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September 13, 2006

Honorable David Cole, Commissioner  
Maine Department of Transportation  
16 State House Station  
Augusta, Maine 04333-0016

Dear Commissioner Cole:

I have just received a letter from Mr. Tim Bolton, a Policy Development Specialist in the Office of Freight Transportation, who was charged with responding to my letter of July 14, 2006 directed to you. The letter from Mr. Bolton, on behalf of the Maine Department of Transportation (DOT), does not adequately address or rebut the serious safety and infrastructure dangers that threaten the well being of every person who travels on Maine streets and roads if truck weights are increased for all of I-95 as you propose.

The assertions outlined in Mr. Bolton's most recent letter about the safety of the overloaded trucks you are allowing everywhere in Maine except on I-95 have no support and are based solely on supposition and wishful thinking. Furthermore, Maine DOT claims that road and bridge damage in Maine is sustainable or acceptable are not supported by the Federal Highway Administration (FHWA). Recent analyses by FHWA repudiate the false assertions of his letter point by point. For example, pavement damage by an 88,000 pounds 5-axle semi-trailer combination is about 1.6 times that of an 80,000 pounds rig. Similarly, the 6-axle combination allowed even on local roads and streets in Maine is calculated by FHWA *to inflict nearly double the damage* of an 80,000 pounds 5-axle combination.

As for the Wilbur Smith and Associates (WSA) study you rely on, FHWA regards the study as fundamentally flawed in several ways. For example, the WSA safety analysis relies on historical crash rates and hypotheses of future truck traffic that results in a projected decrease of only 3.2 heavy truck crashes each year. Yet Maine DOT continues to voice the completely unsupported argument that heavier trucks will mean fewer trucks that produce more safety as a result. This claim has no validation in any study and is contradicted by historical freight traffic data in every state that has raised truck weight limits. Also, FHWA stresses that the WSA study projects a crash reduction of only 0.7 percent from opening I-95 to the heavier combinations. FHWA points out that reliability estimates of less than one percent are not meaningful. In fact, contrary to assertions by Maine DOT there is no reliable safety benefit demonstrated in the WSA study of allowing the giant, overweight trucks on I-95 north of Augusta.

In a similar vein, FHWA simply rejects Maine DOT's claims about bridge damage being acceptable in Maine inflicted by the 88,000 and 100,000 pounds combination trucks. FHWA conducted highly detailed, specific analyses of Maine's bridges and found that of the 273 Interstate bridges in Maine, 73 are rated below HS-20 and that the 88,000 pounds and 100,000 pounds gross vehicle weight extra-heavy trucks will overstress these bridges. FHWA believes that other Interstate bridges will be overstressed and that almost three-quarters of Maine's Interstate bridges are being overstressed. Furthermore, FHWA's analysis states that at least 7 of Maine's Interstate bridges alone could be stressed beyond yield point and that critical bridge support members could fail. This means that Maine DOT's collaboration with special trucking interests to expand the use of giant, overweight trucks on Maine's Interstate bridges could be a matter of life and death to the traveling public. Maine is rolling the dice in light of its fiscal inability to repair and rehabilitate its bridges in a timely manner. Failure of a critical bridge support member could lead to a serious structural failure that could threaten public safety.

For the sake of Maine families, I strongly urge you to stop the foolhardy move of attempting to force overweight trucks on the rest of I-95. Also, I recommend the prudent course of supporting state legislation to remove these extra-heavy, dangerous trucks from Maine's local roads and streets. As Commissioner of Transportation it is your responsibility to reduce the risk of a catastrophic bridge collapse in Maine that could result in deaths and injuries and destroy a key link in Maine's surface transportation system.

Sincerely,

Steve Izer  
Founder  
Parents Against Tired Truckers