



STEVE SISOLAK
Governor

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION

1263 S. Stewart Street
Carson City, Nevada 89712

KRISTINA L. SWALLOW, P.E., *Director*

In Reply Refer to:

December 10, 2021

The Honorable Pete Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Redesignation of the Primary Highway Freight System (PHFS)

Dear Secretary Buttigieg,

On behalf of the Nevada Department of Transportation (NDOT) and the Nevada Freight Advisory Committee (FAC), I appreciate the opportunity to provide comment on the proposed redesignation of the Primary Highway Freight System (PHFS) as listed in the docket (FHWA-2020-0010.) The PHFS and National Multimodal Freight Network play a significant role in connecting the State of Nevada with the national economy.

Nevada was among the nation's fastest-growing states between 2010 and 2020. A key component of this growth is the diversification of the economy, which focused on advanced manufacturing, e-commerce, and distribution. As a result, U.S. Highway 95 was designated by Congress as the future I-11 corridor in 2015. Through the FAST Act, the future I-11 designation was officially extended southward to Nogales and northward from Las Vegas to I-80. I-11 will have a significant role in connecting the urban centers across Nevada, further supporting economic prosperity and freight movement across the western United States. To this end, twenty-three miles of I-11 have been constructed and/or designated since 2017 which contributes to the safe movement of people and goods in Southern Nevada.

Expansion of the PHFS presents an opportunity to further support economic vitality through improvements to the freeway system and other key state highway facilities. This is critically important for Nevada, one of the largest states at over 110,000 square miles that has very limited interstate highway mileage to connect manufacturing and distribution centers. I-80 in Northern Nevada and I-15 in Southern Nevada do not connect or meet any other interstate within the state. The major urban areas, Las Vegas and Reno, are separated by approximately 450 miles. Without implementation of I-11, there would be no interstate connection between the two of the world's largest freight hubs of Tahoe Reno Industrial Center (over 15,000 acres housing such industries as Tesla and Panasonic) in the Reno Sparks area, and 18,000 acres of Apex Industrial Park in North Las Vegas and Clark County. Attached are two exhibits that show the context of how Nevada fits into the national freight network.

As requested in the Federal Register, staff discussed the three options that USDOT outlined at the November 2, 2021, Nevada Freight Advisory Committee (FAC) meeting. There was some discussion but not any clear decision. Staff offered to send out a short survey to the members. This survey was sent to the members on November 10th allowing FAC members twelve days to respond; the survey received nine responses. The responses showed that they were closely split between options 1 and 3.

NDOT supports the recommendations made by the American Association of State Highway and Transportation Officials (AASHTO) in their letter dated October 18, 2021, to expand the PHFS beyond what is currently proposed:

- *Expand eligibility of the National Highway Freight Program to include all of the National Highway Freight Network (NHFN). Eliminate the 2 percent rule so states can spend funds on any NHFN route (to include Critical Urban Freight Corridors and Critical Rural Freight Corridors).*
- *Expand the PHFS to include all Interstate System roadways regardless of how much freight funding a state receives. Given that the Interstate System is just that—a system—a fragmented designation of the Interstate System is not appropriate to addressing freight transportation and goods movement. Freight program eligibility should include all Interstate miles by default.*
- *Remove restrictions on state authority to add mileage to the PHFS, NHFN and National Multimodal Freight Network (NMFN), including but not limited to mileage caps on critical urban and critical rural corridors.*
- *Add eligibility to use funds on any portion of a state’s multimodal freight network as defined in a state’s freight plan.*

NDOT recommends that the U.S. Department of Transportation continues to work with other state DOTs to seek options that will maximize the benefit to the national freight network. We recommend considering a ratio that considers needed mileage and land area.

Of the options offered, Option 1 provides a small yet positive benefit to Nevada’s freight network by adding 18 miles to the PFHS.

Option 3 can incorporate the 24 miles of I-11 constructed since 2017, although it is unclear what method would be used to select the mileage allocated to each state.

This letter provides both the input from the FAC and NDOT. Should you have further questions, please contact Tim Mueller, NDOT Freight Program Manager, at 775-888-7351 or tmueller@dot.nv.gov.

Sincerely,



Kristina Swallow, P.E.

NDOT Director

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