Idaho Transportation Board

Subcommittee on 129,000 Pound Truck Routes

January 21, 2021

Idaho Transportation Department
Room 209
3311 West State Street
Boise, Idaho
3:15 PM

To call in:
Dial 1-415-655-0003 US Toll
Meeting number (access code) 177 154 5351
Meeting password 1234

ACTION ITEMS

1. Welcome and Preliminary Matters – Chair Dwight Horsch
   - December 2, 2020 Subcommittee meeting minutes 1

2. Case #202006:
   SH-6 – Milepost 0.00 to 9.858, District 2
   SH-8 – Milepost 2.331 to 25.549, District 2
   SH-9 – Milepost 0.00 to 13.522, District 2
   Chief Engineer’s (CE) Evaluation and Recommendation
     – Freight Program Manager Scott Luekenga 7
   Public Comments – Public Information Officer Megan Sausser 16
   Discussion and Recommendation - Chair Horsch

3. Revisions to 129,000 Pound Truck Route Manual – FPM Luekenga 35 3:45

4. Adjourn (estimated time) 4:00
Idaho Transportation Board
Subcommittee on 129,000 Pound Truck Routes
December 2, 2020

Due to the COVID-19 pandemic, the Subcommittee met remotely.

Idaho Transportation Board (ITB) Subcommittee on 129,000 Pound Truck Routes Chairman Dwight Horsch called the meeting to order at 2:00 PM on Wednesday, December 2, 2020. ITB Members Jim Thompson and Julie DeLorenzo participated.

ITB Chairman Bill Moad attended, along with principal Subcommittee staff members and advisors Deputy Attorney General Tim Thomas, Chief Engineer Blake Rindlisbacher, Freight Program Manager (FPM) Scott Luekenga, and Executive Assistant to the Board (EAB) Sue S. Higgins.

Minutes: November 19, 2020. Member DeLorenzo made a motion to approve the minutes of the November 19, 2020 meeting. Member Thompson seconded the motion and it passed unopposed.

Case #202002: US-26, Milepost (MP) 24.83 to 34.302, District 3. FPM Luekenga presented the Chief Engineer’s evaluation of US-26. The Division of Motor Vehicles (DMV) confirmed that the highway 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 will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. The surface condition is mainly pavement in fair condition; however, a short stretch is concrete in poor condition. The route has six non-interstate high accident intersection locations in the top 100 and two high accident intersection location clusters. Twelve of the 388 crashes on this route between 2014 and 2018 involved a tractor-trailer combination that resulted in two injuries. FPM Luekenga said the route connects with SH-16 and I-84, which are both 129,000 pound routes. The Chief Engineer’s evaluation recommends approving the route.

Member DeLorenzo said the pavement condition has changed. A pavement rehabilitation project was completed so now all of the surface is rated good. Regarding the public comments, she said a number of them appear to be due to misconceptions about 129,000 pound vehicle combinations. Because of the additional axles required on these configurations, they result in less wear and tear on the road than the 105,500 pound vehicle combinations that currently operate on the route.

Member DeLorenzo moved to send case #202002, US-26, milepost 24.83 to 34.302, to the Transportation Board with a recommendation for approval.

Because the Subcommittee is comprised of three members, Chairman Horsch said a second is not required for motions.
The motion passed unopposed.

Case #202001, SH-19, MP 0.0 to 34.638. FPM Luekenga said the application is actually for SH-19, MP 0.0 to 4.827 and MP 34.195 to 34.638. The DMV confirmed that this highway falls under the blue route category allowing 95-foot overall vehicle length and a 5.5-foot off-track. The bridge analysis determined that the 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 condition is good to very poor. There are no safety concerns and there were no accidents involving tractor-trailer combinations on this route from 2014 to 2018. The public comments received on this route generally expressed concern with safety and congestion. The Chief Engineer’s evaluation recommends approving the route.

Member DeLorenzo said there are plans to improve the surface condition in 2021. She added that the comments again appear related to misunderstanding of 129,000 pound vehicle combinations.

Member DeLorenzo moved to recommend approval of case #202001, SH-19, MP 0.0 to 34.638 to the Transportation Board. The motion passed unanimously.

Case #202003, I-84 Business Loop, MP 61.797 to 58.665, MP 58.67 to MP 57.64, and MP 58.665 to MP 55.9, District 3. FPM Luekenga said the application is actually for a continuous route connecting SH-55, SH-45, and I-84, which are already 129,000 pound routes. The DMV confirmed that this highway 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 two bridges on the route will safely support vehicle combinations up to 129,000 pounds, assuming the axle configuration conforms to the legal requirements. The asphalt on the route is in fair to good condition. There are three non-interstate high accident intersection locations and two high accident intersection location clusters on the route. Between 2014 and 2018, 21 of the 1,208 crashes involved tractor-trailer combinations. The public comments received on this route were similar to the other comments, generally expressing concern with safety and congestion. The Chief Engineer’s evaluation recommends approving the route.

Due to questions on the three different milepost sections, District 3 Operations Manager (OM) Jason Brinkman explained the route, which includes two one-way couplets in the City of Nampa. He said the map can be revised for clarity.

Member DeLorenzo said the evaluation indicates that a portion of the route is in very poor condition, but the report does not reflect pavement rehabilitation projects completed after 2015.

Chairman Horsch asked if there are plans to widen the route, add turn lanes, or make other major improvements. OM Brinkman said there are no major improvements planned on I-84 Business Loop or SH-19. There are plans to widen US-26; however, funding has only been identified to widen a portion of the route. There is also a project underway now to widen US-26 east of SH-16.

Member DeLorenzo noted the public comments were similar to the comments received on the other two routes and generally indicate a misunderstanding of these vehicle combinations.
She reiterated that 129,000 pound vehicle combinations have more axles, resulting in less wear and tear on the road. Approval of this application will result in fewer trucks on the road from the applicant, which should improve safety and reduce congestion.

Member DeLorenzo moved to recommend approval of case #202003, I-84 Business Loop, MP 61.797 to 58.665, MP 58.67 to MP 57.64, and MP 58.665 to MP 55.9, to the Transportation Board. The motion passed unanimously.

Member Thompson noted that the applicant will operate fewer trucks on the route, but questioned other companies operating at weights up to 129,000 pounds. Member DeLorenzo concurred that there may be other companies hauling at weights up to 129,000 pounds. It is difficult to know if they will travel on these routes or other 129,000 pound routes, as they generally take the most direct route.

In response to Member DeLorenzo’s question, OM Brinkman said it appears the applications include local roads, but he does not know the disposition of those.

Revisions to 129,000 Pound Truck Route Manual. FPM Luekenga presented additional revisions to the Manual based on the discussions at the last meeting. The main changes include the addition of an internal kick-off meeting when an application is received. The key players will review the responsibilities and establish due dates. This should help expedite the process. The public comment period was also changed from 30 days to 15.

Chief Engineer Rindlisbacher said he talked to Legal about the 14-day appeal process after the Letter of Determination is issued and may include language regarding that administrative process.

Member DeLorenzo appreciated the inclusion of the timeline, but noted it only addresses routes recommended for approval. It does not address the process or timeline for other scenarios. FPM Luekenga said he can include timelines for other scenarios.

There was some discussion on the 15-day public comment period and ensuring sufficient notice is provided, particularly if weekly newspapers are used for the notification. ITB Chairman Moad suggested working closer with the industry on 129,000 pound routes, including the Idaho Trucking Association and ITD’s Trucking Advisory Council. The Subcommittee concurred and recommended incorporating that into the Manual and presenting the Manual at the next Subcommittee meeting.

The meeting adjourned at 3:15 PM.

Respectfully submitted by:
SUE S. HIGGINS
Executive Assistant & Secretary
Idaho Transportation Board
CASE #202006ID6  
Idaho Transportation Department  
ITD 4886 (Rev. 03-14)  
ltd.idaho.gov

Received 16 September 2020

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.

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Contact Person’s Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bennett Lumber Products Inc.</td>
<td>Brett Bennett or Jim Riley</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Contact Phone Number</th>
<th>Fax Number</th>
<th>E-Mail Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>208-875-1121 or 208-661-1478</td>
<td></td>
<td>Brett@blpi or <a href="mailto:jim.riley@rileystegner.com">jim.riley@rileystegner.com</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Company Address</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>3759 SH-6</td>
<td>Princeton</td>
<td></td>
<td>83857</td>
</tr>
</tbody>
</table>

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](http://www.itd.idaho.gov/dmv/poe/documents/extra.pdf). Submit a map with requested route(s) along with this completed form.

<table>
<thead>
<tr>
<th>Highway Number</th>
<th>Beginning Milepost</th>
<th>Ending Milepost</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-6</td>
<td>0.000</td>
<td>9.858</td>
</tr>
<tr>
<td>SH-9</td>
<td>0.000</td>
<td>13.522</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Highway Number</th>
<th>Beginning Milepost</th>
<th>Ending Milepost</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-8</td>
<td>2.331</td>
<td>25.549</td>
</tr>
</tbody>
</table>

Local Route(s) Requested

<table>
<thead>
<tr>
<th>Roadway Name(s)</th>
<th>Beginning Milepost</th>
<th>Ending Milepost</th>
<th>Jurisdiction Name</th>
<th>Date Request Sent</th>
</tr>
</thead>
</table>

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

1. Justification
Bennett Lumber Products lumber mill in Princeton, Idaho has previously been served by short line rail service provided by Washington Idaho Montana line. That rail service has been discontinued, so all wood products leaving the plant must be shipped by truck to ultimate destinations across the west or lumber destinations or relocations on rail in Clarkston, Washington, Lewiston, ID, Boise, ID or other locations. Today 100% of the product manufactured at the Princeton plant are transported to customers or rail relocations by truck. Recent investments in road improvements on the state highways requested now allow the heavier loads to be safely accommodated. These routes will connect Bennett Lumber’s Princeton mill to US-95 which has been approved for 129,000 lb loads throughout Idaho. Increased highway loads limits will allow necessary efficiency and fewer total truck loads than current requirements.

2. Associated Economic Benefits
Bennett Lumber Products employs approximately 250 employees, most of them associated with the Princeton sawmill. These are family wage jobs with benefit programs meeting industry standards. The annual payroll for the Princeton mill exceeds $4.5 million. Additionally Bennett Lumber provides more than $800,000 annually in contracts for local logging and forestry services in the area.

3. Approximate Number of Trips Annually
Forecasting about 1000 annually will take several months (perhaps more than a year) to ramp up to this level

4. Commodities Being Transported
Lumber and possibly wood chips in the future.

5. Anticipated Start Date to Use Requested Routes Within Six Months of approval
Requestor’s Printed Name: Brett Bennett  
Requestor’s Signature: [Signature]  
Date: 9/14/2020

Requester 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).

<table>
<thead>
<tr>
<th>Idaho Transportation Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attn: Chief Engineer</td>
</tr>
<tr>
<td>PO Box 7129</td>
</tr>
<tr>
<td>Boise ID 83707-1129</td>
</tr>
</tbody>
</table>

Fax: (208) 334-8195  
Email: officeofthechiefengineer@itd.idaho.gov

Page 1 of 2
<table>
<thead>
<tr>
<th>Hwy Review</th>
<th>Proceed</th>
<th>Reject</th>
<th>Date</th>
<th>Chief Engineer</th>
<th>Proceed</th>
<th>Reject</th>
<th>Date</th>
<th>Sub-committee</th>
<th>Proceed</th>
<th>Reject</th>
<th>Date</th>
</tr>
</thead>
</table>

Cc: Local Highway Technical Assistance Council (LHTAC)
Case # 202006SH6
SH-6: MP 0.000 to 9.858 (~ 10 Miles)
SH-9: MP 0.000 to 13.522 (~ 13.5 Miles)
SH-8: 2.331 to 25.549 (~ 23 Miles)
Executive Summary

Bennett Lumber Products Inc., is requesting sections of State Highways 6 (SH-6), State Highway 8 (SH-8) and all of State Highway 9 (SH-9) be designated as 129,000 Pound route(s) (Attached Map) for the transportation of lumber and wood chips from mills in Princeton, ID to a number of destination in Idaho and Washington. Bennett Lumber is projecting up to 1000 loads annually.

These highways are predominantly two lane rural arterial routes passing through agricultural, U.S. Forest Service lands and small rural communities. The highways pass through a mix of flat and rolling terrain with no dedicated passing or climbing lanes. The routes are currently coded as “Blue Routes” and as such all trucks must adhere to the 5.5-foot off-track and 95 foot overall vehicle length criteria.

ITD Bridge Asset Management has reviewed the thirteen (13) bridges pertaining to this request and has determined they will safely support the 129,000-pound truck load. Pavement conditions range from good to poor. The Commercial Average Annual Daily Traffic (CAADT) constitutes 4.72% to 12.35% of the Average Annual Daily Traffic (AADT). These highways have no Non-Interstate High Accident Intersection Locations (HAL), SH-9 has four HAL Clusters. There are a total of 214 accidents on these routes of which three involved truck/trailers resulting in three injuries.

Department of Motor Vehicles, Highway Safety, Bridge Asset Management and District 2 all recommend proceeding with this request. District 2 is recommending SH-6, SH-8 and SH-9 be designated from a Blue Route to a Gold Route in accordance with the Extra Length/Excess Weight up to 129,000 Pounds map.

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. 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 SH-6 from milepost 0.00 to milepost 9.858 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. The requested section of SH-9 from milepost 0.00 to milepost 13.522 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. And the requested section of SH-8 from milepost 2.331 to milepost 25.549 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 thirteen (13) 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.

### Table 1. SH-6, Bridge Data

<table>
<thead>
<tr>
<th>ROUTE</th>
<th>FROM:</th>
<th>MILE POST:</th>
<th>TO:</th>
<th>MILE POST:</th>
</tr>
</thead>
<tbody>
<tr>
<td>US-95/SH-6 Jct</td>
<td>0.000</td>
<td>SH-6/SH-9 Jct</td>
<td>9.858</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HIGHWAY NUMBER</th>
<th>MILE POST</th>
<th>BRIDGE KEY</th>
<th>RATING (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-6</td>
<td>3.45</td>
<td>18821</td>
<td>244,000</td>
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</tbody>
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### Table 1. SH-8, Bridge Data

<table>
<thead>
<tr>
<th>ROUTE</th>
<th>FROM:</th>
<th>MILE POST:</th>
<th>TO:</th>
<th>MILE POST:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>HIGHWAY NUMBER</th>
<th>MILE POST</th>
<th>BRIDGE KEY</th>
<th>RATING (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-8</td>
<td>23.78</td>
<td>10245</td>
<td>228,000</td>
</tr>
<tr>
<td>SH-8</td>
<td>16.99</td>
<td>10243</td>
<td>3,118,000</td>
</tr>
<tr>
<td>SH-8</td>
<td>15.01</td>
<td>10240</td>
<td>1,080,000</td>
</tr>
<tr>
<td>SH-8</td>
<td>14.06</td>
<td>10235</td>
<td>348,000</td>
</tr>
<tr>
<td>SH-8</td>
<td>10.59</td>
<td>10226</td>
<td>938,000</td>
</tr>
<tr>
<td>SH-8</td>
<td>4.98</td>
<td>10221</td>
<td>280,000</td>
</tr>
<tr>
<td>SH-8</td>
<td>2.81</td>
<td>10215</td>
<td>258,000</td>
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### Table 1. SH-9, Bridge Data

<table>
<thead>
<tr>
<th>ROUTE</th>
<th>FROM:</th>
<th>MILE POST:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-9/SH-8 Jct</td>
<td>0.000</td>
<td></td>
</tr>
</tbody>
</table>
TO: SH-6/SH-9 Jct
MILE POST: 13.522

<table>
<thead>
<tr>
<th>HIGHWAY NUMBER</th>
<th>MILE POST</th>
<th>BRRIDE KEY</th>
<th>RATING (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-9</td>
<td>13.19</td>
<td>10295</td>
<td>160,000</td>
</tr>
<tr>
<td>SH-9</td>
<td>8.84</td>
<td>10290</td>
<td>252,000</td>
</tr>
<tr>
<td>SH-9</td>
<td>5.91</td>
<td>10280</td>
<td>198,000</td>
</tr>
<tr>
<td>SH-9</td>
<td>2.92</td>
<td>10275</td>
<td>240,000</td>
</tr>
<tr>
<td>SH-9</td>
<td>2.03</td>
<td>10270</td>
<td>214,000</td>
</tr>
</tbody>
</table>

*The bridge(s) is/are adequate if it has a rating value greater than 129,000 pounds or is designated as "OK EJ" (okay by engineering judgment).

**ITD District 2 Evaluation**

District 2 is recommending SH-6, SH-8 and SH-9 be designated from a Blue Route to a Gold Route. District 2 recommends the following road sections be designated as routes that are legal for a single trailer not exceeding 48 feet and a doubles configuration not exceeding 61 feet and 75 feet overall (doubles configurations can exceed one or the other and still be legal). Permit required if exceeding these dimensions and must not exceed 5.50 feet of off-track and 95 feet overall length including load overhang. Total gross weight not to exceed 129,000 pounds.

**State Highway 6 (SH-6)**

Roadway Characteristics

SH-6 is a two lane rural arterial route passing through agricultural, U.S. Forest Service lands and small, rural communities. The route is predominantly flat with no dedicated passing or climbing lanes. SH-6 traverses the cities of Potlatch and Princeton.

**Roadway Geometry**

*Table 1. SH-6 Roadway Geometry*

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>THROUGH LANES</th>
<th>TURN LANES</th>
<th>SHOULDER</th>
<th>PARKING LANE</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00 TO 0.03</td>
<td>1 – 1 each direction</td>
<td>Yes</td>
<td>Paved</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.03 TO 9.858</td>
<td>1 – 1 each direction</td>
<td>No</td>
<td>Paved</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Pavement Condition**

SH-6 is asphalt paved and is rated in good condition.
Table 2. SH-6 TAMS Visual Survey Data

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>PAVEMENT TYPE</th>
<th>DEFICIENT (YES/NO)</th>
<th>CONDITION STATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00 – 2.400</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>2.400 – 5.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>5.000 – 8.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>8.000 – 9.858</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
</tbody>
</table>

Traffic Volumes

The speed limit of these highway sections vary between 25mph and 55mph.

Table 3. SH-6 Traffic Volumes

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>AADT</th>
<th>CAADT</th>
<th>% TRUCKS</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.000 – 1.515</td>
<td>4,300</td>
<td>290</td>
<td>4.72</td>
</tr>
<tr>
<td>1.515 – 2.247</td>
<td>3,500</td>
<td>300</td>
<td>6.00</td>
</tr>
<tr>
<td>2.247 – 5.200</td>
<td>2,500</td>
<td>280</td>
<td>7.84</td>
</tr>
<tr>
<td>5.200 – 9.858</td>
<td>1,700</td>
<td>300</td>
<td>12.35</td>
</tr>
</tbody>
</table>

State Highway 8 (SH-8)

Roadway Characteristics

SH-8 is a two lane rural arterial route passing through agricultural and wooded properties and small rural communities. The route is predominantly rolling terrain with no dedicated passing or climbing lanes. SH-8 traverses the cities of Moscow, Troy and Deary.

Table 4. SH-8 Roadway Geometry

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>THROUGH LANES</th>
<th>TURN LANES</th>
<th>SHOULDER</th>
<th>PARKING LANE</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.331 TO 3.293 (MOSCOW)</td>
<td>1 each direction</td>
<td>1</td>
<td>Curbed</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td>Center</td>
<td></td>
</tr>
<tr>
<td>3.293 TO 14.20</td>
<td>1 each direction</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td>Turnbays at major intersections</td>
<td>Paved</td>
</tr>
<tr>
<td>14.20 TO 14.57 (TROY)</td>
<td>4 – 2 each direction</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td></td>
<td>10</td>
</tr>
<tr>
<td>14.57 TO 25.549</td>
<td>2 – 1 each direction</td>
<td>No</td>
<td>Paved</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>11’</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25.549</td>
<td>3 – 1 each direction</td>
<td>Yes</td>
<td>Paved</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td>Left Turnbay to SH-9</td>
<td></td>
</tr>
</tbody>
</table>
Pavement Condition

SH-8 is asphalt paved with a short section of concrete on SH-8 in Moscow. SH-8 is mostly good with some fair to poor areas.

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>PAVEMENT TYPE</th>
<th>DEFICIENT (YES/NO)</th>
<th>CONDITION STATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.331 – 2.700</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>2.700 – 3.293</td>
<td>Rigid</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>3.293 – 5.050</td>
<td>Flexible</td>
<td>No</td>
<td>Fair</td>
</tr>
<tr>
<td>5.050 – 8.000</td>
<td>Flexible</td>
<td>Yes</td>
<td>Poor</td>
</tr>
<tr>
<td>8.000 – 10.630</td>
<td>Flexible</td>
<td>Yes</td>
<td>Poor</td>
</tr>
<tr>
<td>10.630 – 13.000</td>
<td>Flexible</td>
<td>No</td>
<td>Fair</td>
</tr>
<tr>
<td>13.000 – 14.255</td>
<td>Flexible</td>
<td>No</td>
<td>Fair</td>
</tr>
<tr>
<td>14.255 – 14.572</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>14.572 – 17.520</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>17.520 – 20.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>20.000 – 21.845</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>21.845 – 24.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>24.000 -27.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
</tbody>
</table>

Traffic Volumes

The speed limit of these highway sections vary between 25mph and 55mph.

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>AADT</th>
<th>CAADT</th>
<th>% TRUCKS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.331 – 2.626</td>
<td>15,500</td>
<td>860</td>
<td>3.88</td>
</tr>
<tr>
<td>2.626 – 2.842</td>
<td>14,000</td>
<td>660</td>
<td>3.30</td>
</tr>
<tr>
<td>2.842 – 3.069</td>
<td>12,000</td>
<td>550</td>
<td>3.21</td>
</tr>
<tr>
<td>3.069 – 3.383</td>
<td>9,800</td>
<td>450</td>
<td>3.21</td>
</tr>
<tr>
<td>3.383 – 4.138</td>
<td>5,500</td>
<td>290</td>
<td>3.69</td>
</tr>
<tr>
<td>4.138 – 4.415</td>
<td>5,700</td>
<td>280</td>
<td>3.44</td>
</tr>
<tr>
<td>4.415 – 4.925</td>
<td>4,500</td>
<td>280</td>
<td>4.36</td>
</tr>
<tr>
<td>4.925 – 5.145</td>
<td>4,900</td>
<td>280</td>
<td>4.00</td>
</tr>
<tr>
<td>5.145 – 5.800</td>
<td>4,900</td>
<td>280</td>
<td>4.00</td>
</tr>
<tr>
<td>5.800 – 7.942</td>
<td>4,500</td>
<td>190</td>
<td>2.96</td>
</tr>
<tr>
<td>7.942 – 8.800</td>
<td>3,600</td>
<td>190</td>
<td>3.69</td>
</tr>
<tr>
<td>8.800 – 9.312</td>
<td>3,300</td>
<td>190</td>
<td>4.03</td>
</tr>
<tr>
<td>9.312 – 11.409</td>
<td>3,300</td>
<td>180</td>
<td>3.82</td>
</tr>
<tr>
<td>11.409 – 11.587</td>
<td>3,000</td>
<td>180</td>
<td>4.20</td>
</tr>
<tr>
<td>11.587 – 14.488</td>
<td>3,000</td>
<td>180</td>
<td>4.20</td>
</tr>
<tr>
<td>14.488 – 14.572</td>
<td>2,200</td>
<td>180</td>
<td>5.73</td>
</tr>
<tr>
<td>14.572 – 15.271</td>
<td>1,800</td>
<td>180</td>
<td>7.00</td>
</tr>
<tr>
<td>15.271 – 16.120</td>
<td>1,600</td>
<td>150</td>
<td>6.56</td>
</tr>
<tr>
<td>16.120 – 16.980</td>
<td>1,600</td>
<td>150</td>
<td>6.56</td>
</tr>
<tr>
<td>16.980 – 18.498</td>
<td>1,500</td>
<td>150</td>
<td>7.00</td>
</tr>
<tr>
<td>18.498 – 19.158</td>
<td>1,400</td>
<td>150</td>
<td>7.50</td>
</tr>
<tr>
<td>19.158 – 21.173</td>
<td>1,400</td>
<td>150</td>
<td>7.50</td>
</tr>
<tr>
<td>21.173 – 22.146</td>
<td>1,400</td>
<td>150</td>
<td>7.50</td>
</tr>
</tbody>
</table>
State Highway 9 (SH-9)

Roadway Characteristics

SH-9 is a two lane, rural arterial route passing through agricultural and wooded properties and is predominantly rolling terrain with no dedicated passing or climbing lanes. There is a railroad underpass at MP 8.85 with a height clearance of 17’ 0”. There is a signed, at-grade railroad crossing at MP 13.50. There are no cities on this section of SH-9. The speed limit is limited to 55MPH.

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>THROUGH LANES</th>
<th>TURN LANES</th>
<th>SHOULDER</th>
<th>PARKING LANE</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00 TO 13.522</td>
<td>2 – 1 each direction</td>
<td>No</td>
<td>Paved</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>12’</td>
<td></td>
<td>3’</td>
<td></td>
</tr>
</tbody>
</table>

Pavement Condition

SH-9 is asphalt paved and is rated in good condition.

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>PAVEMENT TYPE</th>
<th>DEFICIENT (YES/NO)</th>
<th>CONDITION STATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00 – 2.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>2.000 – 3.360</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>3.360 – 6.000</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>6.000 – 7.260</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>7.260 – 9.500</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>9.500 – 11.500</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
<tr>
<td>11.500 – 13.522</td>
<td>Flexible</td>
<td>No</td>
<td>Good</td>
</tr>
</tbody>
</table>

Traffic Volumes

The speed limit of these highway sections vary between 25mph and 55mph.

<table>
<thead>
<tr>
<th>MILEPOSTS</th>
<th>AADT</th>
<th>CAADT</th>
<th>% TRUCKS</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00 – 2.316</td>
<td>1100</td>
<td>170</td>
<td>10.82</td>
</tr>
<tr>
<td>2.316 – 5.751</td>
<td>1000</td>
<td>150</td>
<td>10.50</td>
</tr>
<tr>
<td>5.751 – 11.139</td>
<td>1000</td>
<td>110</td>
<td>7.70</td>
</tr>
<tr>
<td>11.139 – 13.522</td>
<td>1100</td>
<td>110</td>
<td>7.00</td>
</tr>
</tbody>
</table>

Truck Ramps

No runaway truck ramps exist along these routes.
Port of Entry (POE)

There are two P.O.E. rover sites on SH-6 at MP 2.8 and MP 9.75. There are no P.O.E rover sites on SH-8 or SH-9 within the requested route change.

Safety Review

Accident Data

State Highway 6

This segment has no Non-Interstate High Accident Intersection Locations (HAL) in the top 100 and no HAL Clusters.

Analyses of the 5-year accident data (2015-2019) shows there were a total of 53 accidents involving 65 units (0 fatalities and 18 injuries) on SH-6 between US-95 and SH-9 (MP 0.0 – 9.858) of which only 1 of the accidents involved a tractor-trailer combination. Implementation of 129,000 pound trucking is projected to reduce truck traffic on this route.

Table 5. SH-6, HAL Cluster

<table>
<thead>
<tr>
<th>ROUTE</th>
<th>STATEWSHE RANK</th>
<th>MILE POST</th>
<th>LENGTH (MILES)</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

State Highway 8

This segment has no Non-Interstate High Accident Intersection Locations (HAL) in the top 100 and four HAL Clusters. The locations are shown in the table below with their statewide ranking.

Analyses of the 5-year accident data (2015-2019) shows there were a total of 134 accidents involving 187 units (1 fatality and 62 injuries) on SH 8 between US-95 and SH-9 (MP2.331 – 25.549) of which two of the accidents involved a tractor-trailer combination resulting in two injuries. Implementation of 129,000 pound trucking is projected to reduce truck traffic on this route.

Table 5. SH-8, HAL Cluster

<table>
<thead>
<tr>
<th>ROUTE</th>
<th>STATEWSHE RANK</th>
<th>MILE POST</th>
<th>LENGTH (MILES)</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-8</td>
<td>153.5</td>
<td>8.442-8.80</td>
<td>0.358</td>
<td>Latah</td>
</tr>
<tr>
<td>SH-8</td>
<td>361</td>
<td>4.925-5.80</td>
<td>.875</td>
<td>Latah</td>
</tr>
<tr>
<td>SH-8</td>
<td>412</td>
<td>5.80-7.30</td>
<td>1.5</td>
<td>Latah</td>
</tr>
<tr>
<td>SH-8</td>
<td>421</td>
<td>19.158-19.658</td>
<td>0.5</td>
<td>Latah</td>
</tr>
</tbody>
</table>

State Highway 9

This segment has no Non-Interstate High Accident Intersection Locations (HAL) in the top 100 and no HAL Clusters.

Analyses of the 5-year accident data (2015-2019) shows there were a total of 27 accidents involving 29 units (1 fatality and 9 injuries) on SH-9 between SH-6 and SH-8 (MP 0.0 – 13.522) of which none of the accidents involved a tractor-trailer combination. Implementation of 129,000 pound trucking is projected to reduce truck traffic on this route.
Table 5. SH-9, HAL Cluster

<table>
<thead>
<tr>
<th>ROUTE</th>
<th>STATEW</th>
<th>MILE POST</th>
<th>LENGTH (MILES)</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Climate Data

<table>
<thead>
<tr>
<th>PRECIPITATION</th>
<th>ANNUAL AVERAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rainfall</td>
<td>27.04”</td>
</tr>
<tr>
<td>Snowfall</td>
<td>49.0”</td>
</tr>
<tr>
<td>Days w/ Precipitation</td>
<td>110</td>
</tr>
<tr>
<td>Days w/ Sun</td>
<td>255</td>
</tr>
</tbody>
</table>

END EVALUATION
129,000 Pound Route Application 202006SH6
State Highway 6, State Highway 9 and State Highway 8

**Note:** Map color codes have no relationship to DMV’s Extra Length/Excess Weight up to 129,000 Pounds Map or Route Capacity Map.
E-MAILS

Name: Marvin Alderman
Phone Number: None Provided
E-mail: oyimmy@gmail.com
Specific Route: ID-6, ID-8 & ID-9
Date: 12/7/2020

i for one am against any reclassification of any and all highways in north Idaho. i drive a truck for a living and actually see for myself as well as feel it to. Highway 6 is just too narrow and beat up and should be completely ripped up and widened and made to haul these extreme loads first. Highway 9 this summer got a makeover, what a flipping joke. $1.8 million dollar rip-off!! Again it should be ripped up 100%, widened 6 feet each side, and made to handle extreme loads with passing lanes. Highway 8 is in the same boat. Highway 9 makeover is now, you hit the high bumps and drop down between them, where before you dropped down in bottoms to shoot out the tops. They sawed out cracks, filled them in higher and called it good. They all and i mean EVERYBODY involved should be fired! You ride in a 18 wheeler (and i invite you to ride with me) you wouldn't even doubt what i am saying. Then throw a big snow storm like we had 3 weeks ago and the state will not plow it till late afternoon when most heavy rig traffic has it beat down a gone home. Again these roads are not made for extreme loads in any fashion of the word. Until these engineers get a clue it will be a death wish. Narrow needs complete redone. These highways are very much so high capacity money loads for the state of Idaho. Lots of chips, logs, and lumber amongst other trucks. Let Bennett take them thru potlatch and down highway 95 as it is closer to where his destination is anyway. Again i cannot say it loud enough. I OPPOSE BENNETTS RECLASSIFICATION OF HIGHWAYS.

Thank you, Marvin Alderman

Name: Chuck Broscious
Phone Number: None Provided
E-mail: edinst@tds.net
Specific Route: ID-9 & ID-6
Date: 12/7/2020

I-9 Harvard to Deary Highway 6
https://itdprojects.org/projects/id9dearytoharvard/
RE: Proposal to reclassify I-9 Harvard to Deary Highway 6 highway to allow >120,000 pound loads.
Comments submitted to: officeofthechiefengineer@itd.idaho.gov
The Environmental Defense Institute objects to allowing Bennett Lumber to haul <120,000 pound loads on I-9 Harvard to Deary Highway 6 unless the following conditions are met:
1. When the road was rebuilt, was it constructed for <120,000 pound loads? If not, then Bennett Lumber must pay for the new upgrade that can handle the increased loads.
2. Qualified engineers (paid for by Bennett Lumber) must certify the roads qualifications to handle the increased loads and publish their findings.
3. Weight limit checks must be implemented to ensure compliance.
Regards
Chuck Broscious
edinst@tds.net
President Environmental Defense Institute Box 220 Troy, ID 83871
To whom it may concern,

The application for 129k on Highway 6,9, and 8 requested by Bennett Lumber Products should be granted. 129k involves less trips on our roads which also reduces the carbon footprint from trucks.

It also allows the weight to be less of an impact to the road surface on each axle because of spreading the weight out more via more axles required on 129k, the impact to the road is less per axle than the axle weight on a 80,000lbs truck. Also more axles equals more brakes and that increases the safety also for the public and the truck.

Thanks for your consideration.

Allen Hodges
President/CEO
Idaho Trucking Association
3405 East Overland Road/Suite 175
Meridian, ID 83642
P 208.342.3521

Name: Garry Queener
Phone Number: 208-835-5881
E-mail: gquee@tds.net
Specific Route: ID-9 & ID-6
Date: 12/7/2020

I am writing to request that highways 8 and 9 NOT be allowed to carry the loads of up to 129,000 pounds.

I traveled from Troy to Deary for 25 years and from Troy to Princeton (via highway 9) for 3 years. We currently travel from Troy to Moscow over highway 8 several times a week. It seems that the TRENCHES formed in the asphalt from heavy loads is getting worse enough to cause serious puddling. At the very least this causes a lot of water/slush to be thrown up on passing vehicles and often times can even cause hydroplaning when one is force to drive in these tracks.

With the possible exception of highway 8 between Troy and Deary (the newest, now 40+ year old roadbed), these highways were not designed for loads this high. If I remember correctly, load limits prior to the 1980s were about 80,000 pounds. I know that most heavy loads have additional axles, but there still seems to be damage done, especially during the spring months when soils are saturated.

We are STILL waiting for some improvements in the section of highway 8 between Troy and Moscow. How many years now without any upgrades?

Our roads have much more truck traffic than they were ever designed to experience. It seems that profits for one may take precedence over the rest of us. I hope that you will strongly consider NOT approving this request.
Most Sincerely,

Gerry Queener
1900 Little Bear Ridge Rd
Troy, ID  83871
208-835-5881

Name:   Kirk Todish
Phone Number:   208-875-1321
E-mail:  kirk@blpi.com
Specific Route:   ID-9 & ID-6
Date:   12/7/2020

I am in favor of raising the weight limit

Kirk Todish

Name:   Jim Vandegrift
Phone Number:   208-874-2104
E-mail:  jim@blpi.com
Specific Route: ID-9 & ID-6
Date:   12/7/2020

Good morning and thank you for allowing my comments

I firmly believe that State Highways 6, 8 and 9 should be reclassified to include 129K pound loads to be hauled.

The recent improvements, especially to Highway 6, were done to allow for this traffic and I believe it should, finally, be allowed. The road structure can handle the increased load capacity and it will allow for a more consistent, and fair, transportation system between North Idaho and South Idaho.

Please reclassify Highway’s 6, 8 and 9 to include the 129K pound allowance.

Thank You for your consideration

Jim Vandegrift
1838 Conestoga St.
Moscow, Idaho 83843
208-874-2104

Name:   Larry & Carol Grupp
Phone Number:   (208) 882-0446
E-mail:  lgrupp@turbonet.com
Specific Route: ID-9 & ID-6
Date:   12/7/2020

Good Afternoon:
We certainly support reclassification of Idaho Highway 6 from US-95 Junction to Harvard, Idaho Highway 9 from Harvard to Deary and Idaho Highway 8 from Deary to the US-95 Junction in order to classify them as legal for commercial loads weighing up to 129,000 pounds.

Also would be nice if you finally got the last Lewiston-to-Moscow four-lane on U.S. 95 put in place.

Thanks for the opportunity to comment.

Larry & Carol Grupp
1115 Paradise Ridge Rd
Moscow, ID 83843
(208) 882-0446

Name: Jackie Meckel
Phone Number:  
E-mail: bkmeckel@frontier.com
Specific Route: ID-9 & ID-6
Date: 12/8/2020

Please move forward with the request.

Jackie Meckel
1101 Meckel lane
Potlatch, ID
83855

Name: Richard Kopel
Phone Number: 208-310-2308
E-mail: barrister33556@yahoo.com
Specific Route: ID-9 & ID-6
Date: 12/8/2020

My wife and I reside in the City of Moscow, approximately 1/2 mile uphill from and with a direct view of Hwy 8. We constructed our home on Hampton Court in 2019 in accord with and even exceeding the relevant building codes. Obviously, we had not spent time on our lot in the late evening/early morning hours prior to the completion of our home when we obtained a certificate of occupancy. After moving into our home in March, 2019, we were shocked at the loud road noises in the late evening/early morning hours, which we can hear in our home emanating from truckers using their brakes on Hwy 8. After reading the proposal, we are fearful that if this request is granted, the noise problem will worsen. Since the hearing is virtual and no live questions and answers are possible, we wanted to be sure our noise concerns are taken into consideration. We would like a response from an expert, letting us know what noise impact is likely should the request be granted. Thank you for your consideration.

Richard and Kathryn Kopel
barrister33556@yahoo.com
(208)310-2308

Response to Mr. Kopel E-mail sent 12/14/2020
Mr. Kopel,

The Idaho Transportation Department has not conducted any studies on 129k trucking and how it impacts noise. However, since 129k trucking typically results in a reduction in overall truck traffic, it is possible that residents along the highway could expect to hear less noise from truck traffic as a result of increasing the weight limits. Concerns about noise should be directed to local governments since ITD does not have the authority to regulate noise produced by commercial trucking. Usually cities and counties do this by passing ordinances that prohibit the use of engine (jake) brakes and having law enforcement organizations enforce them.

Mr. Kopel response 12/14/2020

Mr. Luekenga,

After reading your response to our concerns with the likely noise increase from the requested truck weight limit change, I was very disappointed although not surprised. During my long career as an attorney, I worked for several government agencies in both Florida and Montana. A lot of my time was devoted to working with government regulators in an effort to modify laws and regulations to better serve the public good. It is obvious that the current IDT authority regarding the impact of trucking on our state highways is missing an important element in determining whether an increase in weight limit should be allowed. It is unreasonable that IDT should not examine whether a requested change will cause increased noise which affects residents in the community.

Please pass my emails on to your Department head so that my concerns can be considered when IDT is requested to suggest changes to current state laws and regulations which it administers. Hopefully, your agency's decision in this case will not result in increased road noise that negatively impacts our enjoyment of life in Moscow. By the way, I had left a voice mail requesting a return call at the phone number on the notice and never received a call back (I know that was not your number so I am not faulting you personally). Since there will be no in-person hearing, at least your agency should return calls to allow the public to ask questions.

Richard and Kathryn Kopel
(208)310-2308

Name: Leonard and Lois Rasmussen
Phone Number: 
E-mail: lenny.rasmussen@gmail.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/8/2020

First my qualifications for these comments, I have over 40 years of over the road flatbed driving experience. I live in the Potlatch area and have driven all roads under consideration with doubles (40-20 and B train) as well as Bennett's Chip trucks. My wife is also a qualified driver and grew up in the area.

We question the need for the heavier longer tractor trailer combinations. The lumber trucks currently loading out of the Princeton mill need to be legal for over the road to other areas. These are out of area units so the impact on the local Potlatch-Princeton economy is marginal. The only lumber trucks for the haul from Princeton to Lewiston that would be hauling the oversize loads would be Bennett's own. Will these units be in addition to the ones they already have on the road? Will they remove current units or keep them and just increase their capacity? Thus there would actually be no decrease in truck traffic. How many jobs will be removed if they go to the heavier longer loads? Would they need more trucks and drivers if the request is not approved? Will the number of chip trucks be decreased or will they keep what they have and add? What will be the impact for total jobs?
The roads under consideration are two lane roads, with limited areas for passenger vehicles to pass the current trucks that travel these roads. We have experienced being passed on the current double yellow no passing zones on each of these roads. It is dicey at best for a passenger vehicle passing with a "regular" 18-wheeler. With the added length and weight of the proposed vehicles there will be more opportunity for tragic passing results.

The "rolling hills" noted in the reports in a passenger vehicle are not noticeable. In a fully loaded 18-wheeler, whether it is a set of doubles or one trailer they are pulled down in speed. The proposed heavier longer units have the potential of backing up traffic. Will there be passing lanes constructed? This should be a requirement to allow these longer heavier vehicles.

The bridges may be judged safe at this point in time. However, with increased weight will the bridge over Deep Greek on highway 95 be sufficient? What about the bridge over the Palouse River? It has sustained flood damage in the past.

On each of the proposed routes they will be traveling through the middle of the towns. The Potlatch route is down a significant grade, right past the elementary school, the main intersection between the shopping mall and bank with a nearly 45 degree curve at the bottom. This is a safety hazard even with the newly widened curve. There are many passenger vehicles entering the road from the busy businesses and these heavier longer loads will be less able to stop when someone pulls out in front of them.

The Potlatch Y junction needs a circle intersection to slow the traffic both ways on 95. The larger heavier longer loads take way more time to get going from a full stop thus potentially blocking the highway both ways.

Are the heavier longer trucks really needed for Bennett Lumber to continue doing business?

Thank you for the opportunity to comment.

Leonard and Lois Rasmussen
Potlatch

Name: Willi Boni
Phone Number:
E-mail: willi.boni@gmail.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/9/2020

The Bennett lumber application to reclassify the highways looks like a good idea to reduce truck traffic in those areas!

Name: James Foster
Phone Number:
E-mail: jamesfoster@mac.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/9/2020

As a resident of Potlatch, I oppose this change. Logging trucks are already very loud. Larger trucks will be even worse. Also, by using larger trucks, Bennett will need fewer drivers. This would harm the workforce and local economy.
I will start by discussing the 23 mile stretch of Highway 8 from Deary to the intersection with 95 in Moscow. Allowing heavier trucks on this stretch of road is a horrible, dangerous idea. This stretch of road is heavily used, especially by morning and evening commuter traffic to and from Moscow. The road IS NOT like the picture on the postcard!! It has numerous bends, few places to pass even another car, much less a truck. Many residential driveways open onto the road. There are also well used secondary roads intersecting this stretch, like the entry to Spring Valley Reservoir, that result in people stopping on 8 in order to make left turns. The road passes through the small charming town of Troy that has no stoplight, but rather a number of crosswalks used by children, townspeople crossing the road to their favorite deli, and even a particularly social wild duck. Any increase in the time it takes to stop, or any hurrying by a trucker trying to meet a deadline would put lives at risk in the town. I live near Troy and do not want to see Main Street become dangerous.

Highway 9 from Harvard to Deary is straighter, but as it is unsafe for large load trucks to continue from Deary to Moscow, it does not make sense to change the rules for 6. Better to keep it as it, a lovely road for country driving. Also, commuter traffic on 6 is increasing, and there are ever more driveways. Trucks could reach 95 via Kendrick and Jullietta, but these small towns have challenges similar to those of Troy. I do not know if the roadbed is strong enough for such heavy trucks.

Changing the classification of Highway 6 from 95 to Harvard is also a bad idea. The distance involved is shorter. BUT, putting more heavy truck traffic onto 95 would make the commute from Potlatch to Moscow even more dangerous than it is now. No change should be made until 95 is a true four lane highway all the way from Lewiston to Coeur d’Alene.

Thank you for your attention.

Lynne Haagensen
1060 Lamb Road
Troy, ID. 83871

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Name: Brian and Pam Robertson
Phone Number:
E-mail: avonontheroad@outlook.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/9/2020

Thank you for the opportunity to comment on the proposed 129k limits on Highways 6, 9 and 8.

Our county road (Old Avon Rd) intersects Highway 9 and a truck coming from the south by our road is on a downhill with an approximate .8 mile straightaway ahead. Trucks now come over that hill at 55 mph and greater and visual distance is not that great. Pulling out onto the highway is sometimes a white-knuckle event. There are numerous county roads and driveways (we’ve noticed you’ve been relocating driveways
for better visual distance the past couple of years) that intersect the highway with short visual distance. Our concern is that a 129k truck will have an increased stopping distance even though it has more braking “power” with extra axles. Does the FMSCA set stopping distance standards for heavy trucks and do they have the data showing those distances? We would like to see the data if available.

Brian and Pam Robertson
1060 Old Avon Rd
Deary, ID 83823

Name:   Ed Haagen
Phone Number:
E-mail:  ehaagen@me.com
Specific Route: ID-6, ID-9 ID-8
Date:   12/11/2020

I have seen what happens when they increased the weight limits to roads in Pennsylvania to allow coal trucks to transport heavier loads. They went from BAD to almost impossible to drive on. I could see allowing an increase load limit from the mill to HWY 95 but not the other areas. We should not be responsible for providing Bennett with an increase in profits by allowing them to destroy our roads. How much of an increase are they paying in highway taxes??

Think this through very carefully.

Ed Haagen

Name:  Raymond and Kitty Geidl
Phone Number:
E-mail:  geidl619@frontier.com
Specific Route: ID-6, ID-9 ID-8
Date:   12/11/2020

Because of the 2020 Labor Day wildfires on the west side of Clearwater County, there is need to salvage burned Ponderosa Pine. The Bennett mill at Princeton, Idaho, is the closest mill that efficiently handles this damaged timber. As landowners of 100+ acres of damaged PPine due to the Clover fire, allowing trucks to haul an additional 23,500 pounds per load will increase the ability to utilize a perfectly good lumber product that might otherwise go to waste.

We urge the ITD chief engineer to allow the load weight limits in Latah and other counties to be set at a rate recommended by science engineers who know what they are talking about so that useable lumber can be produced at a competitive price with other counties in the state. Therefore, we agree with increasing truck load limits by 23,500 or more pounds if engineers say that the roads are built for it.

Thank you for your consideration.

Raymond and Kitty Geidl
294 Bashaw Road
Orofino, Idaho

Name:  Myron and Verlynn Emmerson
Phone Number:  208-875-0079
E-mail:  myver.emerson@gmail.com.
Specific Route: ID-6, ID-9 ID-8
Date: 12/11/2020

ITD Freight Program Manager

As a resident of Latah County for over 70 years and taxpayer, I would like to submit my approval for the reclassification of portions of Highway 6, 8 and 9 to 129,000 pounds. Your analysis is acceptable and sounds reasonable. Please accept my approval of this change. I see NO disadvantages to this request. If you have any questions or concerns, please do not hesitate to contact me.

Best Regards,

Myron Emerson
1030 Boller Road
Potlatch, Idaho 83855
Ph. 208 875 0079
myver.emerson@gmail.com

Name: Abigail Fuller
Phone Number: 
E-mail: abbyfuller@idaho.net
Specific Route: ID-6, ID-9 ID-8
Date: 12/15/2020

The following comments are for the virtual public hearing on Bennett Lumber’s application to use heavier load trucks on Highways 6, 9, and 8, case # 202006SH6.

I have reviewed the engineer's statement and the FAQs available online and I have several comments on the request to change the weight rating on Highways 6, 9, and 8. The first two comments are for all three sections and the rest are specific to Hwy 8, which my husband and I live along at mile 23.

Bridges – The engineers believe the bridges can handle the weight on ONE heavy truck. What happens when TWO trucks happen to be on the bridge at the same time? (example – one heading East and one heading West) It need not be two lumber trucks, because once you change the rating on the roads ANY heavier truck can drive on these sections. It could be a lumber truck and a gravel truck. We get a fair number of the latter on this stretch of Highway 8 due to the gravel pit just down the road from us, which now has an entrance directly to Highway 8.

Winter snow – You've listed an average, but we get a lot of snow out here. One recent year we had 88 inches. Some stretches of road are known to be icy, due to lack of sunlight in the winter months from the trees.

Troy – The report says Troy has two lanes on either side, but fails to mention that in the winter they pile snow down the center, reducing the lanes to no more than 1 1/2 on either side. Given the steep hills down into Troy, this should be a concern for heavier trucks.

Highway 8 accidents – I noted that the Report admits there have been more accidents on Highway 8 than the other two sections. This may be because some of the road is steep and curvy – the worst section is down into Troy going West. With guardrails there is little shoulder on this stretch and it gets little sun in the winter, so can be icy. It could also be because Highway 8 gets more traffic, both commuter traffic and trucks, and it also gets a fair amount of farm equipment moving back and forth, often as over-sized loads. As a driver on this road, I don't feel it is wide enough for bigger trucks.
Noise – The trucks that go by our house often use their compression brakes going down the hill, as one did at 6:30 this morning. How much more noise will the bigger trucks with more brakes make? The ones we get now are noisy enough, we don't need more.

Truck traffic – Bennett says there will be up to 20% fewer truck-trips per day with bigger trucks. How long will that last? Won't they end up shipping more product once they have bigger trucks? And once you allow bigger trucks, what's to stop other big trucks from using the same stretches? I'm particularly thinking of the gravel trucks and logging trucks, although the latter are probably limited by smaller roads further on. I think believing there will be fewer truck trips overall is wishful thinking.

In conclusion, I have concerns about this plan. I suggest you give further consideration to bridge safety, and I specifically request that you disapprove the stretch of Highway 8 included in this proposal, because it is unsuitable for larger loads and because I don't want them driving past my house or have to meet them on the road. Bennet has not even explained why they even need Highway 8, when Highway 6 to 95 is a shorter route.

Thank you for considering my comments.

Abigail Fuller
4750 Hwy 8 (PO Box 85)
Deary, ID 83823

Name: Thomas Heward
Phone Number: thomas_heward@outlook.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/15/2020

Okay to 95 through Potlatch.

The Deary and Troy routes are both filled with hills and traffic that would best be suited to have passing lanes on that don’t exist. Those routes would not only take the beating of the extra heavy traffic. But would also slow down existing traffic in a hazardous area. Those routes are problematic.

Name: Bonnie Wilcoxson
Phone Number: bjwil@potlatch.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/11/2020

I am a Princeton resident and have received the notice regarding Bennett’s weight reclassification for Hwy 6, at least I’m assuming I understood your online evaluation to reflect that this is a weight increase request and, furthermore, they want the state to pay for any modifications. However, I am not an engineer and I don’t completely understand the ramifications of Bennett’s request. Can you help me with that?

What, exactly, do they want?

And what, exactly, are you recommending?

Thank you,
Bonnie Wilcoxson
Bear Creek Road
Talk about putting lipstick on a pig.

According to ITD, approving Bennett's application for larger and heavier loads on highways 6, 8, and 9 will reduce traffic, promote local industry, result in greater public safety and convenience, as well as save the environment.

I don't buy it.

These highways, which serve rapidly increasing rural populations, are two lane roads with limited passing opportunities. They already accommodate a substantial volume of trucks which, by any common measure, are large. Permitting loads designed for multi-lane interstate highways will only invite greater volumes of even larger trucks. Bennett and others may save on shipping costs but those benefits will come at the expense of the convenience and safety of local residents and the general traveling public.

Whatever the merit of raising loads and weights on straight and open roads in the south, the existing length and weight limits on highways 6, 8, and 9 are appropriate and should not be changed.

Arthur Smith
Hwy 9, Deary

I am concerned about the reclassification of the three highways for commercial loads. These large logging trucks run through our towns at high speed with heavy loads. You are asking for fatalities. Unless the state can provide State Police to regulate and enforce speed and safety requirements we will be in danger in all of these communities. I am against your cozy arrangement with Bennet.

Kevin Carson Troy, Idaho

Hello-
I wanted to commit that I do not approve of those heavy loads utilizing the local highways.

Thank you,
Dear Sirs,

I am writing to you to offer my comments regarding the proposed reclassification request by Bennet Lumber Company for Highway 6 from the US-95 junction to Harvard, Idaho Highway 9 from Harvard to Deary, and Idaho Highway 8 from Deary to the US-95 junction.

I live at 1371 Mica Mountain Road, Deary Idaho since 1992, and commute almost on a daily basis to Moscow and Potlatch on the roads involved in this reclassification.

I read the feature article in the Lewiston Tribune regarding this issue, and it is my opinion the ITD has overlooked several important factors regarding these roads and their fitness to be reclassified to take weights up to 129,000 pounds.

First of all, the State has not kept up with the maintenance of these roads in regards to the heavy traffic they currently serve. Case in point; Highway 9 was to be resurfaced this summer, but when the company contracted with the job, Knife River Corporation, were not able to complete the work, because the road base was so degraded that it was interfering with the work. What is needed is a complete reconstruction of the road. Instead the road was chip-sealed. As the road has worn from the summer, the bumps, cracks, and grooves are returning.

Highway 8 is grossly under engineered for the amount of traffic that it serves. It is common to be in a line of cars heading West going to Moscow any day of the work week that is 75 to 100 cars long. And, the same when returning Eastward. There are no safe passing lanes, and the grooves in the pavement attest to the amount of traffic. In wet weather drivers drive on the meridian or on the shoulder to keep their cars from hydroplaning in the grooves. "Riding the ridges" gives some semblance of control, but hardly safe when heavy on-coming traffic is encountered.

I am a big supporter of Bennett Lumber, and I am grateful for their business and support to our community. I think they deserve to have better roads, and I understand their need for a road upgrade. Unfortunately, the roads are in a deplorable condition, and the state has shown complete lack of responsibility in maintaining these specific highways. I would like to see the ITD put these roads at the top of their priority list and upgrade them with added passing lanes or an increase to 4 lanes in some sections where feasible, and a reconstruction of the road base that can withstand the heavy traffic these roads endure. If these issues are met, then a reclassification would be feasible.

Respectfully submitted,

Sarah Stanton

Name: Donald & Betty Nagle
Phone Number: (208) 875-1393
E-mail: bnagle35@gmail.com
Specific Route: ID-6, ID-9 ID-8
Date: 12/21/2020
We support the Bennett Lumber Products request to reclassify the above highways in order to increase their load limits.

Donald & Betty Nagle
1625 Deep Creek Road
Potlatch, ID  83855

Name:  Kendra Guernsey
Phone Number:  
E-mail:  manykitties12@hotmail.com
Specific Route: ID-6, ID-9 ID-8
Date:   1/4/2021

Dear Sir,

I would object to allowing larger trucks on Rt. 8. The noise of their passing is already excessive, and their braking is very loud. I am over a quarter mile off Highway 8 – long driveway – because I thought distance from the road would be quiet. The trucks are so loud that they sometimes wake me up at night. I can hear them braking for the stop sign at the end of the road which is at least a mile from my house. It is not just business and farmers which must be considered, other people live here too and many came for a rural life and quiet and solitude.

Bennett Lumber already has those log trucks which must be quite heavy and I also see some with extra trailers attached. What can they possibly want to transport that they need larger trucks? And then what will creep in to be transported that no one would want there?

So, please consider NOT adding to the already excessive noise from trucks in this area.

Sincerely,
Kendra Guernsey
Hi, this is Paula Bartlett, also calling for Chad Bartlett at 4020 Deary Street, Harvard, ID. I do not think that this should be passed through because we already hear so many jake brakes and truckers going through Harvard, uh, even though it’s going to be a little west of Harvard. I am not for it. Thank you. Bye bye.

Hi, this is Carolyn Rose at 4597, Highway 6, Harvard, ID. (208) 875-8929. I live a quarter-mile up off the road with trees that buffer, and I am hearing a lot of jake brakes for the last couple of weeks um off of Highway 6 so I am concerned about reclassifying this road. Um, that is my main road that I get up on to. I don’t know who the company is, but it’s one logging truck after another and they use their jake brakes a lot. Uh it starts at like 2 in the morning and it lasts until about 8. Anyways, any questions give me a call. Thank you. Bye bye.

Craig Roberts. Princeton, Idaho. (208) 875-1269. Uh I used to be a truck driver, had a Mullan truck, and uh, I think it you’re it should go back down to 80000 pounds. We would put more people to work, and we wouldn’t tear up the road so bad cause the taxpayers have to pay for the roads, and uh the fuel does pay for some of it, but not all of it. And uh just like south Idaho they have that 129,000 down there because of Simplot. Simplot owns the government, and down there they can do about what they want. But up here we have frost and and then heat and stuff.

Just like coming into Lewiston they had to do all of that with concrete so that the heat wouldn’t take that up. And you can tell the ruts right where the single-tire trucks go at 105,500 you know. And that’s just like coming down the Lewiston grade it’s 55 mph for trucks, now they’re going 65 mph down there because they have a retarder and a jake. Why don’t they pick them up?I don’t understand what’s going on.

Uh, that’s my opinion. I just wish they would go back to 80,000 pounds and that would put more truck to work, more people to work and and the company’s lumber...my dad worked for Bennett Lumber all his life, and they still make money doing it without hauling 126,500 in there, 129,500 I meant. So uh so anyway that’s my opinion. I hope it makes a difference. I hope you have a different train of thought there. So thank you very much. Bye.
Name: Patrick Grady  
Phone Number:  
Email Address:  
Specific Route: 202006ID6  
Date: 12/8/2020  

Yes, this is Patrick Grady. My num my address is 1143 Bear Creek Road, Princeton, Idaho 83857. Um I want to share my concerns with having heavier loads on the highway. I have no problem with Bennett Lumber trucks or any local commercial trucks because I know they are well taken care of. My issue is uh with the trucks that come in and travel on these same roads I have to use every day to work and my wife and my kids because many of them relative, relatively speaking, do not follow the speed limits in Princeton, out of Princeton, on the corners out of Princeton going toward the Bennett Lumber Mill and beyond Harvard. The there’s many farmers and one in particular I know personally that never carries insurance on his semi-trucks that he hauls hay with and uh yeah the road’s the road is very windy in these in these areas and the Deary shortcut is uh speed speed demons on that road logging trucks, chip trucks, grain trucks, you name it, freight trucks, never follow even remotely close to speed limit. And unless I had absolute proof that you’re going to shore up the the the police force that’s going to come and the highway patrol to ensure that people are not going to be excessively speeding in these trucks on these roads and that they are being weighed out of Potlatch and making sure that people are not going over limit for what the trucks are rated for then I would not be supportive of it. I actually think the railway should be opened up and get trucks off the highway, not more weight and more danger on the highway. But that’s too bad because I know Bennett’s and many of the other local companies take very good care of their trucks and have dash cams and they they watch their trucks very closely they got GPS on them, but unfortunately that’s not the case for everybody. It’s the others that I don’t like um I’m I’m not going to be supportive of. And that’s it. Thank you.

Name: Christine Ford  
Phone Number: (208) 997-8361  
Email Address:  
Specific Route: 202006ID6  
Date: 12/14/2020  

Hello, my name is Christine Ford. I live at 1021 Angus Lane. This is just off of Highway 9. I’m representing myself and my husband. Excuse me. I went to the website and reviewed the information you had on weighing up to 129,000 pounds uh commercial loads. My husband and I discussed it, and we foresee that there are going to be higher accidents with it double tractor trailers so we are against reclassifying the highways. We want to keep the classification as they are now and have single-tractor trailer loads. If you have any questions give call me back. (208) 997-8361. Thank you. Bye.

Name: Kevin Johnson  
Phone Number: (208) 301-2550  
Email Address:  
Specific Route: 202006ID6  
Date: 12/21/2020  

Hello, my name is Kevin Johnson. I’m a trucker. I own eight large trucks, and I’m absolutely against raising that that weight, that 129,000 pounds on the highways. I am against it. Bennett Lumber has
their thumbs on everybody. They are controlling many, many things they should not be controlling, and absolutely not.

Name: Rich Slognia  
Phone Number: (208) 892-8686  
Email Address:  
Specific Route: 202006ID6  
Date: 12/21/2020

Uh I am Rich Slognia at uh 529 Northeast in Moscow and my comments are this, uh, are more of a question I think. Uh the commercial loads weighing up to 129,000 obviously are more than uh than uh than what’s allocated, or permitted, right now uh I don’t know what the limits are right now, but uh the question I have are these roads going to be able to take that kind of load? And uh or have they been rebuilt to take them? To take the loads? Cause otherwise they’re just going to tear up the roads, and the taxpayer is going to wind up paying for new roads, new construction. And uh that’s a concern of mine. Uh my mailing address is PO Box 8507, Moscow, 83843. So I thank you.

Name: Margo Welch  
Phone Number: (208) 877-1031  
Email Address:  
Specific Route: 202006ID6  
Date: 12/21/2020

Yes this Margo Welch at 1429 Forks Road Deary, Idaho. My comments on your proposal are as follows. First of all I would not recommend I am against your reclassification and these are the reasons. I’ve lived here now in Latah County for since 1993, and the big trucks are pretty much already a pretty big issue for commuters going back and forth to Moscow. And the main reasons are there are no passing lanes. There’s no middle passing lane.

There’s an insufficient amount of of shoulder on most of the highways you are talking about to allow for any kind of emergency, to get off of the highway. Going up and down the hills there’s no runaway truck ramps on Spring Valley, or coming down to the junction of Highway 6 coming from Potlatch, going towards Emida where the cutoff the Highway 9 comes down that road. And that one is a serious one. There’s no passing lane; there’s no emergency truck runaway lane.

Also, who’s going to be paying for these double loads? Basically if you take that weight that you want to go to and you subtract the common weight of a truck, about 30,000 pounds, you’re talking about double loaded truck. You’re talking about twice as much weight as a truck is carrying right now. And already, again, the trucks that are run now, they have only a certain number of years of months during the year the log trucks and they are already running as hard as they can just to barely be able to get buy and afford a truck.

There’s fleets of trucks. It’s the same thing. You got the big Buell chip trucks going to the St. Maries. And you’ve got traffic going to the Cedar Mill at Troy. You got the Bennett Mill, etc. Plus you got a lot of loggers all through the whole area that have their equipment low-boyed. Right now that’s probably our biggest loads that we see going up and down on the roads you are talking about.
So my question is you are talking about doubling the weight? That’s going to have a huge impact on the condition of our highways, especially in the winter time when the road wants to buckle, specifically Highway 9, the cutoff. That road was a dirt road—just what in the 70s?—and you can tell. It goes bump-de-bump-de-bump no matter how many times you go in there and redo it and chipcoat thing, it still obviously does not have much of a surfacing base underneath or you wouldn’t have such a rough ride no matter what.

So you got you got buckling already occurring due to the amount of truck traffic, and as a CDL holder, I can tell you that I appreciate how hard that our truck drivers work. I have made comments before to ITD on things that I have experienced recently this summer that were completely unacceptable as far as the chip coat job that occurred and the way that I got set in traffic. You just don’t have you don’t’ have any indication in proposal. Are you going to expect the taxpayer to pay for Bennett Lumber to run these trucks up and down? And have the extra weight going up and down?

Or are they just going to pay an increased registration fee, and then that’s goes into the big coffer down in Boise? I mean you got people commuting from out where I live in Helmer, and some of them even further into Bovill, all the way into Moscow or into Pullman. And these are the folks that are going to be road-warrioring out there with these double-loaded trucks, and are you going to expect them to turn around and pay for all that so that Bennett Lumber can run these?

So these questions I do not see an answer to them, because there really isn’t one. Of course we are going to be the ones paying for it. So not only are we paying for them to make more money with these double trucks, but then you got commuters going all times of the year up against these these great big trucks already. It’s already pretty hard.

So again my main three points, just to conclude, you got not—yes, after the tone, yes—you got no passing lanes, no runaway truck ramps for any kind of loads that big, and you have not indicated if Bennett is going to the be one paying for this. It’s going to the be the locals paying for this, or it’s going to be

Name: Michael Monn
Phone Number: (208) 352-2684
Email Address: 
Specific Route: 202006ID6
Date: 12/21/2020

Hello, my name is Michael Monn. I live at 1870 Wallen Road in Troy. I am representing no one but myself. I am calling to oppose the reclassification of the highway to allow the heavier loads. I am very concerned about safety. These heavier trucks will no doubt cause more damage and injury to people who are unfortunately in collisions with them. Additionally I commute on this road and the trucks often are not going the appropriate speed for conditions. The road is very curvy, not very wide, and it’s very dangerous especially when there’s snowy conditions so it’s a safety issue. The highway is very dangerous as it is, and we don’t need heavier trucks which could cause further injury.

Additionally these trucks use their jake brakes. It’s very loud. They go by at two, three in the morning, and they indiscriminately apply these things. But heavier trucks are going to be more reliant on those, and that’s really damaging for the quality of life around here, so I oppose the reclassification. Thank you.

Name: Johanna Brown
Phone Number: (208) 301-2440
Email Address: 
Specific Route: 202006ID6
Hello, my name is Johanna Brown, and I live at 1870 Wallen Road which is right off Highway 8 in Troy. And I did review the analysis and application just to make sure I kinda knew what was going on, but I do have some strong concerns about allowing these larger truckloads, specifically on Highway 8 just due to the nature of commuting. So I commute to work in Pullman and many people from Deary and Troy communities commute into Moscow. And those commutes also come with a timeline. People have to be at work at a certain time. And just knowing how that road can get in the winter with absolutely zero passing lanes, being behind large trucks with extremely variable speed is just going to cause extremely dangerous conditions out there that I would just really would like to not see because people are so dependent on commuting to those bigger cities for their livelihood. So that's kind of the main thing I'm thinking about with no passing lanes, with how the road gets in the winter. I worry about people’s safety.

So thank you for collecting comment. And I hope that you will not allow this to go through. Thank you.
December 21, 2020

Idaho Transportation Department
Attn: Scott Luekenga, ITD Freight Program Manager
PO Box 7129
Boise ID 83707
officeofthechiefengineer@itd.idaho.gov

Dr. Mr. Luekenga,

The Latah County Commissioners would like to express our support for raising commercial load limits on Idaho Highways 6, 9, and 8 from 105,000 pounds to 129,000 pounds. This would help to keep our vitally important timber industry competitive in the world wide arena.

Sincerely,

Thomas C. Lamar
Chair

David McGraw
Commissioner

Kathie LaFortune
Commissioner
IDAHO TRANSPORTATION BOARD
129,000 POUND TRUCK ROUTE
SUBCOMMITTEE

CHARTER
MEMBERSHIP
PROCESS
This Charter is developed from guidance provided in the combination of 2013 Senate Bills 1064, and 1117, House Bill 322 and the Governor's transmittal of Senate Bill 1117 to the Secretary of State on April 1, 2013. Membership of the 129,000 Pound Truck Route Subcommittee shall include Idaho Transportation Board (ITB) members, Idaho Transportation Department (ITD) Headquarters (HQs) staff, applicable Districts and advisors as determined by the Chairman of the Board.

The Idaho Transportation Board, in collaboration with Idaho State Police (ISP), must draft rules both for criteria that will be used in assessing the suitability of any nominated stretch of road interstate or state highway and for the public participation process in considering any proposed designation. (The Governor “…must be satisfied with the process before any rules are approved”.)

Safety must be the highest priority, addressing necessary and prudent restrictions on use of designated routes, enforcement processes from jurisdiction to jurisdiction, mechanical requirements for trucks and trailers, driver certification requirements, pavement and roadbed conditions, bridge conditions and load carrying capacities, route geographic conditions, weather conditions, possible restrictions caused by horizontal and vertical alignment, and other factors unique to each area in question. The process of considering nominated routes also must include timely, well-noticed public hearings and notification of adjacent property owners. (This does not mean that adjacent property owners will receive individual notification. Notification will be provided via news releases and information posted on the 129,000 Pound Truck Route website.)

Rules developed by the Idaho Transportation Department and approved by the Idaho legislature for the 129,000 Pound Pilot Project referenced in Senate Bill 1064 shall be incorporated as baseline for implementing the thirty-five (35) routes made permanent by SB1064. Rules for assessing the suitability of any additional routes that are nominated by the state or any local highway jurisdiction having authority over a nominated highway or highway segment will be developed for consideration and approval by the Idaho legislature as part of the formal rules review process.

The 129,000 Pound Truck Route Subcommittee will meet on an as-needed basis. Subcommittee meetings shall be open to the public and minutes will be taken.
Membership

Chairman
Dwight Horsch - Member, District 5, Idaho Transportation Board

Board Members
Jim Thompson - Member, District 1
Julie DeLorenzo – Floating Member*, District 3

*The floating member will serve on the Subcommittee unless a route in a non-Subcommittee member’s
District is on the agenda. In that case, the member from that respective District will serve to ensure the
District is represented by its Board member.

Additionally, a rotating Board member serves on the Subcommittee, determined on a meeting-by-meeting
basis. The Board member in whose District a route is being considered will be the third member unless the
route is in a current Subcommittee member’s District, then the chair will ask a random member to
serve on the Subcommittee for that meeting.

Staff and Coordinating Agencies
Blake Rindlisbacher – Chief Engineer (CE), Idaho Transportation Department (ITD)
John Tomlinson – Highway Safety Manager, ITD
Dan Gorley – Bridge Asset Management Engineer, ITD
Alberto Gonzalez – Motor Vehicles Administrator, ITD
ITD District Engineer from requested route’s district
Lisa McClellan Bonnie Fogdall – Division of Motor Vehicles, Office of Compliance Operations Manager, ITD, or designee
Scott Hanson – Lieutenant, Idaho State Police
Sue Higgins – Executive Assistant to the Board
Representative from the Department of Commerce
Chairman, Trucking Advisory Council (TAC)
Idaho Trucking Association (ITA)
Scott Luekenga Jeff Marker – Freight Program Manager**, Coordinator,

Advisors
Larry Allen - Deputy Attorney General
Vincent Trimboli – Office of Communication Manager, ITD
Mollie McCarty – Governmental Affairs Manager, ITD
Adam Rush – Public Involvement Coordinator, ITD
Representative from the Local Highway Technical Assistance Council
Others as required

** The Chief Engineer has designated ITD’s Freight Program Manager as the 129,000 Pound Route
Program manager and as such is responsible for coordinating the 129,000 Pound Program.
1. **Request Form Application Submission:** The application is submitted using ITD Form 4886 will be completed and submitted to the Idaho Transportation Department Office of the Chief Engineer by the requestor (applicant). The applicant will forward to the adjacent (contiguous) local jurisdictions and the Local Highway Technical Assistance Council (LHTAC) in accordance with guidance on ITD Form 4886.

2. **Review/Analysis:** Following submission of ITD Form 4886, the request will be reviewed for completeness by the Freight Program Manager (FPM). If the application is incomplete, it will be returned to the applicant with an explanation for returning the form. If the form application is complete, the department’s analysis for engineering and safety criteria will commence. Analysis criteria shall include assessment of pavement and bridges to allow legal tire, axle, and gross weight limits as per section 49-1001 and 49-1002, Idaho Code, and route off-track requirements, which includes road width and curvature. Additional consideration shall be given to traffic volumes and other safety factors. (Appendix 1)

   - The FPM creates a case file and coordinates a "Kick Off" meeting to synchronize the processing of the application. The goal of the kick off meeting is to establish the application processing timeline using the Idaho Transportation Board meeting as the starting point and backwards plan the application timeline. The goal is to establish an executable timeline that takes no more than three (3) months to complete the application process.

   - **Participants in the kick off meeting are:**
     - Division of Motor Vehicles Representative
     - Applicable District Engineer Representative
     - Applicable District Public Information Officer
     - Office of Highway Safety Representative
     - Bridge Asset Management Representative
     - Executive Assistant to the Board
     - Government Affairs Representative
     - Office of Communications Representative

   - The FPM will automated tracking system provide the completed ITD Form 4886 to the Office of the Chief Engineer, Office of Highway Safety, ITD Bridge Asset Management Bridge Section, the applicable ITD District and the Division of Motor Vehicles to conduct their respective evaluation of the applicable route(s). Operations Office (DOO) of the submission of Form 4886.

   - The DOO reviews the form. If it is complete, the DOO returns it to the Office of the Chief Engineer to create a case file, assign a case number, and post it in the case file tracking folder, which notifies the Bridge Section and appropriate district to start the review process. If the form is incomplete, the DOO notifies the Office of the Chief Engineer and that Office will notify the requester.

   - The Office of the Chief Engineer FPM sends the forms application to the Executive Assistant to the Board, who in turn, sends the application to the Board member whose district the application is being requested.
The Public Involvement Coordinator, who is responsible for the ITD 129,000 Pound Truck Route website, The FPM will forward the application to ITD’s Office of Communications for posting to the 129,000 Pound Route website.

The applicable District Engineer(s), Office of Highway Safety, Bridge Asset Management Engineer and DMV or their respective designees, will complete a review/analysis of the requested route(s), or route(s) segment(s), and return the request form review/analysis to the FPM Chief Engineer with documented recommendation to approve, or reject the request, or to recommend the applicant provide additional information. District Engineers shall also contact the local jurisdictions that the route(s) travels through to ensure they are aware of the route request.

Where an applicant’s proposal may include local road sections, District Engineers will engage with appropriate (affected) local government officials. ITD will provide assistance in local bridge analyses where required.

Once the staff analysis is complete, the FPM will finalize an evaluation on the application and forward the evaluation to the CE for review.

If the evaluation is favorable toward the application, a public hearing is scheduled to gather public testimony.

If the evaluation is not favorable toward the application, the FPM will present the findings to the 129,000 Pound Route Subcommittee for its consideration. If the Subcommittee concurs with the unfavorable evaluation, the Subcommittee can elect to:

- Return the evaluation to the FPM who will coordinate a re-evaluation with the applicant, HQs staff, DMV and applicable district. Should the re-evaluation be favorable to the request, the FPM will present the updated evaluation to the Subcommittee. If the Subcommittee concurs with the revised evaluation, the FPM will coordinate with the applicable District PIO for a public hearing (Appendix 2); or
- Recommend the Transportation Board deny the application (Appendix 3)

3. Public Hearing: Once the analysis is complete, the FPM will finalize a report an evaluation on the application. If the report evaluation is favorable toward the application, a hearing will be scheduled to gather public testimony. A summary of the Chief Engineer’s report evaluation will be provided to the Subcommittee member who will conduct the hearing. The summary report evaluation will also be posted on the ITD 129,000 Pound Truck Route website. If more than one route has been requested in a district, one hearing may be held to gather testimony on all of the routes in that district. If the report evaluation is not favorable toward the application, the Chief Engineer will present his findings to the 129,000 Pound Truck Route Subcommittee for its consideration.

3. Public Hearing: If the Chief Engineer’s report evaluation is favorable toward the application, the Executive Assistant to the Board will work with the appropriate (affected) Board member(s), the District Public Involvement Coordinator Information Officer (PIO) and respective District Engineer(s) to schedule a hearing. If more than one route has been requested in a district, one hearing may be held to gather testimony on all of the routes in that district.
• The District PIO will post information on the ITD 129,000 Pound Route website announcing the hearing and date of closure for public comment; date and time for closure of public comment to be at least 15 days after posting notification of the hearing.

• The Governmental Affairs Manager will notify appropriate legislators and local elected officials of the time, date and place of the hearing.

• The Office of the Chief Engineer FPM will inform the applicant of the hearing date and time.

• The Public Involvement Coordinator District PIO will provide a script for the hearing officer (Board member) to the Executive Assistant to the Board.

• The Public Involvement Coordinator District PIO will post forward all public communications (oral, letters, e-mails etc...) received to the FPM who will consolidate the public’s comments and coordinate for the posting of the comments to the ITD 129,000 Pound Truck Route website and forward a copy to the Executive Assistant to the Board.

• The Executive Assistant to the Board will provide information packets, including public comments received, to the affected Board member prior to the hearing meeting.

• Hearings will be open to the public.

• The affected Board member will take testimony. The Public Involvement Coordinator District PIO is responsible to transcribe the testimony and post forward the transcript to the FPM and EAB. The FPM will then post it on the ITD 129,000 Pound Truck Route website.

4. Chief Engineer’s Recommendation to the 129,000 Pound Truck Route Subcommittee:
The Office of the Chief Engineer FPM will present findings and relevant information to the 129,000 Pound Truck Route Subcommittee along with a recommendation to approve or reject the application based on the evaluation of the application. On a completed review of engineering and safety criteria.

5. Subcommittee Meeting:

• The Executive Assistant to the Board will work with the Subcommittee Chair on scheduling meetings. Subcommittee meetings will be held at ITD Headquarters with audio/visual connections to affected district offices, or at a location determined by the Subcommittee Chair.

• The Governmental Affairs Manager will notify appropriate legislators and local elected officials of the time, date and place of the Subcommittee meeting.

• The Executive Assistant to the Board and the Public Involvement Coordinator Office of Communications will issue a news release regarding the Subcommittee meeting date, time and place. The Public Involvement Coordinator Office of Communications will post the meeting agenda on the ITD 129,000 Pound Truck Route website.

• The Office of the Chief Engineer FPM will inform the applicant(s) of the meeting.
• The Executive Assistant to the Board will provide information packets, including public comments or reference to public comments, posted on the ITD 129,000 Pound Truck Route website prior to the Subcommittee meeting.

• Subcommittee meetings will be open meetings without additional public testimony; however, comments received up until the published closing date will be considered and specifically addressed by an advisory member of the Subcommittee or ITD staff as required.

• The Chief Engineer FPM will present the analysis of the route(s) and a recommendation for Subcommittee action.

• If the recommendation is favorable, the Subcommittee will discuss, and the voting Subcommittee members as identified in bold face on page 3 shall vote on a motion to hold the request for additional information or recommend the full Board reject or approve the application.

• The result of the decision on the motion or the direction taken on the unfavorable report will be provided to the Idaho Transportation Board at the first available meeting scheduled by the Chairman of the Board.

• The Executive Assistant to the Board will take minutes. The minutes will be posted on the ITD 129,000 Pound Truck Route website by the Public Involvement Coordinator FPM.

6. Idaho Transportation Board Meeting: The 129,000 Pound Truck Route Subcommittee will make a recommendation (options include, but are not limited to, hold the request for additional information or recommend the full Board reject or approve the application) to the Idaho Transportation Board based upon the department’s analysis.

• The Chief Engineer FPM will present the analysis of the route(s).

• A summary of relevant comments received on the request will be provided. If appropriate, a responsible party (i.e. ITD staff, the Department of Commerce, or State Police) will address comments.

• The Subcommittee Chair will present the Subcommittee’s recommendation.

7. If the Idaho Transportation Board rejects or approves the Subcommittee’s recommendation to either approve or deny the request, the Office of the Chief Engineer FPM will prepare a CE Letter of Determination for CE endorsement. Will prepare a Letter of Determination. The Letter of Determination will be sent to the requester and posted on the ITD 129,000 Pound Truck Route website. An applicant has 14 days to file an appeal with the ITD Director. The Director then appoints a hearing officer to review the appeal in accordance with the Idaho Administrative Appeals Act. If no action is taken, the decision becomes final 14 days after the Letter of Determination is posted.

• The Office of the Chief Engineer FPM will send a copy of the CE’s Letter of Determination to the DOQ DMV. If the decision is to approve the route, the DOQ DMV will update the “route for up to 129,000 pound vehicle combinations map”.

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• The Office of the Chief Engineer FPM will send a copy of the Letter of Determination to the Public Involvement Coordinator to post the CE’s Letter of Determination on the ITD 129,000 Pound Route website with the date of the posting.

• The original CE’s Letter of Determination will be maintained by the FPM. Filed in the Office of the Chief Engineer.
Appendix 1

129,000 Pound Time Line

- 0 Day
  - ITD Receives Application
- 2 Day
  - ITD & Applicant Validate Application
- 4 Day
  - Kick Off Meeting
- 5 Day
  - Application Posted to 129K Webpage
  - Inform LHTAC, effected LHJ and/or MPO
- 14 Day
  - ITD Staff, DMV & District Complete Evaluation
  - Evaluation Posted on the 129K Webpage
- 20 Day
  - Public Comment Period Opens
- 35 Day
  - Public Comment Period Closes
- 40 Day
  - FPM completes and submits
    - Subcommittee packet to EAB
    - Comment Posted on the 129K Webpage
- 47 Day
  - 129K Subcommittee Meeting
- 51 Day
  - FPM completes and submits
    - Board packet to EAB
- 67 Day
  - Board Meeting
- 68 Day
  - FPM publishes CE’s Letter Of Determination
- 82 Day
  - Application Posted to Extra Length/Excess Weight Up to 129,000 Pound Map

- 15 Day - Open Comment Period
- 7 Days - Meeting packet submitted to Subcommittee
- 17 Days - Board agenda submission to Board Meeting
- 14 Days - Open appeal dates from published Letter of Determination to when approved route is published on the “Designated Routes up to 129K” Map.
Appendix 2

129,000 Pound Time Line
“Request Returned to ITD Staff”

- ITD Receives Application
- Kick Off Meeting
- ITD & Applicant Validate Application
- Application Posted to 129K Webpage
- Inform LHTAC, effected LHJ and/or MPO
- ITD Staff, DMV & District Complete Evaluation
- Evaluation Posted on the 129K Webpage
- If the application analysis is unfavorable then FPM presents the application to the Subcommittee for its consideration
- If the Subcommittee rejects the application the request is returned to the FPM for staff, District or DMV re-evaluation
- ITD Staff, DMV & District Complete re-evaluation. If favorable FPM coordinates Public comment period and hearings with District PIO
- Process starts with Day 20 of Appendix 1

0 Day
2 Day
4 Day
5 Day
14 Day
20 Day
25 Day
27 Day
30 Day
Appendix 3

129,000 Pound Time Line  
“Request Denied”

129,000 Pound Time Line  
“Request Denied”

ITD Receives Application  
0 Day

Kick Off Meeting  
2 Day  ITD & Applicant Validate Application

ITD Staff, DMV & District Complete Evaluation  
4 Day
Evaluation Posted on the 129K Webpage

If the Subcommitte denies the application  
5 Day  Application Posted to 129K Webpage  
the application is submitted to the Board 
Inform LHTAC, effected LHJ and/or MPO  
with a recommendation to deny the application

24 Day  If the application analysis is unfavorable  
then FPM presents the application to the 
Subcommittee for it’s consideration

26 Day  Application presented to the ITD Board  
If the Subcommittee denies the application 
and denied.
the application is submitted to the Board 
with a recommendation to deny the application

43 Day  FPM drafts Letter of Determination for CE’s  
Application presented to the ITD Board  
Endorsement. FPM submits the letter to  
and denied.
the applicant and posts to the 129K web 
Page