



WASHTO

Western Association of State Highway and Transportation Officials

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June 10, 2010

The Honorable Brian Schweitzer
Chair, Western Governors Association
1600 Broadway
Suite 1700
Denver, CO 80202

Dear Governor Schweitzer:

On behalf of Western State DOTs, thank you for including us in earlier deliberations about the issue of federal limits on truck weight and size and the impact on businesses, transportation systems, communities and the environment.

We understand that at your June meeting the WGA may act on a resolution calling on the federal government to lift the freeze on Long Combination Vehicles for 13 Western states, so that these states have the flexibility to establish and operate pilot test programs to evaluate LCV routes, configurations and operating conditions.

Our membership is divided on lifting the freeze. We appreciate that standardizing truck size, weight and permitting are important for interstate commerce and industry. We are open to operational strategies that add capacity, and strongly prefer a voluntary pilot program.

We are also united about our concerns, which we provide for your consideration:

Safety: We are impressed with the safety results from Canada's experience with allowing certain longer and heavier vehicles. There is a direct relationship between the extent of motor carrier compliance with permit requirements and the existence of an effective regulatory presence. Therefore, a parallel consideration along with lifting the federal freeze would be to assess the current ability of each participating state to provide a uniform and adequate level of permitting and enforcement.

Impact on Roads & Bridges: Data appear to support that certain larger and heavier vehicle configurations actually reduce wear and tear on roads and bridges that are already built to a standard that can accommodate the increased configuration, length and size. Retrofitting existing structures to accommodate the geometric requirements of longer vehicles or to withstand greater gross weights (as in the case of a bridge) could be a significant financial obstacle to initial implementation if the infrastructure is not built to withstand those loadings.

Emissions: We agree that allowing longer and heavier trucks can reduce emissions per ton of freight moved by truck. However, to the extent that the permitting of longer and heavier vehicles shifts freight from trains to trucks it could have the opposite effect on overall emissions per ton moved.

Cost Savings to Trucking Industry: Allowing longer and heavier vehicles can lead to lower operating costs for shippers. However, economies in the trucking industry due to increased sizes and weight may divert more freight movement from other transportation modes to truck transport, thereby inducing more truck trips.

Efficiency: We agree the present system of differing vehicle size and weight regulations from state to state is inefficient from a freight shipper's perspective. However, we believe there are unique situations in each state that require state flexibility to implement different size and weight regulations to accommodate their circumstances.

Impact on Congestion: We understand the position that longer and heavier vehicle configurations could have a positive impact on road congestion. Yet it is not a given that allowing for longer and heavier vehicles will reduce the number of trucks on our highways. Past increases in truck size and weight have not resulted in fewer trucks, fewer trips, or fewer miles traveled. Looking ahead, FHWA predicts that freight volumes in all modes will double in the next twenty years and truck transport will continue to be the predominant mode.

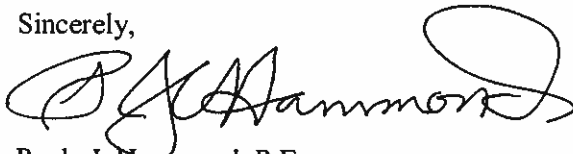
Passenger Travel: Other road users are averse to sharing the road with longer combination vehicles. If such vehicle combinations are allowed to proliferate there will likely be an escalation of these other driver issues (e.g., difficulty when passing a long combination, excess rain spray or snow white-out from a longer combination vehicle, etc.) which will have to be taken into account especially for travel on interstates through more densely populated areas or colder states with light, dry snow.

Costs to States: Permitting longer and heavier vehicles could create additional costs for states unless they are offset by additional fee increases. One cost area is for any road and bridge upgrades required to accommodate longer vehicles. One Canadian province reported it had to upgrade 10 percent of its bridges when it began permitting LCVs. A second cost area is for additional permitting, enforcement and monitoring staff to implement a special longer and heavier permitting program. These additional costs are not insignificant and come at a time of declining tax revenues at both the state and federal levels.

To help us further determine the possible benefits and impacts of lifting the freeze on federal limits, it would be helpful if industry could outline a couple of LCV pilot scenarios, as discussed in a previous WGA session on this issue.

Thank you for considering our concerns.

Sincerely,



Paula J. Hammond, P.E.
Secretary of Transportation, Washington State
WASHTO President

PJH;jaa

cc: Pam Inmann, WGA
John Horsley, AASHTO