



April 25, 2016

Mr. Vinn White
Deputy Assistant Secretary for Transportation Policy
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Regarding: NAPA Comments on the draft National Freight Strategic Plan
Docket Number DOT-OST-2015-0248

Dear Mr. White,

On behalf of the National Asphalt Pavement Association, I write to respectfully urge you to include a definition of "Critical Commerce Corridors" in the final National Freight Strategic Plan (NFSP). Critical Commerce Corridors physically separate passenger vehicles and trucks in order to decrease congestion and make interstates safer. Physically separating passenger vehicles from trucks also helps trucks transporting goods reach their destinations faster, and reduces wear and tear on highways, making Critical Commerce Corridors economical.

As you know, the FAST Act modifies the National Highway Freight Network created by the Moving Ahead for Progress in the 21st Century Act (MAP-21). Under the FAST Act, there are three references to Critical Commerce Corridors:

1. Within one year, the US DOT must designate a new National Multimodal Freight Network using a public process to identify critical freight facilities and corridors, including **critical commerce corridors**, that are vital to achieve the national multimodal freight policy goals. (49 USC 70103)
2. Within two years, the US DOT must develop a national strategic freight plan, which will now be multimodal in scope, and among other things, develop best practices for improving the performance of the Network, including **critical commerce corridors**, critical urban and rural access to critical freight corridors. (49 USC 70102)
3. Every five years, the US DOT is required to re-designate the Network every five years to reflect changes in freight flows, including emerging freight corridors and **critical commerce corridors**. (129 STAT. 1351)

Currently, "Critical Commerce Corridors" is not defined in the draft NFSP. There needs to be a universal definition of what a Critical Commerce Corridor is in an effort to provide guidance to states when making infrastructure investment decisions based on the new programs authorized under the FAST Act. As proposed in Congress and advocated by a large cross-section of stakeholders, **Critical Commerce Corridors is defined as creating a barrier on existing highways, physically separating lanes dedicated for heavy commercial trucks, and lanes dedicated for passenger vehicles.**

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I would greatly appreciate your consideration in including this definition of Critical Commerce Corridors in the final National Freight Strategic Plan.

Sincerely,

A handwritten signature in black ink that reads "Mike Acott". The letters are cursive and somewhat stylized, with the "A" and "C" being particularly prominent.

Mike Acott
President