

June 1, 2016

The Hon. Anthony Foxx  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Re: Docket No. DOT-OST-2016-0022

Dear Secretary Foxx,

On behalf of the Coalition for America's Gateways and Trade Corridors (CAGTC), attached are comments in response to the Notice of Funding Opportunity for the Department of Transportation's freight program, the Nationally Significant Freight and Highway Projects (FASTLANE Grants) for Fiscal Year 2016.

CAGTC is a diverse group of more than 60 public and private organizations dedicated to increasing federal investment in America's multimodal freight infrastructure. In contrast to single mode interests, CAGTC's foremost mission is to promote a seamless goods movement transportation system across all modes to enhance capacity and economic growth.

We thank the U.S. Department of Transportation (USDOT) for its demonstrated commitment to freight and the attention and resources USDOT has dedicated to improving freight policy and programming. We respectfully submit the following comments on the FASTLANE Notice of Funding Opportunity in an effort to continue the positive developments shaping this freight-specific competitive grant program. We hope to provide USDOT with comments that are helpful. Should you have any questions on these comments, please do not hesitate to contact me.

Sincerely,

Elaine Nettle  
Executive Director

The FAST Act's freight programs are a critical first step toward investing in our goods movement system and a down payment on the system's needs. The investments, particularly those distributed through the FASTLANE program, will provide funding for significant freight projects around the country that need federal partnership and are difficult to complete through other programs.

Nationally and regionally significant freight projects are often large in scale, frequently multimodal and crossing jurisdictional borders, making them difficult to fund through traditional distribution methods such as formula programs. With this in mind, the FASTLANE grant program was conceived by Congressional authorizers to make investments in the goods movement system that will aid our economy and improve quality of life.

CAGTC advocates a minimum annual investment of \$2 billion distributed through a freight-specific competitive grant program. However, the funding dedicated to freight infrastructure in the FASTLANE grant program, which begins this fiscal year at \$800 million, is a significant step forward.

### **Ensure Funding is Awarded to Freight Projects**

It is broadly recognized that transportation needs across the United States are many and varied, ranging from personal mobility, to public transportation, to goods movement. Nevertheless, Congressional authorizers developed the FASTLANE grant program to address our nation's freight needs. Any deviation from the authorizers' intent weakens arguments for the program and threatens its longevity and the availability of funding in the next reauthorization.

USDOT's "Program Description" within the Notice of Funding Opportunity lists several transportation objectives that are not included in FAST Act law. Specifically, "investments that better connect people to essential services such as employment centers, health care, schools and education facilities, healthy food, and recreation; remove barriers to access; strengthen communities through neighborhood redevelopment..." (Federal Register Vol. 81, No. 41, Page 10956). Again, we encourage USDOT to confine itself to awarding funding only to freight infrastructure investments. Any objectives not listed in the Nationally Significant Freight and Highway Projects' "Project Requirements" should be considered secondary criteria in the evaluation process.

### **Provide Full Listing of FASTLANE Funding Applications**

CAGTC requests that USDOT make available the full listing of project applications following FASTLANE awards. Having this list available will provide insight into the full range of our freight system's needs and will also assist Congressional authorizers going forward as they craft the FAST Act's reauthorization proposal. Increased public understanding of the nation's large-scale freight needs will benefit ongoing exchange and policy development. In 2012, Congress called for a similar action under Section 1120 of the Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21) law by requiring USDOT to develop a survey on Projects of National and Regional Significance (PNRS). Such a catalogue is important to understand the full scope of freight investment needs and we request that USDOT contribute to the dialogue by making public all applications, not just those that received funding through the FASTLANE freight grant program.