



**Your Safety • Your Mobility
Your Economic Opportunity**

IDAHO TRANSPORTATION DEPARTMENT

P.O. Box 7129 • Boise, ID 83707-1129

(208) 334-8000 • itd.idaho.gov

Idaho Transportation Board

Subcommittee on 129,000 Pound Truck Routes

January 21, 2020

Idaho Transportation Department
Room 209
3311 West State Street
Boise, Idaho

3:30 PM

ACTION ITEMS

	<u>Page</u>	<u>Time*</u>
1. Welcome and Preliminary Matters – Chair Dwight Horsch		3:30
- May 23, 2019 Subcommittee meeting minutes	1	
2. Case #201708: US-93 – Milepost 244.33 to 350.82, District 6	5	3:35
Chief Engineer's (CE) Analysis and Recommendation		
– Program Specialist (PS) Lance Green	7	
Public Comments on two route requests		
– Communication Manager Vince Trimboli	17	
Discussion and Recommendation - Chair Horsch		
3. Case #201709: SH-75 – Milepost 219.5 to 244.33, District 6	12	3:45
CE's Analysis and Recommendation – PS Green	14	
Public Comments – Communication Manager Trimboli		
Discussion and Recommendation - Chair Horsch		
4. Adjourn		4:00

*Listed times are estimates only.

Idaho Transportation Board
129,000 Pound Truck Route Subcommittee

May 23, 2019

Idaho Transportation Board (ITB) 129,000 Pound Truck Route Subcommittee Chairman Dwight Horsch called the meeting to order at 1:30 PM on Thursday, May 23, 2019 at the Idaho Transportation Department in Boise, Idaho. ITB Members Julie DeLorenzo and James R. Thompson were present.

Principal Subcommittee staff members and advisors present included Deputy Attorney General Tim Thomas, Public Transportation Manager (PTM) Jeff Marker, Public Involvement Coordinator (PIC) Adam Rush, Bridge Engineer Matt Farrar, Compliance Officer (CO) Reymundo Rodriguez, District 3 Operations Engineer Jason Brinkman, and Executive Assistant to the Board (EAB) Sue S. Higgins.

ITB Chairman Jerry Whitehead was also present.

Chairman Horsch said that because the Subcommittee is comprised of three members, motions will not require a second.

January 16, 2019 Meeting Minutes. Member Thompson made a motion to approve the minutes from the January 16, 2019 Subcommittee meeting as submitted. The motion passed unopposed.

Chairman Horsch confirmed that public hearings were held on the District 3 route requests being considered today and the engineer's analysis was completed on each route. The Subcommittee members have received and reviewed the public comments. After listening to staff's analysis of each route, the Subcommittee will determine if additional information is needed or present the full Board with a recommendation to accept or deny the request.

Case #201712: US-30, Milepost (MP) 21.53 to 27.94. PTM Marker presented the Chief Engineer's analysis on behalf of Acting Chief Engineer Blake Rindlisbacher. The Division of Motor Vehicles (DMV) confirmed that this section of US -30 falls under the red route category allowing 115-foot overall vehicle length and a 6.5-foot off-track. The bridge analysis determined that the three bridges on the route will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. The pavement is in good condition with no deficient sections. There are no safety concerns and the Chief Engineer's analysis recommends approving the route.

PIC Rush said there was a lot of interest in the five route requests. Two hearings were initially conducted in December 2018. Due to concerns with insufficient notification of the hearings and the proximity to the holidays, an additional public hearing and 30-day public comment period were scheduled last month. Additionally, staff gave a presentation on the

129,000 pound truck route requests in Gem County. A total of 53 public comments were received on the five routes. A number of comments were either in support of or opposed to all of the route requests. A few comments specifically mentioned US-30.

Member DeLorenzo referenced some public comments claiming that the process was not transparent. Because a second public hearing and 30-day public comment period were conducted and staff visited Gem County, she does not believe that concern is valid. She is confident the process to designate these 129,000 pound truck routes was followed.

Member DeLorenzo stated that even if the routes are approved for vehicle combinations up to 129,000 pound trucks, operators still need to obtain permits to travel on the highway(s) at that weight. She understands that some citizens are concerned with safety, but she emphasized that those concerns are taken into consideration. Because Member DeLorenzo believes the process was followed correctly and the engineering analysis did not identify any concerns, she made a motion to recommend that the Idaho Transportation Board approve the 129,000 pound truck route request for US-30, milepost 21.53 to 27.94.

Chairman Horsch asked if any of the three bridges on US-30 are longer than 115 feet. PTM Marker replied no. All of the structures are short spans.

The motion passed unopposed.

Case #201710: SH-52, MP 14.4 to 28.4. PTM Marker said the DMV confirmed that this section of SH-52 falls under the red route category allowing 115-foot overall vehicle length and a 6.5-foot off-track. The bridge analysis determined that the six bridges on the route will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. The pavement is in good condition with no deficient sections. There are no safety concerns and the Chief Engineer's analysis recommends approving the route.

PIC Rush said there were a couple of comments on SH-52, but they did not specify which section of the highway the comments applied to.

Member DeLorenzo made a motion to recommend that the Transportation Board approve the 129,000 pound truck route request for SH-52, milepost 14.4 to 28.4. The motion passed unanimously.

Case #201705: SH-52, MP 28.4 to 30.42. PTM Marker said the DMV confirmed that this section of SH-52 falls under the red route category allowing 115-foot overall vehicle length and a 6.5-foot off-track. The bridge analysis determined that the one bridge on the route will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. The pavement is in good condition with no deficient sections. There are no safety concerns and the Chief Engineer's analysis recommends approving the route.

In response to a question from Chairman Horsch, PTM Marker replied that yes, 105,500 pound vehicles currently operate on this route.

Member DeLorenzo requested confirmation that vehicle combinations up to 129,000 pounds have the same footprint as 105,500 pound configurations, both commercial vehicles are the same length, and the 129,000 pound configurations require more axles so they put less weight per foot on the pavement. PTM Marker responded that all of those statements are correct. Additionally, Member DeLorenzo noted that the applicant intends to operate fewer trucks on the highway because he will be able to haul at a higher weight.

Member DeLorenzo made a motion to recommend that the Transportation Board approve the 129,000 pound truck route request for SH-52, milepost 28.4 to 30.42. The motion passed unanimously.

Case #201711: SH-72, MP 0.0 to 1.99. PTM Marker said DMV confirmed that this portion of SH-72 falls under the red route category allowing 115-foot overall vehicle length and a 6.5-foot off-track. The bridge analysis determined that the one bridge on the route, which is a short span, will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. The pavement is in good condition with no deficient sections. There are no safety concerns and the Chief Engineer's analysis recommends approving the route.

Member DeLorenzo asked for confirmation regarding off-tracking: when a 129,000 pound vehicle combination goes around a corner, it has the same footprint as a 105,500 pound truck: the path of the 129,000 pound truck will be the same as the path of a 105,500 pound truck. PTM Marker replied in the affirmative. The off-track of 129,000 pound trucks will be the same as the 105,500 pound vehicles that are currently operating on the highway.

PIC Rush said the Department received 12 comments in support of this route request and 13 opposed.

Member DeLorenzo made a motion to recommend that the Transportation Board approve the 129,000 pound truck route request for SH-72, milepost 0.0 to 1.99. The motion passed unanimously.

Case #201704: SH-16, MP 100.0 to 113.9. PTM Marker said DMV confirmed that this portion of SH-16 falls under the red route category allowing 115-foot overall vehicle length and a 6.5-foot off-track. The bridge analysis determined that the seven bridges on the route, which are all short spans, will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. Overall, the pavement is in good condition but there is a .8 mile section rated poor and deficient. He acknowledged the number of public comments expressing concern with Freeze Out Hill because there are no passing lanes. Although there are no safety concerns, PTM Marker mentioned that there was a fatality involving a commercial vehicle last fall. A passenger vehicle crossed the center line and struck the truck head on. The Chief Engineer's analysis recommends approving the route.

Member DeLorenzo said she is familiar with this highway and Freeze Out Hill. She asked if 129,000 pound vehicles are slower than 105,500 pound trucks. PTM Marker believes there are variables depending on the tractor.

Member DeLorenzo requested confirmation that each 129,000 pound vehicle has to apply for and be granted a permit before operating at that weight. CO Rodriguez confirmed the requirement for operators to obtain permits. He added that the Administrative Rule includes a provision related to the horse power of 129,000 pound commercial vehicles.

PTM Marker reported that the Department has a project planned in several years to construct a passing lane at the top of Freeze Out Hill.

PIC Rush said the majority of comments received were on this route, including 37 expressing opposition to this route request. Most of those concerns related to Freeze Out Hill and motorists making poor decisions to pass slower vehicles.

Member DeLorenzo believes that the fact that the requestor intends to operate fewer trucks at 129,000 pounds than it currently operates will improve safety and result in less congestion on the route. Additionally, the 129,000 pound vehicle configurations have more axles and more brakes, which should enhance safety. Because state highways are to safely and efficiently move people and goods and because the Department is in the process of extending SH-16 to I-84, she supports the designation of SH-16 for vehicle combinations up to 129,000 pounds.

Member DeLorenzo made a motion to recommend that the Transportation Board approve the 129,000 pound truck route request for SH-16, milepost 100.0 to 113.9. The motion passed unanimously.

IDAPA Rule 39.03.06 – Governing Special Permits for Extra-Length/Excess Weight, Up to 129,000 Pound Vehicle Combinations. EAB Higgins presented minor changes to the referenced rule related to the Board's process to designate these routes. If approved, the new language will mirror the process outlined in the 129,000 Pound Truck Route Manual.

There were no objections to the proposed revisions, so they will be presented to the full Board for consideration.

The meeting adjourned at 2:20 PM.

Respectfully submitted by:
SUE S. HIGGINS
Executive Assistant & Secretary
Idaho Transportation Board



Request For Designated Routes Up To 129,000 Pounds

Idaho Transportation Department

ITD 4886 (Rev. 03-14)
itd.idaho.gov

2017084593

2017095H75

This form is designed to be completed electronically. If completing manually and additional space is needed, continue the narrative on the reverse side. Correspond the number of the section on the front with the continuation on the reverse.

Company Name Arlo G. Lott Trucking, Inc.		Contact Person's Name Andy Lott	
Contact Phone Number 208-280-2554	Fax Number 208-324-8668	E-Mail Address andy.lott@agltrucking.com	
Company Address P.O. Box 110		City Jerome	State ID Zip Code ID 83338

State Highway Route(s) Requested

Vehicles operating on the requested routes cannot exceed the maximum overall length or off-track as shown on the Extra Length Map at <http://www.itd.idaho.gov/dmv/poe/documents/extra.pdf>. Submit a map with requested route(s) along with this completed form.

Highway Number	Beginning Milepost	Ending Milepost	Highway Number	Beginning Milepost	Ending Milepost
US 93	247.5 244.33*	35.816 350.82*			
SH 75	244.33*	219.5			

Local Route(s) Requested

Roadway Name(s)	Beginning Milepost	Ending Milepost	Jurisdiction Name	Date Request Sent

Reasons for Request - Continue on reverse side if necessary, corresponding the number of the section with the continuation.

1. Justification Enlarge the 129,000 route, to enhance the transport of Molybdenum from Clayton ID, to 145 MONTANA BORDER*		
2. Associated Economic Benefits Reduce congestion, decrease carbon and Increase Efficiency		
3. Approximate Number of Trips Annually 1000 currently at 105,000 lbs.		
4. Commodities Being Transported Molybdenum		
5. Anticipated Start Date to Use Requested Routes 12-1-2017		
Requestor's Printed Name Andrew Lott	Requestor's Signature 	Date 11/9/17

Requestor is required to submit a completed application to ITD (see below) and to city, county, and/or highway district officials where the requested state route (or state route segment) is contiguous to respective jurisdiction(s).

Idaho Transportation Department Attn: Chief Engineer PO Box 7129 Boise ID 83707-1129	or	Fax: (208) 334-8195 Email: officeofthechiefengineer@itd.idaho.gov
---	----	---

ITD Use Only

Hwy Review	D-1 <input type="checkbox"/>	D-2 <input type="checkbox"/>	D-3 <input type="checkbox"/>	D-4 <input type="checkbox"/>	D-5 <input type="checkbox"/>	D-6 <input type="checkbox"/>	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date		
Bridge Review	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date	Chief Engineer	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date	Sub-committee	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date

Cc: Local Highway Technical Assistance Council (LHTAC)

Page 1 of 1

* WRITE-IN CHANGES COORDINATED WITH REQUESTER.

Handwritten initials





129,000 Pound Evaluation of US-93

M.P. 244.33 to M.P 350.82

(Case #201708US93)

Executive Summary

Arlo G. Lott Trucking, Inc. submitted a request for 129,000 pound trucking approval on US-93 between milepost (MP) 244.33 at the intersection with SH-75 and MP 350.82 at the Montana Border for transportation of Molybdenum. Currently 1000 trips are made annually at 105,500 pounds. The requested section of US- 93 has a split designation, milepost 244.33 to 263.85 and milepost 304.7 to 350.82 are designated as red routes and as such all trucks must adhere to the 6.5-foot off-track and 115 foot overall vehicle length criteria. Additionally from milepost 263.85 to 304.7 of US-93 is designated as a blue route and as such all trucks must adhere to the 5.5-foot off-track and 95 foot overall vehicle length criteria. ITD Bridge Section confirms the twenty-nine bridges on the route will safely support 129,000 pound vehicles. District 6 analysis shows this section of road in good condition. The Office of Highway Safety analysis shows this section of US-93 has one Non-Interstate High Accident Intersection Location (HAL) and has four HAL Clusters. Department of Motor Vehicles, Highway Safety, Bridge Asset Management and District 6 all recommend proceeding with this request.

Detailed Analysis

Department of Motor Vehicles (DMV) Review

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

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

Off-tracking is the turning radius of the vehicle combination, which assists in keeping them safely in their lane of travel. Off-tracking occurs because the rear wheels of trailer trucks do not pivot, and therefore will not follow the same path as the front wheels. The greater the distance between the front wheels and the rear wheels of the vehicle, the greater the amount of off-track. The DMV confirms that the requested routes falls under one of the above categories and meets all length and off-tracking requirements for that route. **More specifically, the requested section of US-93 from milepost 244.33 to 263.85 and from milepost 304.7 to 350.82 is designated as a red route and as such all trucks must adhere to the 6.5-foot off-track and 115 foot overall vehicle length criteria. The requested section of US-93 from milepost 263.85 to 304.7 is designated as a blue route and as such all trucks must adhere to the 5.5-foot off-track and 95 foot overall vehicle length criteria.**

Bridge Review

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

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

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

ITD District 6 Evaluation

This segment has been evaluated and the District recommends proceeding.

District 6 has evaluated the roadway characteristics, pavement condition, and traffic volumes on US-93 M.P. 244.33-350.82 in response to the request to make this segment a 129,000-pound trucking route. The District has found no concerns with this action and recommends proceeding. Details of the evaluation are provided below.

Roadway Characteristics

This roadway is a major rural collector with the roadway geometry outlined below.

Table 1. US-93 Roadway Geometry

Mileposts		Lanes	Terrain	Left Turn Lane Type	Right Turn Lane Type	Right Paved Shoulder Width (ft)	Parking
244.33	300.00	2 – 1 each direction 12'	Hills	None	None	1 - 2	No
300.00	343.60	2 – 1 each direction 12'		None	None	2 - 3	No
343.60	350.82	2 – 1 each direction 12'		None	None	4 - 5	

* City of Challis has a TWLTL that is 14' wide M.P. 245.9-246.7.

City of Salmon has a TWLTL that is 14' wide M.P. 303.7-305.2.

***Passing lanes have been added on US93 Ascending:**

M.P. 343.6-344.2

M.P. 345.5-346.05

M.P. 346.6-346.8

M.P. 347.8-350.82

Pavement Condition

The requested section of highway is asphalt and is in generally good condition and is not considered deficient in cracking rutting or ride. US93 MP 280.821-305.242 received an overlay in 2015, and MP 244.33-350.82 received a seal coat in 2016. US93 MP 337.00 - 350.82 received an overlay in 2019. Spring breakup limits do not pertain to this section at this time.

Table 2. 2016 TAMS Visual Survey Data

Mileposts	Pavement Type	Deficient	Condition	Cracking Index	Roughness Index	Rut Average (in)
244.325-250.500	Flexible	No	Good	4.00	3.72	0.13
250.500-256.464	Flexible	No	Good	4.00	3.70	0.13
256.464-256.683	Flexible	No	Good	4.90	3.44	0.11
256.683-257.196	Flexible	No	Good	4.90	3.35	0.12
257.196-263.000	Flexible	No	Good	3.50	3.59	0.13
263.000-268.660	Flexible	No	Good	3.50	3.40	0.14
268.660-269.639	Flexible	No	Good	4.40	3.39	0.16
269.639-273.896	Flexible	No	Good	5.00	4.03	0.09
273.896-278.000	Flexible	No	Good	5.00	4.24	0.08
278.000-285.900	Flexible	No	Good	5.00	4.18	
285.900-292.500	Flexible	No	Good	5.00	4.19	
292.500-299.000	Flexible	No	Good	5.00	4.21	0.10
299.000-304.300	Flexible	No	Good	5.00	4.34	0.23
304.300-304.675	Flexible	No	Good	4.20	3.62	0.29
304.675-305.213	Flexible	Yes	Good	5.00	2.92	0.41
305.213-310.000	Flexible	No	Good	3.60	3.15	0.21
310.000-315.592	Flexible	No	Good	3.80	3.96	0.14
315.592-316.000	Flexible	No	Good	4.40	3.72	0.14
316.000-326.000	Flexible	No	Good	4.50	3.74	0.21
326.000-343.629	Flexible	No	Good	4.50	3.23	0.08

Traffic Volumes

The speed limit of the highway varies between 25 and 60 mph. There are 2 stop lights in this segment located in the city of Salmon. The traffic volumes are provided below.

Table 3. 2016 Traffic Volumes

Mileposts	AADT	CAADT	% TRUCKS
244.325-246.444	2100	140	14
246.444-246.598	3700	150	7
246.598-246.992	2100	150	7
246.992-299.452	980	150	9
299.452-304.262	2600	210	8
304.262-305.081	5790	160	9
305.081-305.369	8000	120	8
305.369-306.364	2920	120	8
306.364-326.346	1320	160	8
326.346-350.819	650	190	11

Truck Ramps

No runaway truck ramps exist.

Port of Entry (POE)

The POE does maintain one rover site on this section of highway US-93 (MP 308.80).

Highway Safety Evaluation

This US 93 segment has one Non-Interstate High Accident Intersection Location (HAL) and has four HAL Clusters. The locations are shown in the table below with their statewide ranking.

Analyses of the 5-year accident data (2011-2015) shows there were a total of 317 crashes involving 412 units (8 fatalities and 181 Injuries) on US 93 between MP 244.325 and MP 350.819 of which only 10 crashes involved tractor-trailer combinations. Of the crashes involving tractor trailers, the most prevalent contributing circumstance was speed too fast for conditions. Two injuries and no fatalities resulted from the crashes with tractor trailers. Implementation of 129,000 pound trucking is projected to reduce truck traffic on this route.

Table of HAL Segments US 93:

Route	Statewide Rank	Milepost Range	Length (miles)	County
US 93	740	305.215	Intersection	Lemhi
US 93	101	321.987-322.487	0.5	Lemhi
US 93	185	310.903-311.403	0.5	Lemhi
US 93	286.5	307.804-308.304	0.5	Lemhi
US 93	444	271.819-273.319	1.5	Lemhi

Additional Data:**Bridge Data:**

Route Number: US 93
Department: Bridge Asset Management
Date: 9/15/2019

Route	From:	SH 75 Junction
	Milepost:	244.33
	To:	Montana State Line
	Milepost:	350.82

Highway Number	Milepost Marker	Bridge Key	121 Rating ^a (lbs)
93	244.51	17830	348,200
93	244.84	17835	240,000
93	246.74	17840	246,000
93	251.39	17846	276,000
93	254.77	17850	378,000
93	254.87	17855	330,000

93	254.96	17860	378,000
93	256.79	17866	312,000
93	263.84	17870	154,200
93	268.39	17876	688,000
93	281.91	17880	234,000
93	305.24	17885	170,000
93	309.03	17890	166,000
93	309.75	17895	220,000
93	310.26	17900	238,000
93	315.56	17905	200,000
93	319.01	17910	220,000
93	320.93	17915	270,000
93	324.36	17920	364,000
93	326.27	17925	235,800
93	327.26	17930	232,000
93	333.73	17935	OK EJ
93	336.88	17940	344,000
93	341.35	33340	464,000
93	341.40	33345	282,000
93	342.29	33350	596,000
93	342.37	33355	OK EJ
93	345.63	33360	OK EJ
93	346.23	17946	OK EJ

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



Request For Designated Routes Up To 129,000 Pounds

Idaho Transportation Department

ITD 4886 (Rev. 03-14)
itd.idaho.gov

2017084593

2017095H75

This form is designed to be completed electronically. If completing manually and additional space is needed, continue the narrative on the reverse side. Correspond the number of the section on the front with the continuation on the reverse.

Company Name Arlo G. Lott Trucking, Inc.		Contact Person's Name Andy Lott	
Contact Phone Number 208-280-2554	Fax Number 208-324-8668	E-Mail Address andy.lott@agltrucking.com	
Company Address P.O. Box 110		City Jerome	State ID Zip Code ID 83338

State Highway Route(s) Requested

Vehicles operating on the requested routes cannot exceed the maximum overall length or off-track as shown on the Extra Length Map at <http://www.itd.idaho.gov/dmv/poe/documents/extra.pdf>. Submit a map with requested route(s) along with this completed form.

Highway Number	Beginning Milepost	Ending Milepost	Highway Number	Beginning Milepost	Ending Milepost
US 93	247.5 244.33*	35.816 350.82*			
SH 75	244.33*	219.5			

Local Route(s) Requested

Roadway Name(s)	Beginning Milepost	Ending Milepost	Jurisdiction Name	Date Request Sent

Reasons for Request - Continue on reverse side if necessary, corresponding the number of the section with the continuation.

1. Justification Enlarge the 129,000 route, to enhance the transport of Molybdenum from Clayton ID, to 145 MONTANA BORDER*		
2. Associated Economic Benefits Reduce congestion, decrease carbon and Increase Efficiency		
3. Approximate Number of Trips Annually 1000 currently at 105,000 lbs.		
4. Commodities Being Transported Molybdenum		
5. Anticipated Start Date to Use Requested Routes 12-1-2017		
Requestor's Printed Name Andrew Lott	Requestor's Signature 	Date 11/9/17

Requestor is required to submit a completed application to ITD (see below) and to city, county, and/or highway district officials where the requested state route (or state route segment) is contiguous to respective jurisdiction(s).

Idaho Transportation Department Attn: Chief Engineer PO Box 7129 Boise ID 83707-1129	or	Fax: (208) 334-8195 Email: officeofthechiefengineer@itd.idaho.gov
---	----	---

ITD Use Only

Hwy Review	D-1 <input type="checkbox"/>	D-2 <input type="checkbox"/>	D-3 <input type="checkbox"/>	D-4 <input type="checkbox"/>	D-5 <input type="checkbox"/>	D-6 <input type="checkbox"/>	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date		
Bridge Review	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date	Chief Engineer	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date	Sub-committee	Proceed <input type="checkbox"/>	Reject <input type="checkbox"/>	Date

Cc: Local Highway Technical Assistance Council (LHTAC)

Page 1 of 1

* WRITE-IN CHANGES COORDINATED WITH REQUESTER.

ALM





129,000 Pound Evaluation of SH-75 M.P. 219.5 to M.P 244.33 (Case #201709SH75)

Executive Summary

Arlo G. Lott Trucking, Inc. submitted a request for 129,000 pound trucking approval on SH-75 between milepost (MP) 219.5 and MP 244.33 at the Intersection with US-93 for transportation of Molybdenum. Currently 1000 trips are made annually at 105,500 pounds. The requested section of SH-75 is designated as a red route and as such all trucks must adhere to the 6.5-foot off-track and 115 foot overall vehicle length criteria. ITD Bridge Section confirms the eight bridges on the route will safely support 129,000 pound vehicles. District 6 analysis shows this section of road in good condition. The Office of Highway Safety analysis shows this section of SH-75 has no Non-Interstate High Accident Intersection Location (HAL) and has no HAL Clusters. Department of Motor Vehicles, Highway Safety, Bridge Asset Management and District 6 all recommend proceeding with this request.

Detailed Analysis

Department of Motor Vehicles (DMV) Review

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

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

Off-tracking is the turning radius of the vehicle combination, which assists in keeping them safely in their lane of travel. Off-tracking occurs because the rear wheels of trailer trucks do not pivot, and therefore will not follow the same path as the front wheels. The greater the distance between the front wheels and the rear wheels of the vehicle, the greater the amount of off-track. The DMV confirms that the requested routes falls under one of the above categories and meets all length and off-tracking requirements for that route. **More specifically, the requested section of SH75 from milepost 219.5 to 244.33 is designated as a red route and as such all trucks must adhere to the 6.5-foot off-track and 115 foot overall vehicle length criteria.**

Bridge Review

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

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

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

ITD District 6 Evaluation

This segment has been evaluated and the District recommends proceeding.

District 6 has evaluated the roadway characteristics, pavement condition, and traffic volumes on SH-75 Mp 219.5-244.33 in response to the request to make this segment a 129,000-pound trucking route. The District has found no concerns with this action and recommends proceeding. Details of the evaluation are provided below.

Roadway Characteristics

This roadway is a major rural collector with the roadway geometry outlined below.

Table 1. US-93 Roadway Geometry

Mileposts		Lanes	Terrain	Left Turn Lane Type	Right Turn Lane Type	Right Paved Shoulder Width (ft)	Parking
219.5	244.33	2 – 1 each direction 12'		None	None	2-3	No

Pavement Condition

The road is asphalt pavement and is in good condition; it is not considered deficient in cracking, rutting or ride. SH75 M.P. 217-227 received an overlay in 2011, M.P. 226.6-227.4 was rebuilt and 2 bridges in this section replaced in 2013, and the whole road received a microsurface in 2017. Spring breakup limits do not pertain to this section at this time.

Table 2. 2016 TAMS Visual Survey Data

Mileposts	Pavement Type	Deficient	Condition	Cracking Index	Roughness Index	Rut Average (in)
217.122 - 226.64	Flexible	No	Good	4.00	3.18	0.11
226.624-227.178	Flexible	No	Good	5.00	3.18	0.11
227.178-227.406	Flexible	No	Good	5.00	2.56	0.17
227.406-236.000	Flexible	No	Good	3.50	3.48	0.12
236.000-244.325	Flexible	No	Good	3.50	3.50	0.14

Traffic Volumes

The speed limit of the highway varies between 25 and 60 mph. The traffic volumes are provided below.

Table 3. 2016 Traffic Volumes

Mileposts	AADT	CAADT	% TRUCKS
219.5 – 244.33	650	100	13

Truck Ramps

No runaway truck ramps exist.

Port of Entry (POE)

The POE doesn't maintain a site on this section of highway SH-75

Highway Safety Evaluation

This SH 75 segment has no Non-Interstate High Accident Intersection Locations (HALs) and has one HAL Cluster. The location is shown in the table below with their statewide ranking.

Analyses of the 5-year accident data (2014-2018) shows there were a total of 27 crashes involving 34 units (1 fatality and 16 Injuries) on SH 75 between MP 219.5 and MP 244.325 of which only 1 crash involved a tractor-trailer combination. The one tractor trailer crash was a fatal crash resulting in one fatality with contributing circumstances of drug impaired and failed to maintain lane. Implementation of 129,000 pound trucking is projected to reduce truck traffic on this route.

Table of HAL Segments SH-75:

Route	Statewide Rank	Milepost Range	Length (miles)	County
SH 75	113	219.399-221.399	2	Custer

Additional Data:**Bridge Data:**

Route Number: SH 75
Department: Bridge Asset Management
Date: 1/4/2018

Route	From:	US 93 Junction
	Milepost:	244.33
	To:	near Clayton, ID
	Milepost:	219.50

Highway Number	Milepost Marker	Bridge Key	121 Rating ^a (lbs)
75	244.31	17825	424,000
75	244.20	17820	270,000
75	238.72	17815	188,000
75	234.45	17810	374,000
75	232.45	17805	344,000
75	226.97	17801	258,000
75	226.84	17796	250,000
75	220.57	17791	258,000

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

An ad was carried by local news outlets in Challis, Salmon, and Clayton, about upcoming hearings on allowing 129,000 pound trucks to be permitted for US93 and SH75. The following is being offered as testimony regarding the applications.

Emails:

Dear Mr Green,

We are writing in opposition to granting a permit to Lott Trucking to operate oversized loads via Highway 93, a Scenic Byway along the Salmon River continuing over Lost Trail Pass to Montana.

Points of opposition include:

1. When Monida pass on interstate 15 is closed due to weather, Lost Trail Pass on U.S. 93 would be an even less appropriate route, being steeper and narrower, few passing lanes, sharp curves and fewer snow removal resources.
2. Making Highway 93 a reasonable alternative would require construction of frequent passing lanes, runaway truck escape lanes, a bypass route around the city of Salmon. Appropriate improvements on 93 for some 30 miles south of Salmon adjacent to the Salmon River would be close to impossible and certainly outrageously expensive.
3. Tandem trucks of these weight lack the maneuverability and especially stopping power to safely operate on road such as Highway 93 and should be, in the interest of public safety, be restricted to interstate or four lane Highway's whenever possible. To do otherwise constitutes an avoidable and unacceptable public risk.

The short notice of the comment meeting and brief comment deadline might elicit suspicion of motives of the IDT to minimize negative reaction to the proposal.

In conversations with other local citizens I find then unanimously opposed to this permit. It is my hope that the IDT will do the right thing and refuse the lot trucking permit and any similar future applications.

Sincerely,
Gordon Lucas
RuthCampbell
Received 12/22/2019 10:36PM

- - -

Lance ,
Please DO NOT Allow Expanded Truck & Trailer use on Hwy 93.
Many Thanks
Wil Wilkins
PO Box 14
North Fork ,ID. 83466
Received 12/21/2019 9:22PM

- - -

Dear Lance,

Thank you for the opportunity to comment on the proposed alternate truck route along Highway 93 and 75. I strongly urge the ITD to NOT ALLOW the increased truck/trailer weight along these routes as I do not feel they bring benefit, and may actually further burden our already financially strapped, rural communities. I also do not feel this proposal aligns with our rural values for the following reasons:

1) Safety for our children, tourists, hunters and fisherman, cyclists, and for our wildlife. This route is used by all these folks daily and with tourist and recreational traffic increasing substantially during summer. Many of these folks are going slow, pulling in and out of turn-outs with trailers, and conditions are particularly challenging when the road is covered with snow and ice or falling rocks. Adding heavier trucks to this mix is a bad idea as I have already experienced almost being back-ended and run over by one of these large trucks along Highway 75. Our wildlife are also at great risk with too many being killed along these routes. These are highly valued state resources that should not be placed at increased risk, particularly as these species concentrate on winter range at lower elevations.

2) This route is a Wild and Scenic Highway and is really not appropriate for the heavy truck traffic that we already experience. There are numerous accidents along the windy road and at least one of these trucks has gone into the river in the past.

3). The Salmon River is an iconic river supporting many fish species that are highly valued Nationally. We cannot afford to place these species, or our water, at greater risk.

4) Wear and tear on our city and county roads cost our already strapped counties since my understanding is that there is no additional fees to cover these costs that are part of this proposal.

In the future, I would ask that the State of Idaho change its evaluation process to include a cost/benefit analysis that assesses safety and infrastructure impacts so that cities, counties, and taxpayers have a better foundation for considering these types of proposal.

Please help us retain our rural values, keep our children safe, and not place increased burden on our already strapped counties. Please do not permit this increased truck weight on this route.

Thank you,

Toni Ruth
PO Box 172
Carmen, Idaho 83467
Received 12/21/2019 5:25PM

- - -

Hi Lance,

A friend of mine brought this issue to my attention. These comments are written by my friend but I completely concur. And would vote NO on the Truck Route Application for U.S. 93 Idaho 75 District 6 Public Hearing. I am against this permit application. Below are my reasons why.

First, the public comment period should be extended. This seemed to be a very rushed process with little advertisement. I've heard of many people being upset that they just heard about this, and the comment deadline provided is tomorrow.

Reasons why this permit should Not be granted:

- This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.
- Air pollution. Salmon, ID during the winter has unhealthy air quality conditions. Adding more diesel trucks will make the situation even worse. As a resident who walks often to work, even in the winter, I would like cleaner air to breathe while I'm walking. I do not want to breathe in more diesel fumes.
- U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.
- This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits.

And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

Thank you for your time,

Will

Received 12/21/2019 11:41 AM

- - -

Hi Lance,

Here are my comments on the Truck Route Application for U.S. 93 Idaho 75 District 6 Public Hearing. I vote NO, and am against this permit application. Below are my reasons why:

Reasons why this permit should Not be granted:

- I have lived in both Salmon and Challis with occasional commuting in between the two locations. Even in the comparatively few trips that I made between the two locations on US 93 for the comparatively short amount of time I lived in either place, I saw multiple accidents and often when conditions were fine--A rolled vehicle, a three vehicle motorcycle crash, a car in the river, a two vehicle collision including a livestock trailer; several of these were fatalities. The point I wish to make with this is that I was NOT a frequent commuter on US 93 and even in my relatively few number of trips, I personally was stuck in a disproportion number of traffic stops because of vehicle accidents. THIS IS A DANGEROUS HIGHWAY. For the sake of the safety of their own drivers and other motorists on the road, these trucks should not be allowed on 93.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic. Furthermore, US 93 over Lost Trail is a popular route for recreational road bicyclists, as well as it is not uncommon to have bicycle tourists on other parts of Highway 93. Especially for much of the stretch of US 93 between Salmon and Challis, the road is against a canyon wall and the river; accidents on this highway can be and have been devastating. With trucks on this highway, it would not be a matter of if but when one of these big rigs was involved.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana
- This is a Wild and Scenic Highway. More trucks reduce that value. It impacts wildlife, the quiet, and affects visitors to the area.
- U.S. 93 goes straight through Salmon's downtown with no truck route. Salmon already has noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from the town. The town does NOT need more trucks coming through.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.
- This company does not "need" an alternate route. They can delay their travels if road conditions are bad. They need to take into consideration local residents' lives over their own profits.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please consider these comments, as it is lives of both cities, truckers, and other motorists that will be affected by increased traffic .

Thank you for your time,

Brianna Goehring

Received 12/20/2019 11:12PM

- - -

Lance,

I don't support large double trucks on Hwy 93. Our town's geography and layout mean that there's no poss of a bypass. And our regional roads are narrow and windy, already dangerous enough without more large truck traffic. send those suckers up I-15 please.

Last: please stop spraying salt on our roads! Go back to lava rock and plows. You'll save a ton on repaving. And my car will stop dissolving into a heap of rust.

Thx

~ Chris Swersey
Salmon, Idaho
Received 12/20/2019 4:52PM

- - -

Dear Mr. Green,

I appreciate the opportunity to voice my opinion on the proposed expansion of truck/trailer weight and length on Highway 93. As a nearly daily driver on 93 I strongly oppose these expansions.

This road is very narrow, windy and full of additional hazards. When anyone from out of the area comes to visit I always warn them about the windy road that quite often has rocks, snow and ice on it and almost always has wildlife too...not to mention that a misstep may land you in the river. We see a large number of tourists unfamiliar with the dangers of this road bring risks to themselves and others on the road through poor driving. It takes a lot of close attention and defensive driving to navigate this highway safely without the addition of bigger trucks. We have a lot of accidents just from the inherent risks on this highway. Big trucks will cause more risk and more accidents. They are slow and will necessitate more passing, they are slow to stop and cannot navigate sharp curves well putting them over the centerline or off the side of the road.

It is also important to think of the reasons people come here. One of the most popular is our river. Additional truck traffic puts our river at risk from accidents and contamination of our water. When we do have a truck accident here it is hours to get a capable wrecker here to deal with an accident. In the meantime our river is being polluted. We have vulnerable fish species that can ill afford yet another risk to their survival.

Wildlife is also of great concern. It breaks my heart to see the number of animals that are hit and killed on Highway 93. Bigger trucks are going to mean more animal deaths.

And, this is a biggie, for much of our area the only road is Highway 93. A big rig wreck could block our lifeline highway. Block our route to medical services and block our daily travel route.

Bottom line. Expanded truck/trailer weight and length on Highway 93 will do nothing but increase the risk to people, animals and environment. This is a bad idea.

Sincerely,

Stephanie Latham
Salmon, ID 83467
Received 12/20/2019 4:18PM

- - -

Dear Mr. Green

I urge you and the Idaho Dept of Transportation (IDT) to oppose the current proposal that would expand truck/trailer weight and length on Hwy 93.

My concerns are based on my own experience driving Hyw 93 regularly, especially the section between Salmon and Gibbonsville.

First, many big game animals including deer, elk, and bighorn sheep reside and especially winter in this corridor along Hwy 93. I urge you to drive this road section right now (Dec 20) and observe all of the wildlife adjacent to- and on- the road. The residents in this area have learned to drive slower speeds to avoid collisions with animals. Despite the locals preventive actions, many big game animals die each year on this stretch of highway. Truckers will not be so careful and likely have little concern for wildlife when they are on transport time lines.

Second, this route is heavily traveled by myself as well as tourists and hunters and fishermen that contribute to the local economies. Many of us haul trailers and also admire the wildlife and scenery. In addition to wildlife, Hwy 93 has other unique hazards including falling rocks and trees, sharp bends, steep banks, ice and snow, open range cattle, cattle drives, and a river paralleling most of the route. Adding heavier and longer trucks is unsafe and a bad idea. Such trucks will add additional hazards for regular traffic by increased stopping distance, decreased clearance on tighter corners, and their additional length.

Third, the Salmon River and its fish are unique and essential cultural, economic, ecological, and recreational resources. The Salmon River is a National Wild and Scenic River and it supports several species of fish that are protected under the Endangered Species Act. These include: Chinook salmon, Steelhead, Sockeye salmon, and Bull Trout. Additional heavier and longer trucks increase the risk that a truck will slide into the river and spill toxic fuel or other chemicals.

For the safety of everyone who drives Hyw 93; for the protection of the big game animals, native fish, and the Wild and Scenic Salmon River; and for the protection of the local economies that depend on these natural resources and a safe Hyw 93;

I strongly urge you and IDT to oppose the permitting of heavier and longer trucks.

Thank you for the opportunity to comment.

Russ Thurow
Salmon, Idaho 83467
Received 12/20/2019 1:44PM

- - -

Hello Lance

Thank you for the opportunity to comment. I strongly urge the ITD to NOT ALLOW the proposal that would expand truck/trailer weight and length on Hwy 93. I have used this Hwy daily to commute from my home near North Fork, Idaho to Salmon and for Challis for work, recreation and community activities for 43 years.

Here are my concerns:

1. This route is heavily traveled by tourists, hunters and fishermen for 9-10 months each year. Many of these folks are pulling trailers, admiring the scenery and pulling in and out of turn outs. Most are not familiar with the Hwy 93 and it's peculiar hazards - wildlife, falling rocks and trees, sharp turns, steep banks, ice and snow, open range cattle, cattle drives, and a swift river along most of the route. Adding heavier and longer trucks to this mix is a bad idea. This highway is accident prone with current legal traffic.
2. This is a Wild and Scenic Highway and should have require special restrictive considerations when planning for additional and arguably, more hazardous, traffic.
3. Wildlife, especially big game animals such as deer, elk and mountain sheep, are heavily concentrated from Gibbonsville to Arco. These are very valuable state resources and unfortunately many die each year on this stretch of highway. Many of the truckers use very heavy grill guards and drive with little concern for wildlife and at speeds that may be legal but that are not prudent.
4. Longer, heavier trucks will be an additional hazard for regular local traffic due to the increase stopping distance, decreased clearance on tighter corner and additional length will make safe passing more difficult.
5. The Salmon River is known world wide as a spectacular Wild and Scenic River. It also has a number of fish species that are ESA listed; Chinook salmon, Sockeye salmon, steelhead, white sturgeon and Bull Trout. Additional trucks with hazardous cargos of additional weights will only increase the risk to these species should a truck end up in the river.

Please refrain from permitting trucks of this size to use this route. It can only result in increased accidents.

Thank you.

Jerry Myers
North Fork, ID 83466
Received 12/20/2019 12:12PM

- - -

Hi Lance,

Here are my comments on the Truck Route Application for U.S. 93 Idaho 75 District 6 Public Hearing. I vote NO, and am against this permit application. Below are my reasons why.

Reasons why this permit should Not be granted:

- This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.
- Air pollution. Salmon, ID during the winter has unhealthy air quality conditions from inversions and woodsmoke. Adding more diesel trucks will make the situation even worse. As a resident who walks often to work, even in the winter, I would like cleaner air to breathe while I'm walking. I do not want to breathe in more diesel fumes.
- U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.
- This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits.
- The safety of Salmon school students will be at a greater risk as the schools are along Highway 93 and 28.
- Interstates were built for purposes including truck routes, they should be used for this - not our wild and scenic highways.

And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

I agree with all the above points stated by Jenny Gonyer.

Thank you for your time,

Kelsey Stansberry

Received 12/20/2019 12:08 PM

- - -

Hi Lance,

Here are my comments on the Truck Route Application for U.S. 93 Idaho 75 District 6 Public Hearing. I vote NO, and am against this permit application. Below are my reasons why.

Reasons why this permit should Not be granted:

- This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.
- Air pollution. Salmon, ID during the winter has unhealthy air quality conditions. Adding more diesel trucks will make the situation even worse.
- U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.
- Although this is a tourist town, this is NOT the kind of guests we want to be hosting. Or the type of businesses we want crowding our small town.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have few to none alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.
- This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits.

And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

Thank you for your time,

Fallon Born

Received 12/20/2019 12:03PM

- - -

Reasons why this permit should Not be granted:

- This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.
- Air pollution. Salmon, ID during the winter has unhealthy air quality conditions. Adding more diesel trucks will make the situation even worse. As a resident who walks often to work, even in the winter, I would like cleaner air to breathe while I'm walking. I do not want to breathe in more diesel fumes.
- U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.
- This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits.

And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

Thank you for your time,

Alicia Edwards

Received 12/20/2019 10:41AM

Lance,

Here are my comments on the Truck Route

As stated by a fellow land lover and friend: Application for U.S. 93 Idaho 75 District 6 Public Hearing. I vote NO, and am against this permit application. Below are my reasons why.

First, the public comment period should be extended. This seemed to be a very rushed process with little advertisement. I've heard of many people being upset that they just heard about this, and the comment deadline provided is tomorrow.

Reasons why this permit should Not be granted:

This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.

U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.

If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.

Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.

Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.

Air pollution. Salmon, ID during the winter has unhealthy air quality conditions. Adding more diesel trucks will make the situation even worse. As a resident who walks often to work, even in the winter, I would like cleaner air to breathe while I'm walking. I do not want to breathe in more diesel fumes.

U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.

Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.

More traffic poses a danger to our river recreationists that are parked along the already narrow roads.

This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits.

And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

Thank you,
Alicia McDermott
Received 12/20/2019 10:39AM

- - -

Lance,

My name it's Alicia Gilpin. I have been a resident of Salmon, Idaho for 20 years. I agreed fully with all of the email below, written by a colleague and friend of mine.

Here are my comments on the Truck Route Application for U.S. 93 Idaho 75 District 6 Public Hearing. I vote NO, and am against this permit application. Below are my reasons why.

First, the public comment period should be extended. This seemed to be a very rushed process with little advertisement. I've heard of many people being upset that they just heard about this, and the comment deadline provided is tomorrow.

Reasons why this permit should Not be granted:

- This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.
- Air pollution. Salmon, ID during the winter has unhealthy air quality conditions. Adding more diesel trucks will make the situation even worse. As a resident who walks often to work, even in the winter, I would like cleaner air to breathe while I'm walking. I do not want to breathe in more diesel fumes.
- U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.

- This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits. And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

Thank you for your time,
Alicia Gilpin
Received 12/20/2019 10:36AM

- - -

Dear Mr. Green, I'm writing this to express our feelings against the proposed permit to allow oversized and increased weight truck/trailer traffic on Highway 93 through Salmon. We live on Highway 93 S. and being that the highway is only a two lane road this extra truck traffic would cause not only a safety hazard but also cause increased noise and wear on the Highway. Thank You, Robert and Tina Mauterstock, 211 Highway 93 S. Salmon Idaho
Robert Mauterstock
Received 12/20/2019 9:37AM

- - -

Hi Lance,

Here are my comments on the Truck Route Application for U.S. 93 Idaho 75 District 6 Public Hearing. I vote NO, and am against this permit application. Below are my reasons why.

First, the public comment period should be extended. This seemed to be a very rushed process with little advertisement. I've heard of many people being upset that they just heard about this, and the comment deadline provided is tomorrow.

Reasons why this permit should Not be granted:

- This is a Wild and Scenic Highway. More trucks reduces that value. It impacts wildlife, the quiet, and affects visitors to our beautiful river valleys.
- U.S. 93 has a lot of sharp curves that are dangerous for even school buses, larger trucks would pose a greater risk to oncoming traffic.
- If a truck were to have an accident into the river, it would pollute our river which is Home to endangered wild salmon and steelhead.
- Our economy depends on this river and the scenic values it offers. More trucks would reduce that value and harm our economy especially if a truck accident polluted our river.
- Lost Trail Pass is not a great option for an alternative route. If Monida Pass is closed due to winter conditions, Lost Trail would have worse conditions. More large trucks on this pass poses a safety risk to winter recreationists going to Lost Trail Ski Hill, Chief Jo trails for skiing and snowmobiling, hunters, and travelers between Idaho and Montana.

- Air pollution. Salmon, ID during the winter has unhealthy air quality conditions. Adding more diesel trucks will make the situation even worse. As a resident who walks often to work, even in the winter, I would like cleaner air to breathe while I'm walking. I do not want to breathe in more diesel fumes.
- U.S. 93 goes straight through Salmon's downtown with no truck route. We already have noisy semi-trucks rolling through downtown, adding noise and fumes, which takes away value from our quaint little town. We do NOT need more trucks coming through.
- Road damage. More trucks would result in more road maintenance. Construction takes forever on U.S. 93 since it has only two lanes. We have limited alternatives to avoid construction.
- More traffic poses a danger to our river recreationists that are parked along the already narrow roads.
- This company does not "need" an alternate route. They can delay their travels if bad weather conditions. They need to take into consideration local residents lives over their own profits.

And there are more reasons I could list, but these are the biggest concerns and reasons to Not grant this permit for an alternate truck route on U.S. 93.

I hope Idaho Transportation Department makes the right decision and says No to this permit. It is clear that this is Not a safe or smart truck route alternative.

Please take our concerned local citizens voices into consideration, as it is our lives and towns that will be affected by increased traffic and pollution.

Thank you for your time,
Jenny Gonyer
Salmon, ID 83467
Received 12/20/2019 9:36AM

- - -

I missed the meeting in Salmon last week for the proposed tandem semi truck corridor on Hwy 93. I do not think this is a good idea for a few reasons. The first reason is safety. Having huge trucks on tight, windy road from Challis to the town of Darby, MT is unsafe. Driving these roads anytime from August to May can be hazardous. The second reason is road quality. Heavy trucks wear the road surface down quickly. It takes a lot to get our roads repaired. Who pays for this and to repair our vehicles after driving on rutted roads? These large trucks should be relegated to the Hwy systems that are set up for their size and the ability for other vehicles to get around them. Thank you for letting me express my opinion.

Nancy Bolyard
Salmon, ID
Received 12/20/2019 8:51AM

- - -

Dear Sir: I am opposed to allowing 129,000-pound trucks on sections of U.S. 93 and Idaho 75.

My reasons include:

- the risk of spillage of toxic substances into our beautiful watershed
- the cost to our community that may incur if curbs and such are damaged as the over-sized trucks try to navigate our streets --the danger of reduced stopping distances available to trucks with such heavy loads - we have abundant wildlife that cause drivers to have to stop on a dime to avoid collision - what if such a large weighty truck is trailing such a car?
- the passage of these trucks on these routes will bring zero benefits to our community while presenting risk of potential municipal expenditures.

I wish I were more eloquent on this topic but my objection should be clear. Thank you sincerely for considering my point of view.

Respectfully, Gayle McCampbell

Received 12/19/2019 4:33PM

- - -

Lance, thank you for the chance to comment on the application for the 129,000 pound trucks that would come through Salmon, Idaho. I have concerns that to use this route as an option for that size of truck creates an unacceptable burden on our community.

- The trucks would have to come through Main Street which is not compatible with our downtown area.
- I would not like this application, if approved, to establish a precedent that this route is used for various other trucking opportunities through Salmon.
- This route follows a wildlife corridor and the amount of wildlife killed on the highway would increase.
- This route also follows a Wild and Scenic corridor, a toxic spill into the Salmon River or its tributaries would be devastating.
- Who would be responsible for the cost of the wear and tear on our local highway, I assume state and county coffers? They are often in bad repair without this added use.

Respectfully,

Terry Myers

Received 12/17/2019 2:28PM

- - -

Thank you for the opportunity to comment on the requested allowance of 129,000 lb. loads.

In my taped comments I was erroneously under the impression that the requested change was the allowance of very long trucks, not just the allowance of the heavier loads. My point during that recording was that these very long trucks were seriously dangerous on any freeway/highway used by other motorists. As the additional weight will make these already dangerous vehicles even more so, my most serious concern is still the danger they represent to other motorists.

My other concerns regarding the increased weight are:

1. More damage to the road surface, which will result in increased cost to taxpayers for the upkeep of these roads, plus the disruption of traffic during the resurfacing processes.
2. Mr. Lott of Arlo Lott Trucking, the company requesting this change, touted the safety of his equipment and drivers, but had to admit that a large spill of molybdenum which occurred in the past was his load, but not one of his trucks. This fact indicates that he is not always in control of who transports his loads.
3. If approved, this change will open these highways to all trucking companies wishing to carry these heavier loads, not just the anticipated 700 trips a year to and from anticipated by Arlo Lott Trucking alone.
4. This section of Hwy 93 follows the Wild and Scenic-designated Salmon River, resulting in a narrow and winding road with narrow shoulders, making it more likely that any equipment failure or driver error could result in a serious accident, possibly causing injury to other motorists, or one of these huge loads ending up in the river. Since no environmental studies are necessary for the allowance of the heavier loads, there is the very real possibility hazardous materials could end up polluting this river as the result of an accident. Also, any accident could cause the complete shutdown of this main north-south Idaho route.
5. There will be times during bad winter conditions when these trucks will be required to chain up, but I and other people in attendance at the Dec. 9 meeting had never seen any of these long trucks with chains on, and additionally we were alarmed by the fact that they often drove very fast for the conditions and many times would seriously tailgate other motorists.

FOR THESE REASONS, I AM AGAINST THESE HEAVIER LOADS.

Mary Carroll

Received 12/16/2019 11:57AM

- - -

Comments: I oppose approving larger truck (129,000 pound) transport from Clayton to the Montana line for several reasons. With the exception of the Lost Trail Pass ascent, the route is winding and narrow, with insufficient pullouts to safely accommodate passing such a large vehicle. The route receives considerable travel by large camp-trailers whose drivers may be inexperienced at driving such roads; they don't need to encounter such large vehicles. Our towns are zero stoplight (Challis) and two stoplight (Salmon) communities and we don't need huge trucks on our main street (Salmon) where there are pedestrians and people getting into and out of parked cars along Hwy 93. This request seems to be for the benefit of a single applicant, with no discernible benefit to the affected communities along the transportation route. I oppose granting this application for 129,000-pound vehicle use.

Evalyn Bennett

Received 12/7/2019 12:38PM

- - -

Hello,

I live south of Salmon on HWY 93 and my family and I are opposed to increased trailer traffic.

We've only lived here for 2 years and have seen trucks and trailers Wreck because they fail to make the curve of the road near our house.

The semi trucks we pass on the road often cross the center line while maneuvering the tight curves between Challis and Salmon.

Interstates are appropriate for large vehicles, NOT scenic byways.

Thank you,

Kelly Vanderveer

Received 12/6/2019 9:48AM

Phone Calls:

From Paul Werner of North Fork, ID 3 miles S. of Gibbonsville 12/20/2019

He wanted to make official comments regarding his opposition to the 129k application along US93. He was unable to attend the meeting and therefore is calling in. He is strongly opposed to allowing 129k on US93. The curvature of the road around Sheep Creek is dangerous. There is also a blindspot pulling out from Gibbonsville onto the highway, which is a danger. The wildlife that are constantly being hit along the road, pose a great safety hazard. He also doesn't want to open up US93 to more heavy truck traffic. If Arlo Lott wants to put money where their mouth is they need to put money into Monida Pass to make in an alternate route. The fact that long trucks cross the center line is dangerous to the traveling public.

- - -

From David Dobbs of Salmon, ID 12/19/2019

He wanted to make official comments. He informed me that he is against the approval of 129K along US93. He mentioned 4 objections:

- 1) Who is going to pay for the additional wear and tear to the roadway that is caused due to weight.
 - 2) What's in it for Salmon? The truckers aren't going to stop in Salmon, so there is little benefit to Salmon business or residents. This only benefits the hauler.
 - 3) The turn from US93 on to main street is difficult. Can the trucks even clear this turn safely?
 - 4) This invites more truck companies to use this road, causing more damage.
- - -

From John Black of Elk Bend, ID on 11/25/2019

He wanted to make some official statements. I did inform him of the meeting at the opportunity to have any questions or concerns he may have answered. He will not be able to attend the meetings as he doesn't want to travel at night. He was going to see if he could get a petition together and have that delivered to us.

His concerns were about the road bedding and if the road could handle the weight, since there have been slides in this area and there are already cracks in the road since the last refinishing of the road. He is also concerned about the road bend and the tight angles the trucks would have to make. He is concerned about the speed limit, and feels it should be lowered. He is concerned about the accidents caused by animal strikes, that happen regularly in his area. He is concerned because this is a tourist corridor, and in the summer there is lots of slow moving traffic along this wildlife and scenic river corridor, along with bicyclists. He is not in favor of 129k being allowed on US93. He would like his concerns to be official recognized as a part of the public comment.

- - -

From Jessica, she lives in Salmon on 12/4/2019.

She had great concern with the allowance of 129k loads on US93, and wanted to know why the applicant doesn't use a different route (US93 south to Arco). She will be at the meeting to make official public comments.

- - -

From V.J. Greenwood, who has lived between Salmon and North Fork for the last 50 years on 12/3/2019.

He is concerned with the speed that trucks are allowed to travel. He cites that loads have been lost along this route before due to speed. He also had great concern about the loss of animal life along this route. His suggestion is that the speed limit along the road should be lowered. He may be able to attend the public hearing, but wanted to be sure that if not that his opinion was captured and heard.

Letters:

Jim Kopp, Challis, ID

I see less trucks & less wear & tear on the roadways. This is an advantage for the trucker, the customer and the highway department.

I fully support the heavier loads.

Why wouldn't you do this?

- - -

Robin Phillips, Salmon, ID

I am against the proposal for permitting 90' long rigs at 129,000 pounds on US93 because of the negative effects on our tourism and as a public safety issue. With 93 having so many curves it will be impossible for these rigs to maintain a reasonable speed and it will be a public safety risk trying to pass them. Route 93 doesn't have the road structure to accommodate these rigs.

- - -

Dave Gusky, Salmon, ID

I DO NOT APPROVE OF THE PROPOSED TRUCKING REQUEST _ BASICALLY BECAUSE THE SCHEDLED MEETING IN SALMON _ DEC 9 – 4-6:30 WAS A B--- S--- SESSION AND NOT AN INFORMATIVE MEETING.

THE ONLY ENTITY THAT SHOWED UP WAS THE IDAHO DEPARTMENT OF TRANSPORTATION. NO INFORMATION FROM TRUCKING Co. , ETC.

WHAT A WASTE OF TIME!

- - -

Tom Stillwaugh, Challis, ID

I support allowing the increase in weight on Highway 93 + 75. The information provided shows that the trucks operate safe at these weights plus then actual weight per square inch is less. That relates to less wear and tear on the roads. The business I work for will require less load, thus less trucks on the road. I hope Idaho Transportation Department will change the limits as proposed.

- - -

Mike Solterson, N. Fork, ID 12/1/19

MR. Green

In regards to truck trailer using Hwy 93. I strongly am against this due to the fact that this is a scenic by-way. Truckers now Do not observe speed limit of 65 mph. (Which is way too fast for this road) There is too many semis on the road Hwy 93 the way it is now. This opens up a whole can of worms. I've lived here for 55 yrs in the Salmon- N. Fork area. Bad idea to increase weight of these vehicles.

- - -

Jerry Perry, Salmon, ID

I object to the heavy trucks using our hi ways because there is no money allocated for road up keep or replacement. I know they pay road use tax on all miles traveled but that money goes into one place for all road construction in the state. The big towns get fixed first and we have to live with bad roads. Your representative said it will not affect the roads because of the extra axles will distribute the weight. I say all truck traffic on the roads in this route will affect the roads with no upkeep.

The road from montana line to challis is very narrow and crooked. There is already accident on the sharp corners. The stop signs in to salmon is very adverce and trucks have a hard time getting started; worse when there is ice and snow. The stop signs at junction hw 93 and hw 28 is very sharp. Truck uses the sidewalk a lot.

The trucker would rather go through salmon instead of the freeway because of sage junction.

- - -

Virginia Perry, Salmon, ID

I object to the heavy trucks using our hi ways because there is no money allocated for road up keep or replacement. I know they pay road use tax on all miles traveled but that money goes into one place for all road construction in the state. The big towns get fixed first and we have to live with bad roads. Your representative said it will not affect the roads because of the extra axles will distribute the weight. I say all truck traffic on the roads in this route will affect the roads with no upkeep.

The road from montana line to challis is very narrow and crooked. There is already accident on the sharp corners. The stop signs in to salmon is very adverce and trucks have a hard time getting started; worse when there is ice and snow. The stop signs at junction hw 93 and hw 28 is very sharp. Truck uses the sidewalk a lot.

The trucker would rather go through salmon instead of the freeway because of sage junction.

- - -

Paul A. Edstrom, North Fork, ID

Mr. Lance Green,

I've lived along Highway 93 north of North Fork for 30 years. This narrow twisting, turning route from North Fork to Lost Trail Pass is in an area of considerable wildlife and is in fact a big game wintering area. The deer and elk killed along this stretch of the highway is staggering. Part of the problem is brush and trees are allowed to grow close to the blacktop blocking visibility. Then the 65 mph speed limit is too fast for large trucks.

These large trucks cannot brake fast enough to avoid the game. To a trucker time is money and so they go to beat hell knowing their large bumpers and front end guards (that rival locomotive cow catchers) will protect them from any damage. I walk the highway a lot for exercise and find and report to fish & game many animals either dead or in need to be dispatched. I can tell passenger vehicle kills from truck kills because large truck kills leave no glass and plastic part fragments at the impact site.

Therefore I am against any more and larger trucks. Also, lower the truck speed limit between North Fork and Lost Trail pass and do some clearing of brush and trees along the highway right of way.

- - -

Bob Russel, Salmon, ID

I do not believe those heavy vehicles should be allowed – these roads are not built for heavy loads, damage will result. There is often wildlife crossing these roads, and such heavy loads cannot stop to let them pass. Rocks and other debris are often falling into the road which requires quick response by drivers – in this case it would increase the danger to other drivers with these loads dodging debris.

The main street of Salmon, ID is already extremely busy with traffic – these loads would exacerbate that problem. There are numerous cross-walks requiring traffic to stop quickly.

The city of Salmon has only one bridge crossing the Salmon River- if one of these loads were to break down on that bridge it would cripple traffic throughout the community. Also the bridge is getting some age on it and these heavy loads may put it out {????}/

Interstate Highways are designed for this type of traffic – please confine it to the interstate highways and deny this request for an exception.

- - -

Randall G. Thomas, P.E., Salmon, ID

These segments of US93, and ID75 already have congestion issues with slow moving vehicles which either: Ignore Idaho's slow vehicle pullover statute, or:

Drive at less than the yellow advisory speed in every corner, and then speed up to above the speed limit in every straight away, (aka "Passing Zone").

I would be neutral on this issue if new slow vehicle pullouts were constructed at maximum ten mile increments, and additional signing erected.

With the current roadway geometrics, I must oppose this proposal to increase the number of slow vehicles on the roadway.

- - -

Glenn and Camilla Hugunin, North Fork, ID

We are **opposed** to the proposed truck weight limit increase to 129,000 lbs. on Highways 93 and 75 for the following reasons:

A. SAFETY

1. Highway 75 and 93 were not designed to handle vehicles of this weight. We have been commuting and driving on these roads for 42 years. These backroads already have lots of traffic, especially from spring thru fall. These highways were also not designed for a 65 mph speed limit. There are too many obstacles on this road such as school bus stops, children, joggers, bicyclists, motor cyclists, curves, ice, snow, mud slides, avalanches, rocks, big game, cattle, horses, tourists, commuters, farm machinery, trucks and logging traffic. Do we really need larger, more dangerous trucks as well? My wife has been an R.N. at Steele Memorial Hospital, in Salmon, for 40 years. She has seen far too many injuries and fatalities already on these two highways. Allowing 129,000 lb. trucks will only increase these numbers. **Interstate 15** was designed to handle longer, heavier trucks and increased traffic safely.

2. ENVIRONMENTAL

1. These sections of Highways 75 and 93 are adjacent to the Salmon River, A National Wild and Scenic River. Adding 129,000 lb. trucks that are loaded with mining equipment and products, will greatly increase the likelihood of an accident, and spill into the Salmon River. Again, **Interstate 15** is far more suited to handle such an emergency.

- - -

Dear Mr Green:

I say "NO" to the apparent decision which has been made to allow heavier loads on tandem semi-trailers and trucks to negotiate US Hwy #93 from Challis to Salmon to the Montana state line. A commercial vehicle corridor encompassing US Hwy #93 from Challis to Arco, and proceeding from Arco via State Hwys #26, 33 and 22 to I-15 at Dubois, is the PERFECT truck route to Montana.

I worked in the Challis area while residing in Salmon for 20 years and very familiar with the disastrous history of commercial trucking in this corridor. In addition, I have lived adjacent to US Hwy #93 for the last 40 years in Salmon. Truck traffic from Montana through Salmon and into southern Idaho has increased demonstrably in the last 25 years following the decision made by former Governor Batt to allow increased loads which began the

accelerated surface deterioration of US Hwy #93 during that period. I must say now that the proposal to allow for even heavier and longer trailers and semi's on this section of US Hwy #93 is a complete joke. Tight curves, blind corners, tourists unfamiliar with the road and distracted by the spectacular scenery, coupled with large, big game wildlife populations often confined to the river road corridor make this area an extremely unsafe and difficult route to travel through during ANY season.

Believe me, the last thing the city of Salmon "needs" is additional and heavier commercial trucking on Main Street. I am concerned about accelerated air pollution, and the dust, dirt, diesel fumes and noise associated with commercial trucking, the inadequacy of the existing route through Salmon to handle such traffic as demonstrated by tight, blind turns and crushed highway signs due to narrow right of ways, and increased commercial traffic passing through school zones. Main Street has already failed to accommodate lengthy cattle trucks and wide loads headed to Dakota's oil fields, without special preparation. We already have the worst "engineered" turn on the entire length of US Hwy #93 running from Mexico to Canada. It's a real winner – a 90 degree turn which is seldom negotiated cleanly by current tractor trailer vehicles.

US Hwy #93 has been repaved this summer and is currently in the best condition it has been in its entire existence. However, the highway is in no way able to accommodate increased commercial loads and tandem trailers safely especially during winter even with pouring more money into the road by salt application and accelerated plowing. Snow and ice will always persist during winter in the 4000-7000ft elevations, requiring truckers to chain up which they will resist, and thereby compromising safety for ALL vehicle traffic.

Bottomline:

- a. A perfectly good, year-round (in most cases) truck route exists to meet the commercial trucking needs. Lost Trail Pass in winter should not be considered as a reliable, nor viable, substitute for commercial trucking via I-15 and Monida Pass in Montana.
- b. Salmon, Idaho cannot handle more dirt, dust, diesel fumes, school zone violations, crushed highway signs and associated noise on Main Street.
- c. Expanded commercial trucking will be detrimental to our wildlife populations, and tourism values found in our unparalleled wild and scenic corridor.

Thanks for the opportunity to comment. I hope you will seriously consider the public comments that I know you have received from knowledgeable and concerned local citizens who also do not support this proposal.

Sincerely,

s/s William C Osborne

William C Osborne
22 N Dogwood Lane
Salmon, ID 83467

- - -



208.345.6933 • PO Box 844, Boise, ID 83702 • www.idahoconservation.org

December 20, 2019

Mr. Lance Green

DMV Program Specialist

Idaho Transportation Department

3311 W. State Street

Boise, ID 83707

(208) 334-8427

Electronically Submitted: lance.green@itd.idaho.gov

RE: Idaho Conservation League's Comments Regarding the Proposed Route/Specification Changes for Arlo G. Lott Trucking, Inc.

Dear Mr. Green:

Please accept our comments regarding the proposed changes to Idaho Highway 75 and U.S. Highway 93 to allow Arlo G. Lott Trucking, Inc. to transport molybdenum from Clayton, Idaho through Challis and Salmon to the Montana border. Since 1973, the Idaho Conservation League (ICL) has worked to protect and enhance Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. The Idaho Conservation League has a long history of involvement with mining and environmental protections. As Idaho's largest statewide conservation organization, ICL represents over 30,000 supporters who have a deep personal interest in ensuring that mining operations, including material transportation, are protective of our land, water, fish, and wildlife.

We have serious concerns regarding the proposal to allow trailered trucks to transport 129,000-pound loads on US-93, particularly during the winter months. First, molybdenum is not a benign substance, despite concentrate being relatively insoluble in water; extended exposure poses long-term risks to aquatic life. Further, molybdenum concentrates likely contain additional components which may pose hazards to human life and the environment and the applicant should reveal and list any additional constituents being transported. Transporting these increased loads requires modifying accepted trucking and transportation limitations on small-size local highways just upstream of the the Congressionally-designated Salmon River Wild and Scenic corridor.

On January 19, 2019, ICL spoke with you (Mr. Lance Green) about questions we have regarding unconfirmed information pertaining to Lott Trucking's reason for the modification request. We learned that truck length will not change due to established restrictions on US-93 between Challis and Salmon (a Blue-designated section, allowing 95' truck/trailers). However, we did confirm that this modification request is based on seeking an alternative route to I-15 during winter. According to Mr. Green, Lott Trucking justified the request by citing adverse conditions on I-15 during severe storms, stating that the interstate is not well kept, tends to gather snow drifts, and often closes during severe weather. Further, US-93 was cited as being better maintained and usually remains open when I-15 closes. We do not believe using Lost Trail Pass, which receives up to 300" of snow per year and can have high winds with significant drifting and snowpack/icing issues on a narrow, winding mountain road, serves as a realistic nor functional alternative to a closed federal highway. State Highway Patrol offices and Transportation Departments do not close routes due to adverse conditions without considerable thought and reasoning. We believe if the preferred route is closed due to adverse conditions, operators should wait until conditions improve, reducing risks to human health, company infrastructure (by proactively avoiding an accident), and the environment.

Our concerns regarding the potential for accidents and spills directly below the Wild and Scenic corridor are grounded in recent history. In May of 2018, a truck owned by Arlo G. Lott Trucking, Inc. crashed into a guardrail near the Big Hole River, dumping 48,000 pounds of molybdenum. Fortunately, there were no injuries and no materials reached the Big Hole River. While this incident occurred in Montana, it does not preclude the possibility of an accident in Idaho along the same route, particularly during the winter when US-93 would be used as an alternative route.

US-93 contains two sections that currently maintain length and off-track restrictions based on the winding and mountainous nature of the highway. Moreover, the increased truck traffic through downtown Challis and Salmon, Idaho will increase congestion and the potential for vehicle and pedestrian accidents. While analysis may indicate road and bridge conditions are sufficient to support 129,000 pound loads, traveler and environmental safety must remain the most important factors in this equation.

ITD's proposal evaluation indicates that 1,000 trips of 105,500 pounds annually occur under current conditions, and the hand-modified application for a 129,000 pound route designation (dated 11/9/17) justifies the changes as increasing weight limits to enhance the transportation of molybdenum and to "reduce congestion, decrease carbon, and increase Efficiency." While we commend Lott Trucking for their environmental consciousness and desire to reduce their carbon footprint, we do not believe the inherent risks associated with transporting larger sized loads of hazardous materials outweigh the potential carbon footprint reduction. By our estimation, the established Arco route encompasses 330 miles as opposed to the proposed US-93 route of 230 miles. We do not believe the 100 mile difference justifies the increased threat to human safety and the environment.

We believe allowing heavier loads on US-93 poses risks to human health and the environment that cannot be justified, and we encourage the Idaho Transportation Department (ITD) to reject this proposal. Making an exception can quickly lead to establishing a standard, and ICL does not believe these mountain passes and roads, particularly through river corridors, should be used for over-sized material transportation. We confirmed that, should ITD approve this request, it will establish a precedent for additional trucking companies to follow, which could lead to greatly increasing traffic densities, congestion, and the risk for accidents. Before these types of programmatic decisions be made, ITD should conduct a thorough analysis of roads and associated infrastructure to ensure that the existing road widths, bridges, engineering designs, and emergency facilities (such as runaway truck ramps, chain-up/brake test areas, etc.) are sufficient to withstand consistent use by trucks carrying 120,000-pound loads. Moreover, ITD should conduct a safety study focused on the impacts to towns along the proposed route and define the potential for increased risk to human health prior to making such binding decisions.

Should ITD choose to approve this load alteration proposal, we believe the department should enact several mitigation measures. First, the applicant and ITD should install additional spill containment caches along route corridor described in the application. These caches should include materials necessary to contain and facilitate any spills on land or in the water containment. These could include both absorbent pads, straw bales, and booms. The applicant and ITD should schedule loads to avoid transporting materials on days with high traffic volumes, such as nationally recognized holidays, weekends, and local significant events. ITD should work with the applicant to update safety protocols regarding winter weather advisories, and US-93 should not serve as the primary transportation route during winter storm events due to the increased levels of ice, snow and winds associated with Lost Trail Pass. Chains should be required during potentially freezing conditions. Finally, we recommend the applicant and ITD review and update molybdenum storage and containment protocols.

However, the best path forward is for ITD to prohibit the use of US-93 N through Salmon as a transport option for this large, molybdenum-bearing trucks due to the concerns identified above.

Thank you for reviewing our comments regarding this proposal. If you have any questions about our comments, or if we can provide additional information, please do not hesitate to contact us. We look forward to working with the Idaho Transportation Department on this, and other issues in the future.

Respectfully submitted,

A handwritten signature in black ink, reading "John Robison". The signature is written in a cursive style with a large, looping initial "J".

John Robison

Public Lands Director

Idaho Conservation League

jrobison@idahoconservation.org

(208) 345-6933 ext. 13