crucial to moving freight and should be included in the Final NMFN. We have made specific recommendations for additional mileage in the “Highway” section below.

In addition, there is ambiguity as to which international land border crossings are included in the network and whether rail border crossings are included or not. For example, the list of border crossings includes “El Paso;” yet within El Paso there are seven border crossings (or ports-of-entry) to Mexico, including two rail bridges—the GIS-based map of the border crossings (provided at [nmfn.usdot.opendata.arcgis.com](http://nmfn.usdot.opendata.arcgis.com)) indicates that the Bridge of the Americas (at the terminus of I-110) is the only El Paso border crossing included in the NMFN. Furthermore, at Eagle Pass, Laredo and Brownsville, passenger vehicle only crossings are indicated in the GIS-based map as on the NMFN

instead of nearby commercial crossings. This issue is further addressed below in the “Border/Port of Entry” section.

We agree with USDOT that the 65,000-mile highway network included in the draft Multimodal Freight Network (MFN) released in October 2015 is a more complete network and should be designated as the Final highway portion of the NMFN. At over 5,500 highway and intermodal connector miles in Texas, versus only 3,822 on the Interim NMFN, the MFN is a more thorough representation of freight movement in our state. In fact the MFN already encompasses either all or a portion of three out of the four NMFN recommended additional highway routes listed below, proving the MFN is a superior map.

TxDOT offers the following recommendations for additional routes or facilities to be included on the Final NMFN.

### Highway

The notice in the Federal Register provides that “Each State may propose additional designations that are up to 20 percent of the total mileage of modal routes designated by the Under Secretary for the State.” The Interim NMFN provides 3,822.78 miles of highway designation in Texas, allowing 764.55 additional miles to be proposed. While the Interim NMFN highway network covers the interstates linking the major cities, it fails to include additional non-interstate segments that are essential for connecting major freight corridors and linkages to sea ports along the Gulf of Mexico as well as connector routes to international border crossings with Mexico.

The following non-interstate segments are recommended for inclusion in the Final NMFN. These segments are all on the Texas Freight Network outlined in the Texas Freight Mobility Plan and developed in consultation with the Texas Freight Advisory Committee. The federal register criteria provides consideration for (10) “transportation corridors identified by ...a state freight advisory committee...using national or local data, as having critical freight importance to the region” [49 USC 70103(c)(2)(J)].

Route	Length (miles)	Freight Tonnage 2010	Freight Tonnage 2040	Freight Tonnage Growth Rate	Truck AADT 2010	Truck AADT 2040	Truck AADT Growth Rate
US 59	287.61	9,168,894	23,926,669	61.7%	1,691	4,168	59.4%
BU 59Z	1.69	n/a	n/a	n/a	n/a	9,263	n/a
US 87	100.14	1,405,219	2,398,327	41.4%	905	2,259	59.9%
US 77	70.93	18,232,055	44,762,958	59.3%	4,281	7,903	45.8%
SS 91	1.02	16,010,810	39,239,490	59.2%	4,899	8,630	43.2%
SH 255	22.47	n/a	n/a	n/a	n/a	n/a	n/a
<b>Subtotal</b>	<b>483.86</b>						

**US 59**, from the I-69 terminus in Rosenberg to the World Trade Bridge in Laredo is essential for providing additional connectivity from the Texas-Mexico border at Laredo to the Port of Houston as well as other Gulf Coast ports, including Victoria, Matagorda, and Freeport, that are currently included in the Interim NMFN but lacking connections to highway portion of the NMFN network. This corridor meets criteria (3) “access to border crossings, airports, seaports, and pipelines,” and (7) “intermodal links and intersections that promote connectivity” [49 USC 70103(c)(2)(C) and (G)]. FHWA included a portion of **Business 59 (BU 59Z)** on the interim NMFN highway network to connect

to Laredo International Airport; this additional 1.69 miles segment will provide connectivity to US 59 to the east of the airport.

**US 87**, from I-27 in Lubbock to I-20 at Big Spring is part of the “Ports-to-Plains Corridor” from Mexico to Canada and is essential for providing additional connectivity between interstates serving the energy sector in West Texas, in accordance with the federal register consideration of (6) “access to energy exploration, development, installation, and production areas” [49 USC 70103(c)(2)(F)].

**US 77**, from Corpus Christi to Victoria (US 59) is essential for providing connectivity between the ports of Corpus Christi and Victoria to Houston and points north and east in accordance with criteria (3) “access to border crossings, airports, seaports and pipelines” and (7) “intermodal links and intersections that promote connectivity” [49 USC 70103(c)(2)(C) and (G)]. **SS 91** provides the connecting spur between US 77 and US 59 south of Victoria.

**SH 255**, from I-35 to the Laredo-Colombia Solidarity Bridge in Laredo is essential for providing additional connectivity from the Texas-Mexico border at Laredo to I-35 and points north in consideration of criteria (3) “access to border crossings, airports, seaports and pipelines” [49 USC 70103(c)(2)(C)].

In addition, ten Texas sea ports are included in the Interim NMFN. However, six of these ports (Beaumont, Port Arthur, Texas City, Freeport, Matagorda/Pt. Comfort, and Victoria) have no landside road connections to the Interim NMFN highway network, thus making for an incomplete system. The following segments are the primary access points to these ports and have been identified for inclusion in the Final NMFN in consultation with the respective port authorities and fall under criteria (3) “access to border crossings, airports, seaports and pipelines” and (7) “intermodal links and intersections that promote connectivity” [49 USC 70103(c)(2)(C) and (G)].

Route	Length (miles)	Freight Tonnage 2010	Freight Tonnage 2040	Freight Tonnage Growth Rate	Truck AADT 2010	Truck AADT 2040	Truck AADT Growth Rate
<b>Port of Victoria</b>							
SH 185	7.90	n/a	n/a	n/a	1,557	2,410	35.4%
<b>Calhoun Port Authority (Matagorda/Pt. Comfort)</b>							
SH 172	22.40	3,927,795	14,119,537	72.2%	937	1,328	29.4%
SH 35	6.79	7,681,376	21,789,762	64.7%	836	1,807	53.8%
FM 1593	2.46	n/a	n/a	n/a	174	283	38.4%
<b>Port of Freeport</b>							
SH 36	85.60	53,966	122,156	55.8%	788	1,621	51.4%
SH 288	52.51	15,177,410	31,437,247	51.7%	4,063	9,310	56.4%
SH 6	6.26	n/a	n/a	n/a	734	747	1.7%
FM 2004	27.32	n/a	n/a	n/a	253	617	59.1%
FM 523	13.54	n/a	n/a	n/a	287	665	56.9%
<b>Port of Texas City</b>							
SH 146	20.44	2,733,254	5,450,242	49.9%	1,676	3,387	50.5%
FM 519	3.82	n/a	n/a	n/a	247	554	55.3%
SL 197	1.82	n/a	n/a	n/a	673	669	-0.6%
<b>Port of Port Arthur</b>							
US 69	17.79	13,327,940	28,092,262	52.6%	4,413	8,903	50.4%
SH 87	1.97	1,405,219	2,398,327	41.4%	905	2,259	59.9%
Houston Ave.	1.08	n/a	n/a	n/a	73	67	-8.3%

W. 7th St.	1.04	n/a	n/a	n/a	104	140	25.6%
SH 82	2.83	37,573	50,802	26.0%	1,889	2,503	24.5%
SS 215	2.11	n/a	n/a	n/a	1,577	1,918	17.8%
<b>Port of Beaumont</b>							
SS 380	1.89	n/a	n/a	n/a	2,019	4,807	58.0%
Franklin St.	0.64	n/a	n/a	n/a	84	118	28.2%
Old Hwy 90	0.37	n/a	n/a	n/a	41	42	2.2%
<b>Ports Subtotal</b>	<b>280.62</b>						

TxDOT proposes additional designations totaling **764.48** miles to the highway portion of the NMFN, just under the threshold of 764.55 miles established in the notice.

In addition, we request USDOT utilize the discretion provided in 49 USC 70103(b)(2)(G) and consider including any remaining highway segments of the Ports to Plains Corridor and the I-69 Texas Corridor to the NMFN in accordance with the federal register considerations (3) "access to border crossings, airports, seaports and pipelines;" (4) "economic factors, including balance of trade;" (5) "access to major areas for manufacturing, agriculture or natural resources;" (6) "access to energy exploration, development, installation and production areas;" (10) "facilities and transportation corridors identified by a multi-State coalition as having critical freight importance to the region;" and (12) "the significance of goods movement, including consideration of global and domestic supply chains" [49 USC 70103(c)(2)(C),(D),(E),(F),(J), and (L)]. Both routes serve as major freight corridors, connecting rural and urban regions of both Texas and the US; serve various industries including manufacturing, agriculture and livestock, forestry, and energy development and production; and facilitate international trade with Mexico.

Furthermore, in order to better accommodate the movement of freight across the Texas-Mexico border, TxDOT requests FHWA modify the highway portion of the NMFN at the following border crossing locations:

- **Eagle Pass**, the Eagle Pass-Piedras Negras International Bridge, at the terminus of US57, is indicated in the border crossings GIS layer as on the interim NMFN—this is passenger vehicle only bridge. TxDOT requests the highway network instead be connected to the **Camino Real International Bridge**, the commercial truck border crossing in Eagle Pass.
- **Laredo**, the Juárez–Lincoln International Bridge, at the terminus of I-35, is indicated in the border crossings GIS layer as on the interim NMFN—this is a passenger vehicle and bus only bridge. TxDOT requests the highway network instead be connected to the **World Trade Bridge**, a dedicated commercial truck crossing and the largest international bridge by volume and tonnage on the U.S.-Mexico border, as well as the **Laredo-Colombia Solidarity Bridge**.
- **Brownsville**, the Gateway International Bridge, at the terminus of SH 4, is indicated in the border crossings GIS layer as on the interim NMFN—this is a passenger vehicle only bridge. TxDOT requests the highway network instead be connected to the **Veterans International Bridge**, at the terminus of US77, the commercial truck crossing in Brownsville.

### Railroad

TxDOT recommends the following railroad corridor be included in the Final NMFN. This railroad is on the Texas Freight Network described in the Texas Freight Mobility Plan and developed in consultation with the Texas Freight Advisory Committee. The federal register criteria provides consideration for (10) "transportation corridors identified by ...a state freight advisory committee...using national or local data, as having critical freight importance to the region" [49 USC 70103(c)(2)(J)].

- **South Orient Rail Line from the San Angelo Junction to the Presidio Bridge/Mexican border; 391 miles.** This Class III railroad line is owned by TxDOT and is leased and operated by Texas Pacifico Transportation, a corporate partner with Ferromex – the Mexican railroad that connects with South Orient Rail Line at the Presidio Rail Bridge (rail port-of-entry to Mexico). Although the Presidio Bridge was closed in 2008 due to a fire, it is in the development stages to reconstruct and reopen—once reopened it will be one of only eight rail ports-of-entry between the United States and Mexico. This rail border crossing will ensure that there is an additional major international connection in Texas to facilitate efficient flow of trade between Mexico and the United States. The South Orient provides connectivity to BNSF and Union Pacific, the largest freight railroads in America, as well as the Fort Worth & Western, which also provides connectivity to the Kansas City Southern. This railroad meets criteria (3) “access to border crossings;” (4) “economic factors, including balance of trade;” (5) “access to major areas for manufacturing, agriculture, or natural resources;” (8) “freight choke points” as the line will provide an additional route for traffic and relieve congestion at other border crossings; and (12) “the significance of goods movement, including consideration of global and domestic supply chains” as the Presidio border crossing could be a major domestic supply chain route [49 USC 70103(c)(2)(C), (D), (E), (H) and (L)].

In addition, we recommend including the four rail border crossings in Texas to the NMFN. More details are provided below in the “Border/Ports-of-Entry” section.

### **Maritime**

TxDOT recommends that all Texas sea ports included in the Final NMFN have designated connector routes to the highway portion of the NMFN, which is consistent with goal one of the NMFN, and as detailed in the highway section of this letter.

In addition, TxDOT requests the following modification to the Maritime NMFN network:

- **Marine Highway M-69 named separately from M-10.** The Gulf Intracoastal Waterway (GIWW) in Texas was recently designated as the M-69 Marine Highway by USDOT. However, this does not appear to be reflected in the Interim NMFN. TxDOT requests M-69 be designated in the Final NMFN separately from M-10, which constitutes the remainder of the GIWW from the Louisiana/Texas state line to St. Marks, Florida.

### **Border/Port-of-Entry**

The Interim NMFN identifies five “border crossings” in Texas:

1. El Paso
2. Hidalgo
3. Eagle Pass
4. Brownsville-Gateway (this indicates a passenger vehicle only bridge)
5. Laredo-Juarez/Lincoln (this indicates a passenger vehicle and bus only bridge)

However, it is not specified whether the identified crossings applies to rail crossings and highway crossings. In addition, some cities have multiple international bridges and TxDOT suggests that the individual border crossing bridges be specified. Furthermore, TxDOT requests that the highway portion of the network be modified to connect to the commercial truck crossing instead of the passenger vehicle only crossing at Eagle Pass, Brownsville, and Laredo international borders.

The Federal Register notice solicits “input on what should be the relevant factors for including a land border crossing and roads at that crossing.” TxDOT proposes that all rail crossings on the U.S.-Mexico border (a total of eight) be included in the Final NMFN. Improving rail connections with Mexico is essential to an efficient movement of international trade freight system and consistent with criteria (3) “access to border crossings;” (4) “economic factors, including balance of trade;” (5) “access to major areas for manufacturing, agriculture, or natural resources;” (8) “freight choke points;” and (12) “the significance of goods movement, including consideration of global and domestic supply chains” [49 USC 70103(c)(2)(C), (D), (E), (H) and (L)].

Adding all U.S.-Mexico rail crossings would include the following rail border crossings on the Texas portion on the NMFN:

1. El Paso to Chihuahua
2. Presidio to Chihuahua (reopening to be announced)
3. Maverick to Coahuila
4. Laredo to Tamaulipas
5. Brownsville to Tamaulipas

For highway crossing factors, TxDOT proposes establishing a threshold of northbound truck crossing averages of 100,000 over a rolling five year period. This threshold would yield seven qualifying commercial bridges across the Texas-Mexico border (in order of number of crossings for 2015):

1. World Trade Bridge, Laredo – 1,658,949
2. Pharr-Reynosa International Bridge, Hidalgo County – 546,259
3. Bridge of the Americas, El Paso – 496,772
4. Laredo-Colombia Solidarity Bridge – 356,824
5. Ysleta-Zaragoza Bridge, El Paso – 261,272
6. Veterans International Bridge, Brownsville – 180,664
7. Camino Real International Bridge, Eagle Pass – 141,592

Note that northbound crossing data is readily available from US Customs and Border Protection; however, southbound crossing data is compiled by Mexican authorities and is inconsistent and more difficult to acquire.

Thank you for your consideration of our comments and recommended additions to the Final NMFN. If we can be of additional assistance, please contact Caroline Mays, TxDOT Director of Freight and International Trade at [Caroline.Mays@txdot.gov](mailto:Caroline.Mays@txdot.gov) or (512) 936-0904.

Sincerely,

A handwritten signature in blue ink that reads "Lauren D. Garduño". The signature is written in a cursive style. A small, faint "Digital" watermark is visible over the middle of the signature.

Lauren D. Garduño, P.E.  
Director of Project Planning and Development

Appendix

