10589 S. HIGHWAY 95
P. O. BOX 671
COEUR d'ALENE ID 83816-0671

PHONE (208) 667-6473
TOLL FREE (800) 632-8743
FAX (208) 667-2144
E-MAIL: alc@idahologgers.com

11/30/15

Attention: Adam Rush
Office of Communications
Idaho Transportation Department
P.O. Box 7129
Boise, Idaho 83707-1129

Re: Comments for the Record on proposed use of Hwy. 13, Hwy 162, and parts of Hwy 12 for 129,000-GVW truck routes

Mr. Rush,

These comments are submitted on behalf of Associated Logging Contractors – Idaho, Inc. (ALC). The ALC is a 501 C (6) membership association organized in Idaho in 1966 by logging and wood products hauling contractors. The ALC has over 400 logging and wood hauling contractors as regular members and an additional 100 businesses that are associate members. The majority of the ALC's regular members own and operate trucks as part of their logging business and a full 1/3 of the ALC's members are wood products hauling contractors.

The ALC opposed the passage of legislation that has brought these applications to the Idaho Transportation Department. That said, the ALC wishes to submit the following comments for the record and looks forward to the concerns outlined here being addressed in this process.

The ALC believes it is important to note for the record that in the Legislative Session in 2013 in the signing into law of SB 1117 which set into motion this type of expansion of routes designated for use of 129 GVW loads Governor Otter specifically stated that:

"Safety must be the highest priority, addressing necessary and prudent restrictions on use of designated routes, enforcement processes from jurisdiction to jurisdiction, mechanical requirements for trucks and trailers, driver certification requirements, pavement and roadbed conditions, geographic conditions, weather conditions, traffic conditions, and other factors unique to each area in question. The process of considering nominated routes also must include timely, well-noticed public hearing and notification of adjacent property owners."

The Governor goes on to state that:

"Similarly, the process of identifying, nominating, assessing and designating routes elsewhere in the state must not be rushed toward any predetermined end. Producers, processors, truckers, the motoring public, our communities and Idaho's economy require the public's confidence for this process to succeed."

SB 1117 – now codified as Idaho Code 49-1004 A. – also requires that requests for new routes to be designated as routes for 129 GVW trucks be analyzed for "the safety and feasibility of adding such routes…"

It is the opinion of the ALC that the requirements put in place into law and the concerns expressed by the Governor have not been complied with in the process thus far for these routes under consideration.

Specific comments by route accompany this letter. In general, the ALC believes that the safety analysis called for in law and by the Governor is incomplete and has not addressed existing concerns expressed by local Idaho Transportation Department (ITD) staff. Further, the statements made within ITD's Evaluations of the proposed routes are blanket in nature as well as contradictory in parts.

There is also specificity lacking in the applications as to why these particular routes are needed. As one example, statements under Reasons for Request Item # 2 Associated Economic Benefits that say that a benefit would be to "reduce congestion and soften the footprint" are not supported by facts inherent to the geographic locations of these routes.

The ALC is closely affiliated with an insurance agency who handles a majority of our members' insurance needs. We know firsthand that insurance companies place higher risk factors on trucking companies that use double and triple trailer configurations. This can be proven and as insurance companies set risk points based upon hard data it also clearly demonstrates that trucks with double configurations and at higher weights do cause increased risks of accidents which increases dangerous situations on our highways.

The ALC respectfully requests that the ITD Board reject these applications. In particular, Hwy 13 is clearly not suitable for handling increase truck traffic with 129 GVW loads as the data is very clear that this route is barely safe for regular truck traffic today and is certainly not capable of accommodating the higher weighted trucks on a regular basis in a safe manner.

The ALC looks forward to all of the concerns outlined within this letter and the accompanying documentation being seriously reviewed by the ITD Board.

Thank you for the opportunity to provide these comments.

Sincerely,

Steve Sherich

Steve Sherich
ALC President

Specific Comments from the Associated Logging Contractors (ALC) submitted on the applications filed with ITD by the company Arlo G. Lott Trucking, Inc. Requesting that portions of State Highways 12, 13, and 162 be designated as 129 GVW routes.

Submitted via hand delivery at the ITD Public Hearing in Kamiah, Idaho on Thursday, December 3, 2015.

SB 1117 which passed the Idaho State Legislature in 2013 and was signed into law by Governor Otter specifically requires that safety be analyzed during the designation process. Governor Otter reiterated and expanded that focus in his signing letter writing that:

"Safety must be the highest priority, addressing necessary and prudent restrictions on use of designated routes, enforcement processes from jurisdiction to jurisdiction, mechanical requirements for trucks and trailers, driver certification requirements, pavement and roadbed conditions, geographic conditions, weather conditions, traffic conditions, and other factors unique to each area in question. The process of considering nominated routes also must include timely, well-noticed public hearing and notification of adjacent property owners."

The Governor goes on to state it is of paramount importance that the "public's confidence for this process" is critically important:

"Similarly, the process of identifying, nominating, assessing and designating routes elsewhere in the state must not be rushed toward any predetermined end. Producers, processors, truckers, the motoring public, our communities and Idaho's economy require the public's confidence for this process to succeed."

The ALC believes that the criteria and process set forth in the law, in the Governor's letter, and in ITD's own rules have not been met. Further, the ALC believes that the public's confidence in this process is being eroded because sufficient analysis and public outreach is lacking.

Specific Comments on the "Request for Designated Routes Up to 129,000 Pounds" for Highway 13.

The application submitted by Arlo G. Lott Trucking, Inc., a company based in Jerome, Idaho, states in the "Reasons for Request" that:

Justification – "reduced trips per year per truck."

The ALC believes this statement to be in error. While this company does some business in this area we believe that should this application be granted that truck traffic will increase. The application Item # 3 states 1040 trips will be conducted annually and we believe that a large portion of these will be *NEW* trips added annually. Also, while this application is from one trucking company that seeks to haul lumber, designation of this route as a 129 GVW will open it to other 129 GVW trucks carrying other additional loads which may not be able to meet safety requirements.

Associated Economic Benefits – "reduce congestion and soften the footprint."

The ALC believes this statement to be in error. Due to geographic, pavement, roadbed and traffic conditions unique to this area trucks at the 129 GVW will need to travel at lower speeds. Without passing lanes and suitable shoulders traffic will back up behind these trucks causing increased congestion. 129 GVW trucks will be more likely to spin out on steep grades because they carry more weight on the back end of their trailers and less weight over drive axles than a 4 axle truck. If a 129 GVW truck spins out on Hwy 13 there is no room to pass thus causing added congestion in addition to a dangerous situation. As to the statement of "soften the footprint" in some areas on Hwy 13 the pavement is in poor condition and added truck weight will further deteriorate these conditions in these sections due to roadbed and pavement conditions.

ITD's Evaluation of Idaho 13

The Executive Summary notes that:

- Roadways are in poor to good condition.
- There have been 100 accidents in the last 5 years.
- There are **NO** truck ramps.
- The Harpster Grade is a **5 to 5.5% grade**.
- There are limited chain up locations.

The District 2 Evaluation states that "This segment has been evaluated and the District recommends proceeding".

The ALC requests that the basis for this statement and the evaluation undertaken be shared with the public. The information within the Evaluation appears to contradict this recommendation.

The District 2 Evaluation states that Hwy 13 "is in generally good condition with 11 foot lanes and 1 -2 foot paved shoulders."

The ALC – who has members that traverse this highway daily – has evidence to show that there are *NOT* 1- 2 foot paved shoulders throughout the highway and in fact there are *ZERO* shoulders in some stretches.

The District 2 Evaluation reports that spring break-up limits haven't been imposed in staff's memory but that a 129 GVW designation may require those as MP 0.0 – 5.8 is in poor condition.

The ALC believes this statement is one that clearly shows the contradiction of the statement made at the start of the District 2 Evaluation that recommends proceeding when it is clear that doing so will result in addition of spring break-up limits that appear to have not been needed prior. Further, this will add to congestion and will demonstrate that the goal to "soften the footprint" will clearly not be achieved and in fact will accelerate deterioration of pavement condition.

The ALC knows that the traveling public becomes frustrated during the spring break-up season because trucks – of all weights – are required to travel at slower speeds to reduce impact on the roadbeds. This frustration results in the non-truck traffic passing or attempting to pass the slower trucks when it is generally not safe to do so. On Highway 13 there is no room to pass a slower truck in a safe manner.

The Operations field review within the District 2 Evaluation reveals that local ITD foremen have concerns with off tracking of current tractor trailer combinations. It is also reported in this section that "the portion

from milepost 0.0 – 5.8 (Grangeville to the Top of Harpster Grade) that the roadway is in distress and could suffer additionally if truck traffic picks up."

The ALC asks that the ITD Board look closely at this section as it appears that observations and concerns from ITD staff who are on the ground in this location have not been taken into consideration. This section seems to contradict the finding that the "District recommends proceeding." The ALC believes that this section clearly documents safety issues with current off tracking requirements not being met which will be exacerbated by the 129 GVW configurations. The ALC also believes that this section documents that pavement and roadbed damage will be negatively impacted by the increased truck traffic associated with 129 GVW loads being approved.

The Mobility section documents that there are no passing lanes on this road section including the Harpster Grade. And, the Public Concerns section documents the general public's request for passing lanes and in particular on the Harpster Grade at M.P. 5.5 and at M.P. 11.0.

The ALC believes this clearly documents that adding 129 GVW trucks on this highway is unsafe. There is no room for driver error and no place to get out of the way. This situation will increase accidents and very possibly fatalities given – as stated before – that 129 GVW trucks will need to travel slower increasing driver frustration and the desire to pass slow trucks. The ALC is also concerned that the general public's concerns have not been taken into consideration.

On the Bridge Data – **the ALC requests to see documentation on what entails ""OK EJ" or "okay by engineering judgement". Who is the engineer? Who has made this judgement? How is that judgement scientifically measured and documented?**

In summary on this specific application for Hwy 13, the ALC reiterates that this highway is simply not suitable for designation as a route for 129 GVW trucks. Using the law, ITD's rules and the details of ITD's local staff concerns it is clearly not safe to handle the heavier truck weights. The ALC requests that the ITD Board deny this application.

Specific Comments on the "Request for Designated Routes Up to 129,000 Pounds" for Highway 162.

As noted in comments on Highway 13, the application submitted by Arlo G. Lott Trucking, Inc., a company based in Jerome, Idaho, states in the "Reasons for Request" that:

Justification – "reduced trips per year per truck."

The ALC believes this statement to be in error. While this company does some business in this area we believe that should this application be granted that truck traffic will increase. The application Item # 3 states 1040 trips will be conducted annually and we believe that a large portion of these will be *NEW* trips added annually. Also, while this application is from one trucking company that seeks to haul lumber, designation of this route as a 129 GVW will open it to other 129 GVW trucks carrying other additional loads which may not be able to meet safety requirements.

Associated Economic Benefits – "reduce congestion and soften the footprint."

The ALC believes this statement to be in error. Due to geographic, pavement, roadbed and traffic conditions unique to this area trucks at the 129 GVW will need to travel at lower speeds. Without passing lanes and suitable shoulders traffic will back up behind these trucks causing increased congestion. 129 GVW trucks will be more likely to spin out on steep grades because they carry more weight on the back end of their trailers and less weight over drive axles than a 4 axle truck. If a 129 GVW truck spins out on Hwy 162 there is no room to pass thus causing added congestion in addition to a dangerous situation. As to the statement of "soften the footprint" in some areas on Hwy 162 the pavement is showing "some rutting and pushing of the plantmix" and added truck weight will further exacerbate these conditions in these sections due to roadbed and pavement conditions.

ITD's Evaluation of Idaho 162

The Executive Summary notes that:

- The roadway is in fair to good condition except for a section at the junction of Hwy 162 and Hwy 12 in Kamiah that is very poor.
- There are **NO** truck ramps.
- The 7 – Mile Canyon grade ranges from **3 % to 8.3%** and is approximately 5 miles in length.
- There is a need for construction of chain up locations at the top of 7 – Mile Canyon.
- Accident and fatality rates on this highway are less than those on Hwy 13.
- The foremen for this route report that the route has some rutting and pushing of the plantmix.

ITD District 2 Evaluation notes that this segment has been evaluated and the District recommends proceeding.

The ALC requests that given the inaccuracies in the report of the existence and/or width of shoulders on Hwy 13 that the statement in the evaluation for Hwy 162 that reports 1 – 4 foot paved shoulders be confirmed.

The General section reports that Chain up/down locations "should be constructed at the top of 7 – Mile Canyon Grade.

The ALC supports this recommendation and believes that additional chaining areas need to be constructed on all state routes in the northern part of the state, especially those that will see 129 GVW truck traffic.

The Operations field review section reports that the local foreman for the area reported that the route "does experience some rutting and pushing of the plantmix". Additionally the foreman "reported concern for off-tracking of current tractor trailer combinations."

As with Hwy 13, the ALC asks that the ITD Board look closely at this section as it appears that observations and concerns from ITD staff who are on the ground in this location have not been taken into consideration. The ALC believes that this section clearly documents safety issues with current off tracking requirements not being met which will be exacerbated by the 129 GVW configurations. The ALC also believes that this section documents that pavement and roadbed damage will be negatively impacted by the increased truck traffic associated with 129 GVW loads being approved.

The Mobility sections notes there are **NO** *(emphasis added)* passing lanes on this road section and the Truck Ramps section notes the lack of truck ramps.

The ALC requests that because of the steepness in some parts of the 7 – Mile Canyon grade coupled with NO truck ramps and NO passing lanes that safety issues need to be reviewed and steps taken to fix these issues BEFORE any 129 GVW truck applications or permits are approved. The statement that the "District is unaware of any runaway trucks in the past on this section" is a statement of subjective reasoning to discount the need as opposed to factual analysis of the safety issues that exist in these conditions whether it is at today's truck weights or with the added 129 GVW truck possibilities.

The Public Concerns section reports that the District is unaware of any public concerns that pertain to this request.

The ALC requests documentation that the public and the residents along this route were directly notified of this application. The ALC believes that publishing the notice of a meeting in the local or regional paper, and on the internet is not sufficient public notice.

On the Bridge Data – **the ALC requests to see documentation on what entails ""OK EJ" or "okay by engineering judgement. Who is the engineer? Who has made this judgement? How is that judgement scientifically measured and documented?**

In summary on this specific application for Hwy 162, the ALC is concerned that the highway is not suitable for designation as a route for 129 GVW trucks at this time. Using the law, ITD's rules and the details of ITD's local staff concerns there are safety issues to be addressed and fixed to handle the heavier

truck weights. The ALC requests that the ITD Board deny this application until those items can be addressed.

Specific Comments on the "Request for Designated Routes Up to 129,000 Pounds" for Highway 12 from Milepost 66.22 to 73.85.

As noted in comments on Highway 13 and Highway 162, the application submitted by Arlo G. Lott Trucking, Inc., a company based in Jerome, Idaho, states in the "Reasons for Request" that:

Justification – "reduced trips per year per truck."

The ALC believes this statement to be in error. While this company does some business in this area we believe that should this application be granted that truck traffic will increase. The application Item # 3 states 1040 trips will be conducted annually and we believe that a large portion of these will be *NEW* trips added annually. Also, while this application is from one trucking company that seeks to haul lumber, designation of this route as a 129 GVW will open it to other 129 GVW trucks carrying other additional loads which may not be able to meet safety requirements.

ITD's Evaluation of Idaho 12 from Milepost 66.22 to 73.85.

ITD's evaluation on this section of Highway 12 does indicate that, in general, this 7.63 mile stretch appears to be in good condition and because it is flat does not need truck ramps and it has adequate chain up areas. The accident rates fall in the middle of those for Hwy 13 and Hwy 162. The Evaluation also notes that "Public Concern exists in Kamiah" but beyond the "anecdotally" noted interest in a crosswalk it does not specify what those concerns might be.

The ALC believes that of the 3 applications in this area, this one is of lessor concern for safety reasons outlined in the others. However, in the event that either Hwy 13 or Hwy 162 or both gain designation as 129 GVW routes, this section of Hwy 12 could see increased truck traffic and as a result increased congestion and additional safety concerns with the interaction between trucks, other motor vehicles and pedestrians trying to cross the highway. There is data that exists showing that stopping distances for heavier trucks is longer and these factors will need to be addressed on Hwy 12 should one or both of the other segments be designated 129 GVW routes.

As an aside, if ITD is "anecdotally" aware of interest in the community of Kamiah for a cross walk but that "no formal requests have been made" it is hoped that ITD would assist the community of Kamiah with the formal request process and address the issue that seems to be plain to all concerned.

In closing of these specific comments, the ALC appreciates this opportunity to record the concerns of a majority of its members. The ALC looks forward to working with the ITD on a productive and transparent process on these applications that follows the law passed by the Idaho State Legislature, the rules of ITD, and the specific concerns outlined by Governor Otter when he signed SB 1117 into law.

Mr. Rush,

I would like to express my concern and objection to Highway 13 being considered for 129,000 lbs, loads.

Respectfully,

Gene Meinen
Idaho County Road Supervisor
4682 Highway 13
Kooskia, Idaho 83539

12/14/15

Paul Sheppard called 9:35 am.

He wanted to know what was happening on the 129K load request. I explained to him the requests were for SH13 and SH162.

He asked to take his comment on the proposal.

He said that he opposes SH-13.

He said that he supports SH-162.

He said that the state should take over Old 7.

Paul Shepherd 12-15-15

12/15/15

Mr. Adam Rush,

While I have many opinions on what is going on currently on this side of the world, I typically choose to bite my tongue on big [federal] issues and let things run its course, as they always eventually do. However, when I was informed about the proposed application to allow bigger and heavier trucks to run on my hometown highway, I knew I had to speak my piece.

As I am sure you are aware, we are a small town of hard working people, who do what we can to keep our community and families safe. We already have large trucks traveling through our town on a regular basis, and my concern is not just the inconvenience of larger trucks slowing other vehicles down, but the potential danger that comes with trucks that heavy on already unsafe roads. If you took the time to walk along Highway 13, it would quickly come to your attention that our roads are not equipped to handle such loads. Not only are they very narrow lanes, but the outside curbs are basically nonexistent. On many parts of the road, the white line is painted on dirt because either the pavement was not poured properly /wide enough, or the pavement is breaking off. It is very alarming to me that it would even be considered to put heavier equipment on an already unstable surface.

Having immediate family in law enforcement in the area, I hear about accidents quite often and how a lot of them are caused by unsafe road conditions. This is extremely unsettling seeing as these roads are not only used by citizens, but by children in school buses and tourists who do not know the roads well. I don't think I need to point out the danger of a truck hitting a broken part of the road just right, or how easily these trucks and trailers can tip over.

Please be assured that this letter will not be the last, as I have made it a personal priority to bring these matters to the attention of my neighbors, friends, family, and coworkers in the area, none of whom are the least bit supportive of this change. We are aware that there

are other routes these trucks can take, and will do what it takes to make sure that Highway 13 is not one of them.

Kymberlee Smith
127 Loloyn Lane
Kooskia, ID 83539
208-926-7743

Mr. Rush,

Although our trucks do not travel on highway 13 from Grangeville down to Kooskia, I have personally been on it many times and am extremely uncomfortable with the potential ramifications of allowing vehicles with the 129,000 pound specifications to traverse that route. I urge you to deny the request.

William C. Stellmon
President, Excel Transport, Inc.

Mr. Rush,

I am concerned about the oversized trucks that you are wanting to allow on Highway 13. I live in McCall primarily, but have all of family in Kooskia and visit there quite often. The roads at this time, are not equipped to handle the heavy loads that would driving through there. Not only are they very narrow lanes, but the outside curbs are basically nonexistent. On many parts of the road, the white line is painted on dirt because either the pavement was not poured properly /wide enough, or the pavement is breaking off. It is very alarming to me that it would even be considered to put heavier equipment on an already unstable surface.

My brother is with Grangeville PD and I hear about accidents quite often and how a lot of them are caused by unsafe road conditions. This is extremely unsettling seeing as these roads are not only used by citizens, but by children in school buses and tourists who do not know the roads well. I don't think I need to point out the danger of a truck hitting a broken part of the road just right, or how easily these trucks and trailers can tip over.

Please consider these issues and how it will affect citizens of the community both short and long term. We need to limit the large truck usage of Highway 13 – there are alternate routes that can and should be taken.

Melanie von Lutzow
Human Resources
Evergreen Forest
Tamarack Energy Partnership
P.O. Box H
New Meadows, ID 83654
(208) 347-2111 Ext . 227
Fax: (208) 347-2273
melaniev@frontier.com

Adam as we know there is a push by a few business owners and trucking companies to increase the weight here in idaho.

Well, to put it simply we do not have the highway system in place to allow these extended length vehicles to operate on a consistent basis. For one the extra length and weight would increase the number of truck and car accidents on the highway simply because it will slow down traffic and make it much harder to pass these slower vehicles with the extra length.

The offtrack these larger vehicles will have will make them difficult to navigate on our narrow highways with sharp corners. It will lead to increased wear on the highway because of the increased torque required to pull the load over the hill not to mention increasing the number of spinouts, jackknifes plus mechanical problems.

Before the trucks should be allowed to pull larger loads they should have to be specced out with heavier running gear and increased horsepower to handle the loads.

You should allow 51000 on a tridem thus eliminating the need for extended length vehicles. IN canada they run tri-drive trucks to haul heavier loads as they offer twice the traction of a tandem. They also pull b trains so they can drop a trailer go over the pass and come back and get the other trailer so they do not get stuck on the pass.

The increased weight will give the advantage to big carriers and cause the smaller owner operators to cease to exist. Pulling two trailers is always an increased risk, but adding more weight and length will more than double the chances of problems.

They argue it will cut down on trucks but they will only gain 23000 in total weight with over half being in the way of increased lightweight. If you increased what you put on a tridem to 51000 not only would they see a greater benefit for the total amount of freight hauled and that we would not all have to go buy special equipment to compete.

Think that 7000# increase would allow more weight without a huge increase in empty weight. Even allowing the addition of more axles to increase the weight hauled is a much more viable option for everyone. Like 5 or 6 axles on a 53 instead of 4. They can still meet offtrack and haul increased payload.

Remember, safety is key and what works on freeways does not work on narrow mountain roads with tight corners and steep hills.

The businesses just want to get product hauled cheaper for their bottom line, not ours. So before you increase weight on our substandard roads why not rebuild

them first, adding more lanes as 95 should be four lines minimum border to border along with 12?

The local road districts here on the camas prairie cannot afford the increased maintenance to the road and we do not need the increased problems that go with it. A five to six ton increase in payload will not justify the problems associated with it.

If you're going to allow it, all trucks must be rated for the loads they are pulling, not just take a light highway outfit and overload the components as to which its rated for.

I have over 34 years experience owning and operating trucks myself. So look at the Canadians who haul heavier loads and see how they do it in British Columbia and make it work.

Thanks

Frank Arnzen
Arnzen Transfer
Cottonwood Idaho

RECEIVED
DEC 0 4 2015

Nov. 30, 2015

Cater to the Almighty Dollar or maintain reasonably safe corridors for all travellers on Idaho roads??

That should be an easy answer for those with any common sense and a shred of public concern.

NO! to increased tonnage of commercial vehicles using Idaho Highways 12, 13, 162 ... and the North Central Idaho section of 95.

- Heavier (unjustified) loads would put a greater strain on already-marginal road beds
- Heavier loads translate to more difficulty in vehicle control on twisting roads, during inclement weather or road-way debris resulting in injuries/death/vehicle damage for motorists
- When commercial trucking companies think this is a back idea — then its a REALLY BAD IDEA!

Shelley Dumas
735 W.N. 2nd
Grangeville, Idaho 83530
208 983 2821

Highways 13 and 162 should not have trucks over a certain weight and length on them period.

It is far too dangerous for myself and fellow Idahoans who not only live in the various cities and counties near Kamiah, but for those of us who have to drive the roads as well.

Please just consider routing the trucks over to highways 95 and 12 the quickest and safest ways possible. Who are you going to believe, a bunch of politicians and more in Boise who have probably never seen or driven these roads year round and who know them well or the people who actually live up here in northern and central Idaho who drive them daily and in all sorts of weather conditions?

It's common sense.

Say no to trucks over certain lengths and weights on these highways.

Thanks,

Concerned Idahoan

Dave Funke of Lewiston.

RECEIVED
NOV 30 2015

Merrill Hartley
P.O. Box 114
Kamiah,Idaho 83536
Ph. 208-413-1849

Adam Rush
Idaho Transportation Dept.
3311 State St.
Boise, Idaho 83707

To whom it may concern,

I have held a CDL or the equivalant in the State of Idaho since approximately age 25. I am now 78 years of age and semi-retired. My most recent employement was less than 30 days ago driving a belly dump on logging roads in Idaho county. I have in the past 50 years driven about every kind and combination of large commercial truck or vehicle available. I have driven approximately 3 and 1/2 million accident free miles in 11 western states, mostly Idaho. I firmly believe my record qualifies me to comment on allowing trucks weighing 129,000 lbs. and 95 ft. long to travel on sections of U.S. 12, Idaho 13, and Idaho 162.

None of these were designed to accomadate trucks of this size and weight. There are corners on highway 13 that are extremely tight and can barely accommodate the 72 footers now traveling its length. Highway 162 is not as tight and narrow until you enter the city of Kamiah where you encounter three 90 degree corners before entering highway 12.

I was a staunch supporter of the MEGALOADS on U.S. 12 but as you are aware that is another ball game alltogether,

This present proposal is without a doubt the most unsafe,insane idea I have ever heard of from any segment of the trucking industry in the State of Idaho.

One other part of this proposal really bothers me. There are some mighty fine truck drivers in the State of Idaho but I personally believe there is maybe only 1 driver in 50 that is capable of driving this configuration and weight safely, even on highways designed specifically for these 129,000 lb. 95 ft. long behemoths of the highway.

I drive these 3 sections of highway very frequently in my own personal vehicle and if this proposal is approved I will consider my own personal safety at risk. I sincerely request that this proposal be denied in its entirety.

A concerned citizen,

Merrill Hartley

December 7, 2015

Attn: Adam Rush
Idaho Transportation Department
Boise, ID

Re: Requests for designated routes up to 129,000 pounds on SH 13 and SH162

Thank you for the opportunity to present comments regarding the above requests. I have reviewed the application as well as all the information provided on your website regarding this request.

I am a resident of Harpster, Idaho and am directly impacted by this proposal. I understand the economic drivers that prompted Arlo Lott Trucking to make the request but feel that economics need to be blended with impacts of these routes to other users when additional weight and length are added to commercial trucks.

I am opposed to allowing the additional weight and length for trucks on SH13. I feel the only route that should be considered for this application be SH162.

My itemized concerns/comments are as follows:

*The proposed SH 13 route from Grangeville, down Harpster Grade, along South Fork Clearwater River to the junction of US Highway 12 passes through 3 small towns, Harpster, Stites and Kooskia. These townsites have residential areas close to the roads with children and pets in close proximity. The route along SH 162 only passes through one small town, Kamiah, thereby reducing exposure to townsite residential areas.

*SH13 parallels the South Fork Clearwater River. An accident on this road would have more devastating effects to a river which has anadromous fish and threatened fish species, recreational use by fisherman, swimmers and floaters, water quality and other riverine amenities. SH162 would not have these same concerns and would make for a more appropriate route.

*SH13 from the top of Harpster Grade to Stites suffers from lack of adequate road shoulders. The route especially along the river is narrow and unforgiving. The river is immediately adjacent on one side and steep, often rocky outcrops exist on the opposite. There is little room for a mistake or recovery while driving, making this route hazardous as it exists without adding vehicles with additional weight and length.

*Having lived on SH13 for the last 20 years, I have been exposed to many of the hazards inherent. There are several very sharp blind corners especially between the bottom of Harpster Grade and Stites, where vehicles, not just trucks, mistakenly take the curve too fast or cut corners, resulting in traffic in the center of the road rather than on their appropriate travel way. I can not start to count the number of “close calls” I have experienced when people come around

the corner in my lane! Adding additional weight and length will only exacerbate this situation. The analysis may show trucks can negotiate these curves with additional weight and length but let's face it, we are human and situations we create are often less than desirable and risky. Please do no increase this risk by allowing this proposal on SH13. There are currently no plans in the ITIP to improve these blind corners on SH 13.

*As your engineering analysis states, lack of passing lanes and lack of sight distance is an issue. If larger trucks are permitted, they will no doubt have to slow down causing other users of the road to travel slower than the speed limit, become congested, become anxious and attempt to pass. (I rarely see trucks pull over to allow traffic they are holding up to pass!) This in itself will create a safety issue. Although SH162 has some challenges that are similar, they are not to the same degree as SH13.

*Speed limits vary many times along the SH13 proposed route but are more consistent along SH162 route. This indicates to me that the driving along SH13 is "more technical" and requires constant attentive driving with less room for error. Currently vehicles roar into Harpster and are half way through town before they slow down.

*Your accident statistics and fatalities indicate to me that SH13 is a more dangerous route than SH162 comparatively, making SH162 the better choice for this request.

*Harpster Grade has many switchbacks and is a challenging road, especially in foggy or poor weather conditions. SH 162 is a straighter road. Enough said.

I hope that you give my comments due consideration. As a resident directly impacted by the SH13 request, I am opposed. I feel that the request is more appropriately granted ONLY on SH 162.

I do support ITD considering a project for the ITIP to improve several of the blind corners on SH 13, provided the fix does not impact the riverside and adjustments are made on the cutslope side only.

Sincerely,

Cynthia Lane
263 Sears Creek Road
Harpster, ID 83552

November 16, 2015

Mr. Adam Rush,

I am writing to you concerning the Hwy 13 proposal for 129,000lb weight limit.

As a resident of Grangeville, Idaho, who travels Hwy 13, I am greatly concerned. Hwy 13 is already in very sad shape. There are several areas where this is NO shoulder on this narrow curvy Hwy.

The road is dangerous enough without adding larger trucks and heavier loads to do more damage along with the existing damage. Not only I, but my husband, children, and grandchildren drive Hwy 13. We are strongly opposed to increasing the weight limit on Hwy 13.

Thank you for your consideration,

Cherylyn Kerley
43 Deerwood Dr.
Grangeville, ID, 83530

Dear Adam Rush,

We strongly oppose the proposed plan to allow 129,000 lb, 95’ long truck/trailers to travel on Highway 13. It would be a great danger to other people traveling the highway.

First, Highway 13 is a dangerous road already. The highway itself winds tightly the whole way from Kamiah to Grangeville. Logging trucks regularly cross either the white line or the yellow line to make the corners. A 95’ long truck is not going to be able to make the corners without crossing the lines. Crossing the yellow line obviously endangers oncoming traffic. There is a lot of recreational traffic on Highway 13 heading down to the Clearwater River, including trucks pulling campers, trailers with ATVs, and boats. It will be difficult for them to pass oncoming double trailered trucks around curves.

Secondly, Highway 13 is not in good repair. There are always potholes and bulges in the surface of the pavement that already endanger vehicles. Trucks with double trailers will be bouncing and fish tailing even worse, especially in winter. Double trailers are innately more dangerous.

Thirdly, the slow speed of the heavy trucks will be a danger. Highway 13 is the main route between Grangeville and Harpster/Kooskia. There is a lot of residential traffic as well as recreational traffic and there are few places to pass, passing zones are short so people trying to pass the extra long trucks will face added risk.

Highway 13 had 100 accidents, 49 injury accidents, and 4 fatalities in a 5-year period. During this same 5-year period,

Highway 162 had 38 accidents, 22 injury accidents, and one fatality. Please consider Route 162, as it is much straighter and has longer sight lines. It is a safer alternative.

Sincerely, Peter and Nathalie Kretzmann
1783 Highway 13
Grangeville, ID 83530
208.983-1620

Name: Cynthia Lane

Phone Number: 208-983-3875

Email Address: lanefamily1988@gmail.com

Specific Route: SH13

Comments: Opposed to allowing additional vehicle weight, up to 129,000 pounds as proposed on SH13. More appropriate route would be SH162. Will send letter with detailed concerns.

Name: Rodney Lane

Phone Number: 208-816-8488

Email Address: Blank

Specific Route: Highway 13 and Highway 162

Comments: These are my comments concerning the application to make SH 13 and SH 162 designated routes for trucks up to 129,000 lbs and up to 95 feet. I am opposed to either SH13 or SH162 having additional weight or length approved. Problems exist with the current trucking traffic. They are often not in their own lane making travel dangerous for other users. They often "convoy" currently causing road rage. Passing is near impossible! One additional death on either of these roads is NOT acceptable to me! These are small rural roads. They are recreational travel routes for motorhomes, motorcycles and provide the traveler with scenic value at a slower leisurely pace. These roads are school bus routes with frequent stops and should be restricted. They are not suited to the truck traffic they now have much less additional weight and length. These roads are not maintained currently to appropriate standards in my mind for commercial truck traffic. They have road sloughs (especially near top of Harpster Grade), guardrails that are falling off the road due to the road width being so narrow, rocks and other hazards in the road year round. These challenges are tough in a passenger vehicle and worse in a commercial truck. In fact, I feel commercial trucks should be banned from both these roads. Allowing additional weight and length will not reduce congestion or reduce the number of trips as stated by the proponent. It will be a business decision and when they want they will exceed the 1040 trips annually. No one will stop that! Please deny this proposal for SH 13 and SH 162. Rodney Lane Harpster, ID

District 1
Boundary & Bonner Counties
Statehouse (208) 332-1349
(Session Only - January - March)

Home Address
P.O. Box 101
Sandpoint, Idaho 83864
(208) 263-1839
skeough@senate.idaho.gov

Shawn Keough
Idaho State Senator
State Capitol
P.O. Box 83720
Boise, Idaho 83720-0081

November 15, 2015

Director Brian Ness
Idaho Transportation Department
3311 W. State Street
P.O. Box 7129
Boise, ID 83707-1129

Dear Director Ness:

As you may remember, I was and remain very opposed to expansion into northern Idaho of permitting regular truck traffic at the 129 GVW weight. You may also remember that even though I lost on that bill that allows for routes to be designated on a case by case basis, that I worked and supported language in the bill and in subsequent language from the Governor upon signing the bill into law that clearly spelled out that safety concerns would be thoroughly explored before designation of a 129 GVW route particularly in northern Idaho. While I was less than pleased that the bill passed, I took some small comfort in believing the language in the bill, the language in the Governor's subsequent signing message and the language in the rules for the 129 GVW expansion process all had a strong focus on considering safety and the condition of the road under consideration for such a designation.

On November 11, 2015, another individual lost his life while attempting to maneuver Highway 13 in northern Idaho. It is my understanding that the Idaho Department of Transportation ("ITD") is currently considering whether to allow 129 GVW trucks on that stretch of road. Please accept this correspondence expressing my deep concern and opposition for the potential designation of Highway 13 as a 129 GVW trucking route.

Over a 5-year period, Highway 13 has seen approximately 100 accidents, 49 injury accidents and now 4 fatalities on this 26-mile stretch of road. As recognized in ITD's own detailed analysis, Highway 13 is "a winding roadway that parallels the South Fork of the Clearwater River and traverses the Harpster Grade." In the ITD Evaluation of Idaho Milepost 0.0 to Milepost 26.39, Dist. 2 Evaluation, p. 3. it is reported that approximately 5.8 miles of the roadway is admittedly in poor condition. Undoubtedly, allowing 129 GVW trucks on this route will mean more accidents, more injuries and more deaths. This type of increased suffering seems needless and in direct conflict to the Legislature's codified concerns about safety, the Governor's written concerns about safety and the ITD's own rules and procedures that place priority on safety.

As I travel throughout northern Idaho, I have heard very real concerns from citizens about the safety of 129 GVW trucks traveling on our highways and on Highway 13 in particular. Much of the concern not only deals with safety issues, but environmental ones as well. Here, Highway 13 parallels the South Fork. Allowing large 129 GVW trucks on that highway increases the chance of accidents that could negatively impact the South

Fork. While, I understand that many of the trucks traveling through that corridor would be transporting logs or lumber, nothing will prevent other more hazardous substances from being transported along that route. I am simply opposed to placing additional risk to our waterways in Idaho.

I urge ITD to continue the prohibition of 129 GVW pound trucks on Highway 13. If you have any questions or comments, please do not hesitate to contact me. Thank you for your consideration.

Sincerely,

Shawn Keough
Idaho State Senator
District One: Boundary and Bonner Counties

KBC Transport LLC

208-926-4843 4686 Highway 13 Kooskia, Id. 83539 208-926-4269 (fax)

December 2, 2015

Janice Vassar, Board Member
Adam Rush, Public Involvement Coordinator
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

RE: Request For Designated Routes Up To 129,000 Pounds, Highway 13, Mileposts 0-26.39
ITD Case#201511SH13

Dear Ms. Vassar and Mr. Rush:

My name is Wally Burchak and I am Vice President and part-owner of KBC Transport LLC ("KBC") located in Kooskia, Idaho. Please accept this letter as my comment in opposition to the request to designate Highway 13 as a route for 129,000-pound trucks ("129 GVW").

KBC transport is the largest single company user of Highway 13. We average 8 to 10 trucks per day using Highway 13 and on busy days this number reaches up to 15 trucks. Our primary use of Highway 13 is to haul finished lumber from Kooskia/Kamiah area to the Treasure Valley. These same trucks then reload with rough dry lumber at Evergreen Forest mill located near New Meadows, Idaho and transport this lumber via Highway 13 to the Clearwater Forest Industries planer mill located in Kooskia, Idaho (specifically 4686 Highway 13). The owners of these mills and a new location in Meridian, Idaho are also part-owners in KBC. Because of our location and volume of traffic, we feel our drivers and employees have intimate knowledge of the many difficulties and safety issues surrounding Highway 13.

The owners of KBC have always been concerned with the safety issues involved with hauling 129 GVW. We also recognize the potential economic benefits from moving larger payloads provided these movements can be accomplished safely. I have testified numerous times on 129 GVW issues most recently in Riggins, Idaho. In Riggins, Idaho I raised safety issues but I did not make a concerted effort to stop the passage of 129 GVW from Grangeville, Idaho to Fruitland, Idaho. I testified then and still feel the majority of Highway 95 is safe for 129 GVW with the one major area concern being from the mill in Tamarack to Council, Idaho. I do not feel Highway 13 even remotely meets the criteria of a safe route for 129 GVW.

Highway 13 is a very difficult road to drive for commercial vehicles. It is a winding road with very poor sight lines for drivers to see ahead with any degree of distance. The lower section of Highway 13 parallels the South Fork Clearwater River and is susceptible to frost and ice due to its close proximity to the river. At certain times of year this section is full of out of state and in state fishermen fishing for steelhead and salmon. These fishermen can often make this section like a maze for commercial vehicles. The fisherman often park with part of their vehicle in the road and are always driving while

looking for the next fishing hole drifting back and forth across the yellow line. During the summer cyclists use Highway 13 to move from Highway 12 over Lolo Pass to connect with Highway 95 in Grangeville. With little or no shoulders it makes it very difficult to pass cyclists while still trying to avoid on coming traffic. Two corners commonly referred to as Preachers Corner and Box Canyon are particularly difficult because of rock walls that hang out into the roadway and the very limited sight lines. The other route being proposed, Highway 162, does not pose these obstacles because it does not parallel a river and it is not a preferred route for cyclists.

The most dangerous section of Highway 13 is Harpster Grade. This section is a very winding roadway with a steep up hill slope on one side and very steep slope into the river canyon on the other side. This section of roadway also has very narrow shoulders. The margin of error for a commercial driver in this section is very small. Simply put if something bad happens you have nowhere to go but to pile into whatever obstacle is in your way. This is also where I have documented the poorest road conditions from a commercial driver stand point. ITD has listed top of Harpster Grade to Grangeville as the poorest road conditions, but this does not match from a drivers perspective of safely transporting a load. I have pictures documenting places where the pavement breaks off 3 inches to 6 inches from the white line. In one instance I use a beer can found in the ditch to document the depth of the broken pavement nearly 5 inches deep. This is in direct conflict to ITD's assertion that Highway 13 has one to two foot paved shoulders. If a commercial vehicle or passenger vehicle drops a tire into these holes it will likely cause an accident. There is one instance where the jersey barrier shows the road bed is sloughing off into the river canyon (around mile marker 9). Closer examination shows the pavement breaking off just outside of the white line and sloughing off into the canyon. In another area, the upper hillside is caving in onto the roadway covering the white line (around mile marker 8). The entire road bed from the yellow line over to the hillside shows distress. I have pictures documenting both of these areas neither of which is listed in the ITD evaluation on Highway 13. The biggest fear our drivers complain about concerning 129 GVW is 129 GVW trucks spinning out while climbing Harpster Grade on slick roads. Once you commit to climbing Harpster Grade there is virtually nowhere to pull off the roadway to throw on a set of chains. KBC trucks haul 105 GVW on single 53 foot trailers. We always try to carry 54,000 pounds on the 4 axle truck and 51,000 pounds on the 4 axle trailer. In instances where KBC trucks lose traction they will lift the lift axle on the truck placing an additional 8,000 to 10,000 pounds on the drive axles providing more traction. ISP has always allowed this course of action. Simply put they would rather see a truck break weight laws than spin out on slick roads with the potential to cause a multiple vehicle accident. 129 GVW configurations will have 46,000 pounds on a 3 axle truck and 83,000 pounds on 7 trailer axles spread over two trailers. These configurations will lose traction faster because most of the weight is on the back end of the trailers and they do not have the option of raising an axle to put more weight on the drive axles. 129 GVW configurations will be significantly more dangerous climbing hills on slick roads. In 10 years of hauling on Highway 13, KBC has had two accidents involving our trucks. In both accidents, the trucks where doing less than 30 miles per hour coming down Harpster Grade. Both trucks wrecked on the same corner around mile marker 10 with the latest accident occurring in April of this year. KBC is well aware of the small margin of error on Highway 13 and our drivers have more experience navigating the difficulties of Highway 13 than other companies.

In the last 3 years a common question on commercial vehicle insurance applications is do you pull double or triple trailer configurations? If you answer yes, the following questions ask how many units, what geographic locations, and what mileage radius. Insurance companies ask these questions to assess risk. Attached to this letter is a letter from our insurance carrier dated October 29, 2015. This letter clearly states that insurance companies place a higher risk on double trailer configurations to be involved in an accident than a single trailer configuration. We can argue about the level of increased risk but it is documented DOUBLE TRAILER CONFIGURATIONS CREATE MORE RISK. So by

opening up routes to hauling 129 GVW you are increasing the risk of accidents when compared to single trailer configurations hauling 105 GVW. The vast majority of trailer configurations I see hauling on Highway 13 are single trailer configurations and my office window looks out onto Highway 13. Allowing 129 GVW on Highway 13 will increase the number of double trailer configurations thereby increasing the risk of accidents on an already high accident roadway. I have insurance executives willing to fly out to Idaho to testify on this issue if necessary.

ITD is currently considering two 129 GVW routes to move freight from the Kooskia/Kamiah area to connect with Highway 95 in Grangeville. ITD only needs one 129 GVW route to move freight from all major distribution centers in this area to connection with Highway 95. ITD's own accident data shows Highway 162 to be a much safer route. In a five-year period Highway 13 had 100 accidents, 49 injury accidents, and 4 fatalities (including a recent fatal accident on November 11, 2015). In the same five-year period Highway 162 had 38 accidents, 22 injury accidents, and one fatality. It seems irresponsible to risk the safety of citizens on Highway 13 when there is clearly a safer alternative. In the court of public opinion, ITD will have a very difficult time standing up to scrutiny on why they would risk innocent lives given these safety numbers.

When SB 1117 was signed into law, both the Governor and Legislature clearly stated that safety rules must be established for 129 GVW. The Governor specifically mentions that mechanical requirements for trucks and trailers, driver certification requirements, pavement and roadbed conditions, geographic conditions, weather conditions, traffic conditions, and enforcement processes should all be addressed. ITD evaluations for Highway 13, Highway 162, and Highway 12 only address road conditions, geographic conditions and traffic conditions. The lack of safety rules for 129 GVW creates an environment where all transportation companies have increased risk (those for 129 GVW and those against 129 GVW). AGL Trucking has submitted 129 GVW applications showing newly purchased trucks and trailers all utilizing ABS breaking systems. What rules are in place to say you have to have ABS breaking systems to haul 129 GVW? What rules are in place to stop some fly by night trucking company walking out in some back pasture, pulling out some state of the art 1960 vintage trailers, slapping some additional axles underneath, and going to work hauling 129 GVW? What rules are in place to stop a CDL driver with doubles endorsement, virtually no experience, from hauling 129 GVW on the most difficult highway in all of Idaho (Highway 13)? What rules are in place to stop a 16 year old CDL driver hauling agriculture commodities from hauling 129 GVW on Highway 13? I would never say that AGL Trucking is not a good company, with good drivers, and good equipment. But once the door is opened to hauling 129 GVW, you have no control over the transportation companies that follow. That ladies and gentlemen is what keeps me awake at night when I think about 129 GVW.

For all of the reason listed above, Highway 13, I believe is clearly not a route to risk hauling 129 GVW. Not when there are safer alternative routes that accomplish the same thing. Highway 13 is the poster child for what a 129 GVW route should not look like. KBC drivers continually tell me that Highway 13 is the most difficult road they drive in the 5 Western States we haul in. ITD and ITD Transportation Board can wash their hands from this issue once a ruling is made. I see our drivers daily and see the public who use Highway 13 in the grocery store and at church. They are more than just numbers to me, they are faces I know personally. I just can't allow this to happen in my backyard without a fight.

Thank you for accepting this comment and I would be happy to answer any questions or provide additional information.

Sincerely,

Wally Burchak

Cottingham & Butler
Corporate Headquarters
[illegible] Main Street (PO Box 28)
Dubuque, IA 52004-0028
(563) 587-5000
(800) 703-5235
Fax (563) 583-7339
www.cottinghambutler.com

Cottingham & Butler
C&B Insurance | SISCO | HealthCorp | Safety Management
Established 1887

October 29, 2015

Wally Burchak
KBC Transport LLC
PO Box 340 4689 HWY 13 South
Kooskia, ID 83539

RE: Double Trailers

Dear Wally,

Per our conversation, we did some research from a risk stand point regarding your concern with the state of Idaho. As your agent we have discussed the risk of double trailers and it is our belief that doubles are "innately more dangerous". As transportation specialists, we see many applications requested by a variety of insurance companies all including the question is the insured pulling doubles or triples. We called to a few of these underwriters and they all agreed that there is less control with pulling a double trailer. It stands to reason if you have more chance to lose control, the risk goes up. Our agency also contacted KBC Transport's auto liability carrier, Acuity, and they also view the double trailer configuration as having a more innate risk than a single trailer.

Double-trailer trucks are quite literally what they sound like: semis which haul two trailers, making them extra long. Naturally, there is additional risk of truck accidents in hauling two trailers, not only because truckers in such a setup have a larger blind spot, but also because of the difficulty of managing the additional length and weight when making turns and stops. Again, the common theme is that it is "innately more dangerous". We found some resources on the internet most of which are written by attorneys. Each one makes similar claims that pulling doubles creates more risk on the road ways.

Sincerely,

Jesse Drolema
Sales Executive
Cottingham & Butler Inc
PH: 563-587-5353
Email: jdrolema@cottinghambutler.com

Assurex GLOBAL

November 17, 2015

Wally Burchalk
KCC Transport
P.O. Box 340
Kooskia, Idaho 83539

To Whom it May Concern:

It is my understanding that IDOT is going to increase the weight and length of loads hauled on highway 13.

I have just one question for whoever has made or is making this decision.

Have you seen and driven highway 13 lately?? My guess is that you have not, or you would not be making or considering this decision.

As someone who drives highway 13 every day (and my family also) I oppose this plan.

Sincerely,

Jim Babb

Jim Babb
100 Delaney Rd.
Grangeville, Idaho 83530
208-983-1118

To Whom it May Concern:

Regarding the recent decision of the IDOT to increase the acceptable size of transport trucks that travel on Highway 13: we live near Harpster, and we have some serious concerns about this matter.

We travel up and down Hwy. 13 multiple times weekly, and are often stuck behind a lumber truck or a loaded logging truck. The posted speed limit is 35 mph, but these trucks mostly travel (uphill) about 25 mph, sometimes closer to 30 mph. There are almost NO safe places to pass on this grade, travelling uphill or down, and we end up going very slowly to town. The trucks at the length they are often go over the center line on left-hand curves, and hang over the very narrow shoulder on right-hand curves. There are frost heaves and potholes and sunken areas on the entire grade, and the truckers sway and swerve to avoid them.

If it's true that these new length/weight increases will slow the truckers down another 10 mph, people may begin to take dangerous risks in order to pass the trucks.

If you truly deem it necessary to implement this plan, may we suggest that you

build several truck pull-outs on the way up the grade, and make it mandatory for the truckers to pull into them if they are holding up two or more vehicles-- similar to the Winchester Grade pull-outs. Or only allow them to drive from midnight to 4 a.m.

We absolutely support the logging and lumber industry in our area, and know many families who are supported by the trucking industry in general. We adamatly request that you do not increase the length or weight of the trucks travelling Hwy. 13. We believe that to do so would make a dangerous highway even more deadly.

Thank for your consideration.

Brian & Rachel Foster 11-7-15

Brian and Rachel Foster
PO Box 284; Grangeville ID
637 Lightning Creek Road

DISTRICT 8
CLEARWATER, IDAHO, LEWIS
AND VALLEY COUNTIES

HOME ADDRESS
P.O. BOX 187
COTTONWOOD, IDAHO 83522
(208) 962-7718

STATE CAPITOL
P.O. BOX 83720
BOISE, IDAHO 83720-0081
(208) 332-1300
FAX: (208) 334-2320
snuxoll@senate.idaho.gov

Idaho State Senate

SENATOR SHERYL L. NUXOLL

November 20, 2015

Director Brian Ness
Idaho Transportation Department
3311 W. State Street
P.O. Box 7129
Boise, ID 83707-1129

Dear Director Ness:

I am very concerned with the proposal to allow 129 GVW on Highway 13. Highway 13 is a very winding route that parallels the South Fork of the Clearwater River. This highway is used by heavy truck traffic transporting logs and lumber, but it is also the main traffic corridor connecting Kooskia to Grangeville for local residents in my district. Because of the South Fork river and outlying wilderness areas, it has heavy use from fishing, hunting, camping, and cycling recreationists. This often makes for difficult passage on the many tight corners with very narrow shoulders when trucks are involved. Highway 13 is notorious for being a very difficult road to drive because of the winding corners and many recreationists that travel this route. The pristine waters of the South Fork are also very important to local residents and Nez Perce Tribal members who do not want to risk damage to this ecosystem.

After talking to local trucking companies, it is my understanding that only one 129 GVW route is needed to move goods from the Kooskia/Kamiah area to connectivity with Highway 95. Idaho Transportation Department's ("ITD") evaluations of Highway 13 and Highway 162 show Highway 162 to be a much safer route. Highway 162 is a straighter road with wider shoulders and better sight lines for drivers. It does not parallel a river so you do not have clean water issues or heavy use by recreationists. Highway 13 had 100 accidents, 49 injury accidents, and 3 fatalities in a 5-year period. The fatality total now stands at 4 as another Highway 13 traffic fatality occurred on November 11, 2015. During this same 5-year period, Highway 162 had 38 accidents, 22 injury accidents, and one fatality. It seems irresponsible to risk the safety of citizens on Highway 13 when there is clearly a safer alternative. I think ITD will have trouble standing up to scrutiny if Highway 13 is approved for 129 GVW when these safety numbers are under consideration.

DISTRICT 8
CLEARWATER, IDAHO, LEWIS
AND VALLEY COUNTIES

HOME ADDRESS
P.O. BOX 187
COTTONWOOD, IDAHO 83522
(208) 962-7718

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snuxoll@senate.idaho.gov

Idaho State Senate

SENATOR SHERYL L. NUXOLL

Two years ago I supported legislation to expand permitting 129 GVW truck weights into northern Idaho but also with the promise to protect my citizens from abuse of the law. I supported this legislation with the understanding that safety concerns and road conditions would be thoroughly explored before approving routes for 129 GVW designation. If Highway 13 is allowed for 129 GVW truck use, my concerns for passing this law will be confirmed. I urge ITD to not allow 129 GVW trucks on Highway 13. Highway 162 is a much safer alternative to focus on. If you have any questions, please do not hesitate to contact me. Thank you for your consideration.

Sincerely,

Sheryl Nuxoll

Sheryl Nuxoll
Idaho State Senator
District 7

December 3, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

I am writing to protest the idea of hauling 129K loads on Highway 13. I have held a commercial drivers license for the last 10 years. I have served as KBC Transport's head mechanic for the last 10 years. I have drove commercial vehicles up both Highway 13 and Highway 162. Highway 162 is clearly the safer route because of wider shoulders, better sightlines, and fewer recreational traffic. I commute to work daily on Highway 13 from my home near Harpster. I am well aware of the dangers Highway 13 poses for commercial drivers. Highway 13 is a road that has a very small margin of error for drivers. If you stop paying attention for even a minute you can end up in the jersey barrier or in the river. The road is filled with fishermen at certain times of year driving erratically and parking along road with very little room for trucks to pass. Trucks hauling 129K will be longer and more difficult to control on the winding corners. Pulling two trailers is more dangerous than pulling a single trailer. I have pulled both configurations and without question double trailer configurations are more dangerous and difficult to control. A double configuration is more likely to spin out on slick roads because they have less weight on drive axles and dragging more weight on back trailers.

I have hand picked up spilled lumber from truck wrecks on Highway 13 way to many times during my work as a mechanic. I constantly hear from our drivers of the difficulty driving Highway 13 and their concern this will only become worse with the addition of 129K trucks. Highway 13 is simply one of the most dangerous highways in the state of Idaho. My experience and ITD's own accident data proves this point.

Please deny request to haul 129K on Hwy 13. I feel it is way to dangerous and puts all users of this roadway at an unnecessary risk. I also do not want to subject my family to the additional risk of 129K trucks.

Dave Baldwin
KBC Transport LLC

December 3, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

I am writing to protest the idea of hauling 129K loads on Highway 13. I have been driving commercial vehicles for over 30 years. I owned my own logging truck and hauled logs up both Highway 13 and Highway 162. Highway 162 is clearly the safer route because of wider shoulders, better sightlines, and fewer recreational traffic. Highway 13 is a road that has a very small margin of error for drivers. If you stop paying attention for even a minute you can end up in the jersey barrier or in the river. The road is filled with fishermen at certain times of year driving erratically and parking along road with very little room for trucks to pass. Trucks hauling 129K will be longer and more difficult to control on the winding corners. Pulling two trailers is more dangerous than pulling a single trailer. I have pulled both configurations and without question double trailer configurations are more dangerous and difficult to control. A double configuration is more likely to spin out on slick roads because they have less weight on drive axles and dragging more weight on back trailers.

I currently dispatch all the lumber trucks for KBC Transport. Prior to my work with KBC, I dispatched for Duane Orcutt Trucking for over 10 years. Highway 13 served as our major truck corridor for both Duane Orcutt Trucking and KBC Transport. I have hand picked up spilled lumber from truck wrecks on Highway 13 way to many times during my work as dispatcher. I constantly hear from our drivers of the difficulty driving Highway 13 and their concern this will only become worse with the addition of 129K trucks. Highway 13 is simply one of the most dangerous highways in the state of Idaho. My experience and ITD's own accident data proves this point.

Please deny request to haul 129K on Hwy 13. I feel it is way to dangerous and puts all users of this roadway at an unnecessary risk.

Kevin Childers
KBC Transport LLC

December 3, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

I am writing to protest the idea of hauling 129K loads on Highway 13. I work as a mechanic for Clearwater Forest Industries in Kooskia. I have drove loaded horse trailers up both Highway 13 and Highway 162. Highway 162 is clearly the safer route because of wider shoulders, better sightlines, and fewer recreational traffic. I commute to work daily on Highway 13 from my home near Harpster. I am well aware of the dangers Highway 13 poses for commercial drivers. Highway 13 is a road that has a very small margin of error for drivers. If you stop paying attention for even a minute you can end up in the jersey barrier or in the river. The road is filled with fishermen at certain times of year driving erratically and parking along road with very little room for trucks to pass. Highway 13 is simply one of the most dangerous highways in the state of Idaho. My experience driving this road and ITD's own accident data proves this point.

Please deny request to haul 129K on Hwy 13. I feel it is way to dangerous and puts all users of this roadway at an unnecessary risk. I also do not want to subject my family to the additional risk of 129K trucks.

David Horan

November 17, 2015

Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

Re: 129K Proposal on Hwy 13

I would like to say as a 22 year truck driving veteran of the Northwest and having logged thousands of miles on Highway 13 in North Central Idaho. I cannot think of any other highway that demands as much attention from the driver, nor can I think of any highway that is more dangerous. I found this out for myself this last April. I was driving down with a mill transfer load of lumber like I had done 100 times before. When for reasons I am unsure, I laid the load over in a corner that banked in four different directions. When I heard people were pushing the weight limit for 129,000 lbs I couldn't believe it. It is my professional opinion that 106,000 lbs should definitely be the max on this road. As it is not only dangerous because of corners, but also the road is in less than good shape. I urge you to deny the application for hauling 129,000 lb loads on Highway 13.

Scott Murphy
KBC Transport Driver

November 25, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

I am writing to protest the idea of hauling 129K loads on Hwy 13. I have been driving commercial vehicles for over 30 years. During this time I have driven just about every truck and trailer configuration there is. I currently drive all over the Western United States, and the most difficult road I travel is Highway 13. It is a winding road with very narrow shoulders. It is a road that has a very small margin of error for drivers. If you stop paying attention for even a minute you can end up in the jersey barrier or bank. The road is filled with fishermen at certain times of year driving erratically and parking along road with very little room for trucks to pass. Trucks hauling 129K will be longer and more difficult to control on the winding corners. Pulling two trailers is more dangerous than pulling a single trailer. I have pulled both configurations and without question double trailer configurations are more dangerous. I currently pull a 53 foot single trailer and this is much safer on Hwy 13. A double configuration is more likely to spin out on slick roads because they have less weight on drive axles and dragging more weight on back trailers.

Please deny request to haul 129K on Hwy 13. I feel it is way to dangerous and put my life at a greater risk when I haul on this road.

Bill Lockhart

William Lockhart

November 25, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

My name is Jason Crawford. I have been driving truck for 10 years up and down Highway 13, Highway 12 and Highway 95. I drive all over the Western United States, but the majority on my miles are on these 3 highways. I feel that the 129,000 lb loads proposed for Highway 13 is unsafe. Highway 13 is very narrow in places with sharp corners and very narrow paved shoulders. The margin of error for drivers is very small. 129K trucks will pose a significant hazard for cars and lighter trucks. We have allot of hunters and fishermen on the road and heavy traffic at times. The oversize loads with pilot cars have problems going down this road because of traffic and being so narrow in places.

Highway 13 doesn't have many wide places for a big rig to pull off in an emergency. There is virtually no where to pull off roadway and chain up once you start up Harpster Grade. If a truck spins out they will tie up the whole road and create a dangerous situation because there is no room to get around a truck jack knifed in middle of road. Harpster Grade is a long and fairly steep grade with 25 mph corners. Most trucks can only go between 25 to 35 mph up this hill with no wide spots to pull off. 129K trucks will be going significantly slower. In my eyes the maintenance plows will not be able to keep up with the snow and ice on Harpster Grade with the additional hazard of 129K trucks. Trucks hauling 129K will spin out easier because they have less weight on drive axles and more weight on back part of trailers which pulls harder. If 129K truck spins out and jack knifes in the road with no warning, there will be a wreck and injuries to other vehicles on road. Other trucks and passenger cars can't stop on a dime when they come around a blind corner to find a truck jack knifed blocking both lanes of traffic.

In my eyes I feel like there will be allot of wrecks and lawsuits if you allow 129K trucks on Highway 13.

Jason Crawford

Jason Crawford

November 25, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

I am writing to protest the idea of hauling 129K loads on Hwy 13. I have been driving commercial vehicles for over 30 years. During this time I have driven just about every truck and trailer configuration there is. I currently drive all over the Western United States, and the most difficult road I travel is Highway 13. It is a winding road with very narrow shoulders. It is a road that has a very small margin of error for drivers. If you stop paying attention for even a minute you can end up in the jersey barrier or bank. The road is filled with fishermen at certain times of year driving erratically and parking along road with very little room for trucks to pass. Trucks hauling 129K will be longer and more difficult to control on the winding corners. Pulling two trailers is more dangerous than pulling a single trailer. I have pulled both configurations and without question double trailer configurations are more dangerous. I currently pull a 53 foot single trailer and this is much safer on Hwy 13. A double configuration is more likely to spin out on slick roads because they have less weight on drive axles and dragging more weight on back trailers.

Please deny request to haul 129K on Hwy 13. I feel it is way to dangerous and puts my life at a greater risk when I haul on this road.

Steve Hendren

Steve Hendren

November 25, 2015

Adam Rush
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

I am writing to protest the idea of hauling 129K loads on Hwy 13. I have been driving commercial vehicles for over 30 years. During this time I have driven just about every truck and trailer configuration there is. I currently drive all over the Western United States, and the most difficult road I travel is Highway 13. It is a winding road with very narrow shoulders. It is a road that has a very small margin of error for drivers. If you stop paying attention for even a minute you can end up in the jersey barrier or bank. The road is filled with fishermen at certain times of year driving erratically and parking along road with very little room for trucks to pass. Trucks hauling 129K will be longer and more difficult to control on the winding corners. Pulling two trailers is more dangerous than pulling a single trailer. I have pulled both configurations and without question double trailer configurations are more dangerous. I currently pull a 53 foot single trailer and this is much safer on Hwy 13. A double configuration is more likely to spin out on slick roads because they have less weight on drive axles and dragging more weight on back trailers.

Please deny request to haul 129K on Hwy 13. I feel it is way to dangerous and puts my life at a greater risk when I haul on this road.

Allen York

Allen York

Opposition to 129,000 lbs. load limit/Hwy 13

To whom it may concern:

My name is Duane Orcutt, former owner & president of Duane Orcutt Trucking, Inc. Kooskia, Idaho. My wife and I are residents of Idaho County and I have lived in Kooskia Since 1954. I have been a truck-driver, owner operator most of my life.

I do not agree with the proposed 129,000 lb, 90 foot trucks being allowed on highway #13. This road is a 25 mile road from Kooskia to Grangeville, Id. It is very crooked and narrow with fairly heavy traffic most of the time. Summer-time will see the road lined with fishermen, swimmers, and berry pickers. There are very few turn-outs for parking so parking is mostly on the edge of the road. Winter-time brings very slick, challenging conditions in the shady spots with no room for driver-error.

It doesn't seem right that north-central Idaho canyon roads should be compared to south-eastern Idaho flat straight roads to have the same length and weight laws. I feel that allowing 129,000 lb. trucks 90 feet long or longer will be very hazardous to the public. It will create a dangerous situation for the people driving this road. I strongly oppose 129,000 permits on highway 13, Idaho County, Idaho.

Duane H. Orcutt, former president
Duane Orcutt Trucking, Inc.
199 Big Cedar Road
Kooskia, Id. 83539

November 18, 2015

To Whom It May Concern:

RE: Heavy 129,000# trucks/trailers on Highway 13.

I am completely against these 129,000# trucks/trailers operating on any part of Highway 13 in any direction.

This road for the first part in the canyon follows the river. It is narrow with corners of 30 mph and 25 mph that give no room for error. I feel these trucks would have a very difficult time handling this highway safely and for the safety of other drivers on the road. There is not even close to sufficient shoulder pavement off of the white fog line for the length of these trucks to use if necessary and at any turn could create an extremely dangerous situation for themselves and others on the highway.

The final 9-10 miles is the Harpster Grade that climbs into the city of Grangeville. Again, the extremely sharp corners and no room for error would cause a dangerous situation.

On any part of this highway, for any other trucks or motorists to safely pass would be almost impossible. During winter months, when these trucks climb the grade at a much slower speed, it puts other trucks in a very unsafe situation and the potential for a disastrous situation is eminent.

I drove this highway in a chip trailer/flatbed truck and know the dangers and the extreme care it takes to operate a truck/trailer on this highway. These bigger trucks have no place on this highway. There are alternative routes, let them take the alternative route and stay off of Highway 13, especially for the safety of the citizens and all of the motorists who use this highway daily for trips and for work.

Kevin R. Palmer
844 Pleasant Valley Road
Clearwater, ID 83552

Kevin R Palmer

Peter and Nathalie Kretzmann
1783 Highway 13
Grangeville, ID 83530

October 29, 2015

Idaho Department of Transportation

To whom it may concern,

We strongly oppose the proposed plan to allow 129,000 lb, 95' long truck/trailers to travel on Highway 13. It would be a great danger to other people traveling the highway.

First, Highway 13 is a dangerous road already. The highway itself winds tightly the whole way from Kamiah to Grangeville. Logging trucks regularly cross either the white line or the yellow line to make the corners. A 95' long truck is not going to be able to make the corners without crossing the lines. Crossing the yellow line obviously endangers oncoming traffic. Crossing the white line is dangerous because the shoulders are so narrow, non-existent, or in such poor repair that it will catch the truck tire and send the truck reeling, endangering following and oncoming traffic. The shoulder in many places is practically non-existent, with no white line showing, and only inches from steep embankments. Deer are numerous. There are so many accidents along this highway already.

Just last week, a logging truck braked to miss a deer, crossed the white line and flipped, blocking the whole road. It was on a curve. I heard it happen from inside my house. I hurried in my truck to the scene. It was 6:00am and still dark. Even though I was expecting to find an accident, I almost ran into the logging truck because it was across the road just past a curve and I didn't see it until I was almost upon it.

Secondly, Highway 13 is not in good repair. There are always potholes and bulges in the surface of the pavement that already endanger vehicles. Trucks with double trailers will be bouncing and fish tailing even worse, especially in winter. Double trailers are innately more dangerous.

Thirdly, the slow speed of the heavy trucks will be a danger. There are few places to pass, and passing zones are short. People will try to pass the long trucks and find that they can't make it. This is a life threatening situation.

Please consider Route 162, as it is much straighter and has longer sight lines. It is a safer alternative.

Sincerely,

Peter Kretzmann Nathalie Kretzmann

Peter and Nathalie Kretzmann

Tom and Mary Keller
637 Pleasant Valley Road
Clearwater, Id, 83552

October 29, 2015

Idaho Department of Transportation

It is our understanding there is a proposed plan to allow long truck and trailer combinations (95'), weighing up to 129,000 lbs. to travel on Highway 13. Since Highway 13 includes a segment of roadway known as the Harpster Grade, a steep, winding roadway that is already a hazardous road, it seems unwise to allow even longer and more heavily loaded trucks to travel that highway.

Under the best of weather and road conditions, Highway 13 already presents a challenge to normal length truck/trailer combinations. As it is there are truck accidents occurring on Highway 13. Very recently, a logging truck wrecked near the top of the Harpster Grade as result of trying to avoid hitting a deer. There are numerous deer along that stretch of roadway that always present a hazard to all motorists. Allowing even longer, heavier loaded trucks to travel highway 13 is inevitably going to result in more accidents, some of which are going to involve people driving small cars and pickups.

Highway 13 is generally not in good repair, especially from the top of the Harpster Grade to Grangeville. Currently there are numerous potholes, bulges in the pavement, and cracks in the road surface caused by heavy truck traffic, especially logging truck traffic. If trucks weighing up to 129,000 lbs. are allowed on that road, deterioration of the road surface is only going to increase more rapidly.

Road alignment is already a problem for normal length trucks, causing them to cross the center line or drive off the roadway in order to negotiate the tight turns that exist on the Harpster Grade. Longer trucks will have even more difficulty negotiating tight turns which could result in trucks rolling over.

Finally, the slower speeds of the longer, more heavily loaded trucks will cause traffic to back up behind the trucks and that will result in traffic trying to pass the trucks, even though there are very few safe places to pass, especially on the Harpster Grade. Inevitably there will be vehicle accidents, some of which will be head on collisions which are the most likely kind of accidents that result in loss of life.

We don't believe that it is reasonable to permit trucks that are 95' in length and weighing up to 129,000 lbs. to drive on any road in North Central Idaho, much less Highway 13.

Please reconsider this plan to allow excessively long truck/trailer combinations to travel Highway 13 in the interest of public safety.

Sincerely,

Tom & Mary Keller

November 7, 2015

129,00 lbs Trucks on Highway 13

As a frequent user of highway 13 in a truck, normally hauling loads in excess of 100,00 lbs, in my opinion adding heavier trucks using highway 13 would be a mistake.
The heavier trucks require more time and distance to stop. Making them more likely to be unable to avoid unpredictable traffic situations, road hazards or other problems that occur on a steep, winding narrow country highway. In addition depending on the season and the weather you have the bicyclists, pedestrians, wild game, fisherman along the south Fork, and other vehicles.
In addition you have the issue of escape ramps in case of mechanical brake failures. There are none! In fact on the Harpster grade portion of the highway there is only one pullout large enough for trucks to use, and on the downhill side, it is right after a sharp right hand turn, making this pullout difficult to use especially if you are having mechanical issues or weather related problems.
Though I am not a road engineer, it is not hard to see that the road is not in great condition and adding more weight is not going to make it any better.

Steve Hayden
KBC Trucking
Kooskia, Idaho

Proposed Hwy 13 to 129,000 Lbs.

To whom it may concerns;

I do not want to see Hwy 13 approved for 129,000Lbs.

I live in Harpster, Id and Hwy 13 is like Main Street to all of us that live in this area. This road is narrow, has many blind curves and a steep grade. The noncommercial traffic on this road includes a wide range of drivers from teenage beginners to seniors that are going to town to carry on normal everyday activities. This road is also used by sportspersons and recreationalist. During the fishing season it is not uncommon to have vehicles parked along the Hwy in many locations and not always totally off the road (not very many pull offs to park in). This road is the main travel corridor for people traveling from Missoula to Boise and vice versa. The size of some of the RVs and skills of the people driving them already make this road a challenge to travel at times. The weather also is an issue, in the winter many of the curves do not get much sun during the day and with the moisture off the river, icing conditions could be just around the corner.

As a professional driver with over 30 years of experience and a several million miles under my belt I feel that allowing trucks to carry 129,000 Lbs. on this road will create an unnecessary safety issue. I have been hauling lumber all over the northwest and Hwy 13 is the most challenging road I travel. Increasing the weight limit will increase the length of the trucks and decrease the speed both of which will create problems. People do not like to be slowed down when headed to town, so now not only will they be trying to pass more trucks because they are going slower but will have to pass a longer rig. There are not many places to pass safely on this road but they will try. I have even had an empty 18 wheeler pass me going up Harpster grade while I was loaded. I drive a truck that is able to do the speed limit (35 mph) up the grade loaded to 105,500 Lbs. There are very few trucks running the northwest capable of doing this, by adding the extra weight are speed will be drastically reduced and most trucks will be down to 15 mph or less. Harpster grade does not have any pull outs or passing lanes. Having to slow down to 25 mph or less to go around some of the curves along the road and time it takes to get back up to speed will back up traffic even more.

I could go into the increased stopping distance and everything but for everything I say there is an engineer that can and will say it is safe. Take it from a grandparent that actually drives the road with my neighbors and their kids it's not safe and the amount of money some people think they will make by this change is not worth it.

Allen Horan
251 Wall Creek Rd
Harpster, Id

GIVENS PURSLEY LLP
Attorneys and Counselors at Law

601 W. Bannock Street
PO Box 2720
Boise, ID 83701
Telephone: 208-388-1200
Facsimile: 208-388-1300

www.givenspursley.com

Preston N. Carter
pnc@givenspursley.com
208-388-1222

December 3, 2015

Via email (adam.rush@itd.idaho.gov) and hand delivery
Janice Vassar, Board Member
Adam Rush, Public Involvement Coordinator
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

RE: Request For Designated Routes Up To 129,000 Pounds, Highway 13, Mileposts 0-26.39
ITD Case #201511SH13

Dear Ms. Vassar and Mr. Rush:

This firm represents KBC Transport, LLC ("KBC"). Please accept this letter as KBC's comment in opposition to the request to designate Highway 13 as a route for 129,000-pound trucks ("Request") from milepost 0 to 26.39. The Request was submitted on April 20, 2015 and has been assigned ITD Case #201511SH13.

FACTUAL BACKGROUND

KBC is located near Stites, Idaho, directly adjacent to Highway 13. KBC is one of the largest users of Highway 13, with an average of eight to ten single-trailer trucks driving the route each day. KBC's employees also use Highway 13 to travel to and from work. As such, KBC is intimately familiar with the Highway, and KBC has an acute interest in the safety of this stretch of road.

As you know, from Grangeville, Highway 13 traverses the Harpster Grade, which has a grade of between 5.0 and 5.5%. Despite its steep slope, this segment of the road has no passing lanes, no turnouts, limited chain-up locations, and no emergency truck ramps. Slow-moving trucks traveling up this grade create congestion and driver frustration. ITD's analysis of the Request indicates that, even before the Request, the public expressed concern with the lack of passing opportunities on the Harpster Grade. ITD has described portions of this segment as "in

poor condition" and "in distress." ITD's Tams data indicates that four road segments are rated "poor" and "deficient," four segments are rated "good," and two segments are rated "good."

After traversing the Harpster Grade, Highway 13 turns north and travels alongside and slightly above the Clearwater River. From the intersection with Highway 14 to Kooskia, the road is extremely winding,[1] with narrow shoulders, poor lines of sight, and virtually no opportunity to pass slow-moving vehicles for the entire stretch. In some locations, commonly known as Preachers Corner (approximately milepost 14) and Box Canyon (approximately milepost 12), the canyon's rock face hangs nearly to the white line marking the roadway. The winding nature of the roadway limits visibility, and the close proximity of the Clearwater River means that there is nowhere to go if something goes wrong. In places, the road is suffering from a lack of maintenance, with degraded or nonexistent shoulders.[2] This stretch frequently experiences icy, wet, and snowy conditions, as well as rockfall in areas with no barrier between the canyon walls and the roadway.[3] Due to the combination of the road's setting, lack of maintenance, and weather conditions, **Highway 13 is known to trucking companies as one of the most difficult roadways in Idaho.**

ITD has recorded 100 accidents in a five-year period on Highway 13. According to ITD's analysis, forty-nine of the accidents resulted in injury, and three were fatal. Since ITD's analysis, one additional fatal accident occurred, raising the total to four fatal accidents in the past five years. Eight of the accidents were truck-related, and five involved a truck and a passenger vehicle. The foremen of this route have expressed concern with allowing 129,000-pound trucks on the road.

Highway 13 is not the only route from Grangeville to the Kooskia/Kamiah area. Highway 162 (via U.S. 95 and Highway 62) provides direct access to Kamiah, and a short distance on Highway 12 provides access to Kooskia. This route generally travels through open farmland, is much less winding, and provides straight sightlines. According to ITD's own analysis, Highway 162 is in much better condition and has experienced fewer accidents. Although this route is slightly longer, mileage-wise, it takes only five or ten minutes longer due to better road conditions.

LEGAL BACKGROUND

Idaho Code § 49-1004A provides a mechanism for ITD to consider requests to designate routes for operation of vehicle combinations with a legal maximum gross weight of up to 129,000 pounds. Idaho Code § 49-1004A(1).

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[1] In ITD's words, "a winding roadway that parallels the South Fork of the Clearwater River."
[2] A picture of Preachers Corner is included as Attachment 1. Pictures of degraded shoulder conditions at approximately mileposts 14, 11, 8, and 9 are included as Attachments 2, 3, 4, 5, and 6.
[3] An example of an area prone to rockfall on the Harpster Grade is included as Attachment 7.

When considering a request, ITD is required to analyze the safety of adding the route. *Id.* at § 49-1004A(2). ITD regulations also recognize, and require analysis of, the safety concerns inherent with designating roads for travel by 129,000-pound trucks. Idaho Admin. Code 39.03.22.200.04.b (noting that the "analysis will be completed for engineering and safety" criteria); *id.* ("Additional consideration will be given to traffic volumes and other safety factors.").

The statute and regulations plainly grant ITD the authority to reject a request based on safety concerns. *See* Idaho Code §§ 49-1004A(2) & (3) (directing ITD to consider the safety and feasibility of requests, and noting that the section does not limit local authority's discretion to decline to designate routes); Idaho Admin. Code 39.03.22.200.04.b (noting ITD subcommittee's authority recommend approval, rejection, or request for more information).

The ITD is currently considering requests to designate five sections of roadway. KBC does *not* oppose four of the five requests. KBC opposes only the request to designate Highway 13.

As described in more detail below, Highway 13 is simply not suitable for 129,000-pound trucks, particularly where Highway 162 provides a safer, comparably fast route from Grangeville to the Kamiah/Kooskia area. In addition, if ITD designates Highway 13, one of the most difficult roadways in the State, virtually every section of highway in the State would be eligible for designation.

COMMENT

A. Highway 13 is not suitable for 129,000-pound trucks.

First and foremost, Highway 13 is not safe for 129,000-pound trucks. The Harpster Grade is a winding, 5.0-5.5% grade with no passing lanes, no emergency truck ramps, and limited chain-up locations. Even the trucks that currently travel up this grade—smaller than the proposed 129,000-pound trucks—move very slowly, resulting in excessive congestion, driver frustration, and complaints to ITD. Larger trucks will move even more slowly, exacerbating the already problematic status quo and increasing the likelihood that frustrated drivers will attempt to pass in unsafe areas. Longer, heavier trucks will also have difficulty climbing the steep grade on slick roads. With narrow shoulders, no passing lanes, and a steep drop-off to the river canyon, there is no room to maneuver around a jackknifed truck in the roadway.

The route along the Clearwater River is winding, has very poor visibility, has no passing lanes, and is frequently made more treacherous by weather conditions. In key areas, the roadway is bordered closely by rock walls, which further restrict visibility and constrain drivers' ability to react.

As it is, Highway 13 leaves little or no margin for error for passenger vehicles and trucks. In the past five years, there have been four fatalities and numerous wrecks involving trucks and

passenger vehicles. The foremen for the route expressed their concern with allowing larger trucks along this section of road.

The safety concerns created by the road's inherent characteristics are heightened by the road's condition. As shown in the attached photos, the road shoulder has been degraded in numerous places, leading to sharp drop-offs immediately adjacent to the roadway. ITD's own analysis describes sections of the road as "very poor," "in poor condition," and "in distress." It should go without saying that 129,000-pound trucks should be approved only when roadways are in good condition. All the evidence points in one direction: allowing 129,000-pound trucks will not be safe for the drivers, for passenger vehicles, and for existing trucking traffic. Permitting heavier trucks on roadways that are, by ITD's own analysis, in very poor and distressed condition would not comport with ITD's statutory, regulatory, and general duties to ensure public safety.

Second, ITD must consider the State's liability. ITD's own analysis recognizes the deficiencies in many segments of the road, as well as a disturbing number of truck-on-passenger-vehicle accidents and fatal accidents. Given these characteristics, it is foreseeable that adding 129,000-pound trucks to the road will increase accidents, including fatal ones. ITD can avoid this exposure by denying the Request.

Third, a long stretch of Highway 13 is directly adjacent to, and slightly above, the Clearwater River, one of Idaho's premier rivers and a key stretch for endangered and threatened fish, including steelhead and salmon. Recently, Field & Stream identified the South Fork of the Clearwater as one of the best steelhead fishing areas in the Western United States, which has lead to an increase in out-of-state fishermen and associated travel along Highway 13. Local residents, recreational fishermen throughout the state and region, and members of the Nez Perce tribe have an acute interest in the health of the river. Permitting 129,000-pound trucks heightens the risk of accidents that can release pollutants, including the large amount of diesel fuel carried by these large vehicles, into the river. Extremely large trucks will also detract from the scenic values afforded by the road, and decrease the pleasure of fishing the river. Concerns with the river and its fishery render Highway 13 unsuitable for 129,000-pound trucks.

B. Highway 162 provides a safer, comparably fast route to the Kamiah/Kooskia area.

KBC recognizes (although it does not necessarily agree with) the desire to access the Kamiah/Kooskia area with 129,000 trucks. Denying the petition to designate Highway 13 would not preclude such access. Heavy trucks can proceed to the area from Grangeville via U.S. 95 and Highway 162. This route proceeds largely through open farmland, with a much straighter roadway and much better visibility. This stretch is also in much better condition that Highway 13, as shown by ITD's own analysis. While this route is longer than Highway 13, it takes approximately the same amount of time due to better road conditions.

KBC does not oppose the current request to designate Highway 162, and it does not oppose access to the Kamiah/Kooskia area with 129,000-pound vehicles. It simply requests that

ITD not designate a dangerous route that seriously compromises public safety along Highway 13.

C. Designating Highway 13 would set a precedent for nearly every highway in the State.

To date, ITD has approved four requests to designate routes for use by 129,000-pound trucks: a segment of Highway 55 in the Treasure Valley, two segments of U.S. 95, and a segment of U.S. 12. These routes were overwhelmingly in "good" condition. None of the foremen of the routes expressed any concern with the requests. And none of the routes involved a winding road in a river canyon.

ITD's analysis of Highway 13 stands in sharp contrast. ITD described sections of Highway 13 as "poor," "very poor," "deficient," and "in distress." The foremen for the routes expressed concern over the application. The road is described as a "winding roadway that parallels the South Fork of the Clearwater River," and the Harpster Grade portion is singled out for its lack of passing lanes, emergency truck ramps, and limited chain-up areas. ITD has also received substantial public comments that provide yet more evidence that Highway 13 is unsafe for use by 129,000-pound trucks.

If ITD is to act in the face of its own analysis and substantial public comment, it will mark a sharp departure from its past practice. Moreover, designating Highway 13—recognized as one of the State's most dangerous roadways—will set a precedent for designating nearly every highway in the State, and threatens to render useless ITD's statutory, regulatory, and general public duty to analyze road safety when considering designation requests.

CONCLUSION

ITD's own analysis, and the evidence presented through public comment, point in one direction: Highway 13 is not safe and not suitable for travel by 129,000-pound trucks. It is also not necessary; Highway 162 provides a route that is comparable in time but much safer. For these reasons, KBC respectfully urges ITD to take seriously its duty to ensure safety of routes, and to deny the request to designate Highway 13 for 129,000-pound trucks.

Thank you for accepting this comment. Please do not hesitate to contact me if you have questions, or if you would like additional information.

Sincerely,

Preston N. Carter

ATTACHMENT 1

ATTACHMENT 2

ATTACHMENT 3

ATTACHMENT 4

ATTACHMENT 5

ATTACHMENT 6

ATTACHMENT 7

GIVENS PURSLEY LLP
Attorneys and Counselors at Law

601 W. Bannock Street
PO Box 2720
Boise, ID 83701
Telephone: 208-388-1200
Facsimile: 208-388-1300

www.givenspursley.com

Preston N. Carter
pnc@givenspursley.com
208-388-1222

December 16, 2015

Via email (adam.rush@itd.idaho.gov) and hand delivery
Adam Rush, Public Involvement Coordinator
Idaho Transportation Department
3311 W. State Street
Boise, ID 83707

RE: Request For Designated Routes Up To 129,000 Pounds, Highway 13, Mileposts 0-26.39
ITD Case #201511SH13

Dear Mr. Rush:

This firm represents KBC Transport, LLC ("KBC"). Please accept this letter as KBC's supplemental comment in opposition to the request to designate Highway 13 as a route for 129,000-pound trucks ("Request") from milepost 0 to 26.39. The Request was submitted on April 20, 2015 and has been assigned ITD Case #201511SH13. KBC submitted an initial comment on December 3, 2015, and attended ITD's hearing in Kamiah on that same date. This supplemental comment addresses information that came to light during and after the hearing.

For background on KBC and Highway 13, please refer to KBC's initial comment.

SUPPLEMENTAL COMMENT

A. ITD's engineering evaluation did not consider the winding nature of the road, lack of passing lanes, lack of qualified drivers, and other relevant concerns. This information must be included in ITD's consideration of "safety."

As you know, ITD staff engineers completed an evaluation of Highway 13 before the December 3 public hearing. At the hearing, ITD's engineers made clear that the evaluation was not an all-encompassing review of the safety of Highway 13. Instead, the evaluation and its conclusions were limited to whether Highway 13's pavement and bridges could support the weight of 129,000-pound trucks, and whether 129,000-pound trucks could meet ITD's off-tracking and length requirements. The evaluation listed traffic and accident data, but did not compare it to other routes or

provide meaningful statistics.[1] The evaluation did not consider the winding nature of the road, steep grades, weather conditions, narrow shoulders, poor sightlines, driver qualifications, unique handling properties of 129,000-pound loads in real-world conditions, cyclist and fishermen traffic, and other safety factors.[2]

As noted in KBC's initial comment, the evaluation itself identifies numerous segments of Highway 13 that are in "poor" condition, segments that are "in distress," notes complaints about lack of passing opportunities on Harpster Grade and the foremen's concerns. Thus, even with its narrow scope, the evaluation does not support the conclusion that Highway 13 is safe for 129,000-pound trucks.

Information presented during and after the December 3, 2015 hearing in Kamiah further compels the conclusion that Highway 13 is not safe for 129,000-pound trucks.

First, owners and drivers of trucking companies testified or otherwise made known that only a small percentage of their drivers—estimated at around 10%—could safely drive 129,000-pound trucks. While many drivers hold the required certifications and other technical qualifications to *legally* drive the trucks, few have the experience and skill to do *safely*. This is consistent with KBC's experience: only one of KBC's drivers feels that he could safely drive such heavy loads on Highway 13. Given these numbers, it is extremely likely that drivers without sufficient skill or experience could drive 129,000-pound loads on Highway 13.

Second, after the hearing, Doral Hoff, an ITD engineer, rode in one of KBC's trucks on Highway 13 to obtain firsthand information regarding the route. Two passenger vehicles illegally (and dangerously) passed KBC's truck on the double-yellow line going up the Harpster Grade, due to the lack of passing lanes and turnouts on the route. In KBC's experience, many, if not most, truck accidents are caused by passenger vehicles driving in an erratic or illegal manner when the drivers become frustrated driving behind a slow-moving truck.[3] This is a major concern that will only increase with 129,000-pound trucks, which will move slower and are longer than existing truck traffic. Mr. Hoff also noted the vertical hillsides on both sides of the road, the lack of any real margin of error for drivers, and the congestion caused by bicyclists and fishermen in the summer.

Second, at the hearing, experienced truck drivers and others with first-hand knowledge testified and presented information regarding how 129,000-pound trucks would operate in the real-world conditions presented on Highway 13. Key facts include:

- 129,000-pound trucks operate in double-trailer configurations, which are more dangerous than single-trailer configurations. This is supported by experience, as well as the insurance

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[1] During the hearing, ITD's staff engineers stated that, in determining safety, KBC should not simply compare accidents on Highway 162 to Highway 13, but rather should compare *rates* of accidents. KBC has done so. *See* Attachment 1.

[2] KBC discussed many of these factors in its initial comment. KBC has included with this supplemental comment two thumb drives containing videos of a truck driving Highway 13 and Highway 162. The videos confirm both the facts regarding Highway 13 and that Highway 162 is a safer route.

[3] KBC's experience is corroborated by ITD's engineering review of Highway 95 from milepost 182 to 240, where 9 of the 12 crashes involving trucks and passenger vehicles were caused by the passenger vehicle. Attachment 2, p. 6.

industry, which charges higher rates to reflect the increased risk.[4]

- 129,000-pound trucks with double trailers will move more slowly up Harpster Grade, which has no passing opportunities. Slower traffic means more congestion, and longer trucks are more difficult for frustrated vehicles to pass.

- 129,000-pound trucks with a double-trailer configuration have longer tongues and must carry weight further back on trailers due to axle configurations. This makes the larger trucks much more likely to spin out, particularly on steep grades and in icy conditions, because they have less weight on the drive axles.

- Due to basic laws of physics, the kinetic energy of a 129,000-pound truck makes it much more difficult to accelerate and decelerate, particularly on inclines such as the Harpster Grade. While some 129,000-pound trucks have ABS brakes on all axles, this is not clearly required by rule, particularly for older trucks. Moreover, ABS brakes do not increase stopping power if a vehicle loses traction. If traction is lost, as frequently happens on steep grades or icy conditions, the increased mass of a 129,000-pound truck is much more difficult to handle, even with ABS brakes.

- The lack of acceleration cannot completely be made up by increasing horsepower. A typical 129,000-pound truck has an engine with approximately the same horsepower (550 or 560) as a typical 105,000-pound truck in KBC's fleet, and only 50 or 60 horsepower more than KBC's minimum (500). That is not enough power to make up for the increased mass, and in any case, a 550 horsepower engine has the same torque rating as a 500 horsepower engine, which means that the increased horsepower does not completely translate into increased pulling power.[5] Accordingly, 129,000-pound trucks will move and accelerate more slowly, leading to increased congestion in Highway 13, particular on the Harpster Grade.

Third, after the hearing, ITD produced traffic data on Highway 13, Highway 162, and segments of Highway 95.[6] These data indicate that Highway 13 has a significantly higher rate of truck accidents per volume of commercial traffic per mile, further confirming that Highway 13 is significantly less safe for commercial traffic than Highway 162 and other designated routes.

To summarize: when considering the staff evaluation, ITD must recognize that it was not an overall "safety" review, but rather an engineering document strictly limited to considering pavement and bridge conditions and whether 129,000-pound trucks can, under controlled circumstances, meet off-tracking requirements. ITD cannot and should not consider the evaluation sufficient to satisfy its statutory and regulatory duty to consider the overall safety of the route.

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[4] Excerpts from two insurance applications are included as Attachment 6. Both ask whether the applicant will pull double or triple trailers, recognizing the increased risk of multiple-trailer configurations.

[5] A chart illustrating the relationship between torque, engine speed, and torque is included as Attachment 7. Torque decreases sharply at higher engine speeds, and increased horsepower cannot completely make up for the decrease. Though the chart maxes out at 500 horsepower, the relationship between torque, engine speed, and horsepower continues above 500 horsepower.

[6] *See* Attachment 1.

Moreover, IDT must consider the information presented in initial comments, at the hearing, and in these supplemental comments when making its determination of "safety." Anything less fails to recognize IDT's statutory, regulatory, and general public duty to consider the safety of the route, and would be arbitrary and capricious.

B. ITD has the discretion, and indeed the duty, to consider alternate routes.

At the hearing, ITD's engineers stated that they could not consider Highway 162 as an alternate route or compare Highway 13 to other routes that had been approved. Instead, ITD's engineering review was limited solely to the Highway 13 application itself.[7]

As previously noted, Idaho Code § 49-1004A provides that ITD "shall analyze the safety and feasibility of adding" the requested routes. ITD's rules require that ITD analyze engineering and safety criteria, such as pavement, bridges, and off-track requirement, and that "[a]dditional consideration shall be given to traffic volume and other safety factors." Idaho Admin. Code 39.03.22.200.04.b. The concepts of safety, feasibility, and traffic volume carry with them the inherent authority to consider whether a particular destination can be reached via a safer, more feasible route that has less traffic. Standing alone, Highway 13 is unsafe. The availability of a safer route highlights Highway 13's safety risks. The availablity of a safer route also means that, if ITD designates Highway 13, it effectively imposes safety risks without a countervailing reward to the public.

Once again, ITD should recognize the limitations in the engineering analysis. Nothing in the statute or regulation requires ITD to focus on one particular route. Instead, ITD must consider all the information before it, including the pending application to designate Highway 162, which provides a safer, more feasible, less congested route to the Kamiah/Kooskia area.

Thank you for accepting this supplemental comment. Please do not hesitate to contact me if you have questions, or if you would like additional information.

Sincerely,

Preston N. Carter

Encl.
4498593_4

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[7] The applicant has petitioned for designation of Highway 162 and Highway 13. KBC's initial comment compared Highway 162 and Highway 13 as alternate routes to the Kamiah/Kooskia area, a conclusion confirmed by the videos submitted with this comment. KBC's initial comment also discussed other routes ITD had approved. The engineering evaluations of these other routes are included with this supplemental comment. *See* Attachments 2-5. KBC and the applicant have been working on a resolution to avoid designating Highway 13, but have been encouraged by ITD to proceed with the applications as filed.

ATTACHMENT 1

		HIGHWAY ACCIDENT INFORMATION				
		5-Year Accident Data (2010 to 2014) Hwy 13 & 162				
		5-Year Accident Data (2009 to 2013) Hwy 95				
		Hwy 13	Hwy 162	Hwy 95	Hwy 95	Hwy 95
		MP 0 to 26	MP 8 to 31	MP240 to 312	MP182 to 240	MP63 to 182
Route Start		Grangeville	4-Corners	Grangeville	Riggins	Fruitland
Route End		Kooskia	Kamiah	Lewiston	Grangeville	Riggins
Route Miles		26.4	23.1	71.73	57.9	119.3
Accidents		100	38	355	234	619
Injury Accidents		49	22	234	85	362
Fatalities	*	3	1	10	5	19
Truck Accidents		8	1	45	25	62
CAADT Average		163	79	489	380	460
Truck Accidents/mile		30.303%	4.329%	62.735%	43.178%	51.970%
Trk Accidents/CAADT		4.908%	1.266%	9.202%	6.579%	13.478%
Trk Accidents/CAADT mile		0.186%	0.055%	0.128%	0.114%	0.113%
Accidents/CAADT mile		2.324%	2.082%	1.012%	1.064%	1.128%
Injury/CAADT mile		1.139%	1.206%	0.667%	0.386%	0.660%
Fatalities/CAADT mile		0.070%	0.055%	0.029%	0.023%	0.035%
	*An additional fatality in November 2015 was not included in ITD's data for Highway 13					

ATTACHMENT 2

Evaluation of US-95,

Milepoint 63.051 to Milepoint 240.273

Department of Motor Vehicles (DMV) Review

All Idaho Transportation Department routes are currently categorized by their ability to handle various extra-length vehicle combinations and their off-tracking allowances. The categories used when considering allowing vehicle combinations to carry increased axle weights above 105,500 pounds and up to 129,000 pounds are:

- Blue routes at 95 foot overall vehicle length and a 5.50-foot off-track
- Red routes at 115 foot overall vehicle length and a 6.50-foot off-track.

Off-tracking is the turning radius of the vehicle combination, which assists in keeping them safely in their lane of travel. Off-tracking occurs because the rear wheels of trailer trucks do not pivot, and therefore will not follow the same path as the front wheels. The greater the distance between the front wheels and the rear wheels of the vehicle, the greater the amount of off-track. **The DMV confirms that the requested routes fall under one of the above categories and meet all length and off-tracking requirements for that route.**

Bridge Review

Bridges on all publicly owned routes in Idaho are inspected every two years at a minimum to ensure they can safely accommodate vehicles. A variety of inspections may be performed including routine inspections, in-depth inspections, underwater inspections, and complex bridge inspections. All are done to track the current condition of a bridge and make repairs if needed.

When determining the truck-carrying capacity of a bridge, consideration is given to the types of vehicles that routinely use the bridge and the condition of the bridge. Load limits may be placed on a bridge if, through engineering analysis, it is determined the bridge cannot carry legal truck loads.

ITD Bridge Asset Management has reviewed the fifty-six bridges pertaining to this request and has determined they will safely support the 129,000-pound truck load, provided the truck's axle configuration conforms to legal requirements. To review load rating data for each of the bridges, see the Bridge Data chart below.

ITD District 3 Review US-95 M.P. 63.051 to 182.415

This segment has been evaluated and the District recommends proceeding.

General: The requested route is a portion of US Highway 95, running from Fruitland (Milepost 63) to Lewiston (Milepost 241), with acknowledgement that the portion from Grangeville to Lewiston was previously approved.

The scope of this review is the District 3 limits of the requested route from the south city limits of Fruitland (Milepoint 63.051) to the District 2/3 border at the Idaho County Line (Milepoint 182.415).

This request would extend the 129,000lb limits on US-95 in District 3 from those previously approved between Marsing (Milepoint 26.262) and Fruitland (Milepoint 63.051) to the District 2/3 border (Milepoint 182.415).

The requested roadway in District 3 is generally in good condition with 12 foot lanes and 2-6 foot paved shoulders. There are some deficient pavement areas between Fruitland and Weiser. CAADT is rated as heavy. This route is primarily posted at 65 mph with speed zones of 35 and 25 mph through Fruitland, Weiser, Cambridge, Council and New Meadows.

There are four significant grades on the District 3 portion of this route:

- MP 94.9 to 97.7 with a passing lane northbound and no chain up area;
- MP 98.5 to 102.66 with a passing lane southbound and no chain up area;
- MP 140.0 to 145.0 with short passing lanes and chain up areas in both directions; and
- MP 171.8 to 174.4 with no passing lanes or chain up areas.

There are four 90-degree corners on the District 3 portion of this route:

- MP 113.393 in Cambridge;
- MP 135.778 in Council;
- MP 136.056 in Council; and
- MP 156.047 in New Meadows.

The two 90-degree corners in Council are very tight, and limit offtracking ability for trucks, but they will be eliminated by a realignment project that will start construction in 2016.

There are roadway geometric challenges between Mileposts 172 and 174 due to narrow shoulders, tight curves, and rock slopes that limit offtracking opportunity for large truck combinations, but they will be remediated by a project that will start construction in 2016.

It is District 3's understanding that all truck combinations will be restricted to extra-length "blue" route truck length and offtracking limits between Council and the District 2/3 border until such time as the planned improvements that start construction in 2016 are completed. This "blue" route designation limits allowable truck combinations to 95 feet overall and 5.5 feet of offtracking, which is likely to constrain the maximum permittable gross loads to something less than 129,000 lbs.

TAMS data included below shows pavement conditions and high accident locations. There were pavement rehabilitation projects between Weiser and New Meadows in 2014 that are not reflected on the TAMS report.

Updates: US-95 received plant mix overlays from mile post 87.523 to 108.900, CRABS projects from milepost 113.800 to 123.400 in 2014.

Operations field review: The route begins in Fruitland at M.P. 63.051 and carries through to M.P. 182.415 and is controlled by two ITD Maintenance Foremen. This route is a Blue route which requires vehicles over 95 feet in total length or more than 5.5 feet of off tracking to obtain an over legal permit before traveling the route. D3 has projects programmed to improve the route and bring it up to a red route (115 total length and 6.5 feet of off tracking) but these improvements are not scheduled to start until 2016.

The foreman of New Meadows (mp 113.000 to 182.415) had the following concerns; "My concerns are the off-tracking through the narrow canyons, and poor sub base through all of my area, except MP 176.6 – 182.4, will cause premature pavement failure."

The New Plymouth Foreman (mp 63.051 to 113.00) has not weighed in yet.

Safety: The District 3 portion of the corridor has two Non-Interstate High Accident Location (HAL) Clusters which are shown in the table below and ranked both by State and District. There are no High Accident Location (HAL) Intersections ranked in the top 100 for the State or District on the District 3 portion of the route.

Based on this information, the addition of the 129,000 pound capacity tractor trailer combinations should not have a significant impact on safety.

Table of HAL Segments US-95:

Crashes	State Rank	District Rank	Route	Segment Code	Milepost Range	Length (miles)	County	Project
6	55	15	95	001540	173.459–173.959	0.500	Adams	*1
4	93	23	95	001540	95.605 – 96.105	0.500	Washington	*2

Notes: *1 - Included in 2016 project limits, which will incorporate and consider HAL data for this segment.

*2 - No project proposed at this time.

Accident Data US 95

Crashes and Fatalities on US 95 between MP 63.05 & 182.4

	2009	2010	2011	2012	2013	Total
Crashes	151	169	112	109	78	619
Fatalities	9	2	2	2	4	19

Public Concerns: District 3 will be meeting with local officials along the route in the near future to provide an explanation of the permitting process for the 129,000 loads including the opportunity to present questions/concerns at a hearing to be scheduled in the future.

There are no local road segments in this request that fall within District 3.

Truck Ramps:

No runaway truck ramps exist on the District 3 portion of the route.

Port of Entry: The main issue for POE might be the existing roving POE sites on US95. 129K combinations will tend to be longer than the typical ones we see on US95. A survey of the existing sites to evaluate space and traffic concerns might be a good idea. Much of this would depend on how much traffic we can expect to see. For instance, our site just north of Weiser is fairly roomy for what we look at now, but could fill up quickly if we had to park some of the larger combinations. Council is another one that should be looked at to see if pulling northbound traffic (involves a left turn in and out of the site) with the bigger combinations might be an issue.

Tams Pavement Condition Data:

Year	Route	Milepost From	Milepost To	Length	Pavement	Deficient	Functional Class	Deficient Reason	CI	RI	Rut Average (in)	Condition State	AADT	CAADT	Speed Limit
2013	US095	61 078	63 800	2.722	Flexible	Yes	Rural Principal Arterial	RI	3 2	2 42	0 39	Poor	10678	466	65
2013	US095	64 000	65 037	1 037	Flexible	Yes	Rural Principal Arterial	RI	3 5	2 42	0 48	Poor	13599	502	45
2013	US095	65 037	65 696	0 659	Flexible	No	Rural Principal Arterial	None	5	3 01	0 12	Good	17000	675	35
2013	US095	65 696	66 040	0 344	Flexible	No	Rural Principal Arterial	None	5	3 08	0 14	Good	17000	620	55
2013	US095	65 696	66 040	0 344	Flexible	No	Rural Principal Arterial	None	5	2 64	0 22	Fair	17000	620	55
2013	US095	66 040	66 574	0 527	Rigid	No	Urban Principal Arterial	None	5	2 81	0 11	Fair	17000	620	45
2013	US095	66 040	66 574	0 527	Rigid	Yes	Urban Principal Arterial	RI	5	2 42	0 16	Poor	17000	620	45
2013	US095	66 574	66 953	0 379	Flexible	No	Urban Principal Arterial	None	4 8	3 29	0 16	Good	17000	620	55
2013	US095	66 953	67 142	0 189	Flexible	No	Urban Principal Arterial	None	5	2 82	0 16	Fair	17000	620	55
2013	US095	67 142	68 932	1 790	Flexible	No	Urban Principal Arterial	None	5	2 87	0 16	Fair	11881	519	65
2013	US095	68 932	69 472	0 540	Rigid	No	Urban Principal Arterial	None	5	3 33	0 23	Good	8472	456	45
2013	US095	68 932	69 472	0 540	Rigid	No	Urban Principal Arterial	None	5	3 38	0 15	Good	8472	456	45
2013	US095	69 472	70 280	0 808	Flexible	No	Urban Principal Arterial	None	2 4	3 56	0 15	Good	6109	454	65
2013	US095	70 280	80 225	9 945	Flexible	Yes	Urban Principal Arterial	CI	2 4	2 88	0 49	Poor	4973	612	65
2013	US095	80 225	81 420	1 195	Flexible	Yes	Urban Principal Arterial	RI	2 6	2 30	0 26	Poor	5536	553	65
2013	US095	81 420	81 752	0 332	Flexible	No	Urban Principal Arterial	None	5	1 85	0 14	Good	7100	500	35
2013	US095	81 752	81 995	0 243	Flexible	No	Urban Principal Arterial	None	5	2 92	0 17	Fair	7300	570	35
2013	US095	81 995	83 002	1 007	Flexible	No	Urban Principal Arterial	None	5	3 20	0 17	Good	4488	518	35
2013	US095	83 872	85 740	1 868	Flexible	No	Urban Principal Arterial	None	4 8	3 49	0 18	Good	3200	510	65
2013	US095	85 740	86 606	0 866	Flexible	No	Rural Principal Arterial	None	4 8	3 71	0 16	Good	3200	510	65
2013	US095	87 623	88 300	0 777	Flexible	No	Rural Principal Arterial	None	3	3 16	0 19	Good	3200	510	65
2013	US095	88 300	89 500	1 200	Flexible	No	Rural Principal Arterial	None	2 4	3 24	0 12	Good	2864	460	65
2013	US095	89 500	91 176	1 676	Flexible	No	Rural Principal Arterial	None	3	3 13	0 21	Good	2745	428	65
2013	US095	91 176	94 759	3 583	Flexible	No	Rural Principal Arterial	None	5	3 16	0 11	Good	2759	381	65
2013	US095	94 759	95 000	0 241	Flexible	No	Rural Principal Arterial	None	5	2 88	0 12	Fair	2800	380	65
2013	US095	95 000	97 290	2 290	Flexible	No	Rural Principal Arterial	None	5	3 68	0 07	Good	2323	360	65
2013	US095	97 290	100 000	2 710	Flexible	No	Rural Principal Arterial	None	5	4 08	0 06	Good	2300	387	65
2013	US095	100 000	102 500	2 500	Flexible	No	Rural Principal Arterial	None	5	4 19	0 07	Good	2300	490	65
2013	US095	102 500	104 800	2 300	Flexible	No	Rural Principal Arterial	None	5	3.44	0 13	Good	2330	428	65
2013	US095	104 800	108 900	4 100	Flexible	No	Rural Principal Arterial	None	5	3.29	0 16	Good	2495	488	65
2013	US095	108 900	111 500	2 600	Flexible	No	Rural Principal Arterial	None	4 8	2 59	0 27	Fair	2500	490	65
2013	US095	111 500	112 977	1 477	Flexible	No	Rural Principal Arterial	None	3 5	2 60	0 11	Fair	2418	471	65
2013	US095	112 977	113 393	0 416	Flexible	Yes	Rural Principal Arterial	RI	3 5	2 18	0 14	Poor	2611	420	25
2013	US095	113 393	113 770	0 377	Flexible	Yes	Rural Principal Arterial	RI	3 5	2 12	0 24	Poor	2300	420	45
2013	US095	113 770	123 380	9 610	Flexible	No	Rural Principal Arterial	None	5	3 55	0 08	Good	1928	402	65
2013	US095	123 380	126 800	3 420	Flexible	No	Rural Principal Arterial	None	4 8	2 89	0 14	Fair	1914	400	65
2013	US095	126 800	127 600	0 800	Flexible	No	Rural Principal Arterial	None	4 8	2 91	0 15	Fair	1900	400	65
2013	US095	127 600	129 500	1 900	Flexible	No	Rural Principal Arterial	None	4 8	2 87	0 17	Fair	1900	397	65
2013	US095	129 500	130 100	0 600	Flexible	Yes	Rural Principal Arterial	RI	4 8	2 39	0 22	Poor	1938	374	65
2013	US095	130 100	130 930	0 830	Flexible	No	Rural Principal Arterial	None	4 8	2 55	0 23	Fair	2000	380	65
2013	US095	131 820	135 090	3 270	Flexible	No	Rural Principal Arterial	None	4	2 68	0 19	Fair	2050	374	65
2013	US095	135 090	135 810	0 720	Flexible	Yes	Rural Principal Arterial	RI	3	1 96	0 25	Very Poor	2243	370	25
2013	US095	135 810	145 050	9 240	Flexible	No	Rural Principal Arterial	None	3 5	2 50	0 27	Fair	1785	339	55
2013	US095	145 050	154 100	9 050	Flexible	No	Rural Principal Arterial	None	4	2 75	0 19	Fair	1600	330	55
2013	US095	154 100	160 930	6 830	Flexible	No	Rural Principal Arterial	None	4 3	3 02	0 28	Fair	1632	349	65
2013	US095	156 047	156 052	0 005	Flexible	Yes	Rural Principal Arterial	RI	3	1 69	0 19	Very Poor	2000	170	45
2013	US095	160 930	160 934	0 004	Flexible	Yes	Rural Principal Arterial	RI	4 5	1 54	0 22	Very Poor	2700	410	65
2013	US095	160 952	170 726	9 774	Flexible	No	Rural Principal Arterial	None	4 5	2 71	0 12	Fair	1961	402	65
2013	US095	170 726	171 136	0 410	Flexible	No	Rural Principal Arterial	None	5	3 03	0 10	Good	1900	410	65
2013	US095	171 136	171 926	0 790	Flexible	No	Rural Principal Arterial	None	4 8	2 58	0 14	Fair	1900	410	65
2013	US095	171 926	174 550	2 624	Flexible	No	Rural Principal Arterial	None	5	3 17	0 12	Good	1703	440	55
2013	US095	174 550	176 600	2 050	Flexible	No	Rural Principal Arterial	None	5	3.26	0 10	Good	1715	440	65
2013	US095	176 600	178 476	1 876	Flexible	No	Rural Principal Arterial	None	4 8	3 10	0 16	Good	2100	450	55
2013	US095	178 503	181 354	2 851	Flexible	No	Rural Principal Arterial	None	5	3 29	0 17	Good	2100	450	55
2013	US095	181 354	182 415	1 061	Flexible	No	Rural Principal Arterial	None	5	3 52	0 21	Good	2100	450	55

ITD District 2 Review for adding US-95 M.P. 182.415 to 240.273

This segment has been evaluated and the District recommends proceeding.

General: The roadway is in good condition with 12 foot lanes and 2-6 foot paved shoulders. CAADT is rated as heavy. The roadway is not deficient. This route is primarily posted at 65mph with one segment post at 55/50mph from M.P. 189.867 to 193.896, one segment posted 45/35/25 mph from M.P. 193.896 to 197.621 through Riggins, Idaho and one segment posted 45/35 mph from M.P. 239.382 to 240.257 in Grangeville, Idaho. This request ends in Grangeville at M.P. 240.273. A previous 129,000 pound request from Baker Trucking begins where this request ends at M.P. 240.273 and proceeds on through to Lewiston which is Lott's ultimate destination. Limitation on travel time is not warranted. Spring breakup limits would not pertain to this section. Adequate locations to chain-up exist. TAMS data is included as an excel spreadsheet see table on page 3.

Updates: All projects presented are on US-95 with descriptions, location and year noted. A grind and inlay project was completed recently in the summer of 2014 from M.P. 231.036 to 234.017. Future projects scheduled are: the Pollock Road Turnbay project at M.P. 186.216 (FY16), Race Creek Bridge replacement and curve improvement (allows for off tracking of 6.5 feet or less) (FY15), M.P. 196.729, Time Zone Bridge (Goff) Epoxy Overlay and Maintenance Repair M.P. 197.34 (FY16), the John Day Creek Silica Fume Bridge Deck M.P. 208.488, the Whitebird Hill Passing Lane M.P. 230.3 to 230.8 (FY17) and a pavement preservation project from M.P. 239.539 to 242.010 (FY17).

Operations field review: The route begins in District 2 at M.P. 182.415 and carries through to M.P. 240.273 in Grangeville at Pine Street and is controlled by one foreman. The foremen for this route reported no concerns with the route stating that from an operation/maintenance standpoint it is in good condition.

Safety:

This corridor has seven High Accident Location (HAL) non-interstate segments which are shown in the table below and ranked both by State and District. Analyses of five years' worth of accident data beginning in 2009 show there were a total of 234 accidents involving 282 units. There were 85 injury accidents and 5 fatal accidents. Of the total accidents, there were 25 truck related accidents for this section of highway. Of the 25 truck accidents, 12 of them involved a truck and a passenger vehicle. Breaking this further down shows that of the 12 truck and passenger vehicles, there were 3 of these in which the truck was at fault and 9 where the passenger vehicle was at fault. The truck caused accidents were attributed to Following-Too-

Close and Failure-to-Secure-Load. The crash rate in this section is 42% lower than the average of similar sections of roadway. Accident data is summarized in a table below.

Based on this information, the addition of the 129,000 pound capacity tractor trailer combinations should not have a significant impact on safety.

Table of HAL Segments US-95

Line #	State Rank	District Rank	Route	Segment Code	Milepost Range	Length (in miles)	County	Project
1	72	11	95	001540	197.752 – 198.252	0.500	Idaho	NAT
2	90	15	95	001540	234.838 – 235.338	0.500	Idaho	NAT
3	106	19	95	001540	230.090 – 231.090	1.000	Idaho	*
4	140.5	28	95	001540	207.752 – 208.252	0.500	Idaho	NAT
5	158	33	95	001540	190.626 – 191.126	0.500	Idaho	NAT
6	181	36	95	001540	196.189 – 196.689	0.500	Idaho	*
7	183	38	95	001540	239.782 – 240.262	0.480	Idaho	*

*Note: 3) Whitebird Hill passing lane, 6) Race Creek, 7) W. South 1st to Johnston Road. These improvements proposed for the ITIP would incorporate and consider HAL data for this segment.

NAT: Denotes No project proposed at this Time.

Accident Data US-95

US-95 MP 182.415 to 240.262						
	2009	2010	2011	2012	2013	Total
Number of Crashes	23	36	40	64	71	234
Number of Fatalaties	0	2	0	0	3	5

Public Concerns: Riggins: US-95 is the only route through Riggins. The posted speed through Riggins is 25mph. ITD District 2 personnel met with City personnel, on September 18, 2014, to discuss the proposal by Arlo Lott. District 2 provided an explanation of the permitting process for the 129,000 loads including the opportunity to present questions/concerns at a hearing to be scheduled in the future. Initial and potential concerns, from the City, were whether the loads would be hauling hazardous materials and protection to the river.

Truck Ramps:

Northside Whitebird Hill Grade: No truck ramps exist on the north side of Whitebird Hill which extends from M.P. 231.438 to 234.052. The District is unaware of any runaway trucks in the past on this section.

Southside Whitebird Hill Grade: There are three truck ramps that exist along this route located on the south side of Whitebird Hill Grade. They are adjacent to the highway and positioned for use by southbound traffic. These ramps are located in the order they would appear to a southbound truck as it descended the grade: Ramp #1) M.P. 229.617, Ramp #2) M.P. 227.255 and Ramp #3) M.P. 224.606. Ramp #3 is the most utilized ramp. Ramps #1 or #2 are seldom if ever used.

<u>Port of Entry:</u> The POE has been contacted and has reported there are adequate locations along the route to monitor commercial vehicle compliance.

TAMS Data

Year	Route	BMP	EMP	Length	Pavement Type	Deficient (Y/N)	Functional Class	Deficient Reason	CI	RI	Rut Ave (in)	Condition State	AADT	CAADT	Speed Limit
2013	US095	182.415	188.500	6.085	Flexible	No	Rural Principal Arterial	None	4.8	3.36	0.27	Fair	2100	450	65
2013	US095	188.500	194.600	6.100	Flexible	No	Rural Principal Arterial	None	4.8	3.14	0.29	Fair	2050	448	55
2013	US095	194.600	196.100	1.500	Flexible	No	Rural Principal Arterial	None	4.5	2.85	0.36	Fair	2397	348	25
2013	US095	196.100	197.300	1.200	Flexible	Yes	Rural Principal Arterial	RI	3	2.37	0.32	Poor	1977	388	45
2013	US095	197.300	197.630	0.330	Flexible	Yes	Rural Principal Arterial	RI	3	2.33	0.24	Poor	1900	400	65
2013	US095	197.630	203.750	6.120	Flexible	Yes	Rural Principal Arterial	CI	2.4	3.48	0.26	Poor	1900	400	65
2013	US095	203.750	210.035	6.285	Flexible	Yes	Rural Principal Arterial	CI	2.2	3.59	0.25	Poor	1900	400	65
2013	US095	210.035	210.565	0.530	Flexible	No	Rural Principal Arterial	None	4.8	3.52	0.18	Good	1900	400	65
2013	US095	210.565	213.600	3.035	Flexible	No	Rural Principal Arterial	None	4.8	3.44	0.29	Fair	1900	400	65
2013	US095	213.600	218.376	4.776	Flexible	No	Rural Principal Arterial	None	3.8	3.03	0.41	Fair	1900	341	65
2013	US095	218.376	219.200	0.824	Flexible	No	Rural Principal Arterial	None	3.8	3.45	0.42	Fair	1900	340	65
2013	US095	219.240	222.367	3.127	Flexible	No	Rural Principal Arterial	None	4.8	4.12	0.20	Good	1995	340	65
2013	US095	222.367	223.347	0.980	Flexible	No	Rural Principal Arterial	None	5	3.99	0.23	Good	2000	340	65
2013	US095	223.347	223.800	0.453	Flexible	No	Rural Principal Arterial	None	4.8	2.86	0.15	Fair	2093	340	65
2013	US095	223.800	231.467	7.667	Flexible	No	Rural Principal Arterial	None	3.5	2.73	0.26	Fair	2200	340	65
2013	US095	231.467	234.020	2.553	Flexible	No	Rural Principal Arterial	None	2.7	3.42	0.11	Fair	2200	340	65
2013	US095	234.020	234.338	0.318	Flexible	No	Rural Principal Arterial	None	2.7	3.81	0.10	Fair	2200	340	65
2013	US095	234.338	239.539	5.201	Flexible	No	Rural Principal Arterial	None	4.8	3.99	0.14	Good	2251	444	65
2013	US095	239.539	242.010	2.471	Flexible	Yes	Rural Principal Arterial	CI	2.3	2.89	0.37	Poor	3820	537	65

Bridge Data

129,000-Pound Truck Route Request

Route Number:	US 95
Department:	Bridge Asset Management
Date:	9/11/2014
From:	Fruitland, ID
Milepost:	69
To:	Grangeville, ID
Milepost:	241

Highway Number	Milepost Marker	Bridge Key	121 Rating* (lbs)
95	66.19	18110	212,000
95	67.30	18115	290,000
95	81.01	18120	290,000
95	81.53	18126	348,000
95	82.30	18130	420,000
95	82.85	18134	308,000
95	88.33	18141	342,000
95	99.57	18146	256,000
95	103.50	18150	278,000
95	104.13	18155	278,000
95	108.54	18161	316,000
95	112.56	18165	156,000
95	112.85	18170	196,000
95	113.50	18175	202,000
95	113.77	18180	268,000
95	118.85	18185	910,000
95	120.81	18190	198,000
95	121.60	18195	320,000
95	129.75	18200	194,000
95	132.00	18205	160,000
95	132.76	18210	186,000
95	133.91	18215	230,000
95	133.42	18220	188,000
95	138.52	18225	266,000
95	145.80	18230	158,000
95	154.10	18235	148,000
95	155.57	18240	1,934,000
95	157.47	18240	178,000
95	160.25	18245	162,000
95	161.50	18250	186,000
95	162.65	18255	212,000
95	163.90	18258	OK EI
95	171.91	18260	230,000
95	174.11	18265	268,000
95	176.55	18270	138,000
95	177.02	18275	198,000
95	178.35	18278	222,000
95	179.96	18281	238,000
95	182.40	18285	196,000
95	183.00	18290	216,000
95	185.40	18295	282,000
95	186.04	18300	196,000
95	186.65	18305	432,000
95	189.90	18310	242,000
95	191.15	18315	242,000
95	194.12	18320	268,000
95	196.73	18325	170,000
95	197.34	18331	304,000
95	200.53	18335	OK EI
95	208.48	18340	222,000
95	214.36	18345	218,000
95	215.98	18350	138,000
95	216.30	18355	182,000
95	219.08	18360	272,000
95	221.02	18365	OK EI
95	223.06	18368	270,000

*: The bridge is adequate if it has a rating value greater than 121,000 pounds or is designated as "OK EI" (okay by engineering judgment).

ATTACHMENT 3

Evaluation of U.S. 12, Milepost 3 to Milepost 1.49

Department of Motor Vehicles (DMV) Review

All Idaho Transportation Department routes are currently categorized by their ability to handle various extra-length vehicle combinations and their off-tracking allowances. The categories when considering allowing vehicle combinations to carry increased axle weights above 105,500 pounds and up to 129,000 pounds are:

- Blue routes at 95 foot overall vehicle length and a 5.50 ft off-track
- Red routes at 115 foot overall vehicle length and a 6.50 ft off-track.

Off-tracking is the turning radius of the vehicle combination, which assists in keeping them safely in their lane of travel. Off-tracking occurs because the rear wheels of trailer trucks do not pivot, and therefore will not follow the same path as the front wheels. The greater the distance between the front wheels and the rear wheels of the vehicle, the greater the amount of off-track. The DMV confirms that the requested routes fall under one of the above categories and meet all length and off-tracking requirements for that route.

Bridge Review

Bridges on all publicly owned routes in Idaho are inspected every two years at a minimum to ensure they can safely accommodate vehicles. A variety of inspections may be performed including routine inspections, in-depth inspections, underwater inspections, and complex bridge inspections. All are done to track the current condition of a bridge and make repairs if needed.

When determining the truck carrying capacity of a bridge, consideration is given to the types of vehicles that routinely use the bridge and the condition of the bridge. Load limits may be placed on a bridge if, through engineering analysis, it is determined that the bridge cannot carry legal truck loads.

ITD Bridge Asset Management has reviewed the bridges pertaining to this request and has determined that they will safely support the 129,000-pound truck load, provided the truck's axle configuration conforms to legal requirements. To review load rating data for each of the bridges, see the Bridge Data section.

ITD District 2 Review

This segment has been evaluated and the District recommends proceeding.

Tams data is included. Please see the summary on the last page.

General: U.S. 12 and U.S. 95 overlap for the majority of this section. The roadway consists of a divided highway with two 12-foot lanes with 2- to 8-foot shoulders. Commercial Annual Average Daily Traffic is relatively heavy. The roadway is not deficient. This is a 65 mile-per-hour route, slowing to 45 miles per hour at Milepost 311.5 and then to 35 miles per hour at Milepost 2.712 on U.S. 12 and continues at that rate into Lewiston. Limitation on travel time is not warranted. Spring breakup limits would not pertain to

this section. There are adequate locations to chain-up. However, due to weather conditions, chains are unlikely to be required.

Updates: There are no projects currently planned for this section in the approved ITIP.

Operations field review: The route begins at the U.S. 12/U.S. 95 interchange and precedes west/north into Lewiston. One foreman manages this section and reported no concerns with the route, stating that from an operation/maintenance standpoint it is in good condition.

Truck Ramps: There are no truck ramps along this roadway section. Due to the flat topography, truck ramps would not be required.

Port of Entry: The Port of Entry has been contacted regarding this route request. This route passes directly by the Lewiston Port of Entry, which monitors for commercial vehicle compliance.

Bridge Data:

Route Number: U.S. 12
Department: Bridge Asset Management
Date: 4/22/2014

Route		
	From:	Lewiston, ID
	Milepost:	0
	To:	Lewiston, ID
	Milepost:	2

Highway Number	Milepost Marker	Bridge Key	121 Rating[a] (lbs)
12	1.94	10375	142,000

[a]: The bridge is adequate if it has a rating value greater than 129,000 pounds or is designated as "OK EJ" (okay by engineering judgment).

Crash Data:

US 12 - MP 1.68 to 3.29

	2005	2006	2007	2008	2009	2010	2011	2012	2013	TOTAL
Number of Crashes	14	20	8	19	8	15	16	15	18	133
Number of Fatalaties	0	0	0	1	0	0	0	0	0	1

TAMS Data:

Year	Route	BMP	EMP	Length	Pavement Type	Deficient (Y/N)	Functional Class	Deficient Reason	Condition State	AADT	CAADT	Speed Limit
2013	US012	1.680	1.935	0.255	Flexible	No	Urban Principal Arteria	None	Good	21824	1724	35
2013	US012	1.935	2.602	0.667	Rigid	No	Urban Principal Arteria	None	Good	24652	1877	35
2013	US012	2.602	2.831	0.229	Flexible	No	Urban Principal Arteria	None	Good	22607	1861	45
2013	US012	2.831	3.140	0.309	Flexible	No	Urban Principal Arteria	None	Good	6800	570	45
2013	US012	1.680	1.935	0.255	Flexible	No	Urban Principal Arteria	None	Good	21824	1724	35
2013	US012	1.935	2.602	0.667	Rigid	No	Urban Principal Arteria	None	Good	24652	1877	35
2013	US012	2.602	2.831	0.229	Flexible	No	Urban Principal Arteria	None	Good	22607	1861	35
2013	US012 Main Couplet	2.831	3.290	0.459	Flexible	No	Urban Principal Arteria	None	Good	8500	330	45

ATTACHMENT 4

Evaluation of U.S. 95, Milepost 240.27 to Milepost 312.0

Department of Motor Vehicles (DMV) Review

All Idaho Transportation Department routes are currently categorized by their ability to handle various extra-length vehicle combinations and their off-tracking allowances. The categories used when considering allowing vehicle combinations to carry increased axle weights above 105,500 pounds and up to 129,000 pounds are:

- Blue routes at 95 foot overall vehicle length and a 5.50-foot off-track
- Red routes at 115 foot overall vehicle length and a 6.50-foot off-track.

Off-tracking is the turning radius of the vehicle combination, which assists in keeping them safely in their lane of travel. Off-tracking occurs because the rear wheels of trailer trucks do not pivot, and therefore will not follow the same path as the front wheels. The greater the distance between the front wheels and the rear wheels of the vehicle, the greater the amount of off-track. The DMV confirms that the requested routes fall under one of the above categories and meet all length and off-tracking requirements for that route.

Bridge Review

Bridges on all publicly owned routes in Idaho are inspected every two years at a minimum to ensure they can safely accommodate vehicles. A variety of inspections may be performed including routine inspections, in-depth inspections, underwater inspections, and complex bridge inspections. All are done to track the current condition of a bridge and make repairs if needed.

When determining the truck carrying capacity of a bridge, consideration is given to the types of vehicles that routinely use the bridge and the condition of the bridge. Load limits may be placed on a bridge if, through engineering analysis, it is determined that the bridge cannot carry legal truck loads.

ITD Bridge Asset Management has reviewed the bridges pertaining to this request and has determined they will safely support the 129,000-pound truck load, provided the truck's axle configuration conforms to legal requirements. To review load rating data for each of the bridges, see the Bridge Data section below.

ITD District 2 Review

This segment has been evaluated. The District recommends proceeding.

Tams data is included as an excel sheet. Please see the summary on the last page.

General: The roadway is in good condition with 12-foot lanes and 2-6 foot paved shoulders. The Commercial Annual Average Daily Traffic (CAADT) is relatively moderate. The roadway is not deficient. This is primarily a 65 mile-per-hour route with one 35 mile per hour, two 45 mile per hour and two 55

mile per hour speed zones. The 35 mph zone resides within Grangeville at Pine Street (Milepost 240.273), followed by a 45 mph zone at Milepost 239.91. The other 45 mph zone is located at the City of Lapwai city limits at Milepost 299.0 and Milepost 300.0. The 55 mph zones are transitional speed limits from 65 mph and reside outside the Lapwai city limits at Milepost 298.6, 299.0, 300.0 and 300.7. Limitations on travel time aren't warranted. Spring breakup limits would not pertain to this section. Adequate locations for chain-up exist.

Updates: Repair of concrete slabs to the concrete section Milepost 251 to Milepost 261 occurred in FY13 along with the replacement and widening of seven bridges in Culdesac Canyon from Milepost 286.0 to Milepost 289.2. Future projects scheduled: CRABS from Milepost 239.5 – Milepost 242.40 FY18, Mill, an overlay from Milepost 263.8 – Milepost 267.4 and an inlay from Milepost 312.5 to Milepost 317.4 for the summer of 2014.

Operations field review: The route begins at Pine Street at Milepost 240.273 in Grangeville near Baker Truck Service's dispatch center. The bulk of the shipments are anticipated to be originating from the Idaho Forest Group's lumber mill on the north end of Grangeville at Milepost 240.5. This section is shared by three foreman areas. The foremen for this route reported no concerns with the route, stating that from an operation/maintenance standpoint, it is in good condition.

Port of Entry: Port of Entry staff said there are adequate locations along the route to monitor commercial vehicle compliance.

Crash Data:

US 95 - MP 239.5 to 304.7

	2005	2006	2007	2008	2009	2010	2011	2012	2013	TOTAL
Number of Crashes	68	50	70	73	63	60	96	62	74	616
Number of Fatalaties	3	0	1	2	6	3	1	0	0	16

Bridge Data:

Route Number: U.S. 95
Department: Bridge Asset Management
Date: 4/22/2014

Route		
	From:	Grangeville, ID
	Milepost:	241
	To:	Lewiston, ID
	Milepost:	312

Highway Number	Milepost Marker	Bridge Key	121 Rating[a] (lbs)
95	252.45	18367	OK EJ
95	254.30	18369	OK EJ

95	267.44	18386	250,000
95	269.93	18388	OK EJ
95	270.50	18402	OK EJ
95	279.60	33100	OK EJ
95	279.85	33105	OK EJ
95	280.05	33110	OK EJ
95	280.48	33115	OK EJ
95	280.65	33120	OK EJ
95	280.85	33125	OK EJ
95	281.04	33130	OK EJ
95	281.31	33135	OK EJ
95	281.52	33140	OK EJ
95	281.82	33145	OK EJ
95	282.61	33150	OK EJ
95	282.75	33155	OK EJ
95	283.14	33160	OK EJ
95	285.79	33165	OK EJ
95	286.13	18411	244,000
95	287.26	18416	246,000
95	287.61	18421	246,000
95	287.80	18426	244,000
95	288.13	18431	244,000
95	288.48	18436	244,000
95	289.21	18441	244,000
95	293.68	18446	268,000
95	297.26	18451	386,000
95	301.03	18455	226,000
95	302.46	18460	226,000
95	304.09	18465	196,000
95	304.49	18470	184,000
95	307.89	18475	886,000

[a]: The bridge is adequate if it has a rating value greater than 129,000 pounds or is designated as "OK EJ" (okay by engineering judgment).

Tams Data

Year	Route	BMP	EMP	Length	Pavement Type	Deficient	Functional Class	Deficient Reason	Cracking Index	Condition	AADT	CAADT	Speed Limit
2013	US095	239.539	242.010	2.471	Flexible	Yes	Rural Principal Arterial	CI	2.3	Poor	3820	537	65
2013	US095	242.010	248.400	6.390	Flexible	No	Rural Principal Arterial	None	4.8	Good	2963	421	65
2013	US095	248.400	249.400	1.000	Flexible	No	Rural Principal Arterial	None	4.8	Good	2900	440	65
2013	US095	249.400	251.100	1.700	Flexible	No	Rural Principal Arterial	None	4.8	Good	2900	440	65
2013	US095	251.100	251.639	0.539	Rigid	No	Rural Principal Arterial	None	3.4	Good	2900	440	65
2013	US095	251.639	251.914	0.275	Rigid	No	Rural Principal Arterial	None	3.4	Good	2900	440	65
2013	US095	251.914	252.485	0.571	Rigid	No	Rural Principal Arterial	None	3.4	Good	2887	445	65
2013	US095	252.485	258.400	5.915	Rigid	No	Rural Principal Arterial	None	3.7	Good	2903	519	65
2013	US095	258.400	259.000	0.600	Rigid	No	Rural Principal Arterial	None	4	Good	3100	450	65
2013	US095	259.000	259.400	0.400	Rigid	No	Rural Principal Arterial	None	4	Good	3100	450	65
2013	US095	259.400	260.051	0.651	Rigid	No	Rural Principal Arterial	None	4	Good	3100	450	65
2013	US095	260.051	261.588	1.537	Rigid	No	Rural Principal Arterial	None	4	Good	3100	450	65
2013	US095	263.825	266.102	2.277	Flexible	No	Rural Principal Arterial	None	4	Fair	2900	450	65
2013	US095	266.102	267.437	1.335	Flexible	Yes	Rural Principal Arterial	CI	2.4	Poor	2890	450	65
2013	US095	267.437	269.648	2.211	Flexible	No	Rural Principal Arterial	None	4.5	Good	2800	450	65
2013	US095	269.648	273.735	4.087	Flexible	No	Rural Principal Arterial	None	4.3	Good	2800	450	65
2013	US095	273.735	273.900	0.165	Flexible	No	Rural Principal Arterial	None	5	Good	3500	520	65
2013	US095	273.900	279.300	5.400	Flexible	No	Rural Principal Arterial	None	4.8	Good	3296	489	65
2013	US095	279.300	279.800	0.500	Flexible	No	Rural Principal Arterial	None	4.8	Good	2960	464	65
2013	US095	279.800	282.100	2.300	Flexible	No	Rural Principal Arterial	None	4.3	Good	2900	470	65
2013	US095	282.100	282.600	0.500	Flexible	No	Rural Principal Arterial	None	5	Good	2900	470	65
2013	US095	282.600	283.200	0.600	Flexible	No	Rural Principal Arterial	None	4.8	Good	2900	470	65
2013	US095	283.200	283.700	0.500	Flexible	No	Rural Principal Arterial	None	4.8	Good	2900	470	65
2013	US095	283.700	290.378	6.678	Flexible	No	Rural Principal Arterial	None	4.8	Good	2900	470	65
2013	US095	290.378	291.400	1.022	Flexible	No	Rural Principal Arterial	None	4.8	Good	3033	470	65
2013	US095	291.400	297.100	5.700	Flexible	No	Rural Principal Arterial	None	2.7	Fair	3429	470	65
2013	US095	297.100	300.090	2.990	Flexible	No	Rural Principal Arterial	None	2.7	Fair	4045	597	65
2013	US095	300.090	304.090	4.000	Flexible	No	Rural Principal Arterial	None	5	Good	5159	648	65
2013	US095	304.090	304.715	0.625	Flexible	No	Rural Principal Arterial	None	5	Fair	8164	962	65
2013	US095	337.668	338.500	0.832	Flexible	No	Rural Principal Arterial	None	3.5	Fair	5400	650	60
2013	US095	338.500	339.300	0.800	Flexible	Yes	Rural Principal Arterial	CI	2.4	Poor	5400	650	60

ATTACHMENT 5

Evaluation of Idaho 55, Milepost 10.61 to Milepost 16.76

Department of Motor Vehicles (DMV) Review

All Idaho Transportation Department routes are currently categorized by their ability to handle various extra-length vehicle combinations and their off-tracking allowances. The categories used in the consideration of allowing vehicle combinations to carry increased axle weights above 105,500 pounds and up to 129,000 pounds are:

- Blue routes at 95 foot overall vehicle length and a 5.50 ft off-track
- Red routes at 115 foot overall vehicle length and a 6.50 ft off-track.

Off-tracking is the turning radius of the vehicle combination, which assists in keeping them safely in their lane of travel. Off-tracking occurs because the rear wheels of trailer trucks do not pivot, and therefore will not follow the same path as the front wheels. The greater the distance between the front wheels and the rear wheels of the vehicle, the greater the amount of off-track. The DMV confirms that the requested route falls under one of the above categories and meet all length and off-tracking requirements for that route.

Bridge Review

Bridges on all publicly owned routes in Idaho are inspected every two years at a minimum to ensure they can safely accommodate vehicles. A variety of inspections may be performed including routine inspections, in-depth inspections, underwater inspections, and complex bridge inspections. All are done to track the current condition of a bridge and make repairs if needed.

When determining the truck-carrying capacity of a bridge, consideration is given to the types of vehicles that routinely use the bridge and the condition of the bridge. Load limits may be placed on a bridge if, through engineering analysis, it is determined the bridge cannot carry legal truck loads.

ITD Bridge Asset Management has reviewed the four bridges pertaining to this request and has determined they will safely support the 129,000-pound truck load, provided the truck's axle configuration conforms to legal requirements. To review load-rating data for each of the bridges, see the Bridge Data chart below.

ITD District 3 Review

Idaho Transportation Department districts review the route request and take external factors into consideration when providing a recommendation. Some factors that are considered include: spring breakup concerns, existing and needed chain-up areas, compatibility of runaway truck escape ramps, the pavement condition, current and future roadway improvement projects, port of entry compliance and safety concerns.

To review the technical data on the condition of the highway, please see the TAMS (Transportation Asset Management System) chart on the last page.

The requested route is an east-west portion of Idaho 55, running from the intersection of Farmway Road (Milepost 10.61) to the intersection of I-84 at Exit 33 (Milepost 16.76, Also known as the Karcher Interchange), known locally as Karcher Road and Midland Boulevard.

The highway is predominantly a two-lane roadway with 12-foot lanes, and minimal paved shoulders (commonly 1-2 feet). Turn bays and turn lanes have been added at some intersection locations in recent years. The east end (approximately 0.75 mile portion) of the requested section has been expanded to a multi-lane highway consisting of 4 to 7 lanes (4 through lanes) where the highway intersects with I-84B (Also known as Nampa-Caldwell Boulevard) and I-84 (Exit 33, Karcher Interchange).

The Annual Average Daily Traffic is high to very high, and Commercial Annual Average Daily Traffic is moderate. The roadway is geometrically sufficient. The posted speed is predominantly 55 miles per hour, dropping to 35 miles per hour on the east end. All bridges of concern have been examined and cleared by the bridge section.

Local Port of Entry staff was contacted and has no concerns.

The requester indicates that 33,000,000 pounds (16,500 tons) of sugar beets are moved annually from the Marsing Piling Ground to the Amalgamated Sugar Beet Factory along this route. This condition exists whether or not the 129,000-pound route is approved. At present, this quantity of sugar beets is being moved in approximately 500 loads on 105.5K trucks. Permitting 129,000-pound trucks could lower this trip count to approximately 384 loads.

It may seem counter-intuitive, but an individual 129,000-pound truck imparts approximately 7-8 percent less damage to the roadway than a 105.5K combination. Coupled with a 23 percent lower load count, moving to 129,000-pound trucks for this 33,000,000 pounds of sugar beets would result in approximately 29 percent less pavement stress than moving the same beets in their current 105.5K configuration.

The fewer trips with 129,000-pound trucks also decreases the number of potential conflicts when considering highway safety, particularly for crossing-type accidents, and may contribute to lower congestion due to the fewer total vehicles in the traffic stream.

Finally, this route is the logical extension of a previously-approved 129,000-pound truck route along Idaho 55 from its origin at U.S. 95, west of Marsing, to Farmway Road (Milepoint 10.61). Adding this route will allow sugar beets to travel from the beet piler to the Amalgamated Sugar Beet Factory in the same truck-trailer combination units. This route segment is the last portion of state highway immediately south or west of Nampa (except interstates and urban business loops) which is not currently approved for 129,000-pound trucks. Approving its inclusion will complete a consistent network of state highway routes throughout this important agricultural, economic region.

The District recommends proceeding.

Bridge Data:

Route Number:	Idaho 55
Department:	Bridge Asset Management
Date:	4/7/2014

Route	**From:**	Farmway Road, Caldwell
	Milepost:	10.61
	To:	I-84, Exit 33
	Milepost:	16.76

Highway Number	Milepost Marker	Bridge Key	129 Rating[a] (pounds)
55	16.37	14722	298,000
55	16.47	14724	216,000
55	16.59	14729	332,000

[a]: The bridge is adequate if it has a rating value greater than 129,000 pounds.

Crash History:

	2005	2006	2007	2008	2009	2010	2011	2012	2013	TOTAL
Number of Crashes	94	81	138	122	95	88	114	108	114	954
Number of Fatalaties	1	2		3	3	1		1	1	12

TAMS Data:

Year	Route	Milepoint Range			Segment Length	Number Lanes	Lane Width	Pavement Type	Pavement Deficient	Cracking Index	Roughness Index	Rut Depth	Condition	AADT	CAADT	Speed Limit
2013	SH055	7.110	to	11.100	3.990	2	12'	Flexible	Yes	1.8	2.3	0.25"	Very Poor	6993	612	55
2013	SH055	11.100	to	11.600	0.500	2	12'	Flexible	Yes	1.8	2.2	0.35"	Very Poor	8400	650	55
2013	SH055	11.600	to	15.818	4.218	2	12'	Flexible	Yes	2.2	2.2	0.39"	Poor	14509	732	55
2013	SH055	15.818	to	16.154	0.336	4	12'	Flexible	No	5.0	3.0	0.14"	Good	18000	946	35
2013	SH055	16.154	to	16.766	0.612	4	12'	Flexible	No	4.8	2.7	0.13"	Fair	34453	1334	35

ATTACHMENT 6

ACUITY
A Mutual Insurance Company

TRUCKING APPLICATION SUPPLEMENT

Agency Name Cottingham & Butler Agency # _____

Please complete and attach to Commercial Application (Trucking Business may not be bound)

Applicant Information

Applicant KBC Transport LLC
(First Named Insured)

Federal ID # _____

Effective Date 05/01/2011 ☐ Coverage Bound ☒ Quote

Names of Owners/Officers
Wally Burchak

Year this trucking business started _____ Website address _____

Have you ever had insurance with ACUITY? ☐ Yes ☒ No If yes, give policy number _____

Filings

Authority:
☒ Common
☐ Contract
☐ Exempt
☐ Tow Trucks For-Hire
☐ Private, hauling own goods
☒ Private, hauling own goods and goods of others
☐ All Other

Filings Required:

MC # 168309
☒ State
☐ Form E or EX
☒ Cargo Form H
☐ Oversized/Overweight

DOT # 1357378
☒ Federal
☒ BMC-91X
☒ Cargo BMC-34
☐ Hazardous

If filing is required, be sure applicant name above matches name on filing.

Trucking Operations

List of Commodities Hauled	Average Value	Maximum Value	% of Total Hauls
Chips	$20,000.00	$40,000.00	55.00 %
Lumber	$30,000.00	$40,000.00	35.00 %
Poles	$20,000.00	$20,000.00	2.00 %
Household Refuse	$5,000.00	$5,000.00	8.00 %

Radius of Operations	Percentage of Trips	Trips per Month (Average)
0 – 50 miles	20 %	
51 – 200 miles	70 %	
201 – 300 miles	10 %	-510
Over 300 miles	%	

General Information

Yes*	No	
☐	☒	1. Do you haul any hazardous or extrahazardous substances as defined by the Environmental Protection Agency (EPA)? If yes, please explain: _____
☐	☒	2. Do you pull double trailers? **
☐	☒	3. Do you pull triple trailers? **
☐	☒	4. Does a bobtail liability exposure ever exist for any unit?
☐	☒	5. Do you own any vehicles that are insured elsewhere?
☐	☒	6. Do you allow passengers?
☐	☒	7. Do you act as a freight forwarder, broker, or arrange loads for others?

***If yes, please explain in the Remarks section of this form.**

Gross receipts for the last three years:
current year _____ $_____
prior year _____ $_____
2nd prior year _____ $_____
Projected Receipts for next year $ _____

Gross payroll for the last three years:
current year _____ $_____
prior year _____ $_____
2nd prior year _____ $_____
Projected payroll for next year $ _____

COMMERCIAL AUTO FLEET INSURANCE APPLICATION

Entire application must be completed and signed.

GENERAL INFORMATION [ ] Individual [X] Corporation [ ] Partnership [X] LLC [ ] Other

Name: [illegible] Transport [illegible]

Federal ID # or SSN U.S.: 20-2564559

DOT Number: [illegible]

Mailing Address: [illegible] 13 South

Yrs. In Trucking Industry: 13yrs

Yrs. Operating Under Business Name: 10yrs

City: Kowalia | State: ID | Zip: 83539 | E-Mail: wallyegrodcabs.net

Date Coverage Desired: FROM [illegible] TO [illegible]

Garaging Location(s) if different: | City | State | Zip | Phone ([illegible]) [illegible]

Loss Control Services Contact Person: Name: Wally Burcheck Phone Number: (208) 926-4843

DESCRIPTION OF OPERATIONS [X] For Hire [ ] Private [ ] Non-Trucking [ ] Other (explain)

Range of Transport: [X] Interstate [ ] Intrastate

Commodity (check all that apply): [X] Property (nonhazardous) [ ] Refuse/Waste/Garbage [ ] Hazardous Materials requiring $1,000,000 liability limits or less [ ] Hazardous Materials requiring liability limits in excess of $1,000,000 (if checked, attach explanation)

OPERATIONS LESS THAN 300 MILE RADIUS - List City Destinations Below

1 | 2 | 3 | 4

OPERATIONS BEYOND 300 MILE RADIUS: Identify Metropolitan Areas Traveled Through Or Into

[ ] Atlanta	[ ] Cleveland	[ ] Jacksonville	[ ] Milwaukee	[ ] Philadelphia	[ ] San Diego
[ ] Balt.-Washington	[ ] Dallas/Ft. Worth	[ ] Kansas City	[ ] Mpls /St. Paul	[ ] Phoenix	[ ] San Francisco
[ ] Boston	[ ] Denver	[ ] Little Rock	[ ] Nashville	[ ] Pittsburgh	[ ] Seattle
[ ] Buffalo	[ ] Detroit	[ ] Los Angeles	[ ] New Orleans	[ ] Portland	[ ] Tulsa
[ ] Charlotte	[ ] Hartford	[ ] Louisville	[ ] New York City	[ ] Richmond	[ ]
[ ] Chicago	[ ] Houston	[ ] Memphis	[ ] Oklahoma City	[ ] St. Louis	[ ]
[ ] Cincinnati	[ ] Indianapolis	[ ] Miami	[ ] Omaha	[ ] Salt Lake City	[ ]

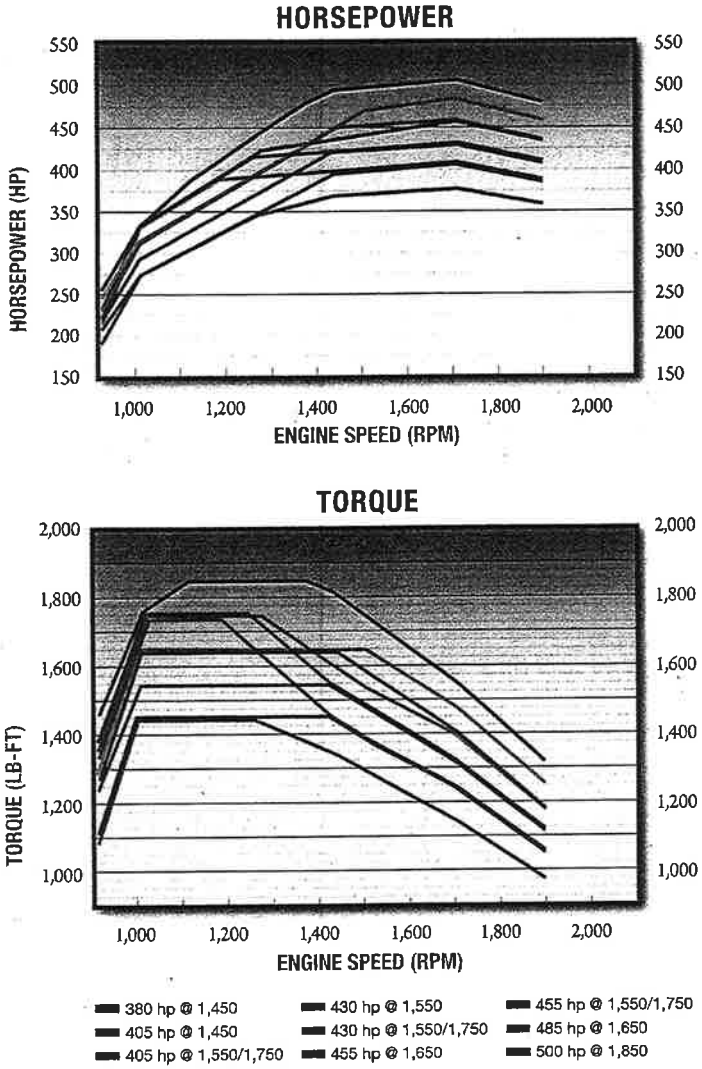
Cities other than above or regular routes

COMMODITIES TRANSPORTED

Commodity	Percent of Loads	Maximum Value	Commodity	Percent of Loads	Maximum Value
Lumber ($50,000 Avg)	61	$40,000	Wood Chips & By Products	[illegible]	2500 avg 5000 max
Bark ($1,000 Avg)	2	$2,000	Solid Waste	4	NA
Misc ($5,000 Avg)	1	$40,000	Steel ($5,000 Avg)	[illegible]	$10,000

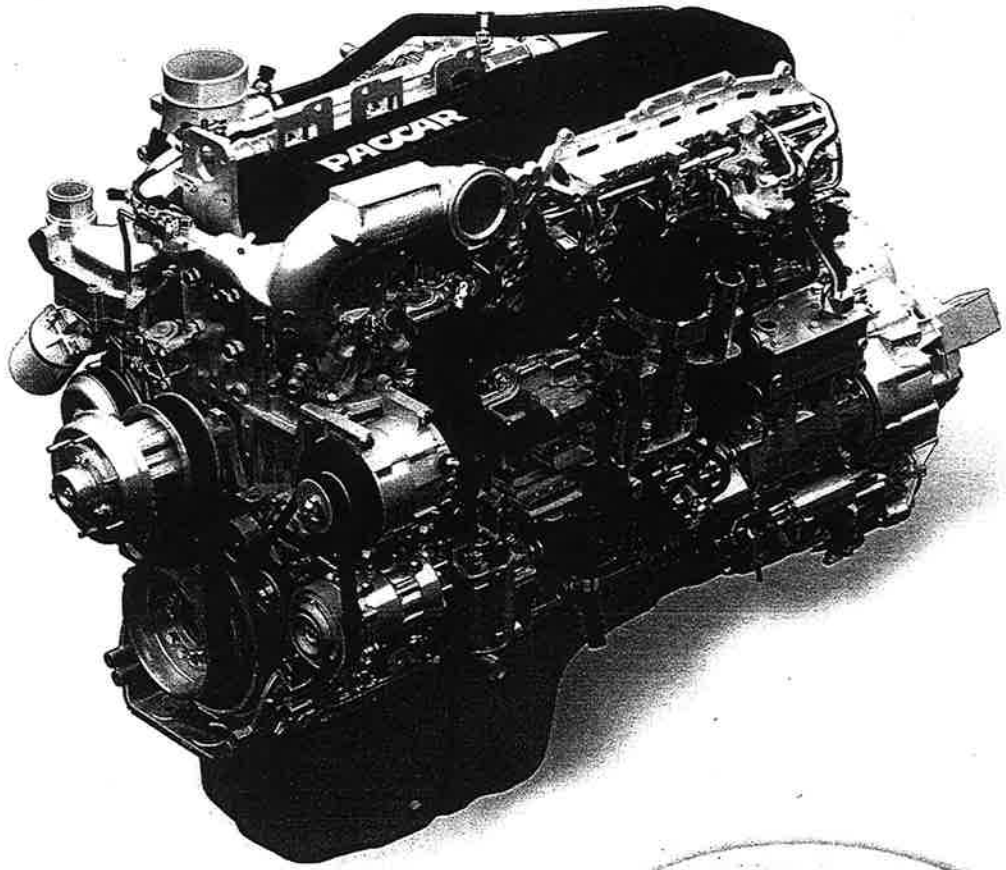
YES	NO	
[X]	[ ]	1. Are filings required? If yes, complete form N-710, Filing Information. Docket #: 168309
[ ]	[X]	2. Do you act as a freight-broker or freight-forwarder or arrange loads for others? If yes, provide Brokerage Name: ____ Docket # ____ Annual Brokerage Revenue: $ ____
[X]	[ ]	3. Are all owned trailers equipped with reflective tape? If no, attach a list of those trailers which are not.
[X]	[ ]	4. Is all equipment operated under the applicant's authority scheduled on the application? If no, attach explanation.
[X]	[ ]	5. Is all owned equipment scheduled on this application? If no, attach explanation.
[ ]	[X]	6. Is all of the scheduled equipment owned by you? If no, attach explanation.
[X]	[ ]	7. Do you subhaul, lease or hire equipment from others? If yes, is it: [X] Permanently Leased [ ] Trip Leased
[X]	[ ]	a. If permanently leased, is it scheduled on this application?
[X]	[ ]	b. If permanently leased, are autos hired with drivers? If yes, complete form T-376.
		c. If trip leased, provide the annual estimated cost of hire: Current Year $ ____ Prior Year $ ____
[ ]	[X]	8. Do you lease to others? If yes, who must provide primary insurance? [ ] You [ ] Other If you provide insurance, is coverage desired for: [ ] Named Lessee(s) OR [ ] All Lessees (Blanket Basis) If Named Lessee(s), attach a list of Name and Address for each lessee.
**		9. Do you pull doubles? [ ] Yes [X] No Triples? [ ] Yes [X] No
[ ]	[X]	10. Do you haul containers or containerized freight?
[ ]	[X]	11. Do you allow passengers other than company employees? If yes, attach copy of passenger program or explain program (frequency, requirements), etc.

ATTACHMENT 7



PACCAR MX-13

Powered By Quality



Peterbilt

Verbal Comments

Good afternoon. It's 4:00 p.m. on Thursday, December 3, 2015. The location is the Kamiah Elementary School, 711 Ninth Street. It is the date, time and place for an Idaho Transportation Department hearing on applications for 129,000-pound routes on U.S. 12 from Kamiah to Kooskia, mile post 66.22 to mile post 73.85; on Idaho 13 from Kooskia to Grangeville, mile post 0 to mile post 26.39 and on Idaho 162 from Kamiah to Four Corners, mile post 31.07 to mile post 8.

Information for this hearing and for written comments submitted directly to the Idaho Transportation Department has been previously provided through ITD press releases to local newspapers, TV stations and radio stations.

In addition, a newspaper ad was placed in the November 17 edition of the "Lewiston Tribune" and the November 19 edition of the "Clearwater Progress" in Kamiah. The closing date for comments is December 17, 2015.

My name is Jan Vassar. I am the Idaho Transportation Department District 2 board member and I will be the hearing officer for this hearing. With me are the following staff: Jim Carpenter, COO in Boise, Idaho headquarters; Dave Kuisti, District 2 engineer; Doral Hoff, District 2 engineering manager and Ken Helm, senior planner.

To give a statement, please begin by stating your name and address and who you are representing if other than yourself. Courtesy is expected in the hearing room to minimize or eliminate interference with recording equipment.

This is not a forum for question and answer sessions although the chair may ask questions to clarify testimony. An information room is available to answer your questions. Thank you. We welcome your testimony.

State Sen. Shawn Keough:

I have two hats of course. I have my state senate hat and I submitted comments to the director but maybe I should leave a set with you. So there's these with my state senate and then I have - as you know, I have a day job.

And that's with Associated Logging Contractors and Steve Sherich is our ALC president and he wanted me to submit these on behalf of him and the logging association. Just in general terms with my ALC hat on and, again, recognizing the potential appearance of a conflict of interest, it's our hope that the ITD board will take a close look at Highway 13 in particular.

Both highways because of the geography and the road bed, the off-track issues, because we're concerned as you'll see in the notes that the analysis - initial analysis done by ITD, at least what's available to the public, is - has some gaps in it and so right there there's concerns that particularly on Highway 13 when the analysis says that there's one to two foot shoulders I believe across the highway, there's some places where the white line is going over on the edge of the asphalt and in some places, there's gaps in that asphalt. And so again, the concern is there's some gaps there.

And the issue for the loggers is safety. There may be - or there certainly are places where 129 configurations make sense in Idaho but only if they're safe.

And those were the goals that were delineated in the Legislature and when the governor signed it into law.

Jerry Frei, Grangevile Highway District

We just have a mile and a half of the Old Highway 7 where it joins 95, you know. We're level ground there so it's not, we don't really have too big of issue.

The other two commissioners, they - we're always - they're always pretty concerned about in the spring, you know, when it gets

soft that they're going to tear up the road and people are hauling oversized loads. I don't know whether that's happening or not but wherever you have a hill is where you run into a little more trouble with heavy loads only because you still only got two drivers and either you're pulling or you're braking. Or not necessarily - you're braking on everything but you're using your jake brakes. You're down to two axles. But otherwise on the level, I can see the weight distribution being pretty decent.

Everybody's pretty concerned about keeping your roads from being tore up. I mean it costs so dang much to fix, you know. So it is an issue when you either overload or put really heavy loads on but I realize that they have weight distributed. Just that the drivers, whatever you're pulling a hill or going down a hill, your drivers have a little more effect on the road than you would if you weren't very heavy.

But you got to remember progress, you know. I mean people need to make a living and it seems like efficiency - no matter what industry you're in, efficiency's a little more critical all the time.

If I was to make a recommendation, we would like to see a new Highway 13 because it doesn't affect us.

Andy Lott, Arlo G. Lott Trucking

Andy Lott, Arlo Lott Trucking, and we're in support of the 129,000-pound routes that we're requesting of Highway 13, Highway 12, Highway 162 and then County Road 7 or 8. It's the one when you go up Highway 162 when you leave here.

Basically, what our main intent is is Highway 162. That's what we really want. We've applied for Highway 13 because we wanted to see which direction we can go. Our trucks will make the off-track.

You know, we fit all the requirements to run Highway 13. Currently, we're running Highway 13 every day with trucks that are the same length.

So the only difference you're going to see is the number of axles on the truck running Highway 13 versus, for example, right now we're on seven axles at 106,000 and then you'll see us - actually, we'll be at 127,000 on ten axles. We may (inaudible). We make a little better off-track. I think we're at 5.33 off-track with our new combination versus we're at 5.5 currently. So yeah. 5.33. So our off-track's just a little bit better.

We ran a trial run about 45 days ago with the State of Idaho. They filmed it, making sure that combination would run up and down Highway 13 and it passed and, you know, everything

looked good.

Highway 13 is fine. We've been running it. One of the things that we look at that I don't - I want an alternative route, Highway 162, and I would love to run 162 all the time and the reason is that Highway 13's just a little more crowded especially running alongside the river.

But wintertime pulling Harpster Grade. We don't even run that way with our 106,000-pound trucks in the winter.

So we really want 162 and the County Road 7 or 8, whatever it is, at Four Corners that takes us into Grangeville.

I looked at where we're at. This doesn't necessarily show the Kamiah-Kooskia mills that we haul out of but my count was as of October, we're at about 700 loads out of this area currently and that will reduce - by these 129,000 pound trucks, it will reduce us a couple hundred loads a year and the efficiencies of it is going to be so much better than what we've currently been doing. We're in full support of it.

My other concern is that we've been running these highways since 1971. In fact, we started out hauling in 1971 out of Kamiah, Idaho, out of the Godwin Cedar Mill. My father had one truck and as a boy, I was

here with him and so we've been doing this a long time.

But it's the inexperienced trucking companies that would get into this market at 129. That has us concerned. Because of safety.

If we get this passed at 129 and we go out and we do a good job and then we get inexperienced companies coming in and flip trucks in rivers - that has us a little bit concerned. That's a safety issue. It's a risk that bothers us. But going forward, we went through the same thing when we went from 80,000 to 106 and I was there through that transition.

And it's worked. It became a standard. So I look for the 129 to become a standard also. We're doing it in Utah. We're doing it in Nevada. We're doing it in Montana and Wyoming.

So Highway 13, it will work for us. We're concerned about wintertime. We don't want to run it during the winter. That's why we want 162 and if we could just have 162 - I should back up. If I can get 13 to the Clearwater Mill, come back out to 12, hit 162, come back into Grangeville, that works wonderful.

Robin Kohls

The whole thing is there is no good, that Highway 13 has no sides. It's either rock or water and both of them are straight and so it doesn't give anybody anywhere to go and if you meet a couple one of those - that's a big rig and I don't care what they say. When it comes around a corner, the perfect driver and the perfect load, he can stay in his lane. Otherwise, he ain't going to stay in his lane.

The other thing that I do know about that road is lots of sportsmen on that road, a lot of sportsmen, and so that's always a thing. Fishermen, they don't care what a white line is.

They don't know you're supposed to turn around in an intersection or something. Well, let's turn around. But anyway, that's my thought is it's a big - a big lot of load.

When you have 162, that's an open road and so if you're going to definitely do it, then I would pick that road for it.

That would be just more access and better roads. If they need down there, then come 162.

Wally Burchak

There's a couple landowners I know pretty well that are concerned along Highway 13. We just had a pretty in-depth discussion.

Number one, we're the biggest single user on Highway 13 by far and this is all laid out in my letter but just so you understand, we have on the average 8 to 10 trucks a day clear up to 15 trucks and the reason is it's our main transportation corridor between the sawmill and Tamarack and Kooskia and the same owners of the sawmill are all actually part owners in the trucking company along with myself. So this route is extremely important to us.

That said, we also recognize that there can be some economic benefits to larger loads provided - that's a big word there - that it can be done safely. And I testified in Riggins so I thought I should just mention it briefly because I do feel that it's an issue because we're going to run into it even with these trucks going up Highway 13 and that is the fact that there still is a section on Highway 95 that I'm fearful is not very safe and that is the section that goes from the mill basically as Tamarack - mill at Tamarack to Council. That's a bad section that I would love to see whatever we could do to help each other to get that fixed.

The other section, and it's a much smaller section, is from the top of Smoky Boulder to - it's approximately a five or six, seven mile section there on Highway 95 outside of Riggins to the top of Smoky Boulder. I feel it's worth stating because of the fact that as you get more and more potentially 129 trucks on the

roadway, those are going to be problem areas that I would love to see as much as possible ITD focus more dollars in those areas.

I'm saying, "Hey, I agree. Let's build 129 corridors but let's make them safe and let's try to funnel money as much as we can.
So my concern with Highway 13 is this and that is our drivers travel all over five western states and virtually all of them will tell you that the most difficult road they drive is Highway 13.

The reason it's difficult, it's such a windy corridor with very short sight lines. You can't see down the road far enough because you have all these tight corners. Therefore, from a driver's perspective, you can't see off in a distance enough to anticipate hazards in the road. So the further you can see down the road, the safer you can adjust to that whether that be braking, maneuvering around it. You're severely limited on Highway 13.

The good thing is a good portion of that that is the worst section which is Harpster Grade is 35-mile-an-hour speed limit, so at least everyone's going slower or should be going slower. The other big problem on Highway 13 is that you have a very narrow shoulder, one to two foot wide. I've got pictures to show that in a lot of instances, it's even less than six inches. It does not match your evaluation.
It's worse - it's much worse than that.

And the other problem is you have a steep embankment dropping down in the river canyon as you climb Highway 13 and you got a steep embankment on your uphill side so from a commercial driver's perspective, you just don't have anywhere to go if something bad happens. You don't have anywhere - room to maneuver.

As I was looking at some of these issues, you show that from the top of Harpster Grade to Grangeville is in the poorest condition. You list it as poor.

So you start from Grangeville and work your way back. You have that listed as poor. It is primarily because of pavement. You have some ruts in it and I know it's - I think it's on the agenda to fix but you have Harpster Grade here listed as fair and I would argue from a commercial driver's standpoint that is completely opposite. And the reason is that you're just looking at pavement conditions and a commercial driver has to look at safety and how do I negotiate all these corners with limited sight distance and poor pavement conditions.

So this is part of an attachment. So on the bottom section, this is called Preacher's Corner. And so this is - this is below Harpster between Harpster and Kooskia and there's a rock wall that comes out almost

all the way to the edge of the pavement. And they call it Preacher's Corner because I guess at one time, a preacher wrecked there. You can see the way trucks are transferring around this trying to keep away from going over the yellow line.

So what I did then also, I took a measuring tape and I started measuring distances to check them based on what you're saying in your evaluation was that you have one to two foot paved shoulders. This is Preacher's Corner. This is just further down the road from it.

So here's 12 inches on the white line. You actually have only a 4-inch paved shoulder and it drops off. It's hard for me to show how bad it dropped off. I'm trying to remember. I think this is right around mile marker 14. I might be incorrect.

So this is the bottom of Harpster Grade. So this is a corner that's - it just comes off the hill. There's dumpsters right here and you got a bridge here. The river is right here. So this corner, 12 inches. You're barely 6 inches. This is actually all dropping off into the river right here. Bad accident corner. A local wrecker company said they're dragging people out of there quite a bit.

So there again, what I'm trying to do is point to you from - if you're a commercial driver and basically have a dash cam, you know, you

have the trailer with these weights and you're trying to negotiate this and one of the big problems at Highway 13 is your margin of error is so small and so you lose your concentration, look at a deer on the hillside, drift, you get your tire over into here and you're in trouble and really quick. There's a big different between Highway 162 and Highway 13 because of this. I'm telling you that 162 is a better route. Much safer.

I'm basically working saying, hey, why don't we compromise here? We don't need both routes. You're still going to need a portion of Highway 13 to get to Kooskia to get to the mill and haul out of the mill. But from Stites to Grangeville, you don't need that roadway.

He (Andy Lott) runs 13 right now. I've been talking to Andy a lot on this and I really reached out to Andy and said, "Andy, we don't need to fight about this. You're a good company. You got good drivers. Why don't we look at this and find a way to compromise?

I'm scared to death of Highway 13. Our trucks go up and down it. I don't want these longer trucks, more weight, chance of spinning out on the roadway. You can take 162, haul 129. We can both have what we want.

You only need one corridor to get from Kamiah-Kooskia to Grangeville." I've said,

"Andy, I've got access to some of the people that are decision makers and I will help you."

Here's another problem. This is part way up Harpster Grade, so there again, you say you have one to two foot paved shoulders. The enbankment's caving down onto the roadway. You have - it's all the way over the white line. You have obviously road distress here so this whole area - this is obviously a big problem that is not going to be a simple fix. It's going to take quite a bit of money.

This is a real concern. This is coming down - it's around mile marker 9 so you can see here because of this is what's happening is this roadway is sluffing off into the canyon. That's the reason you got this up and down on the jersey barrier. So see if we got my up-close picture. I've got an up-close picture of the pavement right here. You can see this divot out of it. The pavement actually drops off right along the white line. So a truck gets into this, you're going to go over the bank and you're going to have a ride down to the river. There's no way that this will hold you if you get into it the way it is right now. This is a problem. It's - you know, it's going to cost money to fix that. I recognize that. A lot of these aren't going to cost a lot of money.

Here's that same location that I just said here. Rocks in the roadway. That's fairly common. I will show you one thing because he didn't want to show it because I had a beer can in there that I grabbed out of the ditch to make a point how deep some of these are. A beer can is five inches. So it's about four and a half inches, four to four and a half inches, how bad that dip is there. So you drop a tire into that right now whether it's a passenger vehicle or a truck, you're going to wreck.

So what I'm getting back to is from a commercial driver's standpoint is the margin of error you have to keep between those white lines, you know, if something happens in front of you.

My main point here is that I'm not trying to shut down 129. I'm trying to shut it down on that roadway that is so dangerous. I'm saying Highway 162 is a much safer roadway and I'll show you later that your own data proves this.

Mainly in this section, I'm addressing some of these issues on the upper part of Harpster Grade. But also I'm addressing how our trucks haul versus what this configuration is. We use 53-foot trailers, so there's your configuration there.

A 53 foot single trailer has 54,000 pounds spread over 4 axles of truck and 51,000 pounds

spread over four axles on trailer. The majority of weight is loaded ahead on trailer so you have the opportunity to put more weight over drive axles of truck (by lifting 3rd axle if truck loses traction, putting 44,000 to 46,000 pounds on drive axles) and making it easier for the driver to control weight. The 129K double configurations proposed by AGL Trucking will have 44,000 pounds on 3 axle truck, 38,000 pounds on back 3 axle lead trailer, and dragging 44,000 pounds on 4 axle pup trailer. This configuration will pull harder because all of the weight is on back end of trailers. They are projecting they will have only 31,000 pounds on the drive axles without the ability to shift more weight on drive axles if they lose traction on slick roads. This configuration will be very dangerous on slick roads.

Most of December, our drivers have fought slick roads on Highway 13. My other point was once you commit up Harpster Grade, there are no pullouts to get off road to chain up. If 129K loads spin out, there is a good chance they will jack knife and block one or both lanes of Highway 13. This is not a good scenario when on-coming traffic cannot see around corners to anticipate trucks blocking the roadway. This will significantly increase the risk to passenger vehicles and other trucks using Highway 13.

So here's the other issue is the argument has been, you know, double trailer configurations

aren't any more dangerous than a single trailer configuration. That's not true. It's never been true. I've argued this for years.

The last three years when we fill out applications for liability and physical damage insurance for our trucks, I've been asked on a regular basis whether we pull double, triple configurations and they'll follow that question right up with how many configurations do you pull of a double, triple configuration? Which geographic areas do you pull them in and what's the radius that you run?

The insurance companies look - they assess more risk the further you get. If you're over 500 miles, it's a higher risk. If you're 250 to 500 miles, it's a different risk. If you're within 100 miles, it's a different risk. We do pull doubles and it's on Greer Grade but it's in a radius that's less than 100 miles but still they're going to nail us for it.

So attached with my letter here is a letter from Cottingham and Butler. These are our insurance carriers. They're out of Iowa. They're one of the largest transportation insurance brokers in the country. We actually insure through Acuity Insurance and what this statement says is that the reason that insurance companies ask those questions is because they're assessing risk and they assess a higher risk to double and triple

trailer configurations than they do a single trailer configuration.

He also goes on to explain why. You know, it's harder to control two trailers than one. You have bigger blind spot. You got more length and in some instances you have more weight. That all makes it more difficult. In arguing whether there's actual facts and data to back this up, my answer to that it doesn't matter. Insurance companies are assessing more risks. They're not going to do that without some sort of justification to it.

I hate to fight about this. I don't want to fight about this issue but I'm not willing to give up 13 without a fight. If we can continue on with problems, I'm willing to come out here and testify to this.

So my point is you got an already extremely dangerous road based on your accident data. 100 accidents in five years, 49 injury accidents. Four fatalities now. Is that 13? So its going to be right here. 49. You have down here 3 fatalities but it's 4. We had another fatality in November of this year. It's in my letter.

So the point. You're going to take something that's going to increase risk. We can argue about how much it's going to increase risk but you cannot argue it's going to increase risk. Insurance companies prove that. You're taking an already dangerous roadway and you're going

to make it even more risky to everyone involved, our trucks and the public.

So I go on to explain here that you've received proposals on two routes. I'm kind of throwing Highway 12 out. So when you compare the data that you've provided in these evaluations between those two roadways, one roadway is obviously straighter. It has wider shoulders. One foot to four foot versus one foot to two foot. And I think you can see in my pictures we're not even getting to one foot in many locations.

You also have a road that's much straighter. I don't know if you've driven both of them but if you ever do, it's significant difference which means it allows you to see further off into the distance and anticipate. Your own speed limits tell you that it's a straighter road because you have a 35-mile-an-hour speed limit up Harpster Grade and you have a 50, 55 on 162. I mean all the data points that Highway 13 is more dangerous. Okay?

Then you take these accidents and you compare these two roadways on accidents. 100 accidents on Highway 13. What is it? 38 on Highway 162. Fatalities, 4 on Highway 13. One on Highway 162. And I understand there could be a difference in the amount of volume but you're not going to make up that difference.

Mr. Lott hauls out of Blue North. That's his primary location. He hauls out of Kamiah. That stretch from the mill in Blue North to Highway 12 is county. He's got to have county approval to do it anyway. I'm not trying to stop Arlo Lott Trucking from hauling 129. Andy and I are friends. They are a good company. I just don't want it to increase or decrease the safety for our drivers, our trucks and the public.
When you're looking at what the governor signed and the Legislature on the bill, the governor specifically mentions some requirements. He mentions truck and trailer requirements, driver certification requirements, pave and roadway conditions, geographic conditions, weather conditions, traffic conditions and enforcement process. Your evaluation only really addresses three items. Traffic conditions, roadbed conditions and geographic conditions.

There has never been any rules established for safety. Here's an example. This is showing new equipment, ABS brakes along the axles all the way through. Good equipment. Where is there in the rules that it prohibits someone from not having ABS brakes? There aren't any. Where's it in the rules that say you have to have new trailers and you can't have a 1960 vintage? There are none. Where's there in the rules that say that you have to have a significant amount of experience to pull these with CDL's? There are none. These rules would protect those that even do 129 and that don't, like us.

We need rules in place. We need to make sure that whoever is running these configurations, they're doing it in the safest possible manner. The governor said you need to have it. The Legislature said you need to have it and it hasn't been done yet. And I'm really going to push that over the next 12 months. We need that. As an industry, we need that. We all need that protection and ITD needs that protection. Who's going to establish them if you don't? The governor said you need to do it before you approve 129 routes. These items need to be taken into consideration. The Legislature said that.

Not everyone is qualified to do this. Frank Buell is here tonight. He has mentioned they've looked at their driver pool and they think only 10 percent of their drivers will be capable of pulling double configurations safely. I don't have a single driver that wants to do it right now. I did at one time. I had one that wanted to do it because he thought he'd make money.

So the problem is that you approve this route, it's not just Arlo Lott that's going to do it. It's the companies that come behind him. Once you open up the front door, you have very little control over the companies that come behind him.

So that is the one thing that really upsets me and concerns me. The only point I would make is, you know, for all of you on the board and

ITD, you're going to make a decision and then for the most part, to a certain extent, you're going to forget about it once you make that decision.

I live in these communities. It is our drivers that I see every single day walking in and out of our office. The public that's in there at the grocery stores, at church with me, whatever, that we're going to put at more risk if you allow Highway 13 and personally they're faces to me.

I don't get to wash my hands from this issue. So I put right in there I'm not going to back down on this. I'm going to fight this tooth and nail to ensure that it doesn't go through because there is an alternative that can work and that's 162.

And honestly, I believe this is going to come up in different - whether I'd be up in St. Maries or Coeur d'Alene or whatever. These same issues are going to come up again.

If we were to establish a compromise here that says that we only need one route in these areas. If there's three or four routes, let's pick the best route, the safest route.

Let's make sure the corridor's there. Everyone has access to 129 and let's keep these other routes safe.

Clynn Huffaker

Are we changing the off-track law on these routes? Off-track on U.S. 12 is 5.5 feet on the off-track law. It’s the same on Highway 13.

You’d have to updtae the off-track law regarding the bridges.

If you’re going to increase the off-track law on hgihway 12, are you going to increase it from Lewiston to Kooskia, or are you going to go farther east to the Montana state line?

I’m a local grain hauler up here. I use a set of doubles.

If you’re going to allow the 129,000, they’ve got to be a certain length to bridge it. They’ll be too long for the off-track law, especially on Highway 13. There are some switch-backs on that grade.

If you’re coming out of Kooskia, heading back to Grangeville, and you’re using Highway 13, you’re going to have too long of trailers to go on the switch-backs at Harpster Grade.

You can mark me in the against column, even though I’m a trucker.

Hearing Officer Jan Vassar

It is seven o’clock p.m., and the hearing is now closed.