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August 15, 2006

Steve Izer
235 Ferry Road
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Dear Mr. Izer:

I am pleased to respond to your letter of July 14, 2006 to Commissioner David Cole, which commented on his letter to you dated June 12, 2006 concerning the Interstate truck weight issue. I will respond to each of your points concerning the Commissioner's letter.

Heavier Trucks Will Result In Fewer Trucks

The point made in the Commissioner's letter really responds to the argument that truck weights on all Maine highways should be rolled back to 80,000 pounds. If vehicle payloads are increased, for a given volume of cargo, fewer vehicles will be needed, reducing the crash exposure risk. You are certainly correct that freight tonnage is increasing. While our Department strives to promote more diversion to rail where appropriate, trucking will probably remain the predominant mode of freight transportation in Maine that it is today. This is a product of today's just-in-time delivery systems and the contraction of rail networks over the last decades. As this volume of truck freight increases, a larger number of trucks would be needed to transport this freight in Maine if weight limits are lowered than would otherwise be the case. The issue is really whether the negative safety factors of heavier trucks (longer stopping distances) are outweighed by the positive benefit of having fewer truck trips per volume of cargo and having most of these through trucks diverted to a more appropriate highway system, the Interstate. We believe that they are.

The Maine Interstate Study you mention did indicate a diversion of truck traffic from the secondary system, though it was not explicitly stated. Exhibit 34 on Page 33 concerning impacts to Maine Pavements shows the change in daily truck miles from the "current condition" which is 80,000 pounds on the non-exempt Interstates, to the "Study Scenario" which is up to 100,000 pounds on the non-exempt Interstates. The chart indicates a reduction in 13,315 daily truck-miles on the non-Interstate system. This calculation was used to determine cost savings from the policy change.



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Heavier Trucks Are Just as Safe as Lighter Trucks

As already noted, our letter talked about heavier trucks being safer from the standpoint of a reduced number of vehicle trips per unit of cargo. Six axle combination trucks loaded to 100,000 pounds and five axle combination trucks loaded to 88,000 pounds are a fact under current Maine law. The issue is whether it is safer to change federal truck weight policy to allow these vehicles to travel on the limited access Interstate Highway System or whether it is safer to continue to divert them to congested secondary roadways and municipal centers. Our Maine Interstate Study on Page 18 notes a significantly lower fatal crash rate on rural interstates than on secondary roads. The study also examines Maine crash data and notes a significantly higher crash rate on secondary highways than on the Interstates and the Maine Turnpike, which currently allows the 100,000 pound vehicle. Anyone can see that a car will always lose in an encounter with a truck. Doesn't it then make sense to have this truck travel, wherever possible, on a highway system that will reduce the chances of a crash?

Heavier Trucks Can Safely Stress Maine's Bridges

Design standards used by our bridge engineers have been adjusted to reflect the fact that Maine's older bridges were not designed for today's truck weights. Bridge capacity is calculated based on current conditions of the bridge and under legal loads to ensure that we are not "dangerously overstressing already damaged bridges" as you state in your letter. We of the Maine Department of Transportation acknowledge our responsibility to the safety of the traveling public, and we do the best that we can with limited resources. We have a diligent inspection program that inspects every bridge at least every twenty four months. We also have twenty five state bridge crews who work year round to maintain and improve our bridges. You are absolutely correct that we have funding shortfalls and that there is a backlog of bridges to be repaired. In light of this, the Department uses engineering judgment to decide when it is necessary to limit truck traffic and where it is best to route the traffic.

You raise a valid point that heavy trucks do increase the rate of deterioration of bridges, especially steel. Steel bridges are affected by cyclical loading (called fatigue) and heavy trucks do speed up this process. This is a concern of the Department, and that is why we have safeguards to prevent bridge failures.

Changes in Truck Fatalities Don't Tell the Whole Story About the Tragic Loss of Lives in Big Truck Crashes

I can speak for the Commissioner in stating that we all deeply regret the loss any life in crashes involving trucks or any motor vehicle. We seek policy options that best promote public safety and prevent such loss of life. The point being made in the Commissioner's letter was that in trying to determine those options that best reduce the risk of fatality or injury, statistics must be used with due caution.

The growth of truck freight traffic, and the growth of traffic in general, increases the potential for more negative interactions of vehicles leading to crashes. MaineDOT's Office of

Freight Transportation is working to encourage more rail freight alternatives to trucking. However, as stated earlier, the nature of just-in-time freight transportation today and the predominance of freight trucking in Maine require that governments do everything within their power to improve the safety of the predominating mode of truck freight transport. One way Maine State Government is doing this is through improvements in commercial vehicle enforcement. Using federal CVISN funding, MaineDOT is cooperating with the Maine State Police and the Bureau of Motor Vehicles in a project that will more fully utilize advanced technology such as license plate readers and weigh-in-motion scales for commercial vehicle safety and weight enforcement. Data base improvements are giving enforcement officers in the field access to data which will allow them to better focus their efforts on non-compliant trucks and drivers. We are also promoting a public-private partnership for a truck rest area in southern Maine to address the tired trucker issue, thereby reducing the risk of fatigue-related tragedies in the future such as that experienced by your family.

As you note in your letter, our study showed a reduction in Maine Turnpike toll revenues if the rest of the Interstate is exempted. This is due to some trucks opting to take the shorter toll free I-295 route north and south. However, our analysis indicates that there would be a significant net reduction in State infrastructure costs which would far outweigh any loss of Maine Turnpike revenues.

We at Maine Department of Transportation believe that our support of an Interstate weight limit exemption on currently non-exempt Interstate highways is consistent with our commitment to preserve and enhance highway safety.

Thank you for your views on this issue.

Sincerely



Tim Bolton
Policy Development Specialist
Office of Freight Transportation

Cc: David A. Cole, Commissioner