

Department of Public Works



Mayor Janda Volkmer

October 13, 2000

State of Washington
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW, PO Box 47250
Olympia, WA 98504-7250

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REGISTRATION DIVISION
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Draft Railroad Operation Rules – Written Comments

Dear Commission:

Thank you for the opportunity to submit comments on your Draft Railroad Operation Rules. The following are our Town of Steilacoom comments:

New Section WAC 480-62-X1.8(3), Evidence of what constitutes an “essentially local safety hazard.” Item (b) covers only natural conditions. Human-made conditions should also be considered. For example, track curvature/geometry can limit sight distance and cause a local safety hazard. Another example in the Town of Steilacoom is the ferry dock, a human-made condition, where school children to/from Anderson Island and McNeil Island must cross the tracks twice a day. This safety concern would not be considered by the rule as written.

New Section WAC 480-62-X2.6, Crossing Surfaces. This section requires local governments to maintain roadway approaches to within one foot of the outermost rail, even the portion within the railroad right-of-way. It appears that this only applies to the surfaces (i.e., road surface, pedestrian walkways, road shoulders). It should be clarified that this maintenance and repair requirement within the roadway approaches does not include such things as signals, signs, gates, fences, brush clearing, tree removal, etc. that are located within the railroad right-of-way. Responsibility for these requirements must remain with the railroad companies.

WAC 480-62-X2.8, Flaggers. In paragraph (8)(e) concerning flagger breaks, add to the end of this paragraph, “During breaks, another qualified flagger must take over the flagging duties”.

If you have any questions, please don't hesitate to call me at (253) 581 1912.

Sincerely,

David K. Gebert, P.E.
Director of Public Works