Subsequent to enactment of the Moving Ahead for Progress in the 21st Century Act (MAP-21), nearly 60,000 miles of principal arterials were added to the National Highway System (NHS). Section 1122 of the Fixing America’s Surface Transportation Act (FAST Act) directed the Department to issue guidance relating to the expanded NHS. In accordance with the FAST Act, I am issuing this guidance regarding how FHWA should work with States that request assistance in reviewing all roads classified as principal arterials that existed on October 1, 2012, and identifying any necessary functional classification changes to rural and urban principal arterials.

We have heard from the American Association of State Highway and Transportation Officials (AASHTO) and several States that the MAP-21 provision caused some unintended consequences, specifically related to bringing the newly added principal arterials into compliance with NHS federal requirements. These requirements include design standards, national performance measure data collection, and outdoor advertisement and junkyard control. FHWA has reviewed the provision and determined FHWA can take administrative actions to address these particular issues.

The purpose of this memorandum is to request each Division Office to work with its respective State department of transportation to review roads classified as principal arterials within the State and to identify any functional classification changes needed to the rural and urban principal arterial system. This review can be used to adjust a State’s NHS mileage total. In addition, States may also, in some cases, request certain roads be withdrawn from the NHS. While we want to assist States to identify appropriate roads that should not be functionally classified as principal arterials, States should not remove all newly designated principal arterials from the NHS en masse. However, if the removal requests are reasonable and appropriate, we should consider these actions.

The NHS modification process is defined in regulations (23 CFR 470) and requires a State to submit a request through the Division Office. Each request contains appropriate justification, including documented coordination with impacted MPOs and local officials. States should coordinate with one another for proposed NHS changes at a State line. Because these
adjustments impact the NHS, the Divisions will review and forward their recommendation to 
FHWA Headquarters for final approval and subsequent adjustment to the NHS.

Many States routinely review their highway functional classifications, or may be in the midst of 
statewide highway functional classification reviews triggered by the 2010 Census. This 
guidance is especially important in those States that have not recently conducted a statewide 
functional classification review. This is an opportunity for States, as they conduct their review 
to give particular attention to routes that are designated as NHS routes. Since NHS routes— 
with the exception of NHS Intermodal Connectors or STRAHNET Connectors—must be 
classified as principal arterials or above, downgrading the functional classification of segments 
would require their removal from the NHS. After I issued similar guidance on February 19, 
2014, numerous States have coordinated with their local partners on functional classification 
downgrades. When States submitted those identified downgrades to FHWA, we have deleted 
them from the NHS.

States can conduct the reviews at their convenience or to coincide with their existing State 
highway review processes. There is no deadline for response to this request. Please provide the 
Office of Human Environment an electronic list of Division Office approvals of functional 
classification changes to principal arterials (to include route number/name, from/to termini, 
beginning/ending mile points, digital maps, and associated geographic information system files). 
Below are links to references that will assist with this process. Please transmit the Division 
Office’s approvals of principal arterials to Mike Neathery. For additional information, please 
contact Mike Neathery at 202-366-1257 (mike.neathery@dot.gov) or Stefan Natzke at 202-366-
5010 (stefan.natzke@dot.gov). For specific questions related to functional classification, please 
contact Spencer Stevens at 202-366-0149 (spencer.stevens@dot.gov).

References:
Functional Classification Manual, 
ations/

NHS Maps and Procedures, 
http://www.fhwa.dot.gov/planning/national_highway_system/

NHS Questions and Answers, 
http://www.fhwa.dot.gov/map21/qandas/qanhs.cfm