

Congress of the United States
Washington, DC 20515

December 22, 2014

The Honorable Anthony Foxx
Secretary
United States Department of Transportation
1200 New Jersey Avenue, SW
Washington, D.C. 20590

Dear Secretary Foxx:

Provisions to increase the permissible size and weight of trucks on our nation's roadways were stripped from MAP-21 by a bipartisan vote in the House Committee on Transportation and Infrastructure. The final bill instead instructed the Department of Transportation (DOT) to conduct a two-year study, scheduled for completion this year, on the impact of higher size and weight thresholds on the safety of our citizens and the vitality of our infrastructure. Congress intended for the Comprehensive Truck Size and Weight Limits Study to thoroughly and objectively assess the implications of alternate truck size and weight limits on highway safety, road and bridge condition, and freight movement.

As Members of California's Congressional Delegation, we are keenly aware of the study's significance to the quality of our state's infrastructure and the safety of our constituents. Our state has suffered too many large-truck tragedies in recent years, and has lost too many lives because of them. In California, there were 9,934 large-truck crashes in 2013 alone—a 9.5 percent increase from 2012. We want to see this trend reversed, not exacerbated. With this in mind, we write to express our concern that the study underway contains a number of methodological shortcomings threatening the integrity of its results, and urge you to take action to address the following:

- The study employs a new, untested methodology that relies on data volunteered by trucking companies lobbying for bigger truck. Additionally, the study gathers data from only a handful of states, which are not representative of national operations. Only one of the states included in the study—Michigan—is in the top-20 most population-dense states in the U.S., leaving us to wonder how the data would change to reflect more populated areas.
- The study does not capture the effect of lower truck rates on rail traffic and makes faulty assumptions about transportation rates, shipper demand, effects of bridge postings, intermodal network operations, and the importance of short line railroads to the transportation system—all of which will impact the Department's truck vehicle miles traveled (VMT) estimate.

- The study will evaluate only 400 of the more than 600,000 bridges in the U.S. Furthermore, of the four million miles of public roadway in the U.S., it will examine only a small number of pavement types to estimate impacts, overlooking more than 90 percent of roadways.
- Turnpike Doubles and Rocky Mountain Doubles are the heaviest and longest configurations operating in the U.S. and, although previous DOT studies have found that these configurations would have the *greatest* impacts on infrastructure and diversion, they are not included in the Department's study.
- Despite a letter from 45 Members of Congress highlighting the importance of potential impacts to state and local infrastructure, the study's quantitative analysis has not been fully extended beyond the Interstates, National Highway System, and National Truck Network. This excludes tens of thousands of miles of potentially impacted county and city roads and thousands of county and city bridges from the study.

Furthermore, it has come to our attention that crucial voices have been largely overlooked through the study's development. According to a Multimodal Transportation and Infrastructure Consortium study, over 90 percent of truck drivers say that more weight negatively impacts braking. The same study indicates that over 95 percent of law enforcement officers report that adding weight makes a truck more dangerous. These professionals have firsthand knowledge of the safety implications of semitrailers, yet their valuable input has not been utilized.

Since law enforcement officers are subject-matter experts who routinely conduct roadside inspections and post-crash investigations, we consider their feedback an essential and mandatory component that must be integrated into the ongoing study analysis. With this in mind, we submit the following list of recommendations put forth by law enforcement officers to improve the study's design:

1. Standardize the collection of higher-quality, impartial data nationwide, including vehicle miles traveled (VMT), number of trailers and axles, and truck weight.
2. Study the impacts of heavier and longer trucks on local infrastructure to adequately assess any unintended consequences. Further, address the fiscal concerns of local officials, including the challenges and pressure faced by police departments to enforce bridge postings.
3. Avoid experimenting with public motorists on public highways and conduct off-road and/or controlled on-road operational tests of bigger-truck configurations, fully evaluating vehicle dynamics in real-world conditions. The study's attention to operational characteristics is widely viewed by law enforcement leaders as critically deficient, and must evaluate key aspects of semitrailer operation, including crash severity, wear and tear, braking, and speed differential.

Thank you for your careful consideration of these concerns as you work to achieve a rigorous, robust, and thorough evaluation of the real-world implications of bigger-truck operations. We

look forward to a completed study that addresses these concerns and fully integrates the viewpoints of key groups like truck drivers, state and national sheriffs' organizations, and the Peace Officers Research Association of California. We stand ready to assist the Department in any way we can as partners in the prevention of higher crash rates in the future.

Sincerely,



John Garamendi



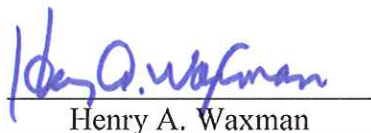
Grace F. Napolitano



Michael M. Honda



Zoe Lofgren



Henry A. Waxman



George Miller



Julia Brownley



Anna G. Eshoo



Adam B. Schiff



Sam Farr