



Owner-Operator Independent Drivers Association, Inc.

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June 16, 2016

Via Electronic Submission

The Honorable Malcolm Dougherty
Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Dear Director Dougherty:

Please accept this letter as formal comments from the Owner-Operator Independent Drivers Association (OOIDA) regarding the California Sustainable Freight Action Plan (CSFAP).

OOIDA is the largest trade association representing the views of small-business trucking professionals and professional truck drivers. We have more than 157,000 members nationwide, including roughly 5,500 who reside in California. In short, we represent a significant number of people that actually drive a truck on a regular basis.

While it is possible that increases in truck size and weights might improve efficiency for certain segments of the freight industry, we believe any efficiency gains would consequently and unnecessarily jeopardize public safety, increase damage to roads and bridges, and create a number of enforcement challenges. It would also give a significant competitive advantage to a select few in the freight industry.

Regarding safety, heavier and longer trucks are harder to handle and maneuver. They also take longer to stop and longer for other motorists to pass. While driver training and experience could potentially mitigate some of this, it will undoubtedly lead to more accidents. This would be bad for motorists and bad for small-business truckers. Further, heavier weights would make it more difficult to properly maintain equipment (i.e. tractors, trailers, tires, etc.). All of these factors could lead to additional safety hazards.

In addition to our safety concerns, we would offer the following comments:

- More axles and different axle configurations will not entirely mitigate infrastructure damage, especially on bridges;

- The ability to operate at 97,000 pounds will effectively become the de facto industry standard and require many owner-operators to purchase expensive new equipment in order to remain competitive;
- There would almost certainly be an increased workload without an increase in freight rates; and
- Any expected permit would likely be cost prohibitive for small-business truckers.

The CSFAP highlights some positive ideas that will improve freight efficiency. Increasing truck size and weights is not one of those ideas. We urge the California Freight Advisory Committee to remove references to increasing truck size and weights in California.

Thank you for your consideration of our concerns. Please contact me directly at (816) 229-5791 ext. 1603 or mike_matousek@ooida.com should you have any questions or require additional information.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Matousek", written in a cursive style.

Mike Matousek
Director of State Legislative Affairs
OOIDA