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TO: Department of Transportation Docket Facility
ATTN: Docket No. FMCSA-98-3297,3298, 3299
Room PL-401
400 7th Street S.W.
Washington, D.C. 20590-0001

FMCSA-98-3297-18
FMCSA-98-3298-14
FMCSA-98-3299-12

FROM: Elmer W. Silaghi
1620 W. Vista Ridge Dr.
Green Valley, AZ 85614

RE: Safety of Interstate 19

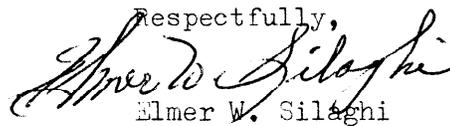
The age restricted retirement community of Green Valley is bisected by Interstate 19 and is close to being half-way between the city of Tucson and the border city of Nogales, Arizona. Interstate 19 is the main artery of transportation for Green Valleys approximately 24,000 residents. The roadway is regularly and conveniently used to travel the 8 mile length of Green Valley from north to south. It is also used to travel south to Nogales, Sonora, Mexico by retirees to purchase life saving prescription drugs at a considerable cost savings and to travel north to Tucson for hospital and emergency medical treatment. Residents also use the artery to travel north and south to experience superb entertainment and dining.

The interstate highway was designed and operational long before NAFTA was conceived. It is not suited for the projected additional volume of truck traffic. During the fiscal year 2000, by U.S. Transportation Department statics, 315,000 Mexican trucks crossed our border at the Nogales port of entry, the majority of which were restricted to the 20 mile border zone. At that, 38 truck crashes in the last 3 years by Mexican trucks within the border zone were reported. That equates to a volume of Mexican truck traffic on Interstate 19 of 863 per day, 365 days a year. With NAFTA, that volume is expected to increase substantially when the 20 mile border zone is eliminated.

Why has our government, our protector from foriegn intruders, relegated an infrastructure incapable of handling the volume, to be the gigantic funnel for truck traffic through our community jeopardizing our health and safety? Why has our government, by designating Interstate 19 as the last leg (or the first depending on the direction of travel) of the CANAMEX highway, foresaken not only the safety of Green Valley residents, but also those of Sahuarita, Amado, Elephant Head, Arrivica, Tubac, Rio Rico et.al.? The third question is, haven't the powers to be ever heard of - "a by-pass"?

This is a deplorable infliction of unnecessary stress to those most immediately affected and their exposure to life threatening safety situations. The differences between U.S. **and** Mexican truck safety and vehicle operator standards are well documented. The proposed administration 18 month window of compliance for Mexican truck safety is totally unacceptable. The risk of personal injury or the loss of life can not be disregarded for the expedience of implementing NAFTA highway access. To be forced to accept the increased and substandard truck traffic on our "main thorough-fare" is unconscionable.

Members of the Department of Transportation, you are strongly urged to consider these important facts in making your decision on the admission of Mexican trucks on our highways and the routes on which they will be permitted access.

Respectfully,

Elmer W. Silaghi