

March \_\_\_\_, 2017

The Honorable Gerald McNerney  
United States House of Representatives  
2265 Rayburn House Office Building  
Washington, DC 20515

Dear Congressman McNerney:

We are reaching out to share our concerns about proposals that would bring longer and heavier trucks to our roads and bridges. Similar proposals were defeated when they came up for a vote in 2015, and we believe that is because members understood the magnitude of damage that will be done to our local infrastructure if we allow 91,000 pounds trucks on our roads on a nationwide basis.

While we recognize the important role that tractor-trailer trucks have in keeping our economy moving, we believe that any potential benefits of bigger and heavier trucks will be offset by the additional damage to local infrastructure, as well as the safety risk that heavier and longer trucks will bring to our roadways.

The U.S. Department of Transportation in their 2016 Comprehensive Truck Size and Weight Study found that heavier trucks of 91,000 to 97,000 pounds would cause an additional \$1.1 - \$2.2 billion in damages to our bridges. The study also determined that longer double-trailer trucks would add an additional \$1.2 - \$1.8 billion in pavement damage. The addition of a sixth axle would only mitigate additional damage, and would have no affect at all unless the weight distribution is evenly placed over each axle, which rarely happens. As you well know, California reflects an aging network of roads and bridges. These proposals are coming at a time when many counties across our state have seen a declining stream of funding for road projects and general maintenance.

Thank you for standing up for highway safety and the integrity of our roads and bridges and please oppose any future legislation that seeks to increase the weight and lengths of tractor-trailer trucks.

Thank you for your service.

Sincerely,

# Longer Double-Trailer Trucks Endanger Motorists and Damage Infrastructure

Prepared by CABT, January 2017

A few large trucking companies are pushing Congress to force states to allow longer double-trailer trucks, or “Double 33s.” These longer double-trailer trucks would replace not only today’s shorter, 28-foot double-trailer trucks, but also many 53-foot single-trailer trucks that commonly operate on the road today. Longer double-trailer trucks would add new dangers for motorists and damage our infrastructure.

Double 33s are 91 feet in length—that is 10 feet longer than the current doubles they are intended to replace and 17 feet longer than current single-trailer trucks. Congress in 2015 rejected these longer double-trailer trucks<sup>1</sup>, and USDOT in its 2016 Comprehensive Truck Size and Weight Limits Study, recommended that Congress not approve these or any other longer or heavier trucks<sup>2</sup>.

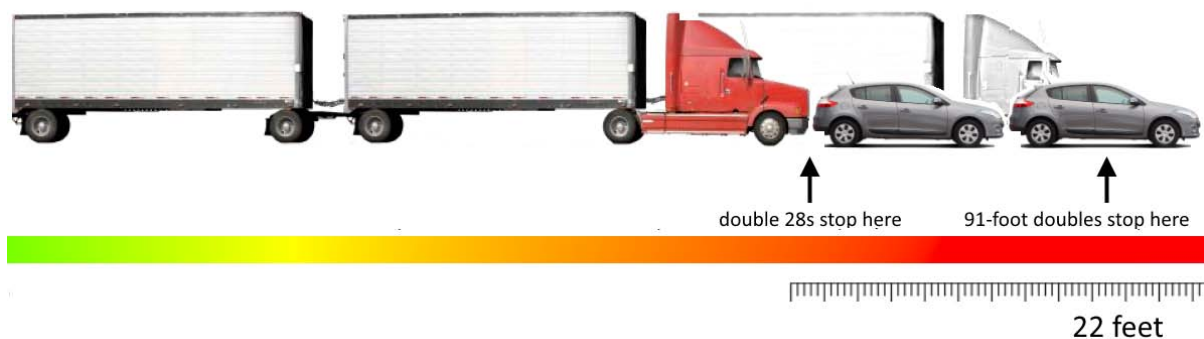
## Double 33s Would Replace Single-Trailer Trucks

Double-trailer trucks represent a relatively small percentage of trucks operating on our roads today. The majority of combination trucks in operation are 53-foot single-trailer trucks. If Congress requires states to allow the longer doubles, today’s truck traffic would change dramatically. Since Double 33s have 24 percent more capacity than 53-foot trailers, market forces would push companies currently operating single-trailer trucks to replace their fleets with Double 33s. According to a 2015 analysis, this would incur a massive shift from single-trailer trucks to Double 33s, resulting in approximately **42 to 101 billion additional miles of double-trailer truck travel on our nation’s highways**<sup>3</sup>.

## Longer Double-Trailer Trucks Would Add New Dangers to the Highways

An influx of double-trailer trucks on the highway would have severe safety implications for motorists. Studies have consistently shown that multi-trailer trucks—doubles and triple-trailer trucks—are more dangerous than single-trailer trucks. A 2013 Marshall University-led study<sup>4</sup> found that double-trailer trucks have an **11 percent higher fatality rate** than single-trailer trucks. This finding is consistent with findings made by USDOT in a 2000 study<sup>5</sup>. Below are several reasons these trucks are more dangerous:

**1. Longer stopping distances.** Double 33s take 252 feet to stop—that is 17 feet longer stopping distance than today’s single-trailer trucks and 22 feet longer than today’s twin-trailer trucks<sup>6</sup>.



<sup>1</sup> On Nov. 10, 2015, the Senate rejected increasing the length of double-trailer trucks as part of the surface transportation reauthorization bill on a 56-31 floor vote; and on Nov. 18, 2015, the U.S. Senate rejected increasing the length of double-trailer trucks on the omnibus spending bill on a voice vote.

<sup>2</sup> USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*.

<sup>3</sup> Mingo, Roger D., and Mark L. Burton, Mark L.; 2015. *Mandated Twin 33 Trailers Produce Costly Shifts in Freight Movement*.

<sup>4</sup> Marshall University, 2013. *An Analysis of Truck Size and Weight: Phase I – Safety*.

<sup>5</sup> USDOT; 2000. *Comprehensive Truck Size and Weight Study*.

<sup>6</sup> USDOT; 2015. *Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report*.

**2. Increased rollover propensity and rearward amplification.** Double 33s experience increased rollover vulnerability, poorer stability and compromised avoidance maneuver compared to single-trailer trucks<sup>7</sup>.

**3. More wear and tear.** Double-trailer configurations have 58 percent higher out-of-service violation rates than single-trailer trucks<sup>8</sup>. This is especially important because a 2016 study by the Insurance Institute for Highway Safety (IIHS) found that trucks with any out-of-service violation are 362 percent more likely to be involved in a crash<sup>9</sup>.

### **Double 33s Would Cause Significant Infrastructure Damage**

According to its 2016 USDOT study, Double 33s would increase pavement damage by 1.8 percent to 2.7 percent<sup>10</sup>, which translates to **\$1.2 to \$1.8 billion in estimated pavement damage every year**<sup>11</sup>.

Also, USDOT found that nearly 2,500 Interstate and other National Highway System bridges would need to be strengthened or reinforced to handle the longer double-trailer trucks, costing taxpayers up to **\$1.1 billion**<sup>12</sup>. The study accounts for only 20 percent of bridges—the other 80 percent of bridges on state and local roads would be more vulnerable to the longer trucks.

### **Many Trucking Companies Oppose Double 33s**

The Truckload Carriers Association (TCA), representing over 700 trucking companies, strongly opposes longer double-trailer trucks. In fact, TCA wrote to Members of Congress in 2015 to express their concerns over increasing the length of double-trailer trucks, stating that these trucks would increase costs of delivering freight, decrease fuel efficiency, incur additional expenses to train or retrain drivers, increase the potential for driver injuries while coupling and decoupling trailers, and exacerbate truck parking problems<sup>13</sup>.

### **The Double 33s Mandate Would Override State Laws**

This legislation would preempt state laws and require every state to allow longer double-trailer trucks on their roads, even if they determined that their roadways were not capable of safely accommodating the longer trucks or that they would damage their pavement and bridges.

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<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> Insurance Institute for Highway Safety; 2016. *Crash Risk Factors for Interstate Large Trucks in North Carolina*.

<sup>10</sup> USDOT; 2015. *Comprehensive Truck Size and Weight Limits Study, Volume 1: Technical Reports Summary*.

<sup>11</sup> R.D. Mingo and Associates; 2015. Analysis of 2012 FHWA Highway Statistics and selected Cost Allocation studies.

<sup>12</sup> Ibid.

<sup>13</sup> Truckload Carriers Association; October, 20, 2015. Letter to House Transportation and Infrastructure Committee Chairman Bill Shuster and Ranking Member Peter DeFazio.

# Heavier Trucks Endanger Motorists and Damage Infrastructure

Prepared by CABT, January 2017

Congress voted in 2015 to reject a proposal to increase truck weight limits from 80,000 pounds to 91,000 pounds<sup>1</sup>. Those companies who would profit from bigger trucks can be expected to renew their efforts in this Congress. Yet, a two-year Comprehensive Truck Size and Weight Limits Study completed by USDOT in 2016 recommended that Congress not approve any heavier or longer trucks<sup>2</sup>. As explained below, there is compelling evidence that heavier trucks would add new dangers to our roads and damage our infrastructure.

## Heavier Trucks Have Dramatically Higher Crash Rates

The 2016 USDOT study found that heavier trucks with six axles—both 91,000-pound and 97,000-pound configurations—had higher crash rates in the three states where there was sufficient data<sup>3</sup>:

Idaho	-	<b>99 percent higher</b> crash rates for six-axle trucks up to 97,000 pounds
Michigan	-	<b>400 percent higher</b> crash rates for six-axle trucks up to 97,000 pounds
Washington	-	<b>47 percent higher</b> crash rates for six-axle trucks up to 91,000 pounds

USDOT noted that the consistency of the higher crash rates added validity to these findings, but more data would be needed to draw national conclusions. However, these findings are consistent with earlier studies that have found higher crash rates are associated with increases in gross vehicle weight<sup>4,5</sup>.

## The Problems with Heavier Trucks

**More severe crashes.** The severity of a crash is determined by the velocity and mass of a vehicle. If its weight increases, so does the potential severity of a crash<sup>6</sup>. Any increase in crash severity increases the likelihood of injuries becoming more serious, or resulting in fatalities.

**More likely to roll over.** Heavier trucks tend to have a higher center of gravity because the additional weight is oftentimes stacked vertically. Raising the center of gravity increases the risk of rollovers<sup>7</sup>.

**Increased wear and tear.** Increasing the weight of trucks causes additional wear and tear on key safety components. The 2016 USDOT study found that trucks weighing over 80,000 pounds had higher overall out-of-service (OOS) rates and **18 percent higher brake violation rates** compared to those at or below

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<sup>1</sup> On Nov. 3, 2015, an amendment offered by Rep. Reid Ribble (R-Wis.) to the Transportation Reauthorization Act was defeated on a bipartisan vote, 236 to 187.

<sup>2</sup> USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*.

<sup>3</sup> Ibid.

<sup>4</sup> USDOT; 2013. *Highway Safety and Truck Crash Comparative Analysis, Final Draft Desk Scan*; “Crash rates tend to increase with increases in GVW.” 1995 University of Michigan Transportation Research Institute (UMTRI) study summary; and “The study also noted an increase in fatal crash rates at higher GVWs.” 1988 UMTRI study summary.

<sup>5</sup> Marshall University, 2013. *An Analysis of Truck Size and Weight: Phase I – Safety*.

<sup>6</sup> Ibid.

<sup>7</sup> USDOT; 2000. *Comprehensive Truck Size and Weight Study*.

80,000 pounds<sup>8</sup>. This is especially important because a 2016 study by the Insurance Institute for Highway Safety found that trucks with any out-of-service violation are **362 percent more likely to be involved in a crash**<sup>9</sup>.

### **Heavier Trucks Would Cause Significant Infrastructure Damage**

USDOT found in its 2016 study that thousands of Interstate and other National Highway System bridges could not accommodate heavier trucks<sup>10</sup>. These bridges would need to be reinforced or replaced, costing billions of dollars. USDOT estimates the following:

- The 91,000-pound, six-axle configuration would negatively affect more than 4,800 bridges, costing \$1.1 billion
- The 97,000-pound, six-axle configuration would negatively affect more than 6,200 bridges, costing \$2.2 billion

NOTE: USDOT only studied 20 percent of the nation's bridges for this analysis. The remaining 80 percent are likely to be the most vulnerable to heavier trucks. In fact, only 1,360 of the bridges considered by USDOT are currently "structurally deficient" (i.e., likeliest to need repair and/or replacement with heavier truck weights), while 70,427 of total bridges are classified as "structurally deficient."

### **Experts Agree that Bigger Trucks Are More Dangerous**

Congress rejected bigger-truck proposals in 2015 in large part because of opposition from national and local law enforcement, including the National Troopers Coalition and the National Sheriffs' Association:

*"The bottom line is bigger and heavier trucks make our roads and highways unsafe due to, among other things, greater stopping distances and higher risk of rollover." (Sept. 23, 2015 National Troopers Coalition letter to Congress)*

*"We are united nationwide in our opposition to both heavier and longer trucks. Please stand with the National Sheriffs' Association and its members and reject heavier and longer truck provisions." (Oct. 20, 2015 National Sheriffs' Association letter to Congress)*

The Truckload Carriers Association (TCA), representing over 700 trucking companies, opposes heavier trucks<sup>11</sup>.

### **Patchwork Exceptions Undermine Enforcement and Compliance**

Some bigger truck proponents have sought to remove the federal weight limits for individual states. USDOT has criticized this kind of piecemeal approach for our Interstate Highway system, finding that it makes enforcement and compliance more difficult, contributes little to productivity, and may have unintended consequences for safety and highway infrastructure<sup>12</sup>.

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<sup>8</sup> USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*.

<sup>9</sup> Insurance Institute for Highway Safety; 2016. *Crash Risk Factors for Interstate Large Trucks in North Carolina*.

<sup>10</sup> USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*.

<sup>11</sup> Truckload Carriers Association; September, 16, 2015. Letter to Rep. Reid Ribble (R-Wis.).

<sup>12</sup> USDOT; 2004. *Western Uniformity Scenario Analysis: A Regional Truck Size and Weight Scenario Requested by the Western Governors' Association*.