

3. RESOLUTION ON IMPACT OF TRUCKING POLICIES ON MUNICIPAL ROADS AND SAFETY

COMMITTEE RECOMMENDATIONS AS AMENDED

That Council:

- 1. Endorse the resolution prepared by CRASH (Canadians for Responsible and Safe Highways) aimed at improving government trucking policies that negatively affect municipal infrastructure and safety and that this resolution be forwarded to the Federal Minister of Transportation, the Provincial Minister of Transport and local MP's and MPP's;**
- 2. Approve that the message sent to Federal and Provincial Ministers include a reminder of their own agreement in 1988 to implement a National Safety Code for trucks.**

DOCUMENTATION

1. Councillor Diane Holmes report dated 23 September 1999 is immediately attached.
2. Extract of Draft Minute, Transportation Committee, 6 October 1999, will be distributed prior to the Council meeting and will include a record of the vote.
3. The following submissions have been received and are held on file with the Regional Clerk:
 - a. The Railway Association of Canada submission dated 6 Oct 99
 - b. CRASH/Transport 2000 joint submission dated Apr 99
 - c. Regional Cycling Advisory Group submission dated 6 Oct 99
 - d. Dalhousie Community Association submission dated 6 Oct 99
 - e. Centretown Citizens' Community Association submission dated 5 Oct 99
 - f. Hunt Club Community Organization submission dated 6 Oct 99

REGION OF OTTAWA-CARLETON
RÉGION D'OTTAWA-CARLETON

REPORT
RAPPORT

Our File/N/Réf. 03 07-99-0095
Your File/V/Réf.

DATE 23 September 1999

TO/DEST. Transportation Committee

FROM/EXP. Councillor Diane Holmes

SUBJECT/OBJET **RESOLUTION ON IMPACT OF TRUCKING POLICIES ON
MUNICIPAL ROADS AND SAFETY**

REPORT RECOMMENDATION

That the Transportation Committee recommend Council endorse the resolution prepared by CRASH (Canadians for Responsible and Safe Highways) aimed at improving government trucking policies that negatively affect municipal infrastructure and safety and that this resolution be forwarded to the Federal Minister of Transportation, the Provincial Minister of Transport and local MP's and MPP's.

BACKGROUND

CRASH is a national non-profit association that represents the general public when governments establish regulations for the operation of large trucks on public roads. They are particularly concerned about the federal and provincial government trucking policies and regulations on municipal infrastructure and safety.

To this end, they have brought forward a "Report Card on Big Truck Safety by Province" dated April 1999 which rates each province in terms of trucking safety performance and results.

As detailed in their letter of 15 April, CRASH recommends the province of Ontario:

1. Resist truck industry pressure for longer trucks and increased hours of work for truck drivers.
2. Phase out heavy tractor-trailers that do not conform to national safety performance standards.
3. Do more to combat truck driver fatigue.

4. Increase truck safety enforcement if it is to protect its citizens from the hazards of a projected doubling of truck traffic under the North American Free Trade Agreement by the year 2015.

Copies of the referenced documents are attached or have been issued separately.

*Approved by
Diane Holmes*

/rn

att.



Canadians for Responsible
and Safe Highways

14 July, 1999

Ms. Diane Holmes
Chair, Transportation Committee
Ottawa Carleton
111 Lisgar St
Ottawa ON
K2P 2L7

Re: Resolution on Impact of Trucking Policies on Municipal Roads and Safety
Please put this on council or transportation committee agenda for discussion and action

Dear Chair Holmes:

Canadians for Responsible and Safe Highways is the national non-profit association that works to represent the general public when governments establish regulations for the operation of large trucks on public roads.

As Executive Director of CRASH, I am writing to provide you with the views of our organization concerning the negative impact of Federal and Provincial government trucking policies and regulations on municipal infrastructure and safety.

We are concerned that ongoing lobbying by the trucking industry associations may result in trucks that are up to 50 per cent longer driven by drivers required to work up to 40 per cent more hours a week. Giant multi-trailer trucks and tired drivers make a dangerous cocktail. Saskatchewan and Alberta already allow longer trucks and driving hours. According to the CRASH 1999 Report Card on Big Truck Safety, these two provinces also have a big truck crash death rate 40 per cent higher than the national average.

The trucking industry is proposing to operate trucks that are up to 130 feet long compared to the current Ontario limit of 82 feet. These longer multi-trailer trucks do *not* meet national safety performance standards and are more difficult to steer or control.

At ramps and intersections, these longer trucks are more inclined to tip over, move into adjacent traffic lanes, or climb onto curbs and sidewalks. This increases risks to all road users and damages municipal infrastructure. The trucking industry claims it would operate these longer trucks only on divided highways. Experience in Saskatchewan shows that once these trucks are allowed on divided highways, it is only a matter of time before 130 foot long trucks are on two lane roads with level intersections.

There are even problems affecting trucks with regular 48 foot trailers in Ontario. The recommended national safety standard limits the weight of a truck-tractor plus one trailer to 102,000 pounds, in order to reduce the risk of rollover. The trucking industry fought to exempt trucks in Ontario from this limit. As a result, these trucks in Ontario can weigh up to 130,000 pounds and are at greater risk of rollover or jackknife at ramps and intersections.

These heavier trucks in Ontario often use "lift axles" to support the extra weight on the open highway, but these axles are lifted up at intersections in urban areas. This exponentially increases pavement damage. In a fully loaded situation, this increases the average axle load by 10-15 per cent. According to the Ontario Ministry of Transport, a 10 per cent increase in axle weight increases pavement damage by 46 per cent. The Province of Ontario has so far refused to implement an Eastern Provinces agreement to phase out these heavier trucks in order to improve safety and reduce road damage. To its credit, Quebec is implementing a plan.

Currently, trucking companies in Ontario cannot work their drivers more than an average 60 hours a week. Trucking associations are pushing the Federal and Ontario Governments to increase this to 80 or more hours a week. A scientific expert panel commissioned by Transport Canada finds that a 70 hour week could reduce truck driver sleep by 12 hours a week and an 84 hour week even more. Less sleep means more sleep impaired driving and fatigue-related crashes. As truck drivers come off the freeway after driving long stretches at 100 kilometres per hour, they may be less alert to deal with urban roads and intersections. Driving a large truck is hard enough when you are alert. Sleep impairment makes it even harder.

CRASH believes that municipalities, whose roads are negatively affected by these trucks, need to have a formal consultative role in Federal and Provincial trucking policies. Today, this is even more important as the Province has downloaded the maintenance costs of 5,700 kilometres of secondary highways to local governments.

Attached for your consideration is a draft letter and resolution which summarize these important concerns. If you agree, we encourage you or your council to send something similar to the Federal and Provincial Transportation Ministers and your MPP and MP, with a copy to us.

We hope to work together with you to achieve safer road conditions and less costly road and bridge repairs. Call me if you have any questions. Thank you for considering this issue.

Yours sincerely,



Bob Evans

Executive Director

Tel 1 800 530 9945 or 1 613 860 0629

Encl

summary of 1999 CRASH Report Card on Big Truck Safety by Province

summary of Angus Reid survey of attitudes about big truck safety

draft letter and resolution from municipalities to Federal and Provincial Transport Ministers

For release 15 April 1999

Ontario Rated on Big Truck Safety

A national safety group today released a report giving Ontario a barely passing grade (55 D) on big truck safety.

“Although Ontario scored above average for its commitment to improve big truck safety, the province still failed in two of seven safety criteria, and has the worst record for big truck safety defects in the country. On average, big truck collisions in Ontario kill 180 and injure 4,500 people a year.” CRASH Executive Director Bob Evans said today.

Canadians for Responsible and Safe Highways (CRASH) prepared the report by comparing provinces across Canada for their truck safety compliance regulations and the statistics and trends in big truck collision deaths and injuries.

Highlights of Ontario’s Truck Safety Rating Grade (55 out of 100, D):

- Allows single semitrailer trucks to carry a heavier load at increased risk of rollover
- Fully implemented only four of 16 National Safety Code standards, lowest rate among provinces
- Ontario has the worst record for truck safety defects among provinces, although the percentage of trucks with safety defects is declining due to increased enforcement efforts
- Rate of big truck collision deaths per capita is below the national average
- Rate of big truck collision injuries per capita is at the national average, and the number of truck-related injuries is increasing relative to all traffic injuries

CRASH Recommendations for Ontario:

- To maintain its position, Ontario must resist truck industry pressure for longer trucks and increased hours of work for truck drivers
- To improve its position, Ontario should phase out heavy tractor-trailers that do not conform to national safety performance standards. It should do more to combat truck driver fatigue.
- Ontario faces a special challenge to increase truck safety enforcement if it is to protect its citizens from the hazards of a projected doubling of truck traffic under NAFTA by the year 2015.

Evans said that a key reason for the poor state of truck safety is that the Federal Government is not using its constitutional authority and responsibility to implement and enforce national trucking safety standards. “For example, the Federal Government did not implement Ontario’s proposal for mandatory safety audits of big truck operations.” Evans said.

“The trucking industry has also expressed concerns about the lack of consistency of trucking safety standards in different provinces. Long-haul trucking has simply outgrown the ability of any one province to regulate trucks crossing its borders,” Evans said.

Summary Table Performance and Results Criteria													
Province	Grade	Weight Limit Truck Tractor Plus One Trailer (tonnes)	Weight Limit Truck Tractor Plus Two Trailers (tonnes)	Allow Longer Combination Vehicles or LCVs	Fully Implemented National Safety Code Standards (16 total)	Limit on Weekly Truck Driver Hours	95-98 Avg Per Cent Trucks with Safety Defects	5 yr Avg Annual Deaths Large Truck Collisions	Annual Truck Collision Deaths/ 100,000 population	92-96 Trend in Large Truck Deaths Relative to All Traffic Deaths	5 yr Avg Annual Injuries Large Truck Collisions	Annual Truck Collision Injuries/ 100,000 population	92-96 Trend in Large Truck Injuries Relative to All Traffic Injuries
NFLD	65 C	49.5	62.5	n	12	60	22	6	1.1	29%	78	13.4	-32%
PEI	57 D	49.7	62.5	n	7	60	16	4	3.0	4%	34	25.6	42%
NS	72 B	52.5	62.5	n	11	60	18	10	1.1	-59%	179	19.2	0%
NB	57 D	49.5	62.5	n	10	60	34	25	3.4	1%	249	32.9	-3%
QUE	57 D	55.5	62.5	y	7	60	29	152	2.1	3%	2708	37.2	3%
ONT	55 D	60.9	63.5	n	4	60	36	177	1.6	2%	4504	41.1	4%
MAN	58 D	46.5	62.5	y	12	60	25	17	1.5	21%	435	38.5	15%
SASK	45 F	46.5	62.5	y	7	104	23	29	2.8	36%	422	41.6	39%
ALTA	43 F	46.5	62.5	y	6	105	28	76	2.8	51%	1375	50.6	19%
BC	58 D	46.5	63.5	n	7	60	26	73	2.0	11%	2004	54.6	0%
YUKON	43 F	46.9	64	y	10	70	29	1	4.6	3%	21	67.8	31%
NWT	61 C	46.5	62.5	y	9	70	21	0	0.6	-136%	20	30.5	103%
CANADA	55 D	46.5	62.5			60	30	573	2.0	8%	12030	41.1	7%

Note: there are some other factors used in grading. Contact CRASH

For more information tel Darrell Richards 1 (800) 530 9945 or 1 (613) 860 0529

To download the report, go to the CRASH web site <http://www.web.net/~crash>

Highlights of Ontario Responses to Angus Reid Poll on Trucking Safety, April 1998

- 83% believe the number of tractor-trailers on the road has increased in the past five years
- 78% believe the upward trend in the number of tractor-trailers has made roads more dangerous
- 90% oppose allowing trucks with double 48 foot trailers
- 96% oppose allowing trucks with triple trailers
- 81% are opposed to increasing the limit on truck driving hours a week from 60 to 70
- 91% believe that a longer work week for truck drivers will undermine road safety
- 82% favour making electronic devices to record driving hours mandatory on large trucks

For more information about the report contact CRASH at 1 800 530-9945 or crash@web.net

Sample Letter to Federal and Provincial Transportation Ministers

Hon David Turnbull
Minister of Transportation
Government of Ontario
77 Wellesley St W
Toronto ON
M7A 1Z8

Hon David Collenette
Minister of Transport
Government of Canada
333 Sparks St Tower C
Ottawa ON
K1A 0N5

Dear Minister:

During the past five years, Federal and Provincial Governments have downloaded a number of transportation responsibilities and costs to the municipal level. In the latest round of downloading, the Province of Ontario transferred the responsibility for 5,700 kilometres of secondary highways.

Although we have received these responsibilities, we have little say or input into government trucking policies that negatively affect municipal infrastructure and safety.

Longer trucks can damage roads and bridges and increase safety problems where these bigger trucks encounter intersections and ramps.

Longer weekly hours of work for truck drivers, as proposed by the trucking industry to government regulators, could increase the problem of truck driver fatigue and the risk of collisions when large trucks exit from the highway and encounter intersections or stopped traffic.

We are writing to state our opposition to allowing longer trucks and increased weekly hours of work for truck drivers. We also request a consultative role by municipalities in Federal and Provincial trucking standards related to truck size and weight and driver hours of work.

Yours truly,

Draft Resolution

Whereas, allowing longer multi-trailer trucks would negatively affect municipal roads and safety

And whereas, heavy non-conforming truck trailers allowed in Ontario cause excessive pavement damage to municipal roads and increase the risk of jackknife or rollover

And whereas the Province of Ontario has downloaded responsibility for secondary highways to municipalities

And whereas increasing the weekly hours for truck drivers would increase the risk of sleep impaired drivers on municipal roads

Therefore be it resolved that

We are opposed to longer trucks and increased weekly hours of work for truck drivers,
We request Ontario to implement a plan to phase out non-conforming trucks, and
We request a consultative role by municipalities in Federal and Provincial trucking standards relating to truck size and weight and driver hours of work

Q&A About the Heavier 53 Foot Trailer Approved for Ontario

Out-going Transport Minister Tony Clement decided to allow 53 foot trailers that can weigh 22,000 pounds heavier or 20 per cent more than existing 53 foot trailers. Trucks with 53 foot trailers can now weigh 130,000 pounds in Ontario, compared to 102,000-108,000 pounds in other Provinces and 80,000 pounds on U.S. Interstates.

The Government says these trucks will reduce shipping costs and reduce the number of trucks on the roads by allowing one truck to carry more freight

Between 1960 and 1970, Ontario nearly doubled the weight limit on trucks. In 1994, Ontario increased the length of trailers from 48 to 53 feet. There are now more trucks than ever. If these trucks reduce shipping costs as stated, they will induce changes in production that increase shipping demand. Other provinces and the U.S. States will now be under pressure to allow heavier 53 foot trailers, and when this happens more long-haul freight will move by truck.

The Government says that these heavier 53 foot trailers will not increase road damage.

The fourth axle may mitigate the additional damage to roads, but the heavier 53 foot trailer will be more damaging to bridges than existing 53 foot trailers.

The Government says these new 53 foot trailers are no heavier than the 48 foot trailer already allowed.

Ontario does allow the use of 130,000 pound trucks with 48 foot trailers that do not conform to national safety performance standards for weight and axle configuration. When it increased the length of trailers from 48 to 53 feet, it dealt with the concerns about the safety of the longer trailer by promising it would meet national standards. It is now dropping that restriction and increasing the weight by 22,000 pounds to 130,000 pounds.

The Government says it will strictly control the use of heavier 53 foot trailers by permits.

A carrier does not need to have a Ministry safety audit to have a permit. Does the government have the resources to effectively enforce the permit restrictions? Permits are just a foot in the door to widespread use.

The Government and industry say the problems of heavier 53 foot trailers have been solved by using a fourth self-steer axle that cannot be lifted at intersections.

Why is this axle not permitted to be utilized on 53 foot trailers in any other province or under the national trucking safety standards?

What is the safety of this new truck?

The Ontario Government has closed its truck testing facility. It has relied on safety performance information supplied by the trucking industry, but there are still some outstanding questions.

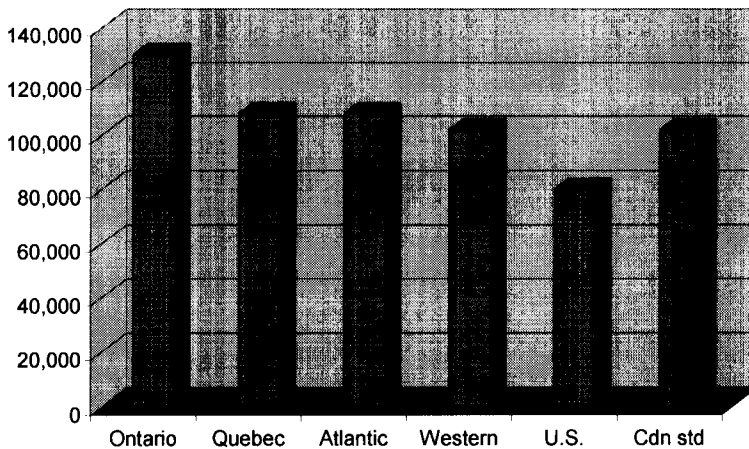
How does the weight of this truck in Ontario compare to other jurisdictions?

The national standard limits the weight of a truck with 53 foot trailer to 102,000 pounds in order to maintain acceptable and safe stability and control. A truck with a 53 foot trailer in Ontario can now weigh up to 130,000 pounds, or 27 per cent heavier. The chart below illustrates there was no competitive pressure on Ontario to allow the heavier 53 foot trailer because this weight is not allowed in other jurisdictions.

Weight Limits on Tractor-Trailers with 53 Foot Trailers

Canada national safety performance standard	102,000 pounds
Western Provinces	102,000 pounds
Quebec and Atlantic Provinces	108,000 pounds
Old Ontario Limit	108,000 pounds
New Ontario Limit	130,000 pounds
U.S. Interstate Highways	80,000 pounds

Weight Limit Tractor + 53 foot trailer



Why was this decision made?

It was a decision by the Minister on a proposal by the trucking industry. CRASH learned about it after the decision was made. There should be public input to changes that affect public safety on public roads before decisions are made.



For immediate release 18 June 99

Three Deaths Raise Concern over Truck Driver Fatigue

A national safety group said today that fatigue should be investigated as a possible cause of recent big truck crashes in the Ottawa area that killed three people.

Canadians for Responsible and Safe Highways (CRASH) cited the moving van that went through a flashing red light sign at Campbell's Bay early Wednesday, killing the two occupants of the car it hit. It also pointed to the collision on Highway 17 early last Friday where two tractor-trailers sideswiped and burned, killing one driver and injuring two others.

Bob Evans, CRASH Executive Director, called on the federal Minister of Transport to resist the current lobbying by the trucking interests for a 40 per cent increase in the number of hours truck drivers can be required to work each week.

Evans said Ottawa should heed the advice of its own expert panel on fatigue to the effect that an 84-hour workweek for truck drivers would be dangerous. "The workload increase being sought by large transport companies would be a sure-fire prescription for more death and injuries on our roads as more and more drivers would be pushed to exhaustion," he said.

CRASH is concerned that a decision to increase truck driver workload allowed under federal regulations could be made as early as this Fall.

For more information, contact Bob Evans tel 1 800 530 9945 or 1 613 860 0529.
Visit the CRASH web site at <http://www.web.net/~crash>

Big Trucks and The Environment

According to work for the climate change transportation table, greenhouse gas emissions from trucking increased 24 per cent between 1990 and 1995, and will increase another 40 per cent between 1995 and 2020.

The trucking industry has been promoting the idea of reducing emissions by allowing longer double and triple trailer trucks. Research for the transportation table finds that these longer trucks would reduce emissions from trucks by only 0.1 per cent (and this study directed by the trucking industry also incorrectly assumes the longer trucks would not attract freight from rail, would not induce increased shipping demand, and there would be no costs to modify intersections and ramps to handle trucks 50 per cent longer).

Following is some information about the negative environmental impacts of longer double and triple trailer trucks taken from a brief to the climate change transportation table by Transport 2000 Canada, Sierra Club and CRASH:

It is expected that LCVs (longer double and tripe trailer trucks) would reduce the cost of transportation for light density materials relative to more concentrated materials. This would create the following inefficiencies and entropy in the production and distribution system that will increase fuel consumption overall:

- *Mode shift from rail to road*
- *Reduction in shipment density*
- *Encourage shipment in a less concentrated form*
- *Increased shipping distances in production and distribution; and*

According to work prepared for the Ontario Round Table on Environment and Economy by IBI Group, rail piggyback or container traffic is 2.7 to 3.3 times more fuel efficient than trucks.

CRASH

Canadians for Responsible
and Safe Highways

CRASH - So that all Canadians may have a say

Canadians for Responsible and Safe Highways (CRASH) is a national non-profit association representing the concerns and expectations of Canadians about sharing public roads and highways with big trucks. CRASH is pro-safety. It is committed to reducing the toll of death and injury on our roads.

The association's mailing list now exceeds 1,600. Membership embraces Canadians of all stripes from coast to coast, including concerned truck drivers and the relatives and friends of persons killed or injured in accidents with large trucks.

The need for an organization to speak for the public on trucking safety matters can be readily demonstrated. CRASH has scrupulously inventoried the very serious level of public unease with large truck operations through surveys conducted for it by the Angus Reid Group. And, any attempt to dismiss these poll results as just uninformed imagination:

- flies in the face of government statistics showing almost 600 Canadians killed and about 12,000 injured (many seriously) in accidents involving large trucks.
- ignores the fact that trucks are getting bigger and more numerous,
- overlooks the continuing high proportions of these vehicles failing mechanical inspections, and
- refuses to recognize that the real victims of trucking accidents are people – people get killed, not trucks. Public concerns must count.

The trucking industry has established a very close and virtually exclusive relationship with government road safety regulators. Over the years, while trucking interests have actively lobbied government for rule changes benefiting the profitability of their members, there has been little equivalent advocacy on behalf of the other parties sharing Canada's road system.

This report provides background information about CRASH, the needs it is attempting to represent, and the approaches it will employ. It was prepared in October, 1998. For more information call 1-800-530-9945 (Ottawa: 860-0529).

Sadly, if one judges by the reaction of the trucking associations since the arrival of CRASH two years ago, the industry has no desire to see anyone else at the table. CRASH believes such an attitude constitutes a disservice to all Canadians.

The deregulated Canadian trucking industry is under enormous competitive and profit pressure. The temptation to push the safety envelope for financial gain is all too apparent. Clearly, there is a need for government to ensure that public safety is protected. But, more critically, there is a need to ensure that the advice governments consider in this respect comes from more than just the trucking industry. That is a role CRASH has assumed.

CRASH has made a difference

Since its debut in mid-1996, Canadians for Responsible and Safe Highways has engaged in advocacy and media programs to bring the public into the process of defining how large trucks will coexist with other road users. It has commissioned and widely communicated the results of two extensive Angus Reid Group surveys on how Canadians view truck safety issues. It has hosted a major trucking safety conference. CRASH representatives have met with literally hundreds of politicians, safety officials and spokespersons for concerned citizens across the country. The association has participated in a number of government hearings and committee meetings. It has developed and nourished a media presence.

CRASH provides a “second opinion” on certain trucking industry aspirations where no alternative considerations had been previously advanced. And, there are signs that this presence - this expression of the public view - is making a difference. The association has raised the visibility of trucking safety as an issue requiring more government attention. It is beginning to lift the curtain on the secretive trucking industry participation in the setting of trucking safety rules. CRASH believes that it has been instrumental in helping to stop, delay or force more study of certain contentious changes to road safety regulation.

Trucking safety will be a major issue in the year ahead

The trucking industry is going to considerable effort to paint trucking as safe. Overall truck accident rates have indeed declined in recent years as the entire road accident picture benefits from such highly successful safety programs as those relating to drinking drivers and seat belt usage. What the truckers prefer not to recognize is that large trucks continue to be significantly over-represented in severe road accidents causing death and serious injury. Almost 20 percent of all road fatalities now involve a large truck.

Why are the trucking associations so aggressively trying to promote a safe image? The answer is simple and brutal. The industry wants to make the case that there has been enough improvement in trucking safety to justify going along with some new steps that trade road safety standards for productivity enhancement.

The change being sought by trucking interests is anything but minor. For example, the Ontario Trucking Association is lobbying for trucks that are 50 percent longer than anything now permitted and would like to see them in the charge of drivers required to work 40 percent more hours every week.

Car drivers in at least four provinces face the prospect of having to share the road with bigger trucks in the coming months. And, Canadians everywhere may be confronted soon with more sleep-impaired truck drivers if the trucking industry succeeds with its desired revisions to federal workload regulations.

A further ongoing basis for concern relates to the fragmented nature of trucking regulation in Canada. The federal government has passed most trucking safety responsibility to the provinces. Subsequent attempts to bring national coordination have failed in key respects. In the current environment, individual provinces are tempted to use safety regulation (or lack of it) as a lever to boost their economic competitiveness. Cutting corners on safety may cut trucking costs and "help" that province's economy. Thus, there can be a race to the bottom in terms of the establishment and enforcement of safety norms.

And, CRASH plans to be part of the action

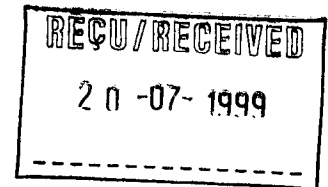
Bigger trucks on more roads, increased truck driver workload, provincial rivalry... these and other developments in the months ahead will require that elected and appointed public officials have the benefit of more than just the views of those seeking financial profit. The “rest of us” who, as motorists, cyclists and pedestrians also use the public road system must be heard.

In bringing the public to the table, Canadians for Responsible and Safe Highways will continue its work to enhance the political understanding of the importance of responding to the legitimate public concerns about trucking safety. The association will augment efforts to build good working relations with road safety regulators. It will continue to advance the public position through participation on committees and at public hearings. CRASH will promote its concerns and arguments through nurturing and employing media channels. With a growing membership, added emphasis can be given to setting up local chapters and encouraging individuals to be more actively involved. This reliance on grassroots support promises to add to the effectiveness of the limited resources available to the association.

CRASH does not seek a fight with trucking interests, it simply wants Canadian decision-makers to have the advantage of a second opinion on truck safety issues. In that regard, the association is prepared to stand on its record. It has consistently spoken in favour of actions promoting trucking safety while remaining neutral in all other respects. It relies on thorough monitoring and research, and presents its cases through advancement of facts rather than hyperbole.

Membership in CRASH is open to any member of the public concerned about trucking safety on public roads. The association will welcome support from any individual or organization prepared to endorse the CRASH mission and objective.

**CRASH may be reached at 1-800-530-9945 (in the Ottawa area: 860-0529).
Please visit our WEB site at <http://www.web.net/~crash>**



19 July 1999

Mr. Ron Sully, Co-Chair
Mr. Ken Ogilvie, Co-Chair
Transportation Table
C/o Transport Canada
Environmental Affairs
Place de Ville Tower C
Ottawa ON
K1A 0N5

Dear Mr. Ogilvie and Mr. Sully:

Mr. John Forster has invited Canadians for Responsible and Safe Highways to submit comments on trucking study #2 as it relates to extra-long trucks. We welcome this invitation and hope our information will help the table in developing its Options Paper. This letter should be considered in conjunction with the paper opposing longer trucks (LCVs or longer combination vehicles) that we previously filed with the table.

One-Sided Report

Firstly, our organization is very concerned that a study funded by taxpayers would so blatantly side with industry claims and dismiss any serious concerns about longer trucks as merely a "political" issue. For example, the report at page 16 states that "*railways and anti-truck lobbies use the issue of long trucks or LCVs as a rallying cry.*" For the record, Canadians for Responsible and Safe Highways, Transport 2000 Canada, and Sierra Club are non-political associations that have written to the table opposing longer trucks. The Canadian Automobile Association policy 5.13 states: "*No increase in maximum truck size or weight should be allowed.*"

The report fails to point out that the longer trucks being proposed do not meet Canada's safety performance standards or that the U.S. Congress in 1991 and again in 1998 has banned any further deployment of these trucks beyond the roads where they operated in 1991. The 1998 U.S. D.O.T. Comprehensive Study on Truck Size and Weight states: "*If LCV (longer combination vehicle) use expanded into the more heavily traveled, higher risk eastern portion of the country, it is not possible to project with certainty what the crash rates for larger and heavier trucks would be. But, this analysis indicates that crash rates would be higher than past history would suggest.* The U.S. report also cautions that longer and heavier trucks may be more prone to rollovers.

Turnpike Doubles on Two-Lane Roads

The transportation table trucking study #2 does admit that oversize Rocky Mountain Doubles (48 or 53 foot trailer plus 28 foot trailer) are now running on two-lane roads in the Prairie Provinces. This makes a mockery of the trucking industry argument that LCV's will be restricted to only the best highways. However, the study makes no reference to the fact that at least one province, Saskatchewan, now allows the very longest LCV's (130 foot long Turnpike Doubles) on two-lane roads. The lesson learned is that once LCV's are allowed on divided highways, the trucking industry will successfully push for them on two-lane roads. The safety concerns about LCV's are even more serious on two-lane roads.

Flawed Assumptions

The report assumes there will be no diversion of freight from rail to truck. The U.S. Department of Transportation estimates that longer combination trucks there would shift 19 per cent of existing rail traffic to truck. About one-third of this shift was due to higher weights already allowed in Canada and about two-thirds from the increased length being proposed here.

The report assumes there will be a reduction in truck movements by allowing one truck to pull longer double trailers. Every time there is an increase in truck weight or length under the same argument, the number of trucks goes up, not down. In 1994, Ontario increased trailer lengths from 48 to 53 feet. There are now more trucks than ever.

The report assumes there will be a reduction in emissions by allowing longer trucks, and that the resulting lower trucking prices will not increase shipper demand for trucking. Simple economic theory suggests a reduction in trucking prices will increase demand for trucking services and therefore increase emissions.

The report assumes there will be *NO* additional costs to modify intersections and ramps to accommodate longer multi-trailer trucks. The example of Turnpike Doubles on divided highways in the prairies has little relevance to the situation in B.C., Ontario or Nova Scotia. The prairie divided highways are mostly rural. There are few interchanges and ramps. More densely populated Ontario has many more ramps and interchanges with geometry that may be insufficient for these wide-turn trucks.

The 1998 U.S. D.O.T. Comprehensive Truck Size and Weight Study finds that allowing longer multi-trailer trucks on main highways there would impose costs of \$3 billion (\$U.S.) to modify interchanges and ramps.

Bottom Line

According to the transportation table, greenhouse gas emissions from trucking increased 24 per cent between 1990 and 1995, and will increase another 40 per cent between 1995 and 2020. The trucking study #2 finds that allowing longer multi-trailer trucks would reduce emissions by only 0.04 to 0.1 per cent. Given the serious safety concerns of several organizations as well as 86 per cent of the Canadian public (Angus Reid Survey, 1998), the transportation table should drop the proposal for longer trucks and not include this recommendation in its options paper.

Conclusion

With respect to LCV's, it appears the trucking associations are attempting to co-opt the work of the transportation table for commercial gain.

Importantly, while trucking study #2 reports there would be a miniscule reduction (0.1 per cent) of emissions by LCV operation, it does find that just enforcing existing speed limits would reduce trucking emissions 3.5 per cent. In stark contrast to the LCV operation that would trade a tiny (and disputed) environmental improvement against increased loss of life on our roads, enforcing speed limits would also improve highway safety.

Because there was no review from outside the trucking industry in trucking study #2, we request that this letter be appended to the final copy of the study. It would be unfortunate if a taxpayer funded study were to be used at and outside the transportation table as a publicly funded publicity piece for longer trucks.

Yours truly,



Bob Evans
Executive Director