



Pennsylvania House Transportation Committee Public Hearing

Altoona Railroaders Memorial Museum  
1300 Ninth Avenue, Altoona, PA

Testimony Presented by  
Kimberly B. Smith  
York Railway Company

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**The Impacts of Bigger, Longer Trucks to Pennsylvania's Short Line Freight Railroads**

Chairman Hennessey, Chairman Carroll and the members of the Pennsylvania House Transportation Committee, my name is Kimberly Smith, and I am Director, Government Affairs at Genesee & Wyoming Railroad Services, Inc. I am here today representing York Railway Company, a subsidiary of Genesee & Wyoming. The 42-mile York Railway, headquartered in York, Pennsylvania, runs from East York through center city York, through Spring Grove and ends in Hanover, Pennsylvania. It's classified by the Surface Transportation Board as a Class III short line freight railroad, one of approximately 600 of the smallest freight railroads across the U.S. According to the American Association of Short Line and Regional Railroads, there are 51 "small" railroads in our Commonwealth, more than any other state. York Railway, like other short lines in Pennsylvania, provides a critical "first mile – last mile" freight service connecting its communities and customers in south central Pennsylvania to the national rail network. The railroad transports clay, cement, chemicals, coal, food and feed products, and forest products.

My testimony today is to brief you on the detrimental impacts of bigger, longer trucks to Pennsylvania's short line freight railroads, like York Railway Company. There are many reasons why all Pennsylvanians should oppose bigger trucks, and vary widely from highway safety, public infrastructure and modal diversions.

However, over the years, the state legislature has incrementally expanded the hazards and damage bigger trucks create in our state. These "one off" truck weight increases date back 25 years and is a very troubling trend.

Year	Heavy Truck Weight Exemptions and Commodities
1994	90,000 lbs. for containerized cargo
1998	107,000 lbs. for bulk refined oil 107,000 lbs. for particleboard / fiberboard for ready-to-assemble furniture 95,000 lbs. for waste coal 95,000 lbs. for livestock
1999	100,000 lbs. for float glass / flat glass 96,900 lbs. for raw water 95,000 lbs. for pulpwood / wood chips
2001	100,000 lbs. for steel coils or slabs 95,000 lbs. for raw coal 116,000 lbs. for building structural components
2005	107,500 lbs. for refrigerated meat products
2006	95,000 lbs. for animal feed / unprocessed grain
2010	105,000 lbs. for nonhazardous liquid glue 95,000 lbs. for waste tires
2010, 2013 & again in 2019	150,000 lbs. for hot ingot / hot boxes
2012	95,000 lbs. for eggs
2013	95,000 lbs. for raw milk 102,000 lbs. for cryogenic liquid
2016	96,000 lbs. for sugar

As I mentioned already, there are many Pennsylvanian's that strongly oppose larger trucks on Commonwealth roadways. One reason all of you should oppose bigger trucks is the condition of Pennsylvania roadway bridges. According to the American Society of Civil Engineers (ASCE) ranks Pennsylvania's bridges a D+. According to ASCE's Bridges Executive Summary "... highway bridges [in Pennsylvania] – the ninth largest inventory in the nation – 18.3% (4,173 bridges) are classified as being in poor condition, down from 24.4% in 2014." Confirming this perspective, earlier this year the American Road and Transportation Builders Association found Pennsylvania still has the second-highest number of structurally deficient bridges in the United States.

To be clear, bigger trucks will not mean fewer trucks. This goes directly to the concern of the short lines with any increases in truck size or weight limits. Bigger trucks always have meant more trucks on our public infrastructure, and let me explain why. Increasing truck weight limits, or reducing the permitting costs to move them, makes movement of freight in these trucks less expensive. While you

may think this is a good thing, the reduced costs come through increased public subsidies for these trucks. While this subsidy may not be readily apparent, it is very real. This was confirmed in a Government Accountability Office (GAO) study: "...according to DOTs' most recent calculations, the revenues generated from federal fuel taxes levied on smaller trucks that weigh less than 25,000 pounds cover 150 percent of their cost impact, but larger trucks weighing over 100,000 pounds pay only 40 percent of their costs." (January, 2008, FREIGHT TRANSPORTATION National Policy and Strategies Can Help Improve Freight Mobility).

This is the very serious and a real concern of smaller railroads in Pennsylvania. In the 2007 short line diversion study prepared by Carl Martland, Research Affiliate, Department of Civil and Environmental Engineering, at MIT, bigger trucks would be devastating to smaller railroads. Mr. Martland's study concluded an increase in truck weight from the current 80,000 lb. limit to 97,000 lbs. could reduce short line merchandise traffic by 44% and overall short line traffic by 17%. Allowing long double and triple trailer trucks – LCVs – with weights up to 148,000 pounds could eliminate 71% of the merchandise traffic and reduce overall short line traffic by 28%.

We have definitely seen this in practices, too. There are well documented cases of almost immediate diversion of freight from short line railroads to trucks following states allowing for heavier trucks. Heavier, longer trucks in Pennsylvania have the ability to devastate Pennsylvania short line freight railroads, like York Railway.

Heavier, longer trucks will result in **more** damage to highways and bridges, **more** cost to tax payers, **more** trucks on roadways, **more** traffic congestion, **more** greenhouse emissions and **less** freight rail traffic. They are simply, and always, very bad public policy.

Thank you for a few minutes of your time and undivided attention.

GAO

Report to the Ranking Member,  
Committee on Environment and Public  
Works, U.S. Senate

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# FREIGHT TRANSPORTATION

## National Policy and Strategies Can Help Improve Freight Mobility



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able to serve their customers more efficiently if they instituted collaborative operational processes, such as sharing terminal facilities for a fee, which could allow more rail companies access to customers near specific terminals or reciprocal switching. For example, one rail company could deliver, for a fee, railcars to another rail company's customers.<sup>23</sup> Inefficiencies in roadway use include daily management and operations practices that do not maximize existing roadway capacity, such as uncoordinated timing of traffic signals and inefficient incident response capabilities.

In a number of ways, current pricing of freight transportation infrastructure can result in inefficient use by failing to align the capital and operational costs of infrastructure with the fees paid by users. First, the financing mechanisms that collect fees from the users—freight carriers—of freight transportation infrastructure do not consistently collect revenues in direct relation to the full cost of providing the infrastructure these carriers use. Consequently, prices often do not provide the correct signals to carriers as they make decisions about their use of transportation infrastructure and the prices they charge their customers. Second, the extent to which carriers bear the full cost of their infrastructure use varies across modes, sometimes distorting the competitive position between them. As a result, a mode that is more costly to society might be used for some shipments if the fees charged to users only reflect a portion of the full cost of the selected mode. For example, according to DOT's most recent calculations, the revenues generated from federal fuel taxes levied on smaller trucks that weigh less than 25,000 pounds cover 150 percent of their cost impact, but larger trucks weighing over 100,000 pounds pay only 40 percent of their costs.<sup>24</sup> From an economic standpoint, this relationship between revenue and cost distorts the competitive environment by making it appear that heavier trucks are a less expensive shipping method than they actually are and puts other modes, such as rail and maritime, at a disadvantage.<sup>25</sup>

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<sup>23</sup>GAO-07-94.

<sup>24</sup>DOT, *Addendum to the 1997 Federal Highway Cost Allocation Study Final Report* (2000), <http://www.fhwa.dot.gov/policy/hcas/addendum.htm> (accessed on Oct. 25, 2007).

<sup>25</sup>GAO, *Freight Transportation: Strategies Needed to Address Planning and Financing Limitations*, GAO-04-165 (Washington, D.C.: Dec. 19, 2003) and GAO, *Railroad Bridges and Tunnels: Federal Role in Providing Safety Oversight and Freight Infrastructure Investment Could Be Better Targeted*, GAO-07-770 (Washington, D.C.: Aug. 6, 2007).

## New Study Shows Huge Short Line Diversion to Bigger Trucks

*“Under the most aggressive scenarios for increasing truck size/weights, the great majority of general merchandise traffic would be subject to diversion.”*

Bigger trucks would be devastating to short line and regional railroads according to a study released on September 10, 2007, by Carl Martland, Research Affiliate, Department of Civil and Environmental Engineering, MIT. Martland concluded that short line and regional rail operations would be heavily impacted by freight diversion if truck sizes and weights were increased, assuming that truck drivers and equipment (and highways) were available to handle the increase in truck traffic. The results of the study showed that an increase in truck weight from the current 80,000 pound limit to 97,000 pounds could reduce short line merchandise traffic by 44% and overall short line traffic by 17%. Allowing long double and triple trailer trucks – LCVs – with weights up to 148,000 pounds could *eliminate 71% of the merchandise traffic* and reduce overall short line traffic by 28%.

Truck Configuration	Decline in rail traffic merchandise	Total decline in rail traffic
 97,000 lb singles	44%	17%
 110,000 lb triples	28%	11%
 129,000 lb turnpike doubles	71%	28%

The Martland Study analyzed a hypothetical set of 100 origin-to-destination freight movements representing a typical mix of commodity and customer characteristics that are handled by short lines. The study looked at trip distances of from 50 to 1,200 miles.

A total of nine different truck configurations and weights were considered, ranging from 90,000 pounds to the heaviest long double trailer trucks weighing 148,000 pounds.

Earlier government and industry studies had shown that increasing truck size and weight would divert substantial portions of Class I freight from rail to the highways. The diversion problem, however, is even more serious for the short line and regional rail operations.

Trucks are more competitive with rail on shorter hauls, and short line railroads have a higher proportion of their traffic in the categories most subject to diversion, i.e. less coal and more merchandise.

### **Bulk Traffic Also at Risk**

Larger trucks would also be a serious competitive threat for bulk rail freight for distances up to 300 miles. The threat is greatest where rail freight service is least efficient, whether because of high circuitry, short trains, expensive track structure, or inefficient facilities for loading and unloading - problems which are generally more serious for the short lines than for the Class I railroads.



# YORK RAILWAY COMPANY

## York Railway Company (YRC)

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Location	York County
Track Miles.....	42
Railroad Employees	18
Logistics Employees .....	5
Highway Crossings .....	193
Public .....	108
Private.....	36
Signalized .....	49
Origin Carloads	~1,955*
Destination Carloads	~10,225*
Truckload Equivalents	
Originated .....	7,820
Terminated.....	40,900

*\*Annual totals for 2018*

## Top Commodities Transported

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1. Clay
  2. Cement
  3. Chemicals
  4. Food and Feed Products
  5. Forest Products
  6. Steel
  7. Scrap

YRC operates between York and Hanover, Pennsylvania. It connects with CSX, Norfolk Southern, and East Penn Railway.

