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August 29, 2024

gmcdonald@pselaw.com

Rob Schommer
City of Bellbrook
15 East Franklin Street
Bellbrook, Ohio 45305

Re: Truck Ordinance

Dear Rob:

I understand that Franklin Street, North Main Street, South Main Street and Wilmington Pike are all designated truck routes in Bellbrook under Section 440.12(b) of the City's Codified Ordinance. The City is dealing with heavy trucks primarily from outside the City limits using these roads to travel through the City not necessarily delivering goods within the City. For example, Ernst Concrete, a ready-mix concrete operation south and outside of the Bellbrook corporate limits, regularly uses these truck routes (primarily Main Street) as a truck route to destinations beyond the City.

For various reasons the City desires to regulate the truck traffic within the City especially on North and South Main Streets. Franklin Street is an Ohio State Route (SR 725) and as such, the City has limited authority to regulate its use within the City limits. I understand the City currently does not have an issue with Wilmington Pike being a truck route.

To address the issue, the City prepared proposed Ordinance 2024-O-11 which eliminates North and South Main Streets as designated truck routes in Section 440.12(b) and adds a new Section 440.14 which prohibits all "through trucks" upon Main Street.

Sec. 440.14. No Through Trucks:

No person shall drive or operate any through truck(s) upon North Main Street and South Main Street within the Municipality, which streets shall be posted in accordance with Ohio R.C. 4511.07 and Section 406.04 of the Municipality Traffic Code.

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OF COUNSEL
JAMES I. WEPRIN

¹ Also licensed in FL and MI

² Also licensed in NY

³ Also admitted in NY and CT

For the purpose of this Section, a "through truck" shall mean any truck having established points of departure and destination neither of which are within the said area.

Prior to enacting the proposed ordinance, the City received a copy of a letter from Taft (the law firm representing Ernst Concrete) stating that the proposed restrictions in the ordinance are likely legally invalid. The letter does not necessarily call into question the City's authority to enact the ordinance, but rather attacks the ordinance itself based on Constitutional grounds.

Taft point out that in the *Ohio Supreme Court case Richter Concrete Corp. v. City of Reading, et al.*, 166 Ohio St. 279 (1957) the court held "through traffic" in "excess of 20,000 pounds" ordinance was illegal in that it imposed restrictions and penalties on those using the streets engaged in through traffic and imposes no such regulations upon those using the streets for other than through traffic, notwithstanding such traffic imposes the same stress upon the streets and creates the same hazard. The court stated the ordinance in effect discriminates between residents and nonresidents engaged in the operation of trucks weighing in excess of 20,000 pounds.

I do not dispute the findings of that case, and arguably the proposed new Section 440.14 may fail under the Richter decision. However, in the subsequent *Ohio Supreme Court Case, City of Niles v. Dean* 25 Ohio St 2d 284 (1971), the court held that a similar ordinance confining through-truck traffic, not intending to discharge cargo within city, to designated state routes, providing that through trucks shall use streets within city designated by director of public safety, permitting any trucker, resident or nonresident, to service industrial and commercial firms in city, and providing that trucks may use certain streets only for servicing of designated businesses thereon is not discriminatory as between resident and nonresident truckers, has uniform operation, and does not constitute denial of equal protection so far as nonresident through truckers are concerned. That case expressly pointed out that the Richter Concrete Case was not applicable because in the Niles situation, all truckers, resident and non-resident, through and local, were subject to the same restriction. (*Niles*, 25 Ohio St. 2d 284, 287).

While the proposed Section 440.14 seems very similar to the Richter Concrete ordinance (and thereby potentially problematic), Bellbrook's existing Ordinance Section 440.12 provides a through truck provision similar to Niles. Simply removing North and South Main Streets as designated truck routes may be all that is needed to eliminate excess trucks on these streets without doing anything more.

Removing North and South Main Street as designated truck routes can still potentially give rise to Constitutional issues. To be upheld the change in the ordinances must as a threshold matter, be reasonable, non-discriminatory, uniform in operation and tailored to meet your goal. Whether or not this is the case, is generally determined by the courts on a case-by-case determination.

Since the enactment of Bellbrook's truck regulations in Section 440.12, the Supreme Court of Ohio has ruled that the right of intrastate travel is a "fundamental right" in *State v. Burnett*, 93 Ohio St.3d 419, (2001). Since the City's truck route regulations may involve a fundamental right to intrastate travel, any deprivation of such right must be evaluated by the court under what is called the "compelling-interest test" rather than the "rational basis test."

The "rational-basis" test is what is typically used by courts in determining if an ordinance passes Constitutional muster. Simply put, if the ordinance's restrictions bear a rational relationship to a legitimate governmental interest, the ordinance is generally upheld. Based on cases I have reviewed, I think Bellbrook can eliminate North and South Main Streets as truck routes, thereby preventing trucks from and meet the rational basis test. The legitimate governmental interest sought to be addressed are dust, noise, soot, pollution, and road damage primarily through residential neighborhoods, which clearly bears a rational relationship to regulating trucks on City streets.

Under the "compelling-interest test", there is a stricter judicial scrutiny whereby the ordinance will only be upheld if it is narrowly tailored and justified by a compelling governmental interest. Under the compelling-interest test, the City bears a heavy burden to prove that the legislation is Constitutional. Assuming intrastate travel is the sole "fundamental right" at play, I believe the City can potentially meet the compelling interest test as well given the facts at issue. Things like dust, noise and road damage are issues that the government can regulate and address, but they likely do not amount to a "compelling interest" that warrants restrictions on Constitutional rights. Public safety, on the other hand is generally deemed a compelling governmental interest. If the City can show the removal of trucks from North and South Main Street is being done for public safety (in addition to the other reasons), it will be in a better position to meet the first part of the compelling interest test in that it seeks to regulate a right for compelling governmental interest. An ordinance is narrowly tailored if it targets and eliminates no more than the exact source of the 'evil' it seeks to remedy. *Frisby v. Schultz* (1988), 487 U.S. 474, 485. A key in upholding the removal of North and South Main Street from the designated truck route would be to show is the best, and simplest way to address residential neighborhood traffic safety.

The City can potentially take the intrastate travel as a fundamental right off the table by showing that travel through Bellbrook via Main Street does not unreasonably impede such travel. There are multiple state routes and interstate highways that provide access all through Greene County without the need to traverse through Bellbrook. There are permissible truck routes (Franklin Street and Wilmington Pike) that permit intrastate travel through Bellbrook. The sole limitation would be the use of Main Street as a through road, but there are clearly alternative routes. The Taft letter points out that enactment of the ordinance will cause Ernst Concrete harm by adding an additional 15 minutes travel time which clearly indicates that there are alternative routes.

In the case of *Ohio Supreme Court case of Transp. Assn. V. Lincoln Hts, 25 Ohio St 2nd 203*, the issue was an ordinance prohibiting vehicles weighing more than 20,000 pounds from traveling upon Shepherd Lane, a residential street. The plaintiff argued that a substantial portion of its business was on Shepherd Lane and it was the shortest, safest, and only reasonable way to travel between its terminals and the nearby Interstate Route 7.

The Ohio Supreme Court stated:

“[a]lthough plaintiffs point out that Shepherd Lane is the shortest route between their terminals and Interstate 75, they do not contend that there are no alternate routes. In fact, the evidence discloses that there are alternate routes which can be utilized by plaintiffs even though they may be, as the Court of Appeals characterized them, ‘circuitous * * * and considerably longer than the direct path afforded were the use of Shepherd Lane not prohibited.’

The mere existence of these available alternate routes supports the reasonableness of the ordinance. The facts that the alternate routes available to plaintiffs are circuitous and that Shepherd Lane is the shortest route are not sufficient to establish that the ordinance is either ‘unduly oppressive’ or that it interferes ‘with private rights beyond the necessities of the situation.’ (*Lincoln Heights, 25 Ohio St 2nd 203, 207*)

Further, the Lincoln Heights court stated in finding the ordinance valid, “We note here the City of Lincoln Heights is almost exclusively a residential community (99.5% residential and .5% business and industrial) and the apparent purpose of the ordinance is to maintain the tranquility necessary to preserve its residential character”. In Bellbrook the City is 96% residential. While there is a portion of both North Main Street and South Main Street that have commercial uses, the vast majority of each is residential with the commercial being in very close proximity to the SR 725 truck route.

While this sounds like a very good case for Bellbrook, it was decided in 1971 under the “rational basis” test and predated the decision that intrastate travel is a fundamental right requiring analysis under the compelling governmental interest test.

Based on the foregoing, I recommend abandoning the proposed new Section 440.14 dealing with through trucks as I do not think it will pass a court challenge under Constitutional grounds. I think the City should concentrate on eliminating North and South Main Street as designated truck routes and rely on its existing Ordinance Section 440.12 as the mechanism regulating the truck traffic. The City can put itself in the best position from a legal challenge by including in the ordinance a statement of purposes which address the issues discussed above. I envision something along the lines of the following (which is not in a final form):

WHEREAS, Article XVIII, Section 3 of the Constitution of the State of Ohio grants municipalities the authority to exercise all powers of local self-government and to enact and enforce local police, sanitary, and other similar regulations that are not in conflict with the general laws; and

WHEREAS, municipal corporations have broad powers and duties with respect to the streets and highways within their limits; and

WHEREAS, the City of Bellbrook previously adopted ordinances relating to commercial and heavy vehicles which have been codified under Chapter 440 of the Bellbrook Municipal Code; and

WHEREAS, The City is primarily a residential community with industrial uses and commercial uses limits of less than 5% of the City; and

WHEREAS, Council has found that commercial and heavy vehicle traffic create dust, noise, soot, pollution, traffic congestion and road damage that disturb the peace, safety and tranquility of the residents and residential nature of the City; and

WHEREAS, North Main Street and South Main Street were designated as traffic routes in 1983; and

WHEREAS, since 1983 much of North Main Street and South Main Street have been developed with multiple new residential neighborhoods that front or have their primary ingress and egress through North and South Main Streets; and

WHEREAS, North Main Street and South Main Street have become primarily residential streets in the primarily residential community of Bellbrook;

WHEREAS, traffic counts reveal that _____ commercial and heavy vehicles traverse North Main Street and South Main Street per day; and

WHEREAS, the residential character of North Main Street and South Main Street and primarily residential uses adjacent to North Main Street and South Main Street are inconsistent with commercial and heavy vehicle traffic; and

WHEREAS, the commercial and heavy vehicle traffic has been increasing and present public safety concerns for the primarily residential traffic on North Main Street and South Main Street; and

WHEREAS, there are multiple State Routes and interstate highways suitable for commercial and heavy vehicles outside of the City of Bellbrook within Greene County and permissible truck routes such as Franklin Street and Wilmington Pike within the City of Bellbrook that permit intrastate travel without the need for North Main Street and South Main Street to be truck routes;

WHEREAS, Council finds, the elimination of North and South Main Streets as designated truck routes will not discriminate between local and through traffic as all commercial and heavy vehicles are subject to the same regulations and must follow designated truck routes in order to reach their destinations, even when they intend to discharge cargo in the City; and

WHEREAS, Council finds further, the elimination of North and South Main Streets as designated truck routes will not discriminate between local and through traffic because if a destination for commercial and heavy vehicles is located on a street not designated as a designated truck route, commercial and heavy vehicles must still use designated routes to reach such streets;

NOW THEREFORE, THE CITY OF BELLBROOK HEREBY ORDAINS:

Section 1. The Whereas clauses set forth above are acknowledged to be the primary purpose of this ordinance.

Section 2. Section 440.12(b) is hereby amended by removing 440.12(b)(2) South Main Street and 440.12(b)(3) North Main Street such that the new Section 440.12(b) shall read as follows:

(b) Establishment of routes. There are hereby established in the City the following truck routes:

- (1) East and West Franklin Street (State Route No. 725); and
- (2) Wilmington Pike.

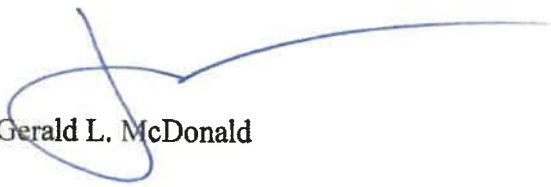
Section 3. It is hereby found and determined that all formal actions of this Council concerning and relating to the adoption of this Ordinance were adopted in an open meeting of this Council, and that any and all deliberations of this Council that resulted in such formal action were in meetings open to the public, in compliance with all legal requirements, including, but not limited to Section 121.22 of the Ohio Revised Code.

Truck Ordinance
August 29, 2024
Page 7

I think the more evidence the City can obtain to bolster the change as a public safety issue the better. I am happy to assist in finalizing an ordinance with you. Feel free to call me to discuss this further.

Sincerely yours,

PICKREL SCHAEFFER & EBELING CO., LPA



Gerald L. McDonald

GLM/lap

Study Name Bellbrook - S. Main St.
Start Date 8/19/2024
Start Time 12:00 PM
Site Code

Northbound					
		Lights	Buses	Single-Unit Trucks	Articulated Trucks
AVG. DAILY VEHICLES OVER 2.5 DAY TIMEFRAME		1899	16	152	25

Channel: Direction
Direction: Northbound

Group	Lights	Buses	Single-Unit Trucks	Articulated Trucks
12:00 PM	26	0	3	0
12:15 PM	23	0	7	0
12:30 PM	23	0	4	2
12:45 PM	26	0	5	1
1:00 PM	30	0	6	0
1:15 PM	36	0	5	0
1:30 PM	25	0	3	0
1:45 PM	30	0	6	1
2:00 PM	31	0	4	1
2:15 PM	35	0	0	1
2:30 PM	22	0	3	0
2:45 PM	27	2	3	0
3:00 PM	53	0	2	0
3:15 PM	26	0	0	0
3:30 PM	33	1	4	1
3:45 PM	35	1	0	0
4:00 PM	49	0	3	0
4:15 PM	40	1	1	0
4:30 PM	43	1	1	0
4:45 PM	37	0	0	0
5:00 PM	42	0	0	0
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5:45 PM	48	0	0	0
6:00 PM	30	0	1	0
6:15 PM	28	0	1	0
6:30 PM	24	0	0	0
6:45 PM	23	0	0	0
7:00 PM	22	0	0	0

7:15 PM	29	0	0	0
7:30 PM	26	0	0	0
7:45 PM	19	0	0	0
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8:45 PM	17	0	0	0
9:00 PM	10	0	0	0
9:15 PM	6	0	1	0
9:30 PM	9	0	0	0
9:45 PM	7	0	0	0
10:00 PM	4	0	0	0
10:15 PM	2	0	0	0
10:30 PM	1	0	0	0
10:45 PM	1	0	0	0
11:00 PM	1	0	0	0
11:15 PM	2	0	0	0
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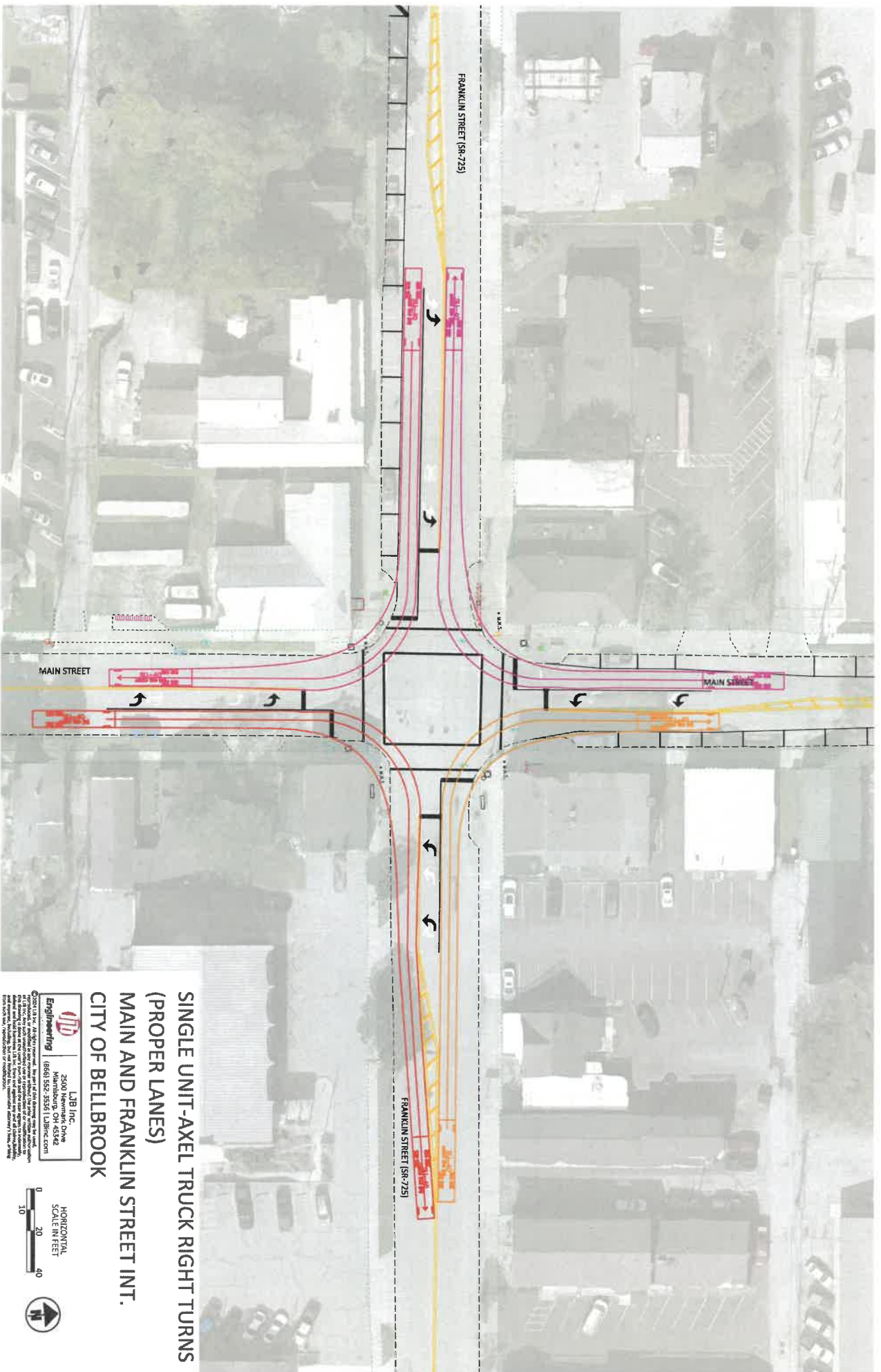
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5:30 AM	5	0	3	0

5:45 AM	7	0	0	1
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6:45 AM	31	4	2	0
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4:30 PM	37	0	0	0


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6:30 PM	37	0	0	0
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7:45 PM	24	0	0	0
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1:15 AM	1	0	0	0
1:30 AM	0	0	0	0
1:45 AM	1	0	0	0
2:00 AM	1	0	0	0
2:15 AM	0	0	0	0
2:30 AM	0	0	0	0
2:45 AM	0	0	0	1
3:00 AM	0	0	0	0

3:15 AM	0	0	0	0
3:30 AM	0	0	0	0
3:45 AM	2	0	0	0
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1:45 PM	19	0	3	1
2:00 PM	25	0	3	1

2:15 PM	31	0	1	0
2:30 PM	19	0	5	2
2:45 PM	35	2	4	0
3:00 PM	40	0	1	0
3:15 PM	35	1	3	0
3:30 PM	42	1	2	0
3:45 PM	27	0	4	1
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11:30 PM	4	0	0	0
11:45 PM	1	0	0	0
TOTAL	1812	17	169	32




**SINGLE UNIT-AXEL TRUCK RIGHT TURNS
(PROPER LANES)
MAIN AND FRANKLIN STREET INT.
CITY OF BELLBROOK**




LJB Inc.
Ohio
2500 W. Main Street
Miamisburg, OH 45342
(866) 552-3535 | LJBinc.com

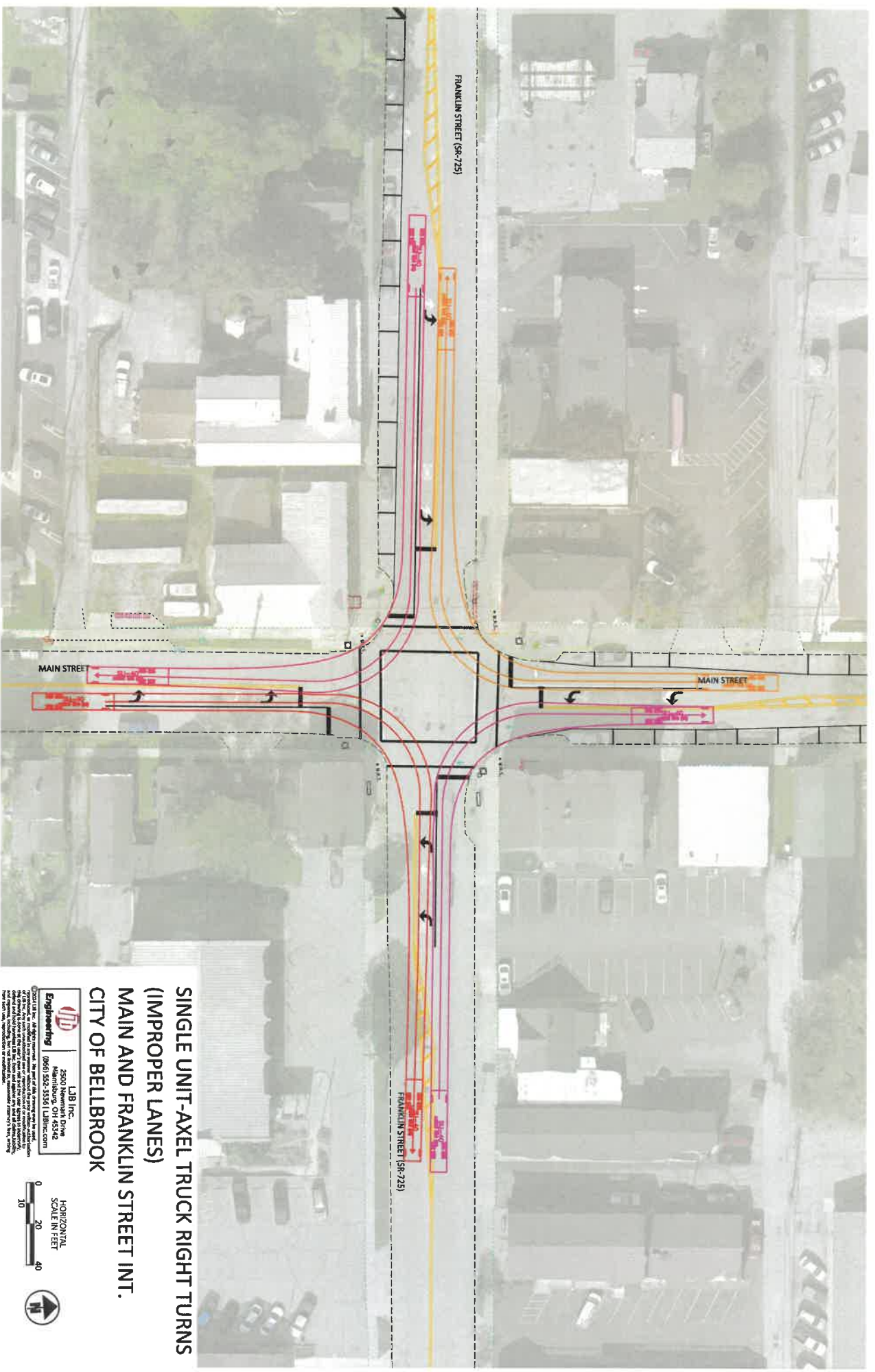
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HORIZONTAL
SCALE IN FEET

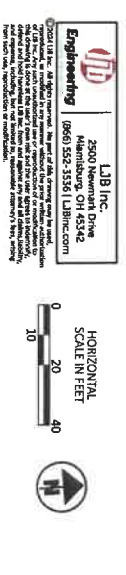


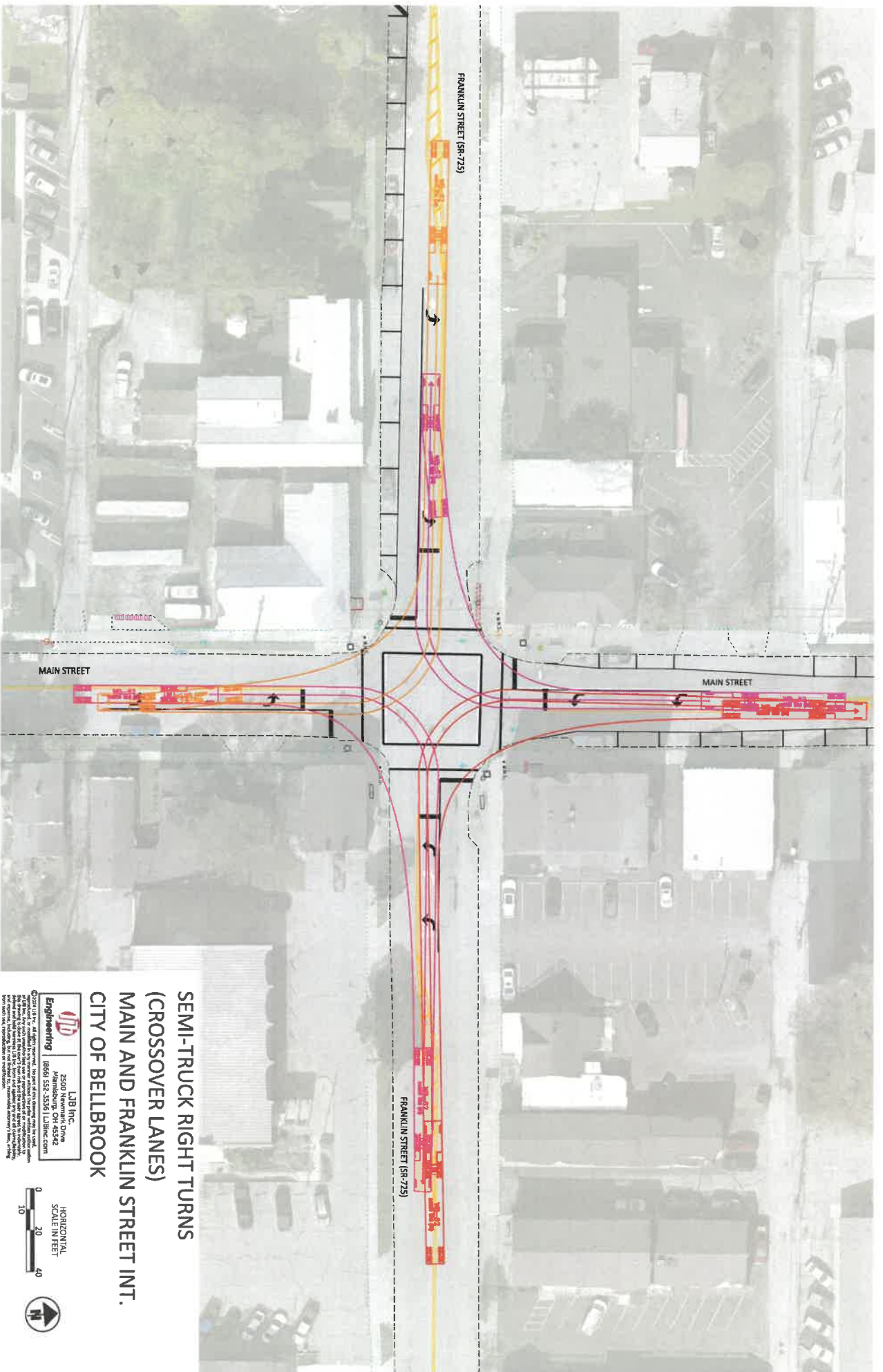
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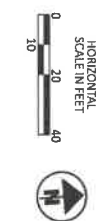
**SINGLE UNIT-AXEL TRUCK RIGHT TURNS
(IMPROPER LANES)
MAIN AND FRANKLIN STREET INT.
CITY OF BELLBROOK**



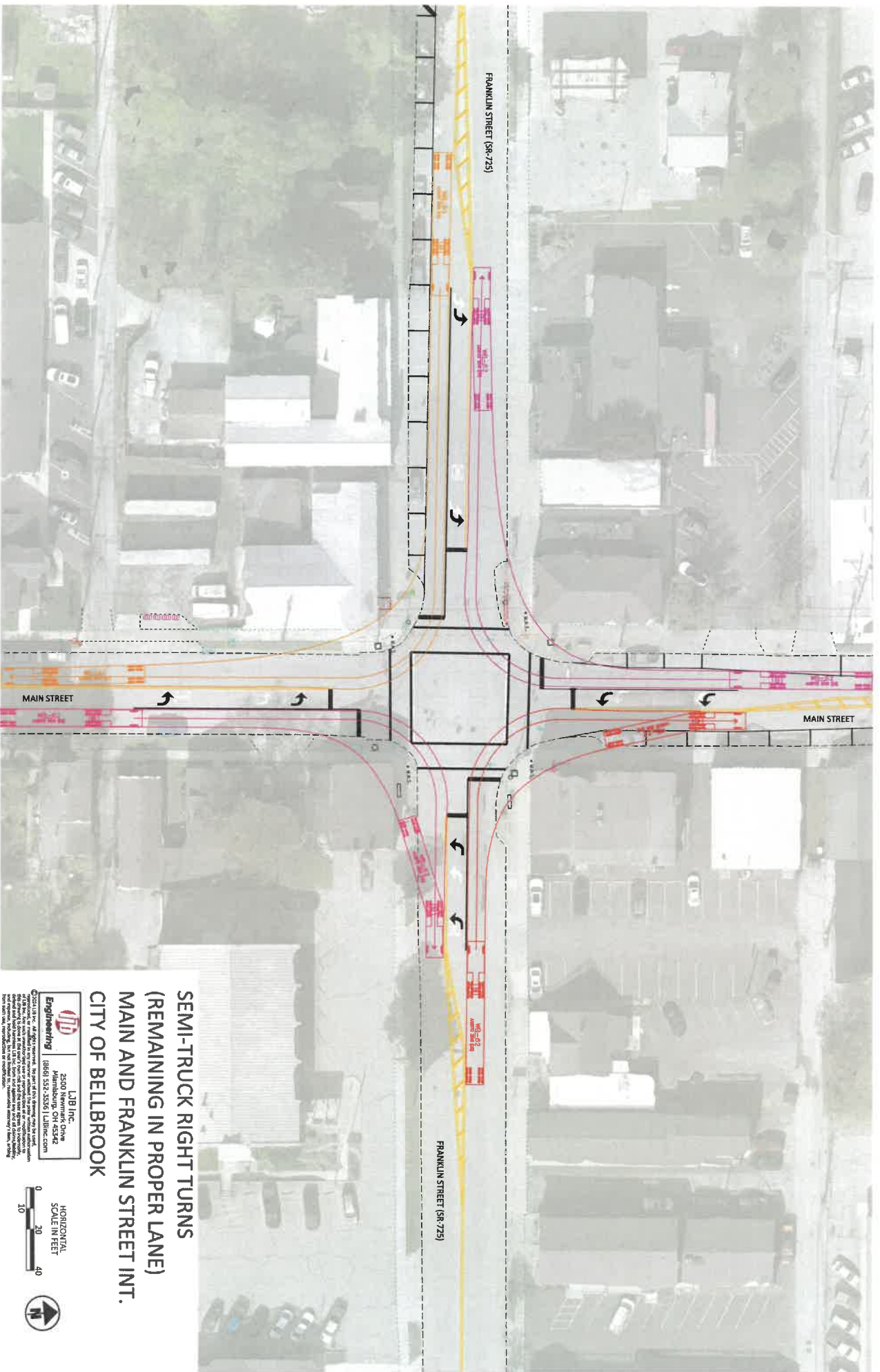


SEMI-TRUCK RIGHT TURNS (CROSSOVER LANES) MAIN AND FRANKLIN STREET INT. CITY OF BELLBROOK


LJB Inc.
 Engineering
 3500 N. Main Street
 Columbus, OH 43262
 (614) 535-5555 | ljbinc.com



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**SEMI-TRUCK RIGHT TURNS
(REMAINING IN PROPER LANE)
MAIN AND FRANKLIN STREET INT.
CITY OF BELLBROOK**

LJB Inc.
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