



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY

April 5, 2024

The Honorable Rick Crawford, Chair
The Honorable Eleanor Holmes Norton, Ranking Member
Committee on Transportation and Infrastructure
Subcommittee on Highways and Transit
United States House of Representatives
Washington, D.C. 20515

Dear Chair Crawford and Ranking Member Norton:

During the March 21, 2024, hearing entitled, *Rural Transportation Challenges: Stakeholder Perspectives*, recently introduced legislation, the Modernizing Operations for Vehicles in Emergencies Act (MOVE Act), H.R. 7496, was discussed and identified as necessary to mitigate potential future emergency scenarios by allowing truck weight increases. Measures, including this one, which undermine the federal truck weight limit have been shown to reduce truck safety, damage roadway infrastructure and endanger road users. Advocates for Highway and Auto Safety (Advocates) urges you to reject this proposal and other similar efforts, and rather to prioritize safety in policies and legislation involving commercial motor vehicles (CMVs).

Truck Crash Involved Fatalities and Injuries Continued to Rise in 2022

While the overall number of traffic fatalities and injuries slightly decreased in 2022, nearly 6,000 people were killed in crashes involving a large truck, an increase of two percent over 2021.¹ Since 2009, the number of fatalities in large truck involved crashes has increased by 76 percent.² Additionally, more than 160,600 people were injured in crashes involving a large truck in 2022, a nearly four percent increase over 2021.³ The cost to society from crashes involving large trucks and buses was estimated to be \$128 billion in 2021, the latest year for which data is available.⁴ When adjusted solely for inflation, this figure amounts to over \$151 billion.⁵

¹ Traffic Safety Facts: Research Note Overview of Motor Vehicle Traffic Crashes in 2022, NHTSA, April 2024, DOT HS 813 560.

² *Id.* and Traffic Safety Facts 2021: A Compilation of Motor Vehicle Crash Data, NHTSA, Dec. 2023, DOT HS 813 527. Note, the 76 percent figure represents the overall change in the number of fatalities in large truck involved crashes from 2009 to 2022. However, between 2015 and 2016 there was a change in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of fatalities in truck involved crashes increased by 21 percent and between 2016 to 2022, it increased by 27 percent.

³ Traffic Safety Facts: Research Note Overview of Motor Vehicle Traffic Crashes in 2022, NHTSA, April 2024, DOT HS 813 560.

⁴ 2023 Pocket Guide to Large Truck and Bus Statistics, FMCSA, Dec. 2023, RRA-23-003.

⁵ CPI Inflation Calculator, BLS, Jan 2021 to Jan 2024 available at https://www.bls.gov/data/inflation_calculator.htm.

Overweight Trucks are Proven to Be More Deadly and Damaging

While certain special interests may continue to advocate for suspension of federal limits on the weight and size of CMVs for a variety of reasons, these laws are essential to protecting truck drivers, the traveling public, and our nation's roads and bridges.

According to the 2021 Infrastructure Report Card from the American Society of Civil Engineers, America's roads receive a grade of "D" and our bridges were given a "C."⁶ Nearly 40 percent of our 615,000 bridges in the National Bridge Inventory are 50 years or older, and one out of 11 is structurally deficient.⁷ Increasing the weight of a heavy truck by only 10 percent increases bridge damage by 33 percent.⁸ The Federal Highway Administration (FHWA) estimates that the investment backlog for bridges, to address all cost-beneficial bridge needs, is \$131.8 billion.⁹

Raising truck weight could result in an increased prevalence and severity of crashes. Overweight trucks also pose serious safety risks. Brake violations are a major reason for out-of-service violations.¹⁰ According to a North Carolina study by IIHS, trucks with out-of-service violations are 362 percent more likely to be involved in a crash.¹¹ This is also troubling considering that tractor-trailers moving at 60 miles per hour are required to stop in 310 feet – the length of a football field – once the brakes are applied.¹² Actual stopping distances are often much longer due to driver response time before braking and the common problem that truck brakes are often not in adequate working condition.

Broad and overwhelming opposition to increases to truck size and weight limits has long been noted. The public, local government officials, safety, consumer and public health groups, law enforcement, first responders, truck drivers and labor representatives, families of truck crash victims and survivors, and even Congress on a bipartisan level have all rejected attempts to increase truck size and weight. Also, the technical reports released in June 2015 from the U.S. Department of Transportation (DOT) Comprehensive Truck Size and Weight Study concluded there is a "profound" lack of data from which to quantify the safety impact of larger or heavier trucks and consequently recommended that no changes in the relevant truck size and weight laws and regulations be considered until data limitations are overcome.¹³

The Infrastructure Investment and Jobs Act (IIJA, Pub. Law 117-58) invested billions of dollars to improve and elevate the safety of our nation's roads and bridges. An increase to federal truck

⁶ 2021 Infrastructure Report Card – Bridges, American Society of Civil Engineers (ASCE); 2021 Infrastructure Report Card – Roads, ASCE.

⁷ 2021 Infrastructure Report Card – Bridges (ASCE).

⁸ Effect of Truck Weight on Bridge network Costs, NCHRP Report 495, National Cooperative Highway Research Program, 2003.

⁹ 2021 Status of the Nation's Highways, Bridges, and Transit: Conditions and Performance, Chapter 7, p. 7-12, FHWA, 2021.

¹⁰ Roadside Inspections, Vehicle Violations: All Trucks Roadside Inspections, Vehicle Violations (2023 – Calendar), FMCSA.

¹¹ Teoh E, Carter D, Smith S and McCartt A, Crash risk factors for interstate large trucks in North Carolina, Journal of Safety Research (2017).

¹² Code of Federal Regulations (CFR) Title 49 Part 571 Section 121: Standard No. 121 Air brake systems (FMVSS 121).

¹³ Comprehensive Truck Size and Weight Limits Study, Federal Highway Administration (June 2015).

size and weight limits is contrary to this objective, will worsen safety problems, and could divert rail traffic from privately owned freight railroads onto our already overburdened public highways. Despite claims to the contrary, bigger trucks will not result in fewer trucks. Following every past increase to federal truck size and weight limits, the number of trucks on our roads has gone up. Since 1982, when Congress last increased the gross vehicle weight limit, truck registrations have more than doubled.¹⁴ The U.S. DOT study also addressed this meritless assertion and found that any potential mileage efficiencies from the use of heavier trucks would be offset in just one year.¹⁵

We urge this Subcommittee to oppose any increases to federal truck size and weight limits, including in response to emergency declarations, and mandating such for pilot programs and state or industry specific exemptions. We have continuously commended Congress for the safety advances included in the bipartisan IIJA, and we have persistently urged the U.S. DOT to swiftly implement the directives. These solutions will help address the motor vehicle crash fatality and injury toll which remains at historically high levels, with more than 42,500 people killed on U.S. roads in 2022.¹⁶ This public health crisis must be addressed, and not worsened by permitting deadly and damaging overweight trucks.

Thank you for your consideration of our concerns. We look forward to continuing to work with you to improve safety on our nation's roadways.

Sincerely,



Catherine Chase
President

cc: The Honorable Sam Graves, Chair, U.S. House of Representatives Committee on Transportation and Infrastructure
The Honorable Rick Larsen, Ranking Member, U.S. House of Representatives Committee on Transportation and Infrastructure
Members of the U.S. House of Representatives Committee on Transportation and Infrastructure

¹⁴ 2017 Annual Report.

¹⁵ Comprehensive Truck Size and Weight Limits Study, Federal Highway Administration (June 2015).

¹⁶ Traffic Safety Facts: Research Note Overview of Motor Vehicle Traffic Crashes in 2022, NHTSA, April 2024, DOT HS 813 560.