



**Idaho Grain Producers Association**

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May 23, 2016

Mr. Ramon Hobdey-Sanchez  
[ramon.hobdey-sanchez@itd.idaho.gov](mailto:ramon.hobdey-sanchez@itd.idaho.gov)  
Idaho Transportation Department  
3311 W. State Street  
P.O. Box 7129  
Boise, ID 83707

RE: Potential Negotiated Rulemaking for Permitting and Safety Requirements for Over-legal Vehicles on Idaho Highways

Dear Mr. Hobdey-Sanchez:

As President of the Idaho Grain Producers Association and on behalf of Idaho's wheat and barley growers, I am submitting the following comments on ITD's proposed negotiated rulemaking for safety issues and permitting of "over-legal" vehicles.

Wheat and/or barley is grown in 42 of Idaho's 44 counties so the safe and efficient transportation of these commodities is critically important to our industry. Consequently, we are very interested in any proposed changes to existing regulations or the development of any new regulations that may impact the distribution of our products.

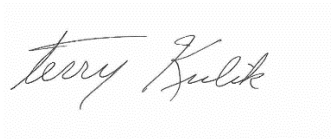
Authorization for 129,000 pound trucks on Idaho highways has been a priority for our growers and we were pleased that the 2016 legislature cleared the way for allowing more efficient vehicles on our interstate highway system. We believe that the pilot projects and all related evidence suggests that these increased weights do not present additional safety concerns and will not create additional harm to our roadways.

**IGPA strongly believes that:**

- **Current rules regulating trucks over 80,000 pounds are sufficient and should also apply to trucks weighing up to 129,000 pounds.**
- **The phrase "over-legal" should be removed from the regulations since 129,000 pound trucks are now legal under both state and federal law.**
- **All current exemptions should stay in place.**
- **Current inspection practices should continue.**

Senate Bill 1229 only addressed 129,000 pound trucks on the federal highway system – accordingly, we do not think this legislative action intended or created the need for additional rulemaking that would impact lighter truck weights. Our members are very concerned about the conditions of our highways and the safety of everyone using them and we believe that it will not be new rules but the efficiencies and reduced number of trucks on our highways will provide the best safety and maintenance benefits.

Sincerely,

A handwritten signature in cursive script, reading "Terry Kulik", is displayed within a light gray rectangular box.

Terry Kulik  
President  
Idaho Grain Producers Association