

September 6, 2022

Steven Haywood
Executive Lead
Ministry of Transportation and Infrastructure
PO Box 9850 Stn Prov Govt
Victoria BC V8W9T5

Via email [REDACTED]

Re.: Utilization of Long Combination Vehicles on BC's Road Network

Dear Mr. Haywood:

I am writing on behalf of the BC Trucking Association (BCTA) to seek support from the Ministry of Transportation and Infrastructure (MoTI) to enable the utilization of long combination vehicles (LCVs)¹ in the Province of BC. Specifically, we are seeking support:

- To establish a British Columbia – Alberta long combination vehicle road network, without the requirement to travel with pilot cars; and
- To establish designated commercial rest areas for the coupling and de-coupling of long combination vehicles.

Consistent with the province, a key priority of BCTA is sustainable transportation to address the climate emergency. However, the trucking sector transports 92% of all consumer goods in our province, and over the past decade BC's transportation sector grew by an average of 4,049 MHD vehicles each year. The principal cause for growth in our sector is directly attributed to two factors: growth in BC's population by approximately 580,000 over this period and growth in e-commerce, which nearly doubled in 2020 due to the COVID-19 pandemic.² As a result of this growth, GHG emissions from BC's transportation sector grew by 27% over a decade (2007-2018), and BCTA modelling is forecasting growth of 17.3% by 2030.

LCVs are not only the safest commercial vehicles on the road, but they also have the potential to reduce commercial road transportation greenhouse gas emissions by up to 41 percent compared to two individual tractor-trailers moving the same amount of cargo. In the 2021 BCTA Infrastructure Priorities Survey, we found 53.3% of respondents who were interested in using LCVs was motivated to do so to lower their greenhouse gas emissions, followed by potential safety impacts (e.g., fewer collisions from stricter operator requirements and restricted operations) at 26.67%.

Expanding the LCV network and establishing designated commercial rest areas for the coupling and de-coupling of LCVs, as we have requested, will increase the opportunity for LCVs reduce emissions and assist in the Class 1 commercial driver shortage, which currently has a vacancy rate of 18.4%³.

¹ For this submission, approval of LCVs is being sought for both rocky mountain doubles (up to 32 m in overall length) and turnpike doubles (up to 41 m in overall length)

² <https://www150.statcan.gc.ca/n1/pub/45-28-0001/2020001/article/00064-eng.htm>

³ BCTA 2022 Compensation Survey.

Additionally, a recently conducted provincial review on travel time windows and pilot car requirements found that vehicles with legal width up to 46m long have a low likelihood of encroachment when the road shoulder is ≥ 1.5 m wide or on multilane highways.

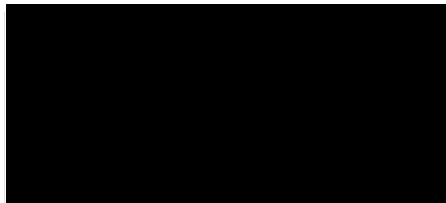
Despite significant infrastructure investment made by the Province, challenges remain for the operation of LCVs in British Columbia. For example, approximately 190 km of Highway 1 road from British Columbia to Alberta will remain a 2-lane highway, even after the completion of the current scheduled projects, including: Salmon Arm West, Chase, Fort Road to Tappen Valley, and Kicking Horse Canyon Project. Additionally, unlike other western provinces, very few BC carriers currently operate LCVs in the province due to the following:

- the only approved east-west LCV corridor in BC is to/from the Lower Mainland to Kamloops & Kelowna as per circular CVSE1014, in sufficient lane capacity (dual lane Highway);
- pilot car requirements for operating on dual lane roads; and
- inability to operate LCVs during adverse weather conditions, with limits operations from mid-Spring to early Fall on the east-west corridor.

In the interest of reducing emissions from the BC's commercial road transportation industry and identifying measures our sector can take today and, in the future, to reduce our sector's carbon footprint, BCTA requests that the Province establishes a long combination vehicle road network without the requirement to travel with pilot cars and designate appropriate commercial rest areas that can accommodate for the coupling and de-coupling of LCVs.

If you have any questions or would like additional information, please do not hesitate to contact me at DaveE@BCTrucking.com or at 604-888-5319, ext. 214.

Sincerely,



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President and CEO

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