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October 24, 2018

Rob Brown, P.E.
City Traffic Engineer
220 Fourth Avenue South
Kent, WA 98032

RE: City of Kent NOI: Downtown Kent Quiet Zone BNSF Response

Mr. Brown,

BNSF is in receipt of the City of Kent (“City”) Notice of Intent (“Notice”) dated August 24, 2018 for a proposed quiet zone (“Quiet Zone”) at the crossings listed below. At the outset of this letter, BNSF would like to be clear that we believe that if not properly accounted for with appropriate safety enhancements, the elimination of the train horn can be detrimental to safety. BNSF writes this comment letter based in part upon requirements set by FRA in the Train Horn Rule (“Rule”) at 49 CFR 222.

DOT#	Crossing Name	RR Milepost	Safety Measure
085625H	S 212 Street	14.190	SSM/ traversable medians with delineators 126’ and 100’
085629K	E James Street	15.942	ASM/ traversable medians with delineators 110’ and 110’
085633A	E Smith Street	16.179	ASM/ traversable medians with delineators 95’ and 106’
085636V	E Meeker Street	16.289	SSM/ traversable medians with delineators 65’ and 98’
085637C	E Gowe Street	16.339	ASM/ traversable medians with delineators 65’ and 98’
085639R	E Titus Street	16.436	Traversable medians with delineators 72’ and 65’*
085640K	Willis Street/State Route 516	16.557	Traversable medians with delineators 100’ and 100’*
085642Y	S 259 th Street	17.090	Traversable medians with delineators 110’ on east side*

*City of Kent to confirm if they are using modification as credits for ASM

The train horn is intended to alert the motoring and pedestrian public of train movement. The City should use the Rule as a minimum guideline in its approach to creating a situation where the train horn is

eliminated as a safety measure. For any quiet zone implemented on BNSF-owned track, we strongly recommend each crossing receive appropriate enhanced safety devices to accommodate for removal of the horn prior to the establishment of the quiet zone.

BNSF acknowledges and appreciates the City's efforts to install Supplemental Safety Measures ("SSM") and Alternative Safety Measures ("ASM") at this multi-crossing Quiet Zone. BNSF understands the City plans to use traversable medians with traffic channel devices. Please note that we do not support the use of traversable medians and strongly encourage City to use non-mountable concrete center medians with a minimum height of 7" instead. Posts or delineators used on the channelization devices can bend or break; please note that the City is responsible for the cost and maintenance of these devices. Further, additional signage and enhancements were discussed at the diagnostic meeting. Please ensure these are implemented in accordance with the diagnostic notes. Additional comments for each crossing can be found below.

- S 212th Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - Taller barriers at the center islands to better protect median signal gate arms are recommended. Two previously incidents where vehicles struck the signal equipment.
 - Installation of LED lights for all signals strongly recommended.
 - The 2011 study prepared for BNSF by Campbell Technology Corporation identified the simultaneous preemption currently in place does not provide enough time for a design vehicle to clear the track. It is strongly recommended that the City addresses the queuing concerns at this location.
- E James Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - City previously proposed addition of a fence along the eastern ROW line, approximately 1,800' north of the crossing where pedestrian trespassing has been observed. Please confirm this will be installed.
 - Crossing currently has significant vehicle queues. BNSF previously issued a study which recommended interconnection at the crossing, but the City has not addressed BNSF's concerns to date.
 - Installation of LED lights for all signals strongly recommended.
- E Smith Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - City previously proposed addition of a fence along the eastern ROW line to deter pedestrian trespassing. Please confirm the fence installation.
 - Crossing currently has significant vehicle queues. BNSF previously issued a study which recommended interconnection at the crossing, but the City has not addressed BNSF's concerns to date.
 - Installation of LED lights for all signals strongly recommended.
- E Meeker Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - East median proposed at 98'. Preferred length is 100' or greater.
 - City previously proposed addition of fence along the west side of the mainline within park properties both north and south of the street to deter pedestrian trespassing. Please confirm the fence installation.

- Crossing currently has significant vehicle queues. BNSF previously issued a study which recommended interconnection at the crossing, but the City has not addressed BNSF's concerns to date.
 - Installation of LED lights for all signals strongly recommended.
- E Gowe Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - East median proposed at 98'. Preferred length is 100' or greater.
 - City previously proposed addition of fence along the west side of the mainline within park properties both north and south of the street to deter pedestrian trespassing. Please confirm the fence installation.
 - Installation of LED lights for all signals strongly recommended.
 - Crossing currently has significant vehicle queues. BNSF previously issued a study which recommended interconnection at the crossing, but the City has not addressed BNSF's concerns to date.
- E Titus Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - Please confirm ASM applications for the center medians will be submitted to and reviewed by the FRA.
 - Please be aware that the spur track adjacent to this crossing will not be a part of the quiet zone, and as a result the train horn will be sounded when trains occupy the crossing.
 - City previously proposed addition of fence along the west side of the mainline between Titus and Gowe to deter pedestrian trespassing. Please confirm the fence installation.
 - Installation of LED lights for all signals strongly recommended.
- Willis Street/State Route 516
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - Crossing currently has significant vehicle queues. BNSF previously issued a study which recommended interconnection at the crossing, but the City has not addressed BNSF's concerns to date.
 - Please confirm ASM applications for the center medians will be submitted to and reviewed by the FRA.
 - Installation of LED lights for all signals strongly recommended.
- S 259th Street
 - Non-mountable medians strongly preferred to the proposed mountable medians with delineators.
 - Center median strongly recommended on west side of crossing, currently only proposed on east side of crossing.
 - Truck entrance in NE quadrant can cause vehicle queuing on tracks while trucks maneuver into storage facility. The City needs to address these concerns with traffic control plans.
 - Please confirm ASM applications for the center medians will be submitted to and reviewed by the FRA.
 - Installation of LED lights for all signals strongly recommended.

Please review the requirements, specifically with regard to median length and height requirements as well as allowance of driveways, and confirm if the safety measures will qualify as an SSM under Appendix A. Should the safety measure not meet the SSM requirements under the Rule, the City is required to submit an application to FRA for the approval of the ASM and this Quiet Zone.

Please provide a written response prior to issuing any further notices for any items where we are requesting further information/confirmation.

The City is required to issue a Notice of Establishment ("NOE") for the Quiet Zone implementation. In the Notice of Establishment, the City should certify that the required SSMs and ASMs have been constructed and comply with the requirements set forth in Appendix A or Appendix B of the Rule. Please ensure all proper advanced warning signage ("NO TRAIN HORN", etc.) will be installed. City of Kent, by issuing the NOE, certifies that it has proper jurisdiction to establish the Quiet Zone, and that the Quiet Zone meets or exceeds federal requirements. If BNSF can be of further assistance, please feel free to contact me or French Thompson, Public Projects Director for BNSF, 2600 Lou Menk Drive, OOB3, FW, TX 76131 (Office phone 817-352-1549).

Regards,



Stephen Semenick
Manager Public Projects, BNSF Railway

cc: Union Pacific Railroad
Engineering Department
Re: Quiet Zone Establishment
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Omaha, NE 68179

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cc via electronic mail:

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