

# **Appendix 7 – Public Comments**

## **Greater Memphis Regional Freight Plan**



**Memphis MPO**  
METROPOLITAN PLANNING ORGANIZATION



To: Memphis MPO

Re: Draft Freight Plan

I recently attended the MPO's ETC meeting and made comments regarding the Draft Freight Plan. I intended to also present my comments at the TPB meeting 2 weeks later, but had to attend the Memphis 3.0 meeting which was at the same time.

After I made my comments at the MPO ETC meeting, I spoke with some MPO staff, and the MPO's consultant. They encouraged me to write my comments and send them in written form, which I am doing here. I will expand on my verbal comments, and provide additional items which I was unable to mention in the 2 minutes allowed for verbal comments.

1. Local Street Issues- "Freight Routes"- Heavy freight trucks cause more damage to roads than passenger autos or small delivery trucks. Additionally, heavy diesel vehicles can be quite noisy, and create late-night disturbances in residential neighborhoods. The plan says nothing about heavy freight trucks using neighborhood streets, nor anything about planning specific freight routes within the communities in order to minimize neighborhood noise and local street impacts. While I acknowledge that these are issues for the individual communities, there would be substantial value to the communities for the Regional Freight Plan to provide guidance, perhaps in the form of "recommended policies" which the communities could consider. This would then give the communities a "bit more power" if and when they considered any restrictive local policies. Some other regions do have MPO defined "freight routes".

MPO Response - In the City of Memphis, both formal and informal truck routes have occurred over time. As a result, without any designated routes, the truck drivers use different navigation tools to customize their routes for pickup and delivery. The Chapter 5, Section 5.1.2 of the freight plan has recommended regional freight corridors that are most critical to the industries throughout the region which can be used by the communities to identify truck routes and policy guidelines.

2. Overnight Diesel Idling- The plan says nothing about the impacts of heavy freight trucks idling while parked overnight. Such idling contributes to noise and air pollution, especially when the trucks are in residential neighborhoods. Technologically advanced devices have now been developed which can minimize and/or eliminate the "need" for diesel vehicles to idle while parked overnight. Again, this is an issue for each individual community. But, any statement or recommendation in the Regional Freight Plan can 1) provide guidance to individual communities who may not have the technical resources to research availability of such devices, and 2) can give the communities a "bit more power" if and when they considered any "special" local policies regarding overnight idling.

Additionally, it would make sense for the regional freight plan to provide pro-forma air pollution estimates based on hours of idling by diesel engines of 2-4 standard sizes. This would be valuable to the communities so they could better understand the impacts.

MPO Response - Chapter 10 of the Freight Plan, Section 10.1.3 has referenced the FHWA Freight and Air Quality Handbook (2010) which provides a list of technological and operational strategies aimed at reducing emissions associated with goods movement. The handbook can provide guidance to any community which needs assistance.

3. Pickup and Delivery- Pickup and delivery is another "local issue" that could benefit from regional policies. Regional policies and/or standards may be appropriate a) to make pickup and delivery more efficient for companies, b) to "protect" neighborhoods, and c) to make sure local streets and parking configurations are designed to meet the needs. Some of the issues are mid-night deliveries in residential neighborhoods, delivery trucks blocking passage of traffic, delivery trucks blocking sidewalks and/or ADA access. Resident-sensitive policies can be very positive for quality of life. Don't you just hate it when the bread truck delivers to the nearby deli at 5am, with the concomitant noise of truck doors and 2-wheel dollies? The Freight Plan could propose some standard policies for consideration by the communities.

MPO Response - See comment 1

4. Rail- Other than a cursory mention of rail and of intermodal terminals, there was no discussion at all of the relative efficiency of rail vs. truck movements- rail is certainly more energy efficient than truck for long-haul freight movement. Certainly individual transportation companies will make their own decisions as to how they will carry any freight, and intermodal terminals have become much more efficient and more mechanized over the last 10-20 years. But, what role should the Memphis MPO play in relation to this? Should the MPO propose policies which will encourage more mode shift to rail? This would pull some trucks off of the roads, and thereby decrease road congestion and air pollution.

How much of the freight moving through the region actually just moves "through" the region? Does the network support efficient rail movements? How much of the truck freight moving into or out of the region should move by rail, if the conditions were right? Should the region provide incentives for the development of additional intermodal terminals, especially if they can be located in very efficient transfer locations? Should the MPO make rail more cost efficient by proposing reconstruction of more railroad crossings?

MPO Response - Both truck and rail modes have inherent advantages and disadvantages. Roads are subject to congestion during peak hours, but can also maintain responsiveness to a tight schedule. Railroads are well suited for large distances and volumes, but don't have nearly as an elaborate network as roadways. Because of this duality between market advantages and disadvantages, freight is able to remain competitive by checks and balances. The competitive access to multiple modes of freight transit is what helps to make the Greater Memphis region attractive in the commodity industry. That's why it is important for MPO to promote all transit modes grow simultaneously to remain competitive on the national and international scale.

5. Pipelines- Many pipelines (oil, gas and other) traverse the Memphis region, but since they are "out of sight", they are also "out of mind". Nevertheless, pipelines do represent a significant portion of all the product(s) which move to and through the region. Product in pipelines would travel by rail if the pipelines were not available. We need more pipeline data- miles of pipelines, miles in "sensitive" locations, barrels of product transferred per year, number of pumping locations and transfer stations, number of leaks or spills per year, age of pipes by use-type, potential for impact on our communities and neighborhoods, any "significant risks" should be identified and studied? "Does the MPO or do any of the individual communities have any ability to influence pipeline location decisions especially when certain risks exist?" "Does the pipeline which traverses the Mississippi River near the Allen Fossil Fuel Plant have any risk of causing damage to the Memphis Aquifer?"

The MPO should have purview over these issues. The MPO should be asking these and other important questions about pipelines and their impacts on the community. The local communities and their mayors should expect the MPO to let them know about these issues and about what important considerations and risks there may be.



MPO Response - Public information concerning pipeline infrastructure is limited for National Security and Safety purposes. The location decision making process is done primarily at the federal level with some state and municipal involvement. MPO deals with only surface transportation projects and federal agencies have more purviews over issues related to pipelines.

6. Truck energy efficiency- Tractor-trailer rigs usually fit a standard traditional configuration. A growing number of tractors have efficient airflow designs which reduce wind drag. However, very few trailers have implemented any kind of efficient airflow design, even though relatively inexpensive after-market accessories exist. These accessories- side skirts, and trailer-tails - can increase the energy efficiency of tractor-trailer combos by 5-10%, providing huge cost savings compared to the costs, plus substantial environmental benefits as well [reducing diesel fuel usage by xx million gallons per year, and reducing NOx by \_\_ tons, and etc, etc ]. Truck operators over time will install these accessories to obtain these savings, but it's not clear why they haven't jumped at this savings opportunity. In order for the region to gain the air quality and broader environmental benefits of reduced fuel consumption, the Freight Plan should recommend that truck operators use these accessories as much as possible. It may also be appropriate for the MPO to recommend state policies which encourage use of these kinds of accessories. Perhaps the MPO should just write a letter to the Governor and TDOT Commissioner recommending that the state incentivize these changes. [[ How many states have any policy or program like this? ]]

MPO Response - The FHWA Freight and Air Quality Handbook (2010) provides a list of strategies such as hybrid-electric vehicles, improved vehicle aerodynamics, more efficient tires, and reduced vehicle weight to improve energy efficiency.

7. Longer and Heavier Trucks- There is currently an effort by truck operators and lobbyists to obtain approvals at various levels of government for longer and heavier trucks. In conflict with that effort, there are groups which are presenting evidence and statistics which "prove" that longer and heavier trucks are not safe and also have huge damage impacts on local roads. Research has shown that road damage increases "exponentially" as truck weight increases- some studies say by the 3rd or even the 4th power of the weight increase. Additionally, there is reason to have specific damage concerns regarding older bridges. While it may not be time for the Memphis MPO to make a formal policy statement on larger/heavier trucks, it should be totally within the purview of the MPO to express concern about the issue, and further, to seek funding for a more in-depth study of the issue. As a minimum, certainly the Freight Plan should state that this is an open issue, and that the local communities should restrict larger/heavier trucks until such time as a state-wide or MPO-wide study, with full public input, is completed.

MPO Response - The legislation regarding longer and heavier truck is still under consideration by the congress. Some of the DOTs are still opposing longer trucks. Both TN and MS state DOTs will take lead in this issue when a federal guideline is available.

8. Future truck technologies- The Freight Plan does mention autonomous trucks, and the possibility of platooning when multiple autonomous trucks work together. But the Freight Plan makes no mention of the following 1) increase of effective highway capacity and reduction of demand for new highway lanes when trucks are platooning, 2) autonomous truck parking, 3) electric trucks (PUD and line-haul), 4) hydrogen fuel cell trucks (see Nikola Trucks), 5) impacts on "refueling" infrastructure, and 6) autonomous deliveries. All of these are actually in development, though there is no telling when they will have sufficient market penetration to

actually make a difference to overall trends. Nevertheless, the Freight Plan should encourage MPO planners and decision makers to be aware of these matters. It is likely that some of them may impact freight flows much sooner than expectations.

MPO Response - MPO acknowledges different emerging technologies in freight industry but at the same time these emerging technologies are still in their infancy stages. The freight plan has identified some technologies which are currently evolving. MPO plans to remain engaged with different public and private sectors specifically both TN and MS DOTs about the development of future technologies and policy guidelines.

Thank you for giving these comments your best consideration prior to publishing the final plan. Sincerely,



Dennis Lynch, BS MechEng MIT, MS CivEng MIT  
Sierra Club National Clean Transportation for All Committee  
Sierra Club Tennessee Chapter Transportation Chair  
Sierra Club Chickasaw Group Chair [dmlynch@alum.mit.edu](mailto:dmlynch@alum.mit.edu)  
901-361-8029

September 20, 2017

Memphis MPO  
125 North Main St., Suite 450  
Memphis, TN 38103

RE: Draft Regional Freight Plan Public Comment

Dear Memphis MPO,

I am submitting the following comments individually as a transportation and mobility professional in Memphis. The Memphis MPO has done great work developing a critical Regional Freight Plan for the region. I would like to see our region grow economically while becoming safer and more attractive to live, work, play and shop. Memphis is a challenging city to get from place to place without a car. It has one of the highest rates of pedestrian fatalities among metropolitan areas, while having very low rates of people who actually walk and take transit, thus exposing themselves to such crash dangers. Freight movement plays a critical and undeniable part of the Memphis economy. As we grow into the next 30 years and endorse a new comprehensive plan, the importance of freight mobility must be balanced with the need for people to get around safely to live, work, play and shop in the city.

The proposed Regional Freight Plan does not demonstrate balance between the needs of freight movement with key goals that will strengthen Memphis as a place to build a career, raise a family, and buy a home. It is my opinion that the emphasis of the draft plan will keep property values and tax revenues low by emphasizing industrial property uses, road widening, and freight mobility across the region, rather than creating a balance of land uses and regional priorities that support a diversified urban economy.

A. MPO Response - Memphis MPO recognizes the need for a balance between the freight as well as maintaining and improving the city as a place to live. Freight plays a very important role in the region's economy, with almost 30% of the employment concentrated in the transportation and warehousing sector. The goal of this plan is to address the needs of the freight sector and support region's economic development potential. The recommendations from this plan will be used in the development of MPO's upcoming Regional Transportation Plan, which will be guided by the livability principles to ensure that transportation choices are available to our citizens to connect them to jobs, parks, schools, churches and other community activities. In addition, the plan and its analysis will be used by the City of Memphis 3.0 plan or any other jurisdiction who wishes to study in detail the land use and transportation connection.

Transit and complete streets are mentioned briefly and favorably ("Public transportation is a limit," p. 53). However, they are not addressed in the details, findings and recommendations of the Plan. We must improve transit and multi-modal routes in Memphis to become competitive in today's urban context.

B. MPO Response - As a regional transportation planning organization, Memphis MPO is federally mandated to provide adequate multi-modal transportation planning, including freight, transit, bicycle and pedestrian plans. Details of each mode are discussed in more detail in their respective plans, such as MATA Short Range Transit Plan, MPO's Bicycle and Pedestrian Plan, etc. The Freight Plan recognizes transit and complete streets with the goal of developing unified acknowledgment between the different plans and their respective focuses. Transit and complete



streets are addressed in the details, findings, and recommendations of their respective plans.

In particular, Chapter 4 on Workforce and Community could better discuss the regional deficit of transit for employees to get to jobs. Section 4.1.3 on page 4-9 states “a wide range of transportation opportunities exist” which is not verified by data. Many areas, such as President’s Island, are not accessible by transit, walking or bicycling.

C. MPO Response - The Chapter 4 on Workforce and Community, tried to capture the connection between community and workforce. This was later elaborated in the development of emerging zone in Chapter 9 and its corresponding appendix. The findings from this chapter along with emerging zones will help MATA in their future transit/mobility studies to identify areas to improve mobility options for employees. In addition, it will help to identify areas of improvement when developing transportation demand management strategies to forecast transportation needs in the respective areas. Employees in this area are also encouraged to use the Rideshare program.

On page 4-9, the Plan recommends “lines of communication” to improve transit. Transit will be improved by dedicating more funding and political support to operate transit routes and increase frequency of service. Absent funding, more communication between employers and the transit agency will not improve transit, as the agency cannot increase service.

D. MPO Response - The plan recognizes a need for better collaboration between transportation agencies and local employers. The “lines of communication” are an important step in improving transit services and funding.

P. 4-10 states “Regional Industrial Areas are well served” by transit because the lines on the map show routes. However, most of Memphis Area Transit Authority routes operate on limited hours, with infrequent headways, and service typically ends in the early evening. Service is extremely limited or typically not provided overnight, Saturdays, and Sundays. Very few Memphians and neighborhoods are well served by transit. Many freight companies also rely on overnight, early, or late shifts, and thus employees cannot use transit. Figure 4-3 shows large parts of Regional Industrial Areas not served by routes. This discussion should be updated to include analysis of transit availability in addition to a map of physical route options. For example, please consider a transit analysis comparable to Figure 9-5, Regional Travel Times, which shows a 20-minute driving travel-shed. This figure should be re-titled to indicate these are driving times. Could this analysis be added for transit mobility to freight and industrial jobs? (MATA can produce “Jane Maps” that show this concept for transit travel.)

E. MPO Response - Chapter 4 of the Freight Plan summarized the workforce including accessibility. Findings from this plan will be shared with MATA for future analysis of transit availability as well as any jurisdictions within the study area that are interested on improving the transit mobility to freight and industrial jobs.

I support the recommendation on p. 4-10 that companies invest in travel demand management strategies. Please define here what some of these strategies are. The Plan states outcomes but does not describe or list TDM strategies. Could you state which strategies could be successfully deployed in Regional Industrial Areas to support employee and freight mobility?

F. MPO Response - On p. 4-11, the plan has referenced Memphis Area Rideshare Program, operated through the Shelby County Health Department's Air Quality Improvement Branch, which offer vanpool and guaranteed ride home services for interested employers. The plan noted that this strategy should be exercised in the Regional Industrial/Freight Zones with high concentrations of employees.

On page 4-11, please add Innovate Memphis' Commute Options TDM Initiative. Please also describe how Shelby County's Rideshare Program could better be exercised in Regional Freight Zones to serve employees. How could they increase adoption in these areas? I agree that these are good tools.

G. MPO Response - Section 10.1.3 of MPO's current Regional Transportation Plan Livability 2040 has addressed Shelby County's Rideshare Programs under CMP Strategies. Additionally, information related to the Memphis Area Rideshare program can be found on the website ([www.vride.com](http://www.vride.com)) or <http://shelbytnhealth.com/163/Memphis-Area-Rideshare-Program>. Memphis Area Rideshare, offered through the Shelby County Health Department Air Quality Improvement Branch, has partnered with vRide, Inc. to provide the Memphis Area an interactive social network for commuters. The Memphis Area Rideshare Program is available to all commuters within the region. Employees within the Regional Freight Zones should be made aware of the program through their respective employers and/or through outreach efforts by the program's administration.

In Section 4.1.4, page 4-11, please describe how social justice is taken into account in the MPO Regional Freight Plan. I strongly agree that it is "important to ensure equitable transportation access and solutions for all users. It is important that these communities are connected to the jobs in the Greater Memphis Region while mitigating the negative aspects associated with heavy industry." Would the Plan recommend strategies to ensure social justice, equitable transportation access and solutions, connection to jobs, and mitigation of heavy industry? Strengthening this section would be a great addition to the Plan.

H. MPO Response - The plan identifies and illustrates environmental justice communities in relation to regional industrial areas so that strategies to address equitable transportation access and solutions and connection to jobs can be developed through our Regional Transportation Plan. Social Justice is referenced in the freight plan to help insure cohesion of plan development amongst all our transportation plans. By identifying these communities we can further work with municipal jurisdictions and agencies to develop improved social justice strategies. Information related to MPO's effort in ensuring social justice can be found on [Title VI](#) and Chapter 9.3 of MPO's current Regional Transportation Plan [Livability 2040](#).





In Section 5.1, page 5-2, this section of the Plan discusses road use for motor vehicle travel only. Pedestrians and bicyclists also use the roadways and are considered vulnerable users. For example, children walk to school on local roads, collectors, and arterials. Please discuss Memphis' Complete Streets policy, and describe what other types of users use the roads. How does the roadway classification and its use affect vulnerable users? Please include where and whether it is a goal to balance road uses for other users.

I. MPO Response - Memphis' policy on complete streets is as follows: Complete Streets are roadways that can be safely accessed, crossed, traveled upon and alongside by all people regardless of their age, ability or travel mode. A connected network of Complete Streets will ensure healthier, more equitable transportation options and an improved quality of life for all community residents, including children, seniors, people with disabilities and people facing economic hardship.

Complete Streets take into account pedestrians, bicyclists, and transit. However, there is no single formula or prescription for the Complete Street, the design is "complete" when it speaks to the needs of its users within the context of the surrounding area.

It is a goal to balance road uses for other users. As policy, the city of Memphis has adopted a default order of considerations for travel modes in the roadway project delivery process. It is as follows: pedestrian, bicycle, transit, auto, and then freight. This default is intended to influence design decisions and guide project managers toward more walkable and bikeable results when weighing alternatives and addressing tradeoffs under the constraints of project development.

For more detail on City of Memphis's Complete Streets Manual/Policy please visit <https://bikepedmemphis.wordpress.com/plans-and-publications/complete-streets-project-delivery-manual/>.

On page 5-1 and Table 5-1, traffic counts are reported for motor vehicles. Please discuss methodology for multi-modal traffic counts and state the MPO's efforts to count all roadway users. Is such data available? If so, please describe.

J. MPO Response - Multi-modal counts will be part of the RTP development and evaluation. The counts can be varied based on area. For more detail, please visit [2040 RTP - Appendix B](#)

On page 5-13, section 5.1.2, please mention the importance of navigation decisions on traffic and personal safety, in addition to the values mentioned here.

On page 5-13, section 5.1.2, please mention the importance of navigation decisions on traffic and personal safety, in addition to the values mentioned here.

K. MPO Response - The plan acknowledges that navigation decisions can have significant consequences not only on the timely delivery of goods but also on the traffic operations, facility condition, and quality of life. For more detail, please visit <https://www.fmcsa.dot.gov/>

On page 5-14, it mentions truck traffic in residential neighborhoods as "perceived safety issues." Please describe the perceived and real safety issues of truck traffic in residential areas, and provide data as to whether they are perceived or actual. If there are real safety issues, this could be edited to remove the

word “perceived.” It would also be useful to describe results of the MPO survey on resident views of truck traffic cites here.

L. MPO Response - The plan uses the term “perceived safety issues” to describe how trucks impact quality of life in residential neighborhood. In these areas, the perception of safety matters as much as safety statistics, which are discussed elsewhere in the plan. Results of the Outreach Survey are presented and discussed in full in Appendix 6 of the plan.

Table 5-7 describes Regional Freight Corridors. Has a study been done of school zones, senior housing, and other vulnerable populations on or adjacent to these freight corridors? Could the MPO include a discussion of multi-modal demand and appropriateness of adjacent land uses to Freight Corridors? It would also be useful to see an analysis of crash frequency and crash type added to the crash discussion in this Plan.

M. MPO Response - The plan has summarized the region’s industrial areas. This includes defining the scaled approach used to define the industrial areas as well as indicators used to compare the many aspects that make each area unique. Chapter 9’s summary can be explored in greater detail in Appendix 2.

Page 5-33, 5-34 and many parts of the Plan discuss freight bottlenecks and choke points. Please discuss whether other community values may balance with and be trade-offs to freight mobility when discussing bottlenecks. These include economic development from other business types, mobility for vulnerable users, support for other land uses such as schools, neighborhood business districts, and senior centers, higher property values, and so on. Page 5-33 and 34 is cited as examples among many. Another example appears at 9.1.2.2, page 9-20, which discusses congestion impact on quality of life but does not discuss quality of life impacts of traffic, nor discuss other factors that make a community livable. Another example is 9.1.2.4 Safety on page 9-23.

N. MPO Response - Bottlenecks and choke points are discussed in chapter 5 to identify known locations across the region and to offer potential mitigation strategies. Their locations were identified through stakeholder interviews within the freight community and previous studies. One of the goals of this plan is to improve operational efficiency of the roads within the region for the efficient and reliable movement of goods for economic prosperity.

On page 5-35, I support “implementing road pricing to bring supply in line with demand,” and the inclusion of complete streets and smart growth.

Section 5.5 on page 5-39 looks at “impact of crashes on freight corridors.” The Plan seems to prioritize freight mobility and congestion reduction as the reasons to prevent crashes. Please add discussion of impact of crashes on human life and community livability, where appropriate. As noted before, an analysis of crash type and severity along freight corridors would also be very useful in the Plan. Are freight vehicles involved in crashes, and if so, how? Can we use crash data analysis to better recommend safety improvements to these roads or the vehicles involved?

O. MPO Response - Both Tennessee and Mississippi Departments of Transportation are the lead agency in MPO Study area to develop, execute and evaluate programs to reduce the number of fatalities, injuries and related economic losses resulting from traffic crashes. For more details, please



visit <http://tntrafficsafety.org/> for Tennessee and for Mississippi [MDOT Traffic Safety](#).

On page 5-40, please include complete streets designs and policies on the list of strategies that reduce incidences of crashes and mitigate impacts.

P. MPO Response - Safety is a key goal of the Greater Memphis Region's comprehensive transportation policy, and complete streets are important tool to achieve that. The scope of the Freight Plan is focused on freight traffic and infrastructure. Complete streets policies will be a part of the upcoming Regional Plan development. The City of Memphis's complete streets policy is summarized under Response I. For more detail on City of Memphis's Complete Streets Manual/Policy please visit <https://bikepedmemphis.wordpress.com/plans-and-publications/complete-streets-project-delivery-manual/>

Section 9.1.2.4 Safety on page 9-23, same comment as page 5-39. Analyze and discuss safety for all road users as well as causes and solutions to crashes.

Q. MPO Response - Both Tennessee and Mississippi Departments of Transportation are the lead agency in MPO Study area to develop, execute and evaluate programs to reduce the number of fatalities, injuries and related economic losses resulting from traffic crashes. For more details, please visit <http://tntrafficsafety.org/> for Tennessee and for Mississippi [MDOT Traffic Safety](#)

Page 10-5 please review and include anti-idling technologies from [www.epa.gov/verified-diesel-tech/learn-about-idling-reduction-locomotives](http://www.epa.gov/verified-diesel-tech/learn-about-idling-reduction-locomotives).

R. MPO Response - Chapter 10 of the Freight Plan, Section 10.1.3 has referenced the FHWA Freight and Air Quality Handbook (2010) which provides a list of technological and operational strategies aimed at reducing emissions associated with goods movement. The handbook can provide guidance to any community which needs assistance.

Chapters 12, please discuss how the MPO region's state and peer city performance measurement plans inform the goals of the MPO region. On brief review, this section again seems to favor freight mobility and it is not clear how performance data would address other community values such as traffic safety. While the MPO region's states' goals and measures may be outside of MPO control, it would be interesting to better understand how the Memphis MPO will use these performance measures. I was not clear how the MPO's four recommendations tied into the state or peer city performance measures.

S. MPO Response - The plan acknowledges the upcoming Performance Measures (PM) that will be used to evaluate Freight Movement, especially from the point of Memphis and other peer MPOs. The [2040 Livability RTP](#) outlines PMs in Chapters 3 and 9, creating standards for freight movement, safety, and accessibility among other measures. PMs will be part of the upcoming Regional Transportation Plan development and reporting of PMs will be based on the federal and state guidelines.

Chapter 14, some of the plans do not support the recommendations and conclusions stated. For example, if the Memphis region is not experiencing growth in congestion, and if young professionals are choosing not to drive, how does this lead to recommendations to widen roads, construct new freeways, and

improve access to intermodal facilities? I was particularly unclear about sections 14.2.2.4 Economic Competitiveness, 14.2.2.5 Sustainability and Quality of Life, and 14.2.2.6 Resiliency. The project groups outlined by the Plan do not provide for the stated goals of a competitive workforce, sustainability and quality of life, and resiliency. Please state mechanisms and data that show how the road widening projects and new construction will meet the goals outlined in these sections.

T. MPO Response - The purpose of this chapter is to assess the path forward and the plan's alignment with ongoing work in the region and future conditions. This includes assessing various freight related projects currently underway or proposed for the Memphis MPO's multimodal freight systems with a significant presence of road projects. The metrics against which the groupings of projects were assessed were derived from the current federal, state and regional goals for freight policy.

Thank you for the opportunity to comment on this important piece of Memphis' community and economy.

Sincerely,  
Suzanne Carlson