

Comments re: All Highway Routes Applied For

The Lewiston Tribune carried an ad about the upcoming hearing on allowing 129,000 pound truck routes on US 95, US 12, Idaho 3 and Idaho 8. The following is being offered as testimony regarding the applications.

- 1) Hwy. 95 Lewiston to Latah/Benewah County Line. No comment except the section between Lewiston and Moscow is ideal on the 4 lane portion. That is what the 4-lane was meant to be able to include. No traffic concerns there. Hwy 95 from Plummer to Moscow could be better for additional truck traffic but we hope that is in the long term plans for the highway dept. (assuming all the funds won't go to the Boise area as some have proposed.)

- 2) US Highway 12 Lewiston to Montana border - Will you not ever leave that highway alone!!! We vehemently oppose heavier (and longer) trucks on that stretch of the highway. Most of that area is in the Scenic River designation. That means more recreation access, not major truck traffic. The road is curvy and allowing trucks that take longer to stop is not good management. We personally recreate on the section between Kamiah and Powell. There are bicyclists, motorcyclists, fishermen, rafters, camping, tourists taking in the beautiful river and mountains with cameras all along the road. These users deserve to have a feeling of safety when pulling in and out of a pull-off, or driving the curvy road. It will just take too long for a truck to safely stop at 50-55mph in an emergency.

We have personally witnessed accidents or near accidents on that road. Two are near the Wilderness Gateway campground entrance. One I was fishing just above the bridge and heard tires screeching. Upon looking up a large truck had overturned with a load of bees, not being able to

make the curve at his speed. Fortunately no vehicle was coming the other direction at that particular moment. Another incident was when a truck hauling toilet paper overturned on the curve just below the campground entrance, spilling his load down the embankment toward the river. Again, fortunately no other traffic was in the immediate area. The driver was just going too fast to make that curve. We always feel just a bit unsafe exiting the campground entrance as we cannot see much distance either way and that would be a bad situation for a larger truck with less stopping time to avoid us.

Another risky instance we witnessed was a small covered wagon pulled by a horse slowing making its way west a little below the Fish Creek raft launch. He was in the main path of his lane and on a curve. We were travelling east in the opposite lane. BUT what scared us is that a large truck coming up behind the horse drawn wagon would not see it in time to stop because of the curve. The driver probably would turn left into our lane to avoid the wagon. As luck would have it, we did not see another truck for about 12 miles going west. Was a scary situation however, and one we will remember a long time.

Just because it might meet the engineering specifications on weight does not mean it is safe. A driver's perception of a safe roadway is as important as the engineering. How fair is it if ordinary driver's fear the safety of the road way just because some commercial enterprise wants to save a few bucks? By approving this you would be leaning too far in the direction of commercial use vs recreational use. Visitors to the Scenic Roadway have tolerated the trucks on the roadway as a compromise now but enough is enough. We know of some folks who avoid that area because they do not feel safe. We are getting to the point where we cautiously venture to the campgrounds and fishing in that area and are always

relieved when we get there and back to Lewiston safely.

You know, HWY 12 is not the only route available for the trucks to use. There is a very nice, safe 4-lane road between Missoula and Coeur d'Alene connecting with HWY 95. That is the route they should use to avoid potential safety issues and conflicts of use.

- 3) The portion of Idaho 3 and 8 from Hwy 12 to Bovill is not good either. These are just RURAL roads, not meant for huge trucking activities. Just because technically it meets the guidelines does not mean it should happen. Keep Idaho rural. The trucking enterprises will push as hard as they can to make more money at the expense of the regular traveler. We do not agree with the larger trucks on those roads either. We frequent that route often to go camping in that area and to visit Elk River. We do not want to be hassled by the larger trucks.

Thank you for taking our comments into consideration when making your decision.

I believe hauling 129,000 lbs on our highways will severely impact our roads, not in a positive way. We have seen through the years the impact on our road from 80,000 to 105,500 lbs. Our roads in central and northern Idaho are in poor shape now.

Even with more axles and less weight, it is still more tires, more weight down the lanes, on the edge of the roads.

Road maintenance and repairs are very expensive and are not getting cheaper. The impact will be greater and the funds are not and will not be available for repairs to the road. Therefore, the roads will be more expensive for the average Joe to use. (vehicle repairs, accidents).

The safety of our highways needs to be looked at very seriously. Our hills are very steep and sometimes very windy. You will not stop these heavy, heavy loads going down our cornery steep hills without many serious accidents, mainly in the winter. I feel the state of Idaho, the trucking industry, and the people of this state cannot afford this road weight limit change.

It's going to be more trucks – heavier trucks and more of them.

Our roads are already in need of repair. I feel heavier loads will not benefit in any way.

My concerns are the present condition of these roads, especially routes 3 and 8 are in bad repair already. I cannot help but think heavier loads can only worsen this condition.

I do not believe this will lead to less trucks. I am also concerned about the extra weight turning off onto county roads that are already crumbling from the weight and constant use.

I am also concerned for public safety in the bog down of larger, heavier trucks on upgrades. And the safety of longer trucks manuevering around the many curves on these roads. To go slower around these bends leaves vehicles rounding those bends behind them at risk of an accident.

We are opposed to your proposal to allow these long and heavy trucks on our highways. For the most part they are only two-lane country roads. Larger trucks will create traffic jams and more accidents. Please do not allow this change.

I am forwarding my concerns and comments on increasing north

Idaho to 129,000 from a business leader that has his own fleet of chip trucks hauling 105,500 and as a retired battalion chief with Moscow Volunteer Fire Dept.

North Idaho and south are seriously 2 different geographic areas and the highway systems in the south can justify these increases to a point. North Idaho cannot support the configurations required by the trucking industry to handle these increased loads. Here are my points below.

1. Trucks hauling this increased weight will be slower (15 mph) on all of these passing lanes on the grades therefor being a hindrance to the lighter, faster trucks (25 mph) that pass them going up all the grades causing a delay for cars and pickup that will try to get by all of them and increasing traffic accidents.
2. In my years of Fire dept work I was involved in multiple extrication/ fatality situations on reisenauer hill (south of Moscow) a well known problem area for hwy 95 that has been awaiting realignment that keeps getting delayed by environmental groups for non sense reasons. I have witnessed during winter ops multiples of accidents on this hill that I can imagine will be exacerbated by a truck pulling doubles and triples if this passes.
3. The highway infrastructure is narrow, and poor subgrade on a lot of failing highways that this increase will increase the dangers and the damage that occurs on the off shoot highway system that reaches companies that could benefit from this increase weight.
4. Bennett Lumber in Princeton Idaho is on hwy 6 in Princeton Idaho and we will be economically disadvantaged to our competitors due to this increase as hwy 6 cannot support the off track that these heavier weight truck configurations need.

5. Hwy 95 has too many problem areas between north Idaho and south Idaho along the river system that will not support properly trucks with doubles or triples to navigate safely. The areas are too narrow and windy.
6. There are several mills and operations on the off shoot highways that will be economically disadvantaged to someone else that will get the order file for purchase of their product due to the increased weight difference causing potentially fatal economic harm to the businesses.

I have been against this increase in Idaho since its inception due to the failing highways and poor budget up north compared to the south that has far less winter issues and geographic challenges. The highways have been rutting just with the increase that those of us have been able to improve our hauling configurations and even if it were approved it will be cost prohibited for us to change our equipment to handle these increases and it will put some truckers out of business trying to keep up with the demand of modifying our configurations with no increased value for doing so. (chip haul)

I oppose the 129,000 for north Idaho and am lobbying the cities and commissioners to follow suit for the same reasons. This increase will only help Clearwater paper and IFG. An increase without fixing the infrastructure to handle it will put the other small business out of business.

Specific Route: General routes

Comments: I strongly oppose the increase of gross vehicle loads to 129,000 pounds. The added weight significantly increases the stopping distance of those vehicles. This adversely effect the safety of the motoring public Additionally, this weight puts a huge burden on

the road beds that must be paid for by the citizens of Idaho. The carriers are reaping the benefits without shouldering the costs.

Comments re: U.S. 12

I am very concerned that you are proposing to allow oversized trucks of up to 129K to travel on non-interstate highways in Idaho. My specific concern is the use of Hwy 12, which is a winding, narrow and often dangerous highway. The high rate of accidents taking place on Hwy 12 in the relatively short distance it travels across our state speaks for itself. As a resident living along the Hwy 12 corridor, I urge you to put public safety first and do not compromise our welfare further by allowing these heavier, larger trucks to use Hwy 12.

I am writing concerning the application to haul 129K on Highway 12. I have been driving commercial trucks for over 30 years. I owned my own truck for 10 of those years. I have pulled both double and single trailer configurations. I have spent a lot of hours traveling Highway 12 and the past 2 years I have driven almost exclusively from Kooskia to Missoula. I haul shavings from Kooskia to Roseburg Fiber in Missoula and then reload with chips which are hauled from Missoula to Clearwater Paper in Lewiston. So all of my driving miles are on Highway 12. I can safely argue that I know this road as well as anyone.

I am very concerned with the proposal to haul 129K loads on Highway 12. This is a very difficult road with many corners that are difficult to see around. The road is in very poor condition and full of pot holes. This past winter this road has been like driving an obstacle course. Trees falling down into the roadway is a fairly common occurrence along with rock slides onto the roadway. Hauling additional weight and trailer lengths I do not feel would

be safe with these driving conditions.

On March 9, 2017 I came around sharp corner at mile post 97 and found a tree about 24 inches diameter across the road. The road had 6 to 8 inches on slush on road and I could not stop in time. The only choice I had was to go into river or hit the ditch. I chose the ditch and the tree hit the top of passenger cab tearing off exhaust stack, mirror and crushed top of cab. When the truck hit the ditch it broke off suspension bolts between suspension and frame causing drive axles to shift sideways. I rode back to Kooskia in a snow plow and we had to cut two trees out of road to get back to town. I then jumped in with wrecker and we had to cut 3 trees out of roadway to get back to truck. Once wrecker hooked onto truck we had to cut out 3 more trees on way back to Kooskia.

Earlier this winter a slide came road at 102 mile marker and we had to back down road to 100 mile marker to get turned around. You cannot back up double trailers if you were hauling 129K. The summer we have to deal with bicyclist, white water rafters, and tourist clogging up road.

The bottom line this is a very difficult road and it will only become more difficult for drivers trying to haul 129K. The road is not safe for heavier weights and longer trailer combinations.

Please do not allow a raise in the load level and size of commercial trucks on this highway. The longer trucks with pup trailers are a severe hazard to all us common folks trying to drive the road safely. Besides this, they will be spilling their polluting contents into the Wild and Scenic Lochsa River when taking the curves too fast.

I am very concerned about the proposal to increase the semi truck load limit on U.S. highway 12. Not only is this a wild and scenic corridor, but the road itself is very narrow and has many sharp turns due to following the river valley.

I have driven this road many times from Portland, Oregon to Missoula, Montana. Larger and longer trucks are completely unsuitable for this highway. If this is allowed there will be even more accidents and fatalities.

I hope your will do your job and deny this proposed load limit increase.

We all know that the Transportation Department's yellow warning sign (Winding Road next 99 Miles) is really the equivalent of 'Fake News'. Running 129,000 pounds of dual trailers makes perfectly good sense under the Republican controlled Idaho government.

What does a few more lives matter when stacked up against corporate profit? It's perfectly understandable, making money is the most valued principle of the Republican Party.

But please don't insult our intelligence if these larger loads are allowed on Highway 12 between Lewiston and the Montana border. Approval will be based on profit, money, greed; not public safety!

Keep up the good work!

I am against increasing the size of trucks allowable on Highway

12. It is already hazardous given current allowable trucks. Please keep focused on the beauty this drive provides, unparalleled, many agree.

I am opposed to allowing heavy, longer loads on US 12 from its junction with US 95 to the Montana border. I just drove over 12 from my home in Missoula to visit my folks in Lewiston and must report that the section from the MT border to Lowell is in bad shape with lots of pot holes and breakup. I attribute the damage to the current truck traffic and hard winter. I would even go a step further to suggest that the road be closed to all trucks above a certain size in the winter, much like Teton Pass is now.

I also oppose larger, heavy, longer loads over 12 because of safety issues especially in the summer with recreational traffic is at its peak over the scenic highway. Add to that the increasing number of long distance cyclists that use the road and you have the potential for increased incidents.

As a health professional, recreational user, and Idaho resident, I am in strong opposition to the the proposal to increase truckloads to 129,000 lbs. along the Highway 12 corridor.

The proposed increase in load size will result in more fatalities along the most dangerous road in Idaho. Our family has seen the spills into the Lochsa River from trucks and deaths from accidents along this treacherous route. Putting heavier and longer trucks on this highway will result in more damage to the recreation and more deaths.

Safety is supposed to be the ITD and Otter's main concerns/priorities, as it is Idaho citizen's. Because the Lower Snake River gets negligible barge traffic, it should not be a consideration.

Highway 12 should be protected and not be an industrial corridor for large trucks. The ITD needs to listen to Idaho residents and users of the highway. ITD should reject this proposal from the trucking company. Thank you, and I would like to receive a response.

Please consider the following comments:

ITD's key mission is "providing the safest transportation system possible."

ITD's measurements of safety are "reduction in fatalities" and "reduction in serious injuries."

However, the following ITD data does not reflect the agency is meeting its goals:

- 2011-2014 total fatal Idaho crashes increased 5.7%, and 2014-2015, 13.1%.
- Injury crashes increased 3.1% and 10.1% respectively.
- Commercial Vehicle fatal crashes, 2011-2014, increased 22%, and 2014-2015, 36.4%.

This data suggests 129,000 loads on HWY 12 will further increase crashes and decrease safety.

I've driven HWY 12 for 8 years and have shared the road with bikers, hikers, and that dangerous, slow-moving "Jesus Saves" wagon from Summer 2016 (yikes!). I, along with many others, also cross HWY 12 to access recreation opportunities. 129,000-pound trucks, barreling around corners, will not increase safety.

Our state government has expressed a need for safety as a highest priority:

Idaho Governor Butch Otter, in reference to designating other short highway segments in Idaho as 129,000-pound routes, said: “Safety must be the highest priority, addressing necessary and prudent restrictions on use of designated routes.”

Idaho State Senator Shawn Keough, in reference to Grangeville-to-Kooskia State Highway 13’s possibly becoming a 129,000-pound route, said: “Undoubtedly, allowing 129 GVW (gross vehicle weight) trucks on this route will mean more accidents, more injuries and more deaths. This type of increased suffering seems needless, and I direct conflict to the Legislature’s codified concerns about safety, the governor’s writing concerns about safety, and ITD’s own rules and procedures that place a priority on safety.”

Here are some other pieces of information to consider:

- According to data from 1994-1998, U.S. 12 has the highest fatality accident rate in Idaho.

- Lewiston Morning Tribune, February 13, 2000, headline: “U.S. Highway 12 Is a Scenic but Unforgiving Corridor That Has the State’s Highest Fatality Accident Rate.”

- Idaho State policeman Lt. Mark Peterson, in reference to U.S. 12’s having no room for driver error, said: “You either have a cliff or the river. You don’t have room to make mistakes.”

No doubt much of this push is coming from the Port of Lewiston and the trucking industry.

The Port of Lewiston’s barging numbers have declined for two decades, and a return is not likely in the future. The Port of Portland isn't bouncing back anytime soon. The truck industry’s current request to ITD to have U.S. 12 designated as a 129,000-pound-trucking route defends a dying port and elevates trucking economic

gain over Idaho's third largest industry: recreation and tourism.

So many unique places line U.S. HWY 12. Designations include Lewis-Clark National Historic Trail, Nez Perce National Historic Trail, segment of the Nez Perce National Historical Park, Northwest Passage Byway, Lochsa-Clearwater Wild & Scenic River corridor, segment of the TransAmerica Bicycle Route, and its legendary wildness, beauty, and historical richness. Our state economy relies on recreation and tourism. Let's not replace that with the trucking industry.

Just don't do it. Stop with these terrible administrative rules already.

Really?

You have driven the road haven't you?

I can understand why industry would want to increase the weight limit. What I can't understand is how IDT could ever justify such a change as being to the benefit of Idaho citizens.

I no longer live in Idaho but I *have* driven the Lewis-Clark Highway recently and have, in the past, recommended the drive to friends who are planning Western vacations. With the larger trucks that a 129,000 pound limit would entail, I'm not sure that I could do that in good conscience. Those trucks would transform what is now a scenic drive and a great introduction to Idaho's mountains into a harrowing stressful couple of hours. There is no pressing need for, or benefit to, Idaho for such a change.

Specific Route: U.S. 12

Comments: Increasing the load limits to 129,000 lbs would, first and

foremost, increase the number of serious accidents and fatalities on this very narrow and winding road. It would also damage Idaho's third largest economy, recreation and tourism, and in turn would damage the economy of the entire state. The importance of maintaining the pristine condition of this Wild and Scenic corridor cannot be overemphasized. A spill into the river would do irreparable damage to the fish and other creatures that depend on its quality to survive. In reference to the port of Lewiston being a "major hub", the US Corp of Engineers categorizes the Lower Snake River "waterway" as "of negligible use". Please deny this request as completely unacceptable. Thank you!

Let's just stay with the current HWY 12 weight load, you do not have the capability to manage above that in a responsible and professional manner...You way too political to trust with our Public Resources.....You are just not reliable or trustworthy people!!!!

Specific Route: Hwy 12

Comments: I just read that ITD is considering a high weight limit and long trucks on the Lolo Pass Hwy US 12. That is insane. Every time I drive that road some truck is over the line on a sharp curve. I've encountered many accidents in my 30 years of driving that road. Many of these accidents were by truckers in a hurry and the sharp curves catch them by surprise. Yes, the many grain trucks that used to use it are reduced in numbers just now, but the sharp curves still remain. With long trucks and drivers pushing to meet miles there will be more trucks over the line and that means dead innocent people. Do we really want to have more accidents where it takes a helicopter to get the victims out to medical care? Second, that is a Wild and Scenic River Corridor and that kind of haulage violates the spirit of the W&SR act. You just lost a court case on that; why try again?

This request smacks of greed for perceived economic growth from industry while discounting economic growth from tourism and with little regard for public safety.

Highway 12 is a designated National Scenic Byway on 99 + miles of winding road and follows a designated Wild and Scenic River. This attractive area for scenic driving, whitewater rafting, quality fishing, birdwatching, etc. is matched by limited similar experiences. Economics generated from tourism exceeds would be industrial traffic to the tax subsidized Port of Lewiston.

Safety appears to play a small part in the decision making process with “a set agenda.” We’ve lived through the grain truck destruction of life and property of the 1970’s, ‘80’s and more recently the countless spills of cargo from lumber to oil with costly outcomes.

The state’s inability to properly fund our infrastructure needs are on full display this year on Highway 12. Don’t add to the problems.

When considering Highway 12 for 129,000 GVW the first consideration should be SAFETY, SAFETY, SAFETY. Then you should take a serious look at the economic attributes of tourism in this great state.

NO to 129,000 GVW on Highway 12!

Re: Comments on request for 129,000 lb. trucks on U.S. 12

ITD repeatedly claims public safety is its highest priority. Governor Otter has stated that public safety must be the number one consideration in the approval or disapproval of requests to designate

any section of highway in Idaho as an approved route for trucks weighing up to 129,000 lbs.

Safety

My driveway joins Highway 12 at Milepost 77.4. I previously lived at Milepost 80.4. I have driven on Highway 12 for business and personal reasons for many years and presently drive this highway almost daily.

During the era of heavy grain truck traffic in the 1970s - 1980s, four of my close neighbors—Winslow, Winslow, Johnson, Trainer—were **KILLED** by trucks on Highway 12 in three separate accidents within ten miles of my home.

A truck crash three miles upstream from my home coated the surface of the Middlefork with diesel fuel and produced a pungent odor in the valley. Highway repair costs necessitated by this spill were enormous.

A lumber truck accident filled the Middlefork with loose boards and entire units of lumber.

Dead pigs floated down the Lochsa and Middlefork after a truck tipped over in the river.

Three years ago a truck traveled for 100+ yards with one side of its wheels in the barrow pit until it hit my driveway, then tore out four-foot chunks of pavement across the driveway apron and miraculously returned to the roadway. Based on tire tracks, any driver and passengers of a vehicle in the opposing lane in that vicinity would have been killed.

Two years ago my wife and I could not gain access to Highway 12 from our home because of the lumber scattered across our driveway and for approximately 100 yards of both lanes of Highway 12. The crushed cab of the lumber truck sat in the ditch just 20 yards upstream of our driveway.

Also two years ago another lumber truck drove into the Middlefork of the Clearwater one mile below our driveway.

ITD now claims Highway 12 is a safe route for larger, heavier trucks on the only Highway in Idaho that warns drivers “winding road next 99 miles.”

Highway 13 between Kooskia and Grangeville poses many of the same problems that Highway 12 presents, only for far fewer miles. Here’s what Idaho State Senator Shawn Keough said about the possibility of 129,000 lb. trucks on Highway 13:

“Undoubtedly, allowing 129 GVW (gross vehicle weight) 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 writing concerns about safety and ITD’s own rules and procedures that place priority on safety.”

II. Associated Economic Benefits

ITD’s analysis predicts fewer trucks on Highway 12 if the road is approved for 129,000 lb. designation. This claim is misleading at best. The application from Doug Andrus points to what is likely the major push for this route designation—possible increased grain truck traffic to the Port of Lewiston. The applicant suggests the amount of truck traffic on Highway 12 will increase with route approval, which is highly likely. The applicant further claims that the Port of Lewiston is “an ideal location for shipping and receiving many commodities.” With the exception of an extremely limited amount of sawdust/wood chips that were formerly shipped to the Port of Wilma, the only commodity shipped to or from the POL is grain. The Port ships no lumber, paper, paperboard, pulp, petroleum, or pulse. The decline in shipment of all these commodities began long before the demise of all container shipping on the Lower Snake River. Further, despite years of effort, the Port has been unable to attract any upstream freight for the Bakken oil fields, Alberta tar sands or other interior locations. The Port is largely a taxpayer subsidized real estate development and property management government entity.

Lewis-Clark Terminal, Inc., a private corporation that ships grain from its own property over its own docks, will be the most likely beneficiary of any increased grain truck traffic on Highway 12.

As ITD is well aware, Highway 12 is a National Scenic Byway and All-American Road (one of 30 in the nation), parallels and/or crosses the Nez Perce and Lewis & Clark National Historic Trails, and for 100 miles lies within a federally-designated Wild and Scenic River Corridor. The Lochsa River is also one of the finest white-water rivers in America. In April and May traffic along the Lochsa River travels at 15 mph, with cars of spectators and rafting equipment squeezed onto every turnout and wide shoulder along the route.

Tourism is a major industry in Idaho and particularly so in north-central Idaho. From 2002 to 2013 I personally guided over 5000 visitors from all over the U.S. between Lewiston and Missoula, operated Elderhostels in the region, and was an outfitter on the Lewis & Clark and Nez Perce National Historic Trails. I thus have first-hand knowledge of the tourism industry along Highway 12. Permitting this route to become a major thoroughfare for heavier trucks will discourage tourism in north central Idaho. As so often is the case, ITD is considering only unlikely benefits, e.g. to the Port of Lewiston, while ignoring predictable costs to many of the businesses and private citizens of north central Idaho as well as to ITD itself in road repairs. Replacing sections of highway after an oil spill (highly likely), damaging one or two of America's original 8 Wild and Scenic Rivers, increasing risk to Idaho's threatened and endangered salmon and steelhead..... What about those potential and predictable costs?

Summary

A February 13, 2000 article in the *Lewiston Morning Tribune* began: "U.S. Highway 12 is a scenic but unforgiving corridor that has the state's highest fatality accident rate." Idaho State Police Lt. Mark Peterson accurately described much of the length of Highway 12: "You either have a cliff or the river. You don't have room to make mistakes."

In the safety evaluation portion of ITD's response to the request in question, ITD states that in the past 5 years there have been 41 crashes involving tractor-trailer combinations. Of the crashes involving tractor trailers, the most prevalent contributing circumstances were inattention, speed too fast for conditions, and failure to maintain lane.

I have repeatedly witnessed truck drivers making all of these errors of judgment on Highway 12. If the ITD Transportation Board cares about public safety the board will deny the request to permit 129,000 lb. loads on Highway 12. If the board cares about negative economic impact, it will deny this request. The approval of this route for 129,000 lb. loads would clearly demonstrate that ITD and Idaho's government are ruled by special interests at the expense of taxpayers, small business owners and ordinary citizens.

We're writing to weigh in on ITD's proposal to increase the weight limit for trucks on U.S. Highway 12 from 105,500 to 129,000 pounds. Setting health and safety concerns aside for the moment, this is poor policy for the Clearwater River and two of its tributaries protected as Wild and Scenic Rivers: the Middle Fork of the Clearwater and Lochsa rivers.

Idaho Rivers United has long worked to protect and uphold the qualities for which these rivers were protected and has maintained consistent involvement in federal and state government processes that could threaten those qualities, which include scenery, water quality, fisheries habitat and others. Raising the weight limit for trucks within the river corridor would further industrialize the corridor and degrade the natural environment and the specific Outstandingly Remarkable Values for which the corridor was designated Wild and Scenic under the original 1968 Wild and Scenic Rivers Act.

Second, raising the weight limit for trucks on Highway 12 would make an already dangerous highway more unsafe. Highway 12 is the only

road in Idaho that has a sign proclaiming: “Curves the Next 99 Miles.” The highway is often obscured by fog, snowstorms, rain storms or smoke from forest fires. What’s more, the members and supporters of IRU are frequent users of the river, river corridor and its many pull-outs and recreation facilities. Heavier, slower-to-stop trucks on Highway 12 are a direct threat to the health and safety of people using this federally-recognized river corridor to camp, hike, raft, hunt, fish and other activities.

In addition to the increased safety risks to citizens, we are concerned about an increased risk of environmental degradation. It is not uncommon to read reports of trucking accidents along Highway 12 and, on occasion, these accidents directly impact the aquatic environment. In the petition to increase weight limits on Highway 12 one of the proposed actions is hauling loads of road salt from Montana to ITD maintenance stations. If a 129,000 pound load of road salt were to be introduced into the Lochsa or Clearwater rivers, the effects could be disastrous for federally listed species of salmon steelhead and bull trout.

Lastly, and only loosely related to rivers and river users, heavier trucks are clearly established to take a heavier toll on roads. All Idaho motorists pay for upkeep of our highways, and we object to regulations that will cost Idahoans more for the negligible benefits to a handful of truckers who will haul heavier loads.

In sum, we have three fundamental objections to this proposal.

1. Highway 12 goes through two federally protected Wild and Scenic River corridors. These corridors were protected to uphold the values of clean water, wild fish and the natural landscape. They are not suitable places for further industrialization.
2. Raising the weight limit makes rural, winding Highway 12 less safe for people who live, recreate and visit the area to experience its abundant natural beauty, public lands and world-class whitewater.

3. Studies show that impacts to roads increase with additional weight placed on them. The cost of this weight limit adjustment would be borne by all Idaho motorists and taxpayers.

For the above reasons, Idaho Rivers United respectfully objects to the proposal to increase weight limits on U.S. Highway 12 from 105,500 to 129,000 pounds.

Please deny all requests to increase the load limits to 129,000 pounds for trucks on Highway 12. Please deny all requests to haul hazardous materials on Highway 12. Such hauls jeopardize the Lochsa River.

Thank you for denying the request that 129,000-pound loads be allowed on U.S. Highway 12 in Idaho.

As a Washington State teacher who transported his wife and three daughters over this road each summer for three years to gain an advanced degree and improve my ability as a teacher I'm aware of the value of maintaining the optimal safety for this route to the University of Montana. **Highway 12 was then classified as the most dangerous highway in Idaho, Tanker-truck accidents that have sent oil spills into the Wild & Scenic Lochsa and Middlefork Clearwater rivers have caused significant public inconvenience, environmental damage, fish losses, and huge clean-up costs as well as endangered other drivers.**

Increased numbers and sizes of truck loads traveling US 12 will, in addition to threatening the welfare of families will damage tourism and recreation one of Idaho's largest economic sectors.

Specific Route: Highway 12

Comments: Having lived on Highway 12 for thirty seven years, I am well acquainted with the logistical challenges every driver faces on a regular basis. Although there are stretches of 12 such as the Lewiston area where the highway appears wide and fairly straight, the majority of the remaining miles to the Montana line are narrow and unforgiving. The attempt to legalize these mini megaloads will almost certainly result in disasterous outcomes. Highway 12 can best be described as the only highway that could be constructed in very difficult geography. The length factor will cause these trucks to cross over into oncoming traffic in places like the Kamiah Narrows. The only responsible decision the IDT can make is to deny access to these over length loads.

Specific Route: Highway 12

Comments: I spend 2 to 3 months every year on the Lochsa River for the last 35 years. I've witnessed countless accidents and fatalities on this beautiful but very dangerous roadway. I absolutely oppose heavier and larger truck limits and loads. It was never designed for that type of traffic, nor could it be due to the geography. Use the freeway system, it was constructed for these options. Please consider my objections.

Specific Route: Highway 12

Comments: Why do we have to continue to speak up about keeping highly dangerous vehicles like the 129,000 trucks off of highway 12? Have you ever driven a car on that highway and then have to pass a huge vehicle? Hare you ever stopped to view the beautiful scenery? I could continue with question mark comments but the point is simply that this is a highway for viewing beautiful country and NOT for having to avoid ways for some corporation to make more \$\$\$ at the cost of human enjoyment and/or convenience. Your planners should get a grip on what being a human is all about! (and that is not for individuals to wait for "trickle down" prosperity to come their way.)

Enough is enough. Stop hoping that environmentally cognitive people will let you slip by.

Specific Route: Highway 12

Comments: I am against the increase in truck weight on this wilderness highway, which is already suffering from overpopulation by humans. Also, the amount of road kill of different species is already out of control. To increase the weight that truckers can haul on that highway will just increase the slaughter.

Specific Route: U.S. Highway 12

Comments: **OPPOSED** to **INCREASED LOAD LIMITS** on U.S. Highway 12. My husband and I are strongly opposed to increasing the load limits from 105,500 to 129,000 pounds for large trucks on HWY 12 along the Lochsa and Clearwater rivers through the Lochsa-Clearwater U.S. 12 Wild & Scenic River corridor.

We spent three weeks along the Lochsa River last summer and speak from personal experience. We believe the standing of Highway 12 as a National Scenic Byway should exempt it from use as a heavy industrial transportation corridor for which it is not designed.

We believe the transportation of larger loads jeopardizes the corridor and all it represents in terms of archeology, history, culture, recreation, and scenery. We offer two supporting points: 1) For normal traffic, it is a mentally and physically demanding stretch of road to drive because of the relentless curves, some with speeds as low as 25 mph. It is a two-lane road. These factors contribute to increased risk of accident in transporting larger or longer loads.

The increased risk of accident and proximity of the highway to the Lochsa River and tributaries poses an unacceptable risk to the river.

The Lochsa is also a river used by salmon returning to Idaho to spawn. This area of the Bitterroot Range also contains the priceless archaeology, culture, and history of the Nez Perce Native American tribe and the 1805 trails of the Lewis & Clark Expedition.

The river and its surrounding landscape should be protected. We oppose increasing the load limits for large trucks on HWY 12 from 105,500 to 129,000 pounds, which would expose the Lochsa River and the area's archaeology, history, culture, scenery, and recreation to the risk of damaging accidents caused by the transportation of larger loads under the demanding conditions of this winding, two-lane road: U.S. Highway 12.

2) There are signs on U.S. Highway 12 all along the Lochsa River that designate the highway as a "Wild and Scenic Byway." The U.S. Department of Transportation Federal Highway Administration National Scenic Byways Program began in 1991 to recognize roads having outstanding archaeological, (and) cultural, (and) historic, (and) natural, (and) recreational, and scenic qualities. In 1996, the first roads were designated by the U.S. Secretary of Transportation as National Scenic Byways and All-American Roads--recognized today as America's Byways. The Northwest Passage Scenic Byway (U.S. Highway 12) is included as one of only "300 Best Drives in the U.S." in the Guide to Scenic Highways and Byways published by National Geographic. This Scenic Byway should be protected.

Increasing load limits from 105,500 to 129,000 pounds exposes the Lochsa River, tributary, and surrounding area to unacceptable risk and contradicts the following quote from Ray LaHood, as U.S. Secretary of Transportation. "America's Byways offer us the opportunity to explore our nation in a truly unique way. The U.S. Department of Transportation is committed to preserving these scenic routes to ensure travelers experience the best of U.S. History, culture, and nature. The beauty of these roadways helps tell our American story, whether traveling across the country or close to home." -- Ray LaHood, U.S. Secretary of Transportation.

We oppose increasing load limits from 105,500 to 129,000 pounds through the Lochsa-Clearwater U.S. 12 Wild & Scenic River corridor.

Specific Route: Highway 12

Comments: Please do NOT allow an increase in load limits for trucks on Hgwy 12. Already a dangerous road, it will only lead to more tragedy if this is allowed to happen. Don't allow the self-serving financial incentives of very few to jeopardize the safety of the many good folks that need to use this road on a routine basis. Thank you for considering this input.

Friends of the Clearwater is submitting the following comments on the proposal to upgrade Highway 12 to the routine use of 129,000 pound trucks from the current maximum of 105,500 pounds. We oppose this proposal for three crucial and important reasons. They are listed below.

- **SAFETY:** Highway 12 is a winding road, by geographic and topographic necessity, which makes it a more dangerous road. There have been lumber spills and diesel spills in the Wild and Scenic River Corridor. Diesel spilled into the Lochsa or Middle Fork Wild and Scenic Rivers or the main stem Clearwater River threaten water supplies of local communities down river. The heavier trucks could increase fatalities, especially since there will be no requirements for reduced speeds for trucks that would be between 20% - 25% heavier. Highway 12 already has a high fatality rate.
- **INDUSTRIALIZATION/DEGRADATION OF THE NATURAL ENVIRONMENT:** The Wild and Scenic River Corridor already received considerable truck traffic. Making

it available to larger vehicles will increase the industrialization of this important natural area. This would further degrade the natural values in this area.

- IMPACTS TO ROADS: Studies by the University of Idaho show markedly increased impacts from heavier loads. This affects Idaho citizens and had a negative economic impact on local citizens.

The Idaho Transportation Department (ITD) already has abundant information and data that clearly demonstrate safety concerns, increases in impacts to roads, and impacts to the natural environment. We encourage you to do right by the citizens and reject this proposed increase. Rather than increase load sizes, ITD should consider regulations that could reduce accidents and toxic spills into rivers. This proposal is going in the wrong direction for the safety and health of Idaho citizens and others travelers on Highway 12.

The trucking industry is NEVER satisfied unless we the public pay for its existence: cutting expenses by increasing driver hours, shortening driver distances via back country roads, increasing truck loads, more trailers or higher speeds. It is insane to use hwy 12 for anything but local traffic: we have driven it and it demands ones outmost attention.

The trucks almost forced us off the road by tailgating and swerving, passing close to corners etc. So now they want even more payload???

Boycott them! Already we pay for the ships on the rivers by having no salmon etc!

Big trucks bearing heavy loads on the narrow Hi-Way 12 of the Wilderness Lochsa River is a tragedy almost certain to happen. Now

you want to increase the the trucks load capacity. Unconscionable!
Don't do it!

Specific Route: Highway 12

Comments: Public Safety is the #1 mission of ITD: “providing the safest transportation system possible.”

Governor Otter, in reference to designating other short highway segments in Idaho as 129,000-pound routes, said: “Safety must be the highest priority, addressing necessary and prudent restrictions on use of designated routes.”

Increasing load and length limits will do a lot to increase traffic accidents and fatalities on Hwy. 12. As the highway sign cautions as the road enters the Wild and Scenic Corridor: “Winding Road Next 99 Miles.”

Several years ago Swift stopped using Hwy 12 for the majority of their trucks (a few local owner-operators who know the road well are still allowed to use it). Why? There were way too many 'incidents' on 12. Mostly speeding and going into the river. A few involved hazmat.

So, basically the road was not safe enough to haul even “normal” loads. As a local resident who drives Hwy. 12 frequently I feel the increased load limits will DECREASE the driving safety along the river corridor for myself and my family. The corridor already has the highest accident rate in the state. Why do you want to increase that rate? These same issues apply to Highway 13 between Kooskia and Grangeville. A couple of years ago I came within inches of being crushed between the jersey rail and a truck hauling a double wide trailer up this grade - a "normal" oversize load. For the safety of ALL highway users, please do not increase load limits to 129,000 lbs.

Specific Route: U.S. Highway 12

Comments: I oppose the weight increase on the Lochsa Highway. Larger and heavier trucks represent too great a conflict with the natural values found in the canyon, which is one of America's treasures. I have driven the canyon many times and truck traffic is already as great as it should be.

Specific Route: Highway 12

Comments: You are not proving anything when you give in to large corporations who want to monopolize/ruin/"use" our highways. What you need to prove is that you care about our natural areas and the people who make use of them in humanistic ways. Shame on you!

Specific Route: Route 12, Lochsa Highway

Comments: Dear ITD - Do NOT increase the truck load limit from 105,500 pounds to 129,000 pounds on Route 12. The trucks that travel this winding road along the Wild & Scenic Lochsa River are quite large and heavy enough. Route 12 is a Scenic Byway of spectacular beauty, not a road to be further commercialized. Larger and heavier trucks would not only degrade the experience of travelling this road for the rest of us, but also would increase the risk involved. After the megaloads issue, I would have thought that you at the Idaho Dept. of Transportation would have gotten the message by now about the importance of protecting this scenic route.

Specific Route: US 12

Comments: To whom it may concern: Please do NOT increase the load limit on US 12 from 105,500 pounds to 129,000 pounds. Such an increase would put public safety at risk, and the increased heavy truck traffic could harm North Central Idaho's recreation and tourism economy.

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 12 as a route for 129,000-pound trucks ("129 GVW").

My biggest concern with the proposed application is from milepost 86 to milepost 174. This section of Highway 12 has numerous tight corners with poor sight lines. It is also section of road that is prone to rock slides, tree blow downs and avalanches. Highway 12 has a very high accident rate and fatality rate on this section of roadway given the traffic volume. This section of highway has very poor sight lines, very few passing lanes, and very small margin of error when drivers lose control. There has also been 3 major fuel spills from fuel tankers over turning along highway 12 in the last 10 years.

In previous letters to ITD (most recent being January 16, 2016), we reference a brake study by National Highway Traffic Safety Administration ("NHTSA") dated October 2010. This study illustrates the effects of driver reaction times to obscured unforeseen obstacles on highways with poor sight lines like Highway 12. Drivers have difficulty anticipating obstacles in roadway if they cannot see them. The NHTSA report and other studies show that stopping distances for commercial trucks range from 500 feet to 600 feet at 60 mph. The poor sight lines and corners on Highway 12 will not allow larger loads to stop in time to avoid unforeseen obstacles in roadway.

We have also documented in previous letters to ITD that not all brake positions are the same. A study by Commercial Vehicle

Safety Alliance ("CVSA") tested differences in stopping distances when tractor brakes were degraded by 20% versus a 20% degradation of trailer brakes. The increased stopping distance more than doubled when tractor brakes degraded over trailer brakes degraded. Federal Motor Vehicle Safety Standard 121 (Brake Standard) is based on tractor's having to do majority of braking in panic stopping situations. Article in July 2013 Heavy Duty Trucking magazine states "in panic situations, which the 60-mph requirement FMVSS 121 simulate, vehicle weight shifts forward, putting more load on tractor brakes". So the problem with most I 29K configurations is overall weight is being increased but no additional braking is being done by the tractor. The physics in this situation is straight forward. If the mass is increased, the amount of force ($K=mv^2$) takes to stop vehicle also increases. Unless tractor brakes are enhanced with higher performing disc brakes, 129K configurations will not stop as quickly as 10SK or 80K configurations. This is a bad combination on dangerous roads like Highway 12.

On March 9, 2017 a KBC Transport truck hit a downed tree around milepost 97 on Highway 12. The driver came around a sharp corner and was unable to stop in time to avoid a 24 inch diameter tree across the highway. The driver had to make a choice either go into the river or hit the ditch. This all happened with a 53 foot chip trailer loaded with shavings having a gross weight of 63,000 pounds.

The driver chose the ditch and ducked across the seat as the tree smashed top of cab and exhaust stack. The driver rode back into town with snow plow and they had to cut two trees out of road to make it back to Kooskia. KBC driver then jumped in with wrecker and they had to cut 3 trees out of road to make it back to truck and 3 more trees on the way back to town. This all happened between 2am and 4am in the morning during a bad storm, but it is not unusual to have downed trees across the road. The stretch of highway from milepost 86 to milepost 174 is remote section of

highway that has very difficult weather conditions. If this was fuel truck carrying a 129K load, it would have resulted in a major fuel spill.

I believe 129K loads can be hauled safely, but I do not believe roads like Highway 12 are safe for these loads. The combination of poor sightlines and unstable hillsides just make this too dangerous road for 129K loads.

I am firmly opposed to enlarging trucks & loads on the scenic, dangerous highway.

I would respectfully request that the IDT **NOT** allow for increased heavy truck load limits on Highway 12. I have seen so many bad accidents over the years on this road, and so many of them seem to involve large trucks. Since speed enforcement appears infrequent at best (through no fault of the police - just due to budget limitations and many other priorities), one mechanism for improving the dismal safety stats on this road, would be to ensure there are not more trucks carrying even heavier loads. Please consider this input - I'd be grateful as would my family.

Between Lewiston and the Montana line, Highway 12 is a beautiful drive, but a dangerous, curvy road, and mostly just enough room for traffic to flow both ways.

The experimental oversize truckloads caused a lot of expence and annoyance for the oil companies and the public. What makes the ITD think that bigger, longer trucks wouldn't cause more expence, annoyance, and the possibility of damage to the environment and quite possibly an increase of deaths? The possibility of making more money will not outweigh the danger the oil companies and the public would face.

I am opposed to increasing the load limit on Route 12 along the Lochsa River. This is a very dangerous route for normal-sized semi trucks, much less for longer rigs. Please do not allow heavier trucks on this Wild and Scenic route along the river.

COMMENT AGAINST ALLOWING 129,000-POUND TRUCKS/LOADS ON U.S. HIGHWAY 12 IN IDAHO:

Approval of increasing load limits on U.S. Highway 12 from 105,500 pounds to 129,000 pounds would decrease public safety, increase truck-involved accidents and fatalities, and damage North Central Idaho's recreation and tourism economy. Approval should NOT be granted.

According to ITD's [mission](#), "providing the safest transportation system possible" is ITD's number-one goal. Among ITD's measurements of safety are "reduction in fatalities" and "reduction in serious injuries." According to ITD [crash data](#), commercial vehicle fatal crashes in Idaho from 2011-2014, increased 22%, and 2014-2015, 36.4%. Should ITD be expanding truck weights and resulting lengths on U.S. Highway 12 that will almost surely further increase crashes, rather than increase safety? Clearly not. Doing so would exhibit a disregard for all-vehicles' driver and passenger safety on U.S. 12. ITD could not publicly nor legally justify such disregard.

Idaho Governor Butch Otter, in reference to designating other short highway segments in Idaho as 129,000-pound routes, said: "Safety must be the highest priority, addressing necessary and prudent restrictions on use of designated routes."

ITD has wisely posted a warning sign, downriver from my home, at approximately Milepost 75.5 on U.S. 12: "Winding Road Next 99 Miles." I've driven the full 174-mile Lewiston-to-Lolo-Pass route

many many times, and can solidly say that almost the entire route is “winding.” ITD can not now ignore the already existing and acknowledged U.S.12 safety risks of which “Winding Road” warns.

Idaho State Senator Shawn Keough, in reference to Grangeville-to-Kooskia State Highway 13’s possibly becoming a 129,000-pound route, said: “Undoubtedly, allowing 129 GVW (gross vehicle weight) trucks on this route will mean more accidents, more injuries and more deaths. This type of increased suffering seems needless, and I direct conflict to the Legislature’s codified concerns about safety, the governor’s writing concerns about safety, and ITD’s own rules and procedures that place a priority on safety.” Like U.S. 12, State Highway 13 is a “winding road.”

This morning I drove down my driveway along the Middle Fork Clearwater River to enter U.S. Highway 12. At the bottom, I waited about 20 feet up the drive for a west-bound normal-size semi-truck to round the long curve immediately upriver of my driveway. I waited those 20 feet up because I’ve grown accustomed to having semis round that curve fast, too fast, so that one once ran into the ditch for about 100 yards before crumbling the paved entry to my drive, careening into the left lane before being able to cross back into its lane on yet another curve and continuing on (one tire missing) to Lewiston, where it was halted (thanks to my phone call) by police. Had I or one of my neighbors, friends or welcome tourists been approaching from the west, he or she would have been struck, likely killed, by that semi-truck. And that’s not the first time a regular-size semi has swung off-road across my driveway along U.S. 12! This morning, the semi driver swung across the yellow center line to avoid heading into the ditch and my drive. His avoidance driving isn’t unusual. Semi-trucks crossing the yellow line on curvy Highway 12 is common.

According to data from 1994-1998, U.S. 12 had the highest fatality accident rate in Idaho. *Lewiston Morning Tribune*, February 13, 2000, headline: “U.S. Highway 12 Is a Scenic but Unforgiving Corridor

That Has the State's Highest Fatality Accident Rate." With no exaggeration, Idaho State policeman Lt. Mark Peterson, in reference to U.S. 12's having no room for driver error, said, "You either have a cliff or the river. You don't have room to make mistakes."

Since the mid-sixties, when I came to north central Idaho, I've seen or heard about lots of regular-size semi-truck loads landing in the river - lumber, pigs, oil, trucks themselves, etcetera. Four Middle Fork neighbors and other friends on other stretches of U.S. 12 have been killed in semi-truck/car accidents. I drive U.S. 12 almost every day, as does my husband, my daughter and son-in-law and two grandchildren. My second daughter, son-in-law and three grandchildren frequently drive U.S. 12 upriver from Lewiston for camping, hiking, and such. Dozens of my friends and neighbors drive U.S. 12 several times a week if not daily. Because of the curves, narrow highway in much of U.S. 12's distance, rock bluffs, narrow-to-no shoulders, and most of all semi-trucks, I worry about all of these family members, friends, and neighbors. U.S. 12, by its very nature - plus regular-size semi-trucks - is already not safe. Adding 129,000-pound vehicles will surely increase the highway's danger.

Even though Doug Andrus Distributing is a private business and the Port of Lewiston's barging numbers have trended steeply downward for at least two decades, the truck industry's current request to ITD to have U.S. 12 designated as a 129,000-pound-truck highway says:

"This is a key stretch of highway that will allow Doug Andrus Distributing to better serve the Idaho Transportation Department in delivering road salt to different maintenance sheds. Increasing weights from 105,500 to 129,000 will be a massive boost to the efficiency of road salt transportation, allowing Doug Andrus and other competitors help ITD lower the cost of transportation in the future. Also, Lewiston is a major hub in the shipment of sea going goods. The waterways coming into Lewiston from the ocean make it an ideal location for shipping and receiving many commodities. Getting these commodities to and from Lewiston in

an efficient manner has a major impact on the viability of the port. Increasing the allowable weights on U.S. 12 will help keep Lewiston competitive as a shipping location.”

In reference to the above industry statements, I say:

Delivery of road salt (on behalf of one private business or more than one) is NO VALID REASON to further endanger public safety on U.S. 12.

“Major hub,” referring to the Port of Lewiston, is BLATANTLY FALSE. The US Corps of Engineers categorizes the Lower Snake River waterway as “of negligible use” - that includes Port of Lewiston. A look at the POL’s shipping numbers over the last couple decades quickly tells you why.

Finally, North Central Idaho’s economy must be considered. According to ITD’s [mission](#), its second goal is to “Provide a mobility-focused transportation system that drives economic opportunity.” In North central Idaho, there is no “economic opportunity” based upon salt delivery. There is no “economic opportunity” based upon 129,000-pound trucks whizzing (or careening) by. There is, however, a thriving economy based upon tourism and recreation, thanks to the U.S. 12 Wild & Scenic designation, its Northwest Passage Scenic Byway designation, its Nez Perce National Historic Park designation, its Lewis & Clark Trail designation, its top-billed status as a superb motorcycle route, its being a segment of the Trans-continental Bicycle Route, its Lochsa Historical Ranger Station, its National Forest designations, its nearby Selway Bitterroot Wilderness designation, and its exceptional ability to lure recreationists of all sorts - cross country skiers, snowshoers, snowmobilers, 4-wheel enthusiasts, backcountry horsemen and horsewomen, fishers, hikers, birders, wildflower identifiers, swimmers, picnickers, rafters, whitewater and quiet water kayakers, campers, sightseers, photographers, and more. What a treasure the

U.S. 12 corridor now is! Damaging it by adding heavier, lengthier truck traffic makes NO sense nor cents.

Increased numbers and sizes of truckloads traveling U.S. 12 will damage North Central Idaho's (and the state's third largest) economic sector: tourism and recreation. U.S. 12's designations and its legendary wildness, beauty, and historical richness - draw in-state, national and international recreationists and tourists to North Central Idaho. Turning 129,000-pound truckloads loose on U.S. 12 will in effect industrialize U.S. 12 and make the route much less safe for non-bigrig drivers and, thereby, discourage recreationists and tourists from exploring North Central Idaho and endanger the lives of all travelers on U.S. 12.

The answer to the question of whether or not to allow 129,000-pound loads couldn't be more obvious: NO.

Comments re: U.S. 95

Specific Route: U.S. 95

Comments: It makes more sense to extend the 129,000 lb zone on US 95 to Lewiston instead of cutting it off at the Benewah-Latah County Line. The two primary beneficiaries of the higher weight limit will be businesses hauling to the Port of Lewiston and chip trucks hauling to Clearwater Paper. Neither of them will receive any benefit from the new weight limit if they can't haul to Lewiston.

I live two blocks East of HWY 95 in Moscow. I turn off a side street without a light onto 95 to get into town. I do not want to encounter heavier or longer trucks, it is already a compromising situation at times with all the wood-chip trucks we must deal with.

I am thinking these heavier trucks will probably be louder as they go by and will make more noise with their brakes also. The sound from

highway trucks in our neighborhood is quite loud already. There are a number of busy intersections in Moscow that HWY 95 encounters and the potential for a mishap or fatality would be greater with heavier trucks and our bikers, pedestrians and cars. These concerns far outweigh any possible road surface benefits.

Comments re: U.S. 12 and Idaho 13

I am opposed to granting the request of the trucking industry to increase the allowable weight to 129,000 pounds on both highways 12 and 13. I have a personal relationship with both highways. I've cycled both of them as well as driven, of course. Also my parents' memorial (their only memorial) is on 12 near Weir Creek.

1. Increased weight means longer units, trucks plus pups. This length is particularly dangerous on curves. Curves are the most attractive and dangerous feature of both roads.
2. Increased load capacity makes trucking cheaper so truck traffic would be increased.
3. Increased truck traffic and longer trucks would result in more accidents.
 - a. Fatal Idaho crashes have increased a lot, nearly doubled: 5.7% to 13.1% from 2014 to 15.
 - b. Commercial vehicle fatal crashes have increased from 22% to 36% from 2014 to 15.
4. Highway 12 has Idaho's highest fatal accident rate. Do you want to increase this rate in the name of commercial trucking?
5. Motorists, motorcyclists, and bicyclists are at greater risk of death and injury with increased weights, lengths, and traffic. You should go hang out some summer day at any of the pleasant turnouts along the

Locsha and count the lines of motorcyclists, especially. But there are always bicyclists as well.

I humbly drive an old Subaru Legacy. Does a truck have more right to use 12 than I do? Is his reason for being there better than mine?

6. Increased danger of fatalities and injuries will damage Idaho's vital economic sector of tourism and recreation. Highway 12 has a list of designations based on its beauty that is exceptional. People searching for a natural and peaceful and slow and gorgeous route are drawn to 12. And 13 as well. Increasing weight and length and amount of trucks will discourage people from coming to north Idaho and damage local economies.

Don't kill a number of families and motorcyclists and bicyclists and say, "sorry, but that's business."

7. The Lochsa river is specially clean and bigger and more trucks mean more accidents and that means mean more spills.

Highway 12 runs through sacred country for me; you don't have to be Nez Perce to revere the living Earth in the Lochsa area.

Living but violated. Living but under attack. Living but with less and less each day. Living but more and more precious as other remnants and islands of biodiversity and beauty die. Beauty is a value in itself and must be protected. Biodiversity is the foundation of life.

Every move ITD makes trying to make highway 12 (and 13) industrial routes to serve commercial interests is a move in the wrong direction, fouling and harming where we came from and what we must cherish and protect and remain connected to. Commerce isn't the highest value a developed society has. Health is more important.

Do the right thing. Deny this request.

Comments re: Idaho 8

My family has owned a home on the east edge of Deary for over 50 years. There has been a steady increase of traffic on Hwy 8 over that time.

Trucks are a large part of it. My dad was a logger and a truck driver. I have nothing against truck drivers. But it seems they have gotten more less considerate over the years. They are the biggest, noisiest rigs on the road. Every small and large town has a sign or two posted at city limits “No Compression Brakes” but they are ignored more often than not. The highway has gotten so noisy that I have to stop conversations when a trucker rides his brakes past my house and diesel fumes stink up the air.

If the Canadian company re-opens the Simplot Clay pit out of Bovill we don't know what kind of hauling on Hwy 8 that will entail. So, yes I am concerned when the state talks about allowing bigger rigs to haul on N. Idaho hiways.

Our highways are narrow and curvy w/few passing lanes and treacherous weather conditions sometimes.

I think it's a terrible idea to allow bigger trucks to go through our towns.

As I look at the hiways today esp. # (highway number left out of comment) and #8 I can't help but believe that 105,500 is too heavy for our roads much less adding to that – the ruts on #3 are actually dangerous especially when it rains. Doesn't seem like extra axles do any good.

Comments re: Idaho 3

Don't think large trucks should come up hwy 3.

Comments re: Use of Salt

I am concerned salt being used on roads is causing pavement damage. Also it is causing more wiring damage than mag chloride. Also causing structural damage to steel frames and components.

Verbal Comments

My concerns with the 129,000 gross vehicle weight is not only the length but I know they have to meet off-track but when you start pulling that much weight, it creates an unsafe pulling behind you, especially with that many corners and the height of their loads and especially with the dangerous river conditions.

On a daily basis, you run across trees across the road, big boulders and rocks, elk and deer in a plethora, more than a lot of other roads that I've been on. And like I said, I get -- on a daily basis, you see, if not one but all of these things combined and when you pack in 129,000 pounds, your stopping distance and your safety of getting stopped for these increases for things that can happen, some hazards, you know, losing your load, getting out of control, especially when you're pulling doubles is to rather packing your weight like they do on a set of -- like a 53-foot trailer.

And then the winter conditions, there's a lot of slides. There is sometimes several feet of snow on the road and that makes it difficult for a truck that's pulling 129,000 pounds. And to me, it just creates another safety issue of the drivers that are able to pack -- not saying it can't be done but a lot of times, these outfits that are looking to do this aren't hiring completely ones that are used to packing that much weight so they bump up to it and there's a difference in how you handle it.

If somebody hasn't pulled that much weight before, it's a lot different than anything that you've ever pulled and it doesn't seem like a lot but 28,000 pounds or so of difference is a lot of weight.

And as I said, I'm not so much concerned about the road surface. I understand that that probably could be even an improvement with the more axles. But to me, it's the lesser of the evil than, you know, pulling that much weight in my opinion.

But just one thing I wanted to throw at them is somebody that's - like I said, I've got a million and a half miles logged up there and I do it every day, 365 days a year almost.

And I go to Missoula every day and you see a lot on that road and I've done it for right at 15 years now. And to see starting increasing this much weight to me creates a hazard and I see -- the reason I say that, when you see this configuration, I see tankers that come down the river all the time with fuel. And a lot of times, they're the ones that get out of control the most because they're pulling a four-axle pup. And with that many corners and the road conditions, if you go up there right now, you'll see the road conditions. It is ugly up there. Right now, there's big old potholes. There's big ruts in the road.

And that throws that trailer around like this and you start stacking that much weight like it does those tankers, I've seen dozens and dozens of them tanker wrecks and they're only packing 105. So you start stacking way more weight on them, it makes that pup a lot more squirrely.

And it likes to do this and to me, they're the ones -- especially going down the pass -- Lolo Pass is very windy and steep and they're the ones that -- their trailers want to pass them all the time because of that and if you start adding that much more weight back there, to me, it -- it increases that risk by quite a bit.

The other thing that I have -- I wonder about is I know that Idaho brought out -- and this is for their bridges is fine but what about the bridges in Montana on that stretch? I know that that's not our concern as an Idahoan but that's what we ran into just a couple weeks ago when they closed the bridge down at Lolo Hot Springs. They said it was unsafe to travel. They had to go in and shore it up and the road was shut down.

Now, if we start adding more weight to that, you know, I know it gets - - Idaho gets out of sight and out of mind but for me that travels it every day, that much more weight is going to tear them couple of bridges that are in Montana down. If they don't fix them, we don't get to run our route. So to me, that's a little bit more concern too.

Right now, they barely let us go across the bridge there at Lolo Hot Springs as it is so if you bump up to 130,000 every day, is it just going to tear that bridge apart and then we won't get to travel it.

So that was a concern of mine too. I'm like, okay, so I know our Idaho bridges can handle that but the other concern is, you know, I know right now we're using a lot of salt on the road up there. Using like a 70 percent salt mix. That's absolutely tearing the snot out of our road.

I mean I love it for the sense that, yeah, it keeps our road - the Idaho pass has never been so good in all these years and I've drove it a lot of years but there's a downfall to that. There's huge potholes. The road is coming apart at the seams. You pack that much weight, it makes it that much more challenging.

And what happens is too is then they get into Montana. Montana don't keep their roads like that so what happens is that these drivers - I seen it six times this year. They top over the top of Idaho just fine and they start down Montana, there's been about six to seven truck wrecks. I just came across one on Friday. Same way. The road was slicker than snot. Montana didn't keep it up and they wreck.

You know, that's what happens. I can climb up Lolo Pass just fine and I start down the Montana side and it's slicker than snot. And you don't know that because they don't have any signs up there or nothing. Their road crew is no where near as good as Idaho's. I mean I'll pat Idaho on the back. They've done a phenomenal job of keeping our road clear.

But that's the other factor is that just on the Montana side, they're going to have a lot more accidents with more weight and -- but the other thing is have any of you guys made a trip to Missoula in the last month?

I encourage you to drive up there from here to there. You'd be surprised at how much - my parents live in Montana. We own a construction outfit over there and, like I said, I drive over there on my time off, whatever. And as I was coming home last night, I was sideways in the road in my personal pickup I don't know how many times from hitting potholes. The potholes right now are deep and there's thousands of them.

And again, I fully understand that those axles will not have an effect on the road surface. What I'm saying is that road conditions now, their ability to maintain that machine on the road is increased. And that's what bothers me because I meet them on the road and I have been literally just about run off the road I don't know how many times by the tankers pulling these pups - this style of pup and they - they can't keep it in control because a lot of them are trying to avoid the potholes. A lot of them are trying to meet their off-track, things like that.

And then again, then you add into the element that - their imperfections of not being a good driver, perhaps speeding a little bit. But then you throw that much more weight at them, their ability to slow it down, get it stopped and get it under control is lessened by a lot and they're the ones that I'm meeting on the road. I don't want to get hit by them and that's what kind of concerns me. It concerns me quite a bit, actually.

So that's what concerned me too is when they do that, they're going to get more fuel capacity and I've been on six fuel spills up there so far in my time and it's - is that going to get worse? Hope not. I haul garbage that way so - mine is I don't want to put any garbage in the river.

But this - it comes from me, you know, and in my time of driving, I don't have a ticket or an accident on my driving record. I've never been so much as pulled out of the ditch up there so I know what it takes to maintain safety and it's a pretty good record that I'm proud of.

And for all the years that I've been driving to not have any mishaps or anything but - and like I said, I've hauled a lot of - 130 up to 250 to 300,000-pound loads. Rock crushers and stuff like that, you know, that

get pretty heavy and it takes a certain person to do it. It really does. Your objective thinking is to go slow, be careful and be proactive of what you're going to find up there. Like I said, every day, it changes. Every day, that road changes and I mean the elk that come up out of the river and fly right in front of you. You hit that elk, it sends you in another lane. You're trying to get it under control. It happened to me. I had an elk come up out of the river. I hit it. My hood flew up and I couldn't see where I was going and my headlights hit the ground to where you can't see plus your hood's blocking. It was raining. It's hard to get stopped.

I had a light load of shavings on. It was only, at that time, I had maybe 70,000-pound total load. Got stopped pretty quick but for a guy that's pulling that much weight, sometimes that don't happen and when I ended up getting stopped, I was right near the edge. I'm like I think of other people in that same scenario that that can happen to, you know.

I go to Kendrick at least once a month, often twice a month. And I go to Lewiston. I've been along Highway 3 numerous times in the last six weeks. It's horrible.

I know all about axle weight, tire weight, distribution of load. I understand it. I do not think this is going to mean fewer trucks. I think it's going to be just as many or more trucks and they will be heavier. And it's a real crying shame that the Legislature doesn't have the nerve to spend the money, to appropriate the money, to fix the roads. I am opposed to heavier trucks on Highway 3.