



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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April 18, 2016

Mark McCauley, Acting County Manager
Clark County
1300 Franklin Street
Post Office Box 5000
Vancouver, Washington 98666-5000

Sent via Email and First Class Mail

Re: TR-160237, Notice of Intent to Establish a Quiet Zone, Northwest 122nd Street

Dear Mr. McCauley:

Thank you for the opportunity to comment on the Northwest 122nd Street proposed quiet zone, as described in Docket TR-160237.

The Washington Utilities and Transportation Commission (UTC) received notice on February 23, 2016, from Clark County (County) of its intent to establish a railroad quiet zone at the Northwest 122nd Street highway-rail grade crossing, DOT #092421N. The County is proposing a quiet zone at the crossing which will be in effect 24 hours per day, seven days per week.

UTC staff previously filed comments on similar proposals by the County in March 2012, and August 2013. After reviewing the County's most recent proposal, UTC staff provides the following comments.

Crossing inventory data on file with the Federal Railroad Administration (FRA) for the 122nd Street crossing is still inaccurate. UTC staff will work with FRA to update sections 3, 4 and 5 of the U.S. DOT Crossing Inventory Form for the Northwest 122nd Street crossing based on information provided by the County in the Notice of Intent (NOI). It is staff's opinion that the inaccurate crossing data does not impact the integrity of the risk assessment including the Alternate Safety Measure analysis because the average daily traffic and roadway speed limit are both lower than what is recorded in the FRA database. However, UTC staff is concerned that the FRA crossing inventory, identifies the train detection as "DC" at this crossing which does not meet the minimum train detection requirement of "constant warning." The County should

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contact BNSF Railway Co., to clarify the type of train detection at the crossing and/or work with the railroad to upgrade it prior to implementing a quiet zone at this crossing.

UTC staff reiterates its concern of the restricted sight distances in the northeast (40 feet) and southeast (300) quadrants of the crossing but acknowledges that in the event of a signal failure, the crossing gates will lower into a downed position thus creating a barrier to drivers attempting to traverse the crossing. The required minimum sight distance is 700 feet, which is significantly deficient at the crossing.

The narrow roadway and steep grade changes on both approaches to the crossing present additional challenges for drivers especially those pulling boats or other recreational equipment over the crossing.

Currently, the County proposes to install "Qwik Kurb" mountable medians with three foot high channelization devices on both approaches to the crossing; 75 feet on the west and 50 feet on the east side. UTC staff acknowledges that FRA regulations accept the use of "Qwik Kurb" as supplemental or alternative safety upgrades, however it is UTC's staff opinion that this type of channelization is less effective than non-traversable median barriers. Qwik Kurb is designed to allow vehicles to drive over them resulting in little or no damage to the vehicle. Non-traversable medians provide a higher disincentive for drivers to disregard them because of the potential resulting damage to the vehicle.

In conclusion, Commission staff acknowledges that the Northwest 122nd Street railroad crossing qualifies for designation as a quiet zone as proposed by the County, however UTC staff recommends that the County consider mitigating the issues identified in these comments.

Thank you for the opportunity to provide comments. Please feel free to contact Kathy Hunter at 360-664-1257 or by email at khunter@utc.wa.gov if you would like additional information.

Sincerely,



Steven V. King
Executive Director and Secretary

cc: John Shurson and Richard Wagner, BNSF Railway
FRA Associate Administrator for Safety
Kurt Laird, AMTRAK
Ahmer Nizam, WSDOT
Christine Adams, FRA