

## **Submitted Rulemaking Comments (statewide permitting)**

Below is a listing of the public comments the Idaho Transportation Department received regarding IDAPA 39.03.15 – Rules Governing Excess Weight Permits for Reducible Loads. The open comment period was 10/5/16 - 10/26/16.

To review the comments, please go to the listed page numbers. Thank you!

<b>Date</b>	<b>Name/Organization</b>	<b>Pages</b>
10/12/16	Homedale Highway District	2
10/24/16	Simplot Transportation	3
10/25/16	The Right Truck for Idaho Coalition	4-5



**Mailing Address:** P.O. Box 713, Homedale ID 83628-3458  
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October 12, 2016

**IDAHO TRANSPORTATION DEPARTMENT**  
**P.O. Box 7129**  
**Boise, ID 83707-1129**

**From: Board of Commissioners of The Homedale Highway District**

**RE: Written Comment Concerning,**  
**39-0315-1601 Rules Governing Excess Weight Permits for Reducible**  
**Loads**

To Whom It May Concern:

As this Board understands the intent of the proposed ruling (Larger Loads – Less Loads), these loads might prove to show lighter footprints, and that the carriers are responsible for any and all cost of engineering studies that maybe required. This Board is in the belief that there is a possible one (1) mile access to these routes for terminals and facilities for fuel, food, lodging and repairs that the local jurisdictions would have no word on these accesses. This District responded to a letter, sent by ITD (Dec, 4, 2015), requesting a listing/map of approved local roads used during the pilot project. The Boards conclusion was that there are no approved routes for 129,000 lb. loads within its jurisdiction. This Board wishes clarification of the (one (1) mile access) for further study.

Chairman of the Board, Larry Prow  
Vice-Chairman, Joel Wilson  
Commissioner, Scott Salutregui

October 24, 2016

Ramón S. Hobdey-Sánchez  
Governmental Affairs Program Specialist  
Idaho Transportation Department  
3311 West State Street  
P.O. Box 7129  
Boise, Idaho 83707-1129

RE: Proposed Rules on Statewide Permitting

Dear Mr. Hobdey-Sánchez:

Thank you for the opportunity for Simplot Transportation to comment on the state's efforts to implement a statewide permitting system following passage of Senate Bill 1229.

We support the proposed rules as they are currently drafted. A single statewide permitting system, as administered by ITD, would create an efficient process for companies, drivers and law enforcement officials. It would reduce administrative burden and promote the effective movement of goods throughout the state.

Again, thank you for the opportunity to comment on the Idaho Transportation Department's proposed rules. If you need to contact me, please call 208-780-5724 or e-mail [bill.moad@simplot.com](mailto:bill.moad@simplot.com).

Sincerely,



Bill Moad  
Director Fleet Operations  
Simplot Transportation

October 25, 2016

Idaho Transportation Department  
3311 W. State St.  
P.O. Box 7129  
Boise, ID 83707-1129

Dear Mr. Ramon Hobdey-Sanchez,

Thank you once again for the opportunity to provide comment on IDAPA rule 39.05.15 on the statewide permitting system. The Right Truck Coalition has enjoyed the opportunity to work with the Idaho Department of Transportation (ITD) staff and board members and want to commend all for the exceptional job done by ITD since rulemaking began. This process has been fair and objective and we appreciate the openness and expediency that the ITD has shown in sharing critical information to stakeholders. ITD should also be commended for keeping this rulemaking process narrowly focused on the permitting and safety requirements for all vehicles over 80,000 pounds.

1) While respecting the responsibilities of local jurisdictions, the Coalition strongly supports an efficient single permitting process for Idaho as it is essential to commerce. It is also good government and avoids costly duplication of government administrative processes at the 289 local jurisdictions and unnecessary paperwork for both the government and private sector.

2) Also there needs to be credible, fair, and uniform standards across the state for qualifying routes and issuing permits for "over legal" trucks. The presumption should be that permits will be issued unless there is a clear and verifiable reason that a carrier does not meet required standards, or that the highway infrastructure is inadequate. To avoid arbitrary and discriminatory government, permits should be uniformly available to all properly configured trucks over 80,000 lbs. up to the current state limit of 129,000 lbs.

3) The future of Idaho's commerce depends on higher gross volume trucking. The trucking and shipping companies of Idaho are investing millions in modernizing truck fleets for larger loads. These investments not only improve business, but also improve safety through modern braking and power systems and reduce road impacts by reduced axel loads. Idaho's governments at all levels need to cooperate, support and facilitate modern trucking through a single permitting program and uniform, cooperative programs to permit roads for truck traffic.

4) We respectfully request that a representative of the shipping industry be made a member of the ITD Board's special 129,000 truck advisory committee.

Once again, thank you for your efforts in conducting a fair and expedient rulemaking process. It has been a pleasure working on this issue with the ITD.

Sincerely,

THE RIGHT TRUCK FOR IDAHO COALITION

<b>Arlo G. Lott Trucking LLC</b>	<b>Associated Food Stores</b>	<b>Monsanto</b>
<b>Milk Producers of Idaho</b>	<b>Idaho Grower Shippers Association</b>	<b>US Ecology Inc.</b>
<b>Idaho Trucking Association</b>	<b>Idaho Farm Bureau Federation</b>	<b>Scoular Company</b>
<b>Food Producers of Idaho</b>	<b>WinCo Foods</b>	<b>Idaho Grain Producers</b>
<b>Idaho Forest Group</b>	<b>The Amalgamated Sugar Company</b>	<b>Idaho Oregon Fruit and Vegetable Association</b>
<b>Transystems LLC</b>	<b>Northwest Dairy Association</b>	<b>Northwest Grocery Association</b>
<b>Glanbia Nutritionals</b>	<b>Darigold, Inc.</b>	<b>Idaho Dairymen's Association</b>
<b>Idaho Sugar Beet Growers Association</b>	<b>Idaho Cattle Association</b>	<b>Far West Agribusiness Association</b>
	<b>Northwest Food Processors Association</b>	