



Community
Transit

Administrative
Offices
1133 164th St. SW
Suite 200
Lynnwood, WA
98037-8121

QA-18383

February 14, 1994

(206) 348-7100
Fax 353-4749

F HWA 97-2212-26
OFFICE
49-33

Tom Klimek
Federal Highway Administration
Room 4232, HCC-10
Office of the Chief Counsel
400 Seventh Street, SW
Washington, DC 20590

Re: Docket No. 93-33

Dear Mr. Klimek:

As a public transit provider Community Transit is vitally concerned with the maintenance of the Public Right of Way. As the request for comments in the Federal Register points out, in recent years the question of axle weight limits for public transit vehicles has been a subject of discussion and action in the State of Washington. Since approximately half of Community Transit's boardings are on routes that use the Interstate system, the issue of axle weight limits is obviously of great importance.

In 1987 the local MPO (at that time the PSCOG) undertook a study of this issue. Through the course of the study it became clear that the current weight limits, which are based on static load, did not correlate well with actual pavement wear. A standard that is based on a wider range of vehicle characteristics, including suspension type and other factors, would more closely approximate the dynamic loads that are responsible for pavement wear. Even though the full size buses in Community Transit's fleet do exceed the weight limits when fully loaded, it is not by a large amount. Further, all of these vehicles are equipped with air suspension systems that reduce dynamic loads.

It was also recognized in the study that mid-sized agencies such as Community Transit have very little power to influence the manufacturers of transit vehicles. For market forces to be effective, new standards for transit vehicles must be nation-wide. Only then will the economies of scale make it worthwhile for manufacturers to meet the standards.

WPS1/CP
Revised: 02/14/94

FHWA DOCKET 93-33-24
PAGE 1 OF 2

Therefore, Community Transit suggests the following for consideration by the FHWA:

Weight limits on public transit vehicles should be raised or suspended until standards can be developed that more accurately reflect vehicle impacts on pavement wear.

To assist in developing these standards the FHWA may wish to undertake a study that compares pavement wear on an HOV lane with an adjacent general purpose lane (though any real-use comparison will have to deal with variables that are not easily quantified, this may still provide useful information).

Given the time and cost associated with acquiring new transit vehicles, grandfathering in the existing fleet is a necessity.

The transit agencies should continue to work with the private sector to develop lower weight coaches and products to retrofit existing coaches where practical.

Community Transit appreciates the opportunity to comment on this issue. An effective resolution will need to take into consideration the multiple goals of public transit and highways. If the FHWA would like more information on Community Transit's experiences in attempting to address the vehicle weight limits, ADA requirements, Clean Air Act requirements or other related challenges, please feel free to contact me at (206) 348-7103 or Charles Prestrud at 348-7129.

Sincerely,



William B. Mac Cully
Director of Transit Development

WM/CP

cc: J. Ristau, Interim Executive Director
C. Prestrud, Supervisor of Comprehensive Planning