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November 8, 2013

The Honorable Anthony Foxx, Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Comprehensive Truck Size and Weight Study

Dear Secretary Foxx:

The California State Association of Counties (CSAC) submits the following comments for the Department of Transportation's consideration in its development of the Comprehensive Truck Size and Weight Study undertaken pursuant to the Moving Ahead for Progress in the 21st Century Act (MAP-21). CSAC is the voice of California's fifty-eight counties at the state and federal level. Its long-term objective is to significantly improve the fiscal health of all California counties so they can adequately meet the demand for vital public programs and services, including the preservation and improvement of California's local transportation infrastructure.

It is important to ensure that the condition of California's local roads and bridges is considered as part of an analysis of the impacts of larger or heavier trucks. Whether by car, bus, bicycle or on foot, every trip begins and ends on a local street and road. Counties and cities in California maintain an estimated 312,708 lane miles of roads, and 13,775 bridges included in the National Bridge Inventory. Despite sizable investments from the American Recovery and Reinvestment Act and a recent infusion of bond funding from the State of California, the pavement condition index (PCI) of California's local streets and roads has continued to decline. With a statewide average PCI of 66 (on scale of 0 [failed] to 100 [excellent]), local agencies in California currently face a \$1.9 billion annual funding shortfall to simply maintain the status quo. Moreover, of the 13,775 local agency bridges in California, 1,964 are functionally obsolete and 2,088 are structurally deficient. As recent tragedies highlight, when bridges fail, the cost can be human. Having a well-maintained transportation network is critical to the efficient and safe movement of people and goods, a robust economy, and our environment. Any analysis of the potential impacts to the transportation system due to heavier or larger trucks must incorporate a thorough examination of the impacts of such vehicles on local roads and bridges, as they serve a vital role in the overall transportation network in California and nationally.

CSAC consulted with the County of Los Angeles to collect data related to the potential impacts of larger and heavier trucks on County-maintained transportation infrastructure. Where possible, CSAC has provided data from our California Statewide Local Streets and Roads Needs Assessment and other sources, or extrapolated from the Los Angeles County's calculations to come up with statewide estimates. We hope the following information will be helpful to your department as it undertakes this important analysis.

Structurally Deficient or Functionally Obsolete Bridges

Statewide, there are 1,964 city and county bridges that are functionally obsolete and 2,088 bridges that are structurally deficient. Functionally obsolete bridges may have geometry making it difficult or impossible for them to accommodate large trucks, while structurally deficient bridges may be unable to accommodate heavier trucks.

Bridges Not Rated to Handle Trucks Weighing 97,000 lbs or More and Estimated Costs to Upgrade

Based on a preliminary screening of their 1,111 National Bridge Inventory bridges, Los Angeles County identified 126 bridges that may not be adequate to carry the larger 97,000 pound truck. Using a construction contract cost of \$350 per square foot, the County estimated the total cost to replace these bridges to be approximately \$500 million. In addition to the construction contract cost, the total cost includes the cost of plans, specifications, consultant services, survey, material testing, construction engineering, inspection, contract administration, change order contingency, and other necessary work.

Extrapolating Los Angeles County's estimate to the 2,088 structurally deficient city and county bridges statewide by applying the \$350 per square foot estimate to the cumulative area of these bridges yields an estimated \$5.76 billion cost of replacement.

Cost to Analyze Bridges to Determine if they are Capable of Handling 97,000 lbs or Heavier Trucks

The County of Los Angeles estimates that at a cost of \$4,000 to fully analyze each bridge, it would cost approximately \$4.5 million to load rate and determine whether the 1,111 locally-maintained NBI bridges in Los Angeles County are capable of handling a 97,000 pound truck. Extrapolating from Los Angeles' estimate, it would cost an estimated \$55.1 million to inspect city and county bridges statewide to determine whether they were sufficient to support heavier trucks.

Miles and Pavements Types of Locally-Maintained Roads

Los Angeles County Public Works maintains approximately 2,987 miles of asphalt paved roads, 30 miles of concrete paved roads, and 201 miles of unpaved roads. As previously indicated, cities and counties in California maintain 312,708 lane-miles of roadways, including 96,017 lane-miles of major urban roads and 28,056 lane-miles of major rural roads. Statewide, concrete paved roads are estimated to comprise less than 0.5% of the local network.

The Cost of Oversize/Overweight Permits and Whether the Cost of the Permit Covers the Full Damage Done by Permitted Trucks

The Los Angeles County Code requires the Public Works Department to charge the maximum permit fee amount allowed as published by the State, which is currently \$16 or \$90, for a single-trip permit and a blanket annual permit, respectively. For permits requiring inspections during movement, the County charges separate fees to recover our inspection cost. The fees the state authorizes local agencies are authorized to charge to for the issuance of overweight/oversized transportation permits are neither sufficient nor intended to account for any current or future damages to roads resulting from these truck trips.

Thank you for your consideration of CSAC's comments. We hope this information will assist the Department in analyzing potential impacts to local roadways and bridges as it completes the Comprehensive Truck Size and weight study mandated by MAP-21. Should you have any questions or need additional information, please contact me at (916) 327-7500 ext. 566, or kbuss@counties.org.

Sincerely,



Kiana Buss
Legislative Representative