

April 20, 2016

Mr. Kome Ajise
Chief Deputy Director
California Department of Transportation
P.O. Box 942873
Sacramento, CA 94273-0001

Mr. Ajise:

On behalf of the Peace Officers Research Association of California, California Police Chiefs Association, California State Association of Counties, League of California Cities and California State Sheriffs' Association, we are deeply concerned with Section IV.A of the "Strategies to Maximize Asset Utilization in the California Freight System: Part II – Strategies" White Paper, which appears to recommend a relaxation of California's truck size and weight laws as an action in the Sustainable Freight Action Plan. We are writing to request that this recommendation not be included in the Sustainable Freight Action Plan delivered to Governor Brown.

Our organizations strongly oppose any state or national effort to increase truck size and weight because such increases would endanger motorists, damage state and local roads and bridges, and increase costs to motorists and taxpayers. California's congressional delegation overwhelmingly opposed several proposals in Congress in 2015 that called for increases in truck size and weight—and, in fact, Sen. Dianne Feinstein served as a leading advocate to defeat the "Double 33s" proposal that would have mandated longer double-trailer trucks on California highways. Proposals for longer and heavier trucks were ultimately defeated in Congress last year, in part due to the U.S. Department of Transportation (USDOT) Technical Reports published in June of 2015 that recommended against any increases in truck size and weight. The reports found alarmingly higher crash rates for heavier trucks, longer stopping distances for longer trucks, and increased infrastructure damage from both heavier and longer trucks.

Attached is a memo detailing numerous concerns with increasing truck size and weight, which is based largely on the USDOT study. Speaking on behalf of law enforcement and local government organizations across the State of California, we request that this recommendation not be included in the Sustainable Freight Action Plan delivered to Governor Brown. Thank you for your consideration, and please contact us if we can answer any questions.

Sincerely,



Michael Durant
President
Peace Officers Research Association of
California



Ken Corney
President
California Police Chiefs Association



Kiana L. Valentine
Legislative Representative
California State Association of Counties



Rony Berdugo
Legislative Representative
League of California Cities



Sheriff Donny Youngblood, Kern County
President, California State Sheriffs' Association

Enclosure: Memo

cc: Mr. Benjamin De Alba
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HEAVIER AND LONGER TRUCKS ARE NOT A SUSTAINABLE FREIGHT STRATEGY FOR CALIFORNIA

April 2016

1. The US Department of Transportation initiated a two-year long “Comprehensive Truck Size and Weight Limits Study” in 2012. In June 2015, DOT released various Technical Reports with the findings from its research (http://ops.fhwa.dot.gov/freight/sw/map21tswstudy/technical_rpts/index.htm). Importantly, in a letter to Congress following the release of its Technical Reports, USDOT recommended that there be **no increases in truck size or weight** (Undersecretary Peter Rogoff’s transmittal letter to Transportation and Infrastructure Committee Chairman Bill Shuster: http://ops.fhwa.dot.gov/freight/sw/map21tswstudy/technical_rpts/trtransmittalletters.pdf).
2. The USDOT reports found that heavier and longer trucks are more dangerous: a) heavier trucks have dramatically higher crash rates in states where they are currently authorized to operate, from a 47% higher crash rate in Washington state to a 400% higher crash rate in Michigan (Highway Safety and Truck Crash Comparative Analysis Technical Report, pg. 26, Table 8); b) longer double-trailer trucks need an alarming 22 additional feet to stop than today’s double-trailer trucks (Highway Safety and Truck Crash Comparative Analysis Technical Report, pg. 65, Table 26).
3. The USDOT reports also found that heavier and longer trucks impose dramatically increased costs to maintain and repair infrastructure. Longer double-trailer trucks would increase pavement damage up to 1.8 to 2.7% annually, translating to \$1.8 billion, as well as \$1.1 billion in bridge damage (Volume 1: Technical Reports Summary, ES-12, Table ES-2b). Triple-trailer trucks would incur significant bridge reinforcement or replacement, costing \$5.4 billion (Volume 1: Technical Reports Summary, ES-12, Table ES-2b). Heavier trucks would also incur significant bridge reinforcement or replacement—an increase in truck weights to 91,000 pounds would cost \$1.1 billion, and an increase to 97,000 pounds would cost \$2.2 billion (Volume 1: Technical Reports Summary, ES-11, Table ES-2a).
4. CSAC estimates that it would cost in excess of \$5 billion just to replace the city and county bridges in California that could not accommodate trucks weighing 97,000 pounds or more (2013 CSAC letter to USDOT is attached).
5. The Federal Highway Administration has found that trucks on the road today only cover about 80% of their damage, and heavier trucks would pay even less (FHWA Addendum to Highway Cost Allocation Study, 2000). Proponents of heavier trucks may see higher profits; motorists and taxpayers will end up paying the bill.
6. The Federal Motor Carrier Safety Administration reported there were 10,412 large-truck crashes in California in 2014, causing 342 fatalities and 4,992 injuries.
7. Just last November, Congress rejected both weight and length increases. The House voted down an amendment on the floor to allow 91,000 pound trucks on Interstates and

NHS – the California delegation voted overwhelming to oppose this increase with 42 members of the California House delegation opposing a weight increase and only 11 supporting it (H.R. 22, Amendment No. 29 on Nov. 3, 2015).

8. Senator Feinstein was the leading opponent of longer trucks (double 33s), which were rejected by the Senate 56-31 (Wicker-Feinstein Motion to Instruct on H.R. 22 on Nov. 10, 2015).
9. Because Congress rejected heavier and longer trucks, if California does decide to increase truck weights or length (a state cannot unilaterally allow LCVs on their highways now under the 1991 LCV freeze passed by Congress), this would result in diverting truck traffic from the interstates to the state and local roads and those trucks would be heavier and longer than the trucks on the roads today. The state and local roads are the most vulnerable to bigger trucks in terms of both safety and infrastructure.

Our organizations believe the above facts should be adequate reason to reject any truck size or weight increases as part of a sustainable freight strategy.

In addition, we would like to point out the positions of the following important stakeholders:

- Opposition from safety groups: The National Troopers Coalition, National Sheriffs' Association, International Association of Chiefs of Police, National Association of Police Organizations, AAA, and the National Association of Counties all oppose increases in truck size and weight.
- Opposition from trucking companies: The trucking industry is deeply divided on longer and heavier trucks as evidenced by the attached letters by the Truckload Carriers Association (TCA) and large number of individual truckload carriers.
- Public opposition: A 2015 nationwide poll found 76% of respondents oppose longer and heavier trucks, while 15% support and 9% not sure. (Harper Polling, live-operator survey of 1,000 respondents with a margin of error of plus or minus 3.1 percentage points, January 2015)

In summary, Congress rejected increases in both truck weight and length outright just last November. Given the dramatically negative impacts of larger and heavier trucks and longer trucks, our organizations ask that CARB and California DOT and the other Sustainable Strategy agencies, remove this strategy from any final recommendations on sustainable freight to the Governor. California should not adopt a document promoting the idea of heavier or longer trucks.