Coalition Against Bigger Trucks
Protecting Motorists. Preserving Infrastructure.

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# MEMORANDUM

**FROM:** **BRAD ROSEBERRY, PRESIDENT**
**COALITION AGAINST BIGGER TRUCKS**

**TO:** **CHAIRMAN SAM GRAVES AND RANKING MEMBER RICK LARSEN**
**TRANSPORTATION & INFRASTRUCTURE COMMITTEE**
**CHAIRMAN DAVID ROUZER AND RANKING MEMBER ELEANOR HOLMES NORTON**
**TRANSPORTATION & INFRASTRUCTURE COMMITTEE**
**HIGHWAYS & TRANSIT SUBCOMMITTEE**

**DATE:** **APRIL 24, 2025**

**SUBJECT:** **TRUCK SIZE AND WEIGHT COMMENTS FOR SURFACE TRANSPORTATION REAUTHORIZATION**

The following comments are submitted by the Coalition Against Bigger Trucks (CABT). CABT is a nonprofit grassroots organization with a coalition of over 3,500 local supporters across the country. CABT supporters include law enforcement leaders, local elected officials, truck drivers, motorists, safety advocates, railroads and trucking companies. For more information on CABT go to www.cabt.org.

Legislation to increase the size and weight of trucks has been offered and debated as part of every highway reauthorization bill since 1991. With the Infrastructure Investment and Jobs Act (IIJA) scheduled for reauthorization in the 119th Congress, it is likely that there will again be proposals to increase truck size and weight.

## INTRODUCTION

The efficient movement of freight is essential to domestic commerce and America's competitiveness in global markets. However, efficiency entails more than shipper costs; it also demands attention be given to public safety, infrastructure, and a responsibility to the men and women who are directly engaged in supply chain activities. Viewed through this broader lens, it is not difficult to understand why proposals for heavier or longer trucks have proven to be so controversial and why they have generated such strong opposition from law enforcement, local government officials, labor, and the motoring public.[1]

[1] Those on record opposing truck size or weight increases include: International Association of Chiefs of Police; National Association of Police Organizations; National Sheriffs' Association; National Troopers Coalition; National Association of Emergency Medical Technicians; Towing and Recovery Association of America, Inc.; AAA; Institute for Safer Trucking; Road Safe America; American Public Works Association; National Association of Counties; National Association of County Engineers; National Association of Towns and Townships; National League of Cities; The United States Conference of Mayors; Owner-Operator Independent Drivers Association; International Brotherhood of Teamsters; SMART Transportation Division; American Short Line and Regional Railroad Association; and Association of American Railroads.

There are certain considerations that must be incorporated into the decision-making process for bigger trucks –

- There is ample statistical and anecdotal evidence showing that trucks operating above the current 80,000-pound interstate weight limit are involved in more crashes.
- The infrastructure requirements associated with longer or heavier trucks are profound. Both pavement and bridges are affected by load factors. Current funding cannot support existing use, let alone longer or heavier trucks.
- Faced with heavier or longer vehicles, truck drivers will face more dangerous conditions and are unlikely to enjoy the rewards from their increased productivity.
- Increased truck size and weight limits will induce more truck traffic because freight traffic will be diverted from other non-roadway freight modes.

The seminal work on the impacts of longer and heavier trucks on public safety and infrastructure is the multi-year Comprehensive Truck Size and Weight Limits Study conducted by the US Department of Transportation from 2013 to 2016 ("2016 USDOT Study"). The 2016 USDOT Study found that heavier and longer trucks have serious safety problems and cause additional damage to our highway infrastructure. In the transmittal letter with the final report, then Under Secretary Peter Rogoff stated:

> At this time, the Department believes that the current data limitations are so profound that the results cannot accurately be extrapolated to predict national impacts. As such, the Department believes that **no changes in the relevant truck size and weight laws and regulations** should be considered until these data limitations are overcome.[2]

Critical to any future consideration of truck size or weight limits, DOT recommended that further research be done to fill in the information gaps. At the request of DOT, the Transportation Research Board (TRB) convened a special committee that worked for over a year to develop a detailed research plan. The committee identified a program of 27 short- and long-term research projects that would improve USDOT's ability to evaluate future truck size or weight initiatives.[3] The TRB research projects have been before USDOT for nearly six years now, and no action has been taken. **We recommend that Congress oppose any efforts to increase truck size or weight and support safe and comprehensive research plans, such as those laid out by the USDOT and TRB.**

**BACKGROUND**

Generally speaking, the federal government limits the maximum gross vehicle weight of trucks operating on interstate highways to 80,000 pounds. States retain the authority to establish truck

[2] Peter Rogoff, Under Secretary, United States Department of Transportation; 2015. Transmittal letter.
[3] Transportation Research Board; 2019. *Research to Support Evaluation of Truck Size and Weight Regulations*.

weight limits off the interstates. Congress imposed a "freeze" in 1991 on the length and weight of longer combination vehicles on interstate highways. There are exceptions to these general limits under what are commonly referred to as "grandfather rights" or specific route or commodity exemptions granted by Congress.

Over the years, there have been many attempts to increase nationwide federal truck size and weight limits, all of which have been rejected. In 2015, during consideration of the Fixing America's Surface Transportation (FAST) Act (P.L. 114-94), the House voted down an amendment to raise truck weight limits from 80,000 pounds to 91,000 pounds[4] and the Senate voted to oppose longer double trailer trucks ("Twin 33s")[5].

In the 118th Congress, H.R. 3372 was introduced, which would allow for a "pilot project" authorizing weights up to 91,000 pounds in an unlimited number of states for a period of up to 10 years. The only data sought in this pilot are the number of crashes and the miles traveled by trucks involved in crashes. This is nothing more than an experiment on motorists using vehicle configurations we know to be more dangerous.

To date in the 119th Congress, bills have been introduced in both the House and Senate to allow heavier log trucks nationwide: H.R 2166 & S. 1063. Additionally, H.R. 1487 was introduced, which would allow heavier log trucks on Virginia interstate highways.

The debate over truck size and weight limits extends to both single trailer and multi-trailer trucks. USDOT evaluated the impacts of six alternative truck configurations in its 2016 study.[6] They are:

- 88,000-pound, five axle, single trailer trucks
- 91,000-pound, six axle, single trailer trucks
- 97,000-pound, six axle, single trailer trucks
- 80,000-pound, five axle, double 33-foot trailer trucks
- 105,500-pound, seven axle, triple 28-foot trailer trucks
- 129,000-pound, nine axle, triple 28-foot trailer trucks

Recent lobbying and legislation in Congress has focused on the 91,000-pound single trailer and the double 33-foot configurations.

**PROTECTING MOTORISTS**

There is no more important issue in the truck size and weight debate than protecting motorists. Making a truck longer or adding weight will make driving more difficult and increase the chances of a crash. A 2000 study by USDOT found that multi-trailer trucks have an 11% higher fatal crash rate than

[4] US House of Representatives; November 3, 2015. Roll Call 588.
[5] US Senate; November 10, 2015. Vote Number 304.
[6] USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*, Table 1, pg. 5.

single-trailer trucks.[7] The 2016 USDOT Study found that heavier single trailer trucks in limited state testing had anywhere from 47% to 400% higher crash rates.[8] In fact, we are not aware of one study that shows a heavier truck is a safer truck.

The higher crash rates are not surprising given what we know about the operating characteristics of longer and heavier trucks. Multiple trailer trucks take longer to stop than single trailer trucks.[9] Both longer and heavier trucks are less stable and more likely to roll over.[10] Both longer and heavier trucks experience greater wear and tear on key components and as a consequence have higher out-of-service rates.[11] This is especially important because a 2016 study by the Insurance Institute for Highway Safety (IIHS) found that trucks with any out-of-service violation are 362 percent more likely to be involved in a crash.[12] And crashes involving longer and heavier trucks are likely to be more severe because of the added mass.

However, even while the academic community ponders the public safety consequences of longer and heavier trucks, those who practice in the area of highway safety have few qualms in their rejection of increased truck size and weight.[13] The National Troopers Coalition, representing 42,000 troopers in 43 states, opposes increases in truck size and weight. The National Sheriffs' Association, representing thousands of sheriffs nationwide, opposes increases in truck size and weight. The National Association of Police Organizations, representing 241,000 law enforcement officers, opposes increases in truck size and weight. The International Association of Chiefs of Police, representing law enforcement leaders from municipalities across the country, opposes increases in truck size and weight.

Law enforcement officers are the true truck size and weight experts. They are trained and have firsthand experience in truck crash causation. They are the first on the scene of a truck crash. They conduct the crash investigation. They are the ones who conduct roadside inspections. Years of training and real-world experience make them uniquely qualified to evaluate the impacts of bigger trucks.

Most concerning, proposals for a heavier truck "pilot project" (such as H.R. 3372 introduced in the 118th Congress) amount to little more than experimenting on the lives of motorists. There is no reason to believe that a heavier truck pilot project will not simply replicate the findings of previous studies: higher crash rates, exposing motorists to unnecessary risks.

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[7] USDOT; 2000. *Comprehensive Truck Size and Weight Study*. Vol. 3, pg. VIII-5.
[8] USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*. Table 2, pg. 10.
[9] USDOT; 2015. *Comprehensive Truck Size and Weight Limits Study, Highway Safety and Truck Crash Comparative Analysis Technical Report*. Table 26, pg. 62.
[10] Ibid, pg. 72-74.
[11] USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*. Tables 2-3, pg. 10-11.
[12] Teoh, Eric & Carter, Daniel & Smith, Sarah & McCartt, Anne; 2016. Journal of Safety Research. Crash Risk Factors for Interstate Large Trucks in North Carolina. Journal of Safety Research.
[13] Law enforcement association group letter opposing bigger trucks

Pilot projects are well suited for proposals with a long track record of analysis that have ruled out significant sources of risk. They are the final stage before broader adoption of concepts with a strong theoretical case and broad base of evidentiary support.

Heavier truck configurations couldn't be further from meeting this standard, with numerous prior studies identifying significant risks, and none that we are aware of finding safety benefits. Proponents of heavier trucks have much more work to do before testing with actual motorists should even be considered, let alone implemented.

**INFRASTRUCTURE**

If the general public is familiar with any aspect of the truck size and weight question, it is the extent to which heavy trucks damage highway infrastructure. Heavy trucks impose nearly all the damage suffered by bridges and pavements. The result is a system that is badly fatigued and impossible to fund even under the current maximum load weights. The American Society of Civil Engineers (ASCE) graded the nation's bridges with a "C" and summarized as follows:

> There are more than 623,000 bridges across the United States. Currently, 45% of all bridges are at least 50 years old, and more than 42,000 (6.8%) of the nation's bridges are considered structurally deficient, meaning they are in "poor" condition. Unfortunately, 168 million trips are taken across these structurally deficient bridges every day.[14]

All of the alternative truck configurations studied by USDOT would increase that damage because, as explained below, there would be more trucks on the roads as well as, in most cases, more damage per truck because of the added weight.

USDOT found in its 2016 study that thousands of interstate and other National Highway System bridges could not accommodate heavier trucks. These bridges would need to be reinforced or replaced, costing billions of dollars. USDOT estimated the 91,000-pound, six-axle configuration would negatively affect more than 4,800 bridges, costing $1.1 billion; the 97,000-pound, six-axle configuration would negatively affect more than 6,200 bridges, costing $2.2 billion; and, triple-trailer trucks weighing 129,000 pounds with nine axles would cost an additional $5.4 billion.[15] It is important to note that the cost of labor and materials has risen dramatically since this report was published, meaning the costs today would be much higher.

Twin 33s would increase pavement damage by 1.8 percent to 2.7 percent.[16] Also, USDOT found that nearly 2,500 interstate and other National Highway System bridges would need to be strengthened or reinforced to handle the longer double-trailer trucks, costing taxpayers up to $1.1 billion.[17]

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[14] American Society of Civil Engineers; 2025. Infrastructure Report Card: Bridges. pg. 28.
[15] USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Bridge Structure Comparative Analysis Technical Report*. Table ES-2, pg. ES-7.
[16] USDOT; 2016. *Comprehensive Truck Size and Weight Limits Study, Final Report to Congress*. Table 2, pg. 10.
[17] Ibid.

While the USDOT examined interstate infrastructure, there is no truck trip that starts and stops on the interstate. 44% of semi-truck traffic operates off the interstate system,[18] and much of this travel takes place on municipal and county owned roads. A recent report from the Coalition Against Bigger Trucks, conducted with county bridge engineers and local officials, found that more than 68,000 bridges would be put at risk by 91,000-pound trucks. These bridges would cost $78.7 billion to replace, an unfunded federal mandate on state and local governments.

Funding is a critical issue. For several years, the funds available through the Federal Highway Trust Fund have been supplemented through general funds. Further still, individual states face even more dire challenges. Adding to these challenges by allowing larger or heavier vehicles would be imprudent.

**TRUCK DRIVER IMPACTS**

In the case of firms that operate their own truck fleets, the benefits of cost reductions would be purely internal. In the case of common carriage, benefits would likely be divided between shippers and carriers. In either case, however, it is unlikely that drivers would see significant gains even though they would be faced with significantly increased responsibility.
Labor markets in motor carriage provide notoriously "sticky" wages. Fleet managers are extremely hesitant to increase wages in markets where the demand for trucking services is highly cyclical. Once increased, wages cannot be easily reduced even when demand softens. Therefore, managers resist wage increases in favor of other labor strategies.

As a consequence, driver wages have not increased at the same pace as other U.S. occupations. In 2023, the average heavy-haul truck driver earned $55,990.[19]

Heavier or more complex tractor-trailer combinations will subject drivers to increased responsibility and more difficult tasks, but the evidence suggests they will reap few of the rewards.

The International Brotherhood of Teamsters has expressly and emphatically opposed a movement toward heavier and or larger trucks:

> "Certain industry stakeholders continue to call for increases in truck size and weight. Whether it's increasing the weight limit on federal highways to 90,000 lbs. or expanding the use of the twin 33' trailer configuration, the Teamsters Union opposes any increase in the current Federal weight limits for trucks and the current size of double trailers traveling on the National Highway System. Our Interstates and other major highways are in serious disrepair and half of our bridges are more than 40 years old with one in four being structurally deficient or functionally obsolete. Increasing truck size and length will put further stress on an already deteriorating infrastructure system. While a properly deployed 6th axle can mitigate weight increases on road surfaces, the same cannot be done on bridges. In addition, our highways are

[18] Bureau of Transportation Statistics; 2023. *Vehicle Miles Traveled by Highway Category and Vehicle Type*
[19] Bureau of Labor Statistics; May 2023. *May 2023 National Occupational Employment and Wage Estimates: United States.*

not designed for longer combination vehicles. Our merge lanes and entrance and exit ramps are not designed for eighty-four feet long vehicles. Longer and heavier trucks take more time to get up to speed and require greater stopping distances. From a driver's perspective, our roadways are congested like never before. Reaction times are pushed to the limit as drivers attempt to maneuver big rigs and avoid quick changing lanes or slowed down vehicles. The claim that increasing truck lengths and weights will result in fewer trucks on the road is unfounded. Historically, each time increases have occurred truck traffic has grown as shippers take advantage of cheaper rates and divert freight from rail to highways."[20]

**TRUCK VOLUMES**

A movement toward heavier trucks or differing tractor-trailer combinations will result in more truck movements.[21] Representations to the contrary ignore the most basic tenets of economics. Heavier or longer truck combinations will reduce trucking costs. This will, in turn, increase truck use. To suggest that this increased use will be fully absorbed by increased truck capacity is a falsehood.

There are two probable sources of increased truck volumes. These include: (1) the increased truck use by existing motor carrier customers, and (2) the diversion of freight traffic from non-highway modes – primarily rail. Short line railroads are particularly vulnerable to diversion. These small businesses that serve local communities would be at great risk.

Importantly, however, the growth in truck utilization among existing truck users would not be the only source contributing to increased truck traffic. A decline in motor carrier costs would also induce shippers to shift from non-highway modes to the roadways. While the effects on maritime use are not well documented, CABT has looked carefully at probable rail-to-truck diversions. Depending on motor carrier scenarios, a relaxation in current standards could divert between five and 15 million annual rail shipments to all-roadway routings.[22]

**SUPPLY CHAIN DISRUPTIONS**

Proponents of heavier trucks argue that increased weights are necessary to respond to emergencies, including supply chain disruptions. This argument ignores two simple facts that cannot be dismissed: 1) there is already a law in place when a major disaster strikes to allow the President to increase truck weights on interstates; and 2) heavier and longer trucks would make it harder to retain and recruit truck drivers, further disrupting the supply chain.

1. In 2020 President Trump, in response to the COVID pandemic, declared a national emergency and instituted 23 U.S. Code § 127, which allows states to issue overweight permits in response

[20] International Brotherhood of Teamsters; June 12, 2019. *Testimony before the Committee on Transportation and Infrastructure's Subcommittee on Highways and Transit, "The State of Trucking in America"*.
[21] Mark Burton, Appalachian Transportation Institute, Marshall University; June 2020. *Estimating the Rail-to-Truck Traffic Diversions Attributable to Increased Truck Size and Weight*.
[22] Ibid.

to disasters. This was utilized across the country to ensure medicine, food and other critical goods were delivered and available to Americans. This is also used for natural disasters, such as hurricanes.

2. Raising truck weights would depress driver recruitment and retention, damaging the supply chain and our ability to respond to crises. A March 2022 survey of professional truck drivers conducted by OOIDA found that 68% of respondents felt that heavier or longer trucks would make it more difficult to recruit or retain truck drivers. The overwhelming majority of professional drivers believe bigger trucks would be counterproductive, making driver shortages even worse.

**CONCLUSION AND RECOMMENDATION**

A relaxation of truck size and weight standards will lead to increased heavy truck traffic. While reducing costs for a select set of shippers may result in higher profits, bigger trucks would endanger motorists, law enforcement and first responders, damage highway infrastructure at the taxpayers' expense, place a greater burden on commercial drivers and increase the number of trucks on the road.

We recommend that Congress oppose any efforts to increase truck size or weight and continue the progress made by the 2016 study by following through on its recommendations for safe and comprehensive research. TRB has presented a comprehensive and ambitious plan for further truck size and weight research. Properly implementing the recommended research projects would result in an enhanced ability to evaluate the impacts of changes in truck size or weight.

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