

Commision members;

Thank you for the opportunity to give you my comments on the above mentioned ammendment concerning the maximum size of walkway gravel in rail yards.

I am a railroad switchman for the BNSF, with 39 years experience. I have worked in many rail yards all over our state.....some safe, and others less safe. The safest rail yards all have a good surface for us to walk on.To me the definiton of "good walking surface" is one that is clean, level, and one that has gravel the correct size to allow it to pack down to give a stable surface to walk on. Your commission correctly reconized this fact, and suggested using crushed rock no larger than 3/4 inch as the industry standard in WAC 480-60-035.

Unfortunately rail carriers in this state have not responded to your suggestions and are hell bent on installing large diameter gravel, not because its safe but rather because they can use larger diameter "Main line ballast" under the misconception that one size gravel fits all. The irony here is not that the 3/4 inch minus gravel will not cost more, it's just handier for the carriers to keep one size on hand. You will hear red herring arguements from the carriers that the size chosen is to address drainage and mud issues. If these conditions exist , they should be corrected by grading, culverts, french drains, etc, and then after that is accomplished, covered by the appropriate crushed rock, i.e. 3/4inch minus crushed rock.

It is just plain dangerous and physically debilitating to work long term on gravel larger than the suggested industry standard of 3/4/ inch.

I urge you to not suggest, but rather legislate rail carriers to comply, by ammending WAC480-60-035.

Respectfully;

Gary Gibbs

I urge your commission to amend the above WAC480-60-035