



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY

February 25, 2025

The Honorable Shelley Moore Capito, Chair
The Honorable Sheldon Whitehouse, Ranking Member
Committee on Environment and Public Works
United States Senate
Washington, D.C. 20510

Dear Chair Capito and Ranking Member Whitehouse:

Thank you for holding tomorrow's hearing, "Infrastructure Investment and Jobs Act Implementation and Case Studies." Advocates for Highway and Auto Safety (Advocates) respectfully requests this letter be included in the hearing record.

Our Nation's Roadways Are Dangerous, Disastrous and Deadly for All Road Users

America's roads move an ever-increasing number of people and goods.ⁱ We all rely on our infrastructure system for household supplies to be delivered, for family vacations to be enjoyed, and for our Nation's economy to thrive. However, Americans suffer a significant death and injury toll caused by preventable crashes. On average, 116 people were killed every day on roads in the U.S., totaling just over 42,500 fatalities in 2022.ⁱⁱ This is a 26 percent increase in deaths in just a decade.ⁱⁱⁱ An additional 2.38 million people were injured.^{iv} Early projections for 2023 traffic fatalities remain at a similar historic high level; nearly 41,000 people are estimated to have died that year.^v

The American Society of Civil Engineers (ASCE) reports "these vital lifelines are frequently underfunded, and over 40% of the system is now in poor or mediocre condition."^{vi} In their 2021 Report Card, roads received a grade of "D," with 43 percent in poor or mediocre condition.^{vii} Bridges received a "C," with 42 percent being at least 50 years old and more than 46,000 considered structurally deficient.^{viii} Moreover, our deteriorating roads are forcing the Nation's motorists to spend nearly \$130 billion each year for extra vehicle repairs and operating costs.^{ix}

In addition to the physical and emotional repercussions of motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).^x This figure equates to every person living in the U.S. essentially paying an annual "crash tax" of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.^{xi} When adjusted solely for inflation, this figure amounts to over \$1.72 trillion.^{xii} Research from the Network of Employers for Traffic Safety (NETS), finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.^{xiii}

According to the Federal Highway Administration (FHWA), traffic incidents, which include crashes, are one of the seven main causes of traffic congestion which erodes the reliability of travel time.^{xiv} The report notes that for truck operators, "[t]he cost of unexpected delay can add another 20

percent to 250 percent” to their hourly costs.^{xv} 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.^{xvi} When adjusted solely for inflation, this figure amounts to over \$151 billion.^{xvii}

These devastating crashes impact millions of Americans each year including the family of U.S. Department of Transportation (DOT) Secretary Duffy and Members of Congress. These tragedies result in long-lasting impacts which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities.

Safety Advances in the Infrastructure Investment and Jobs Act (IIJA) Must be Implemented Comprehensively and with Expediency

We once again commend the Committee on Environment and Public Works for advancing commonsense safety solutions in the Infrastructure Investment and Jobs Act (IIJA).^{xviii} The design, maintenance and building of roads throughout the country can and should prioritize getting from Point A to Point B safely for all users as well as quickly and efficiently to avoid hazardous scenarios.

The Safe System Approach (SSA) is incorporated in the IIJA and undertakes a holistic method to improve safety in the roadway environment. The SSA is “an effective way to address and mitigate the risks inherent in our enormous and complex transportation system. It works by building and reinforcing multiple layers of protection to both prevent crashes from happening in the first place and minimize the harm caused to those involved when crashes do occur.”^{xix} SSA assumes that humans will make mistakes and that we must anticipate this and make accommodations to account for limited human injury tolerances through five elements: Safe Vehicles, Safe Road Users, Safe Roads, Safe Speed and Post-Crash Care.

Roadway infrastructure improvements consistent with the SSA to limit conflicts include: reducing speed limits; employing automated enforcement to augment traditional enforcement; adding speed curbing features like speed humps; performing road diets; and, installing roundabouts, as well as educating on driver behavior such as using real-time speed feedback signs.

Other examples of infrastructure to promote safety include adding lighting and improving sight lines; installing leading intervals and pedestrian hybrid beacons; ensuring curb extensions, accessible sidewalks, protected intersections and separated bike lanes; and, prioritizing road separations and rumble strips. Localities can advance these and other infrastructure improvements systemically by requiring their adoption as appropriate in road projects.

Traffic circles or “roundabouts” have been found by the Insurance Institute for Highway Safety (IIHS) to be a safer alternative to traffic signals and stop signs by reducing speed and conflict points.^{xx} In fact, intersections converted from traffic signals or stop signs to roundabouts have reduced injury crashes up to 80 percent and cut all crashes by nearly half (47 percent).^{xxi} Moreover, along with improving safety the Federal Highway Administration (FHWA) has noted traffic circles are efficient in keeping travelers moving and “can be implemented in both urban and rural areas under a wide range of traffic conditions.”^{xxii} Federal funding for states and localities to build roundabouts and other proven infrastructure upgrades is available through the Safe Streets and Roads for All (SS4A) program and should be preserved.

The IIJA authorizes safety upgrades to the Highway Safety Improvement Program (HSIP) that will help to protect vulnerable road users (VRUs) and provides robust funding for the SS4A program to provide direct access to localities to make roadway improvements consistent with SSA and Complete Streets policy. These changes promote infrastructure features that consider multimodal use, calm traffic, separate different types of road users, reduce vehicle speeds, and prevent or mitigate harmful interactions among road users. Advocates supports enhancing HSIP to allow for funding of projects that can strengthen protections for VRUs, perpetuating and expanding access to SS4A funding opportunities, advancing Complete Streets measures and ensuring that all communities across the Nation can take advantage of federal dollars to implement these innovative approaches to improving public safety on their roadways.

Initially authorized by the Highway Safety Act of 1966, the Highway Safety Program, known as Section 402, which is jointly administered by the FHWA and the National Highway Traffic Safety Administration (NHTSA), provides federal funding to states to reduce motor vehicle crashes and address dangerous driving behaviors.^{xxiii} To receive funding, states are required to have a highway safety program that is approved by the U.S. DOT. Advocates supports this program as it is critical in assisting states in addressing roadway safety. In addition, Advocates has supported expanding eligible uses of the dollars under the program to combat emerging issues of concern such as drugged driving and distracted driving.

As with all federal safety grants, it is critical that these programs include clear and transparent measures for success to ensure funds are spent as intended and result in actual safety benefits and improvements. Advocates supports the continuation and funding for these safety grant programs to help reduce the death, injury and financial toll on American roads.

Automated Enforcement Improves Roadway Safety

Automated enforcement (AE), such as speed and red-light running safety cameras, is a verified deterrent against frequent crash contributors and has been identified by NHTSA, FHWA, the National Transportation Safety Board (NTSB), Centers for Disease Control and Prevention (CDC), IIHS and others as an effective means to curb dangerous driving behavior.^{xxiv} Moreover, the Congressional Research Service (CRS) has found that speed camera programs are effective in reducing speeding and/or crashes near cameras.^{xxv} Additionally, for VRUs, such as pedestrians and bicyclists, small changes in speed can have a large impact on survivability. New crash tests performed by IIHS, the AAA Foundation for Traffic Safety, and Humanetics show that modest five to ten miles per hour (mph) increases in speed can have a severe impact on a driver's risk of injury or even death.^{xxvi} Provisions in the IIJA correctly permit use of certain federal funds for AE programs in school and work zones. This allowance should be expanded to curb deadly driving on other roadways, especially high injury networks.

Advocates Supports Efforts to Alleviate the Truck Parking Shortage

Advocates recognizes that the lack of safe and convenient truck parking is an issue that merits federal action. However, simply dedicating more federal funding to building parking facilities will likely not solve the issue alone. Studies have demonstrated that the parking shortage is often most acute in areas of the country such as along the Interstate 95 corridor in the Northeast where building facilities for parking may not be realistic due to costs and scarcity of open land.^{xxvii} As such, along with providing funding to address this issue, Advocates urges policymakers to examine additional remedies to address this problem such as use of existing dormant facilities.

Overweight Trucks Damage our Nation's Crumbling Infrastructure

Federal limits on the weight and size of commercial motor vehicles (CMVs) are intended to protect truck drivers, the traveling public, and our Nation's roads, bridges and other infrastructure components. Yet, provisions allowing larger and heavier trucks that violate or circumvent these federal laws to operate in certain states or for specific industries have often been tucked into must-pass bills to avoid public scrutiny.

The U.S. DOT Comprehensive Truck Size and Weight Study found that introducing double 33-foot trailer trucks, known as "Double 33s," would be projected to result in 2,478 bridges requiring strengthening or replacement at an estimated one-time cost of \$1.1 billion.^{xxviii} This figure does not account for the additional, subsequent maintenance costs which will result from longer, heavier trucks. In fact, increasing the weight of a heavy truck by only 10 percent increases bridge damage by 33 percent.^{xxix}

Raising truck weight or size limits could result in an increased prevalence and severity of crashes. Longer trucks come with operational difficulties such as requiring more time to pass, having larger blind zones, crossing into adjacent lanes, swinging into opposing lanes on curves and turns, and taking a longer distance to adequately brake. In fact, double trailer trucks have an 11 percent higher fatal crash rate than single trailer trucks.^{xxx} Overweight trucks also pose serious safety risk. Brake violations are a major reason for out-of-service violations.^{xxxi} 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.^{xxxii} 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.^{xxxiii} 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.

There is overwhelming opposition to any increases to truck size and weight limits. 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. 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.^{xxxiv}

The IJA investments are improving and elevating the safety of our Nation's roads and bridges. Any increase to federal truck size and weight limits will undermine this objective, worsen safety problems, and 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.^{xxxv} 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.^{xxxvi}

We urge this Committee to oppose any increases to federal truck weight limits, including pilot programs and state or industry specific exemptions.

Ensuring Safe Integration of Automated Driving System (ADS) Technology

Autonomous driving technology has made advances yet remains unable to consistently operate safely with all road users, conditions and scenarios, as evidenced by fatal and serious crashes involving passenger motor vehicles equipped with ADS of varying levels.^{xxxvii} Further, the interest in expanding the use of this technology must not be used as a pretext to eviscerate essential safety regulations administered by NHTSA and the Federal Motor Carrier Safety Administration (FMCSA), and particularly in the absence of new standards to ensure the technology performs safely and as needed. The public safety protections provided by safety standards and the Federal Motor Carrier Safety Regulations (FMCSRs) have become no less important or applicable simply because a passenger vehicle or a commercial motor vehicle (CMV) has been equipped with an ADS. In fact, additional substantial public safety concerns are presented by automated CMVs. Moreover, vehicles equipped with ADS may result in new impacts on roadway and bridge infrastructure due to considerations such as increased weight and mileage, and use of lane centering technology.

Advocates and numerous stakeholders developed the “[AV Tenets](#),” policy positions which should be foundational to any AV legislation.^{xxxviii} The AV Tenets have four main, commonsense categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and worker rights; and, 4) ensuring local control and sustainable transportation. While the AV Tenets were developed for application to vehicles under 10,000 pounds, many of the principles also could apply to larger commercial vehicles. At a minimum, autonomous CMVs must meet safety standards for the ADS and related systems, including for cybersecurity, and operations must be subject to adequate oversight as a starting point for their potential deployment.

In December 2024, Advocates released a public opinion [poll](#) that found 9 of 10 adults surveyed are concerned about themselves or their loved ones getting into motor vehicle crashes.^{xxxix} The survey also noted that 88 percent of respondents were concerned about sharing the roads with driverless trucks, with 69 percent acknowledging a high level of concern.^{xl} The significant percentage expressing concern was regardless of political affiliation or region.^{xli}

Thank you again for convening this hearing and for your consideration of these issues. We look forward to continuing to work with you to improve safety for all road users on our Nation’s roadways.

Sincerely,



Catherine Chase
President

cc: Members of the U.S. Senate Committee on Environment and Public Works

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