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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

CITY OF FIFE,

Petitioner,

v.

UNION PACIFIC RAILROAD,

Respondent.

DOCKET TR-100098

PREPARED REBUTTAL TESTIMONY
OF CHARLES E. BURNHAM, P.E.

1. Please State your name, job title, and place of business.

Charles E. Burnham, PE
Vice President/Senior Project Manager
David Evans and Associates, Inc.
3700 Pacific Highway East, Suite 311
Fife, WA 98424

2. What is the purpose of your rebuttal testimony?

I am testifying in response to the pre-filed testimony of Terrel A. Anderson.

3. Have you read the pre-filed testimony of Terrel A. Anderson?

Yes, I have.

4. Do you have any concerns with Mr. Anderson's testimony?

1 Yes, I do. On page three of his testimony, he states that “cost alone, especially if it is not an
2 extraordinary cost, is not sufficient reason to choose an at-grade crossing over a grade-separated
3 crossing.” Contrary to this assertion, cost is not the only factor supporting an at-grade pedestrian
4 crossing over a grade-separated crossing at this location. A safe pedestrian crossing at the proposed
5 location is an immediate need, and funding for construction of an at-grade crossing is attainable now,
6 where a stand-alone pedestrian grade separation could take years to fund and construct. (Exhibit No.
7 ___ RB-1T). The proposed crossing is adjacent to an existing at-grade crossing. The crossing is over
8 a single track, rather than multiple tracks. The track gets relatively light use (85 trains per week), and
9 the trains pass at low speeds (an average speed of 18.4 miles per hour). (Exhibit No. ___ (BB-2)). All
10 of these factors are reasons to choose an at-grade crossing over a grade-separated crossing at this
11 location.

12 Mr. Anderson also states on page 3 of his testimony that “most crossing accidents occur at
13 signalized crossings.” This statement might appear to indicate that signalization does not improve
14 crossing safety. In reality, the reason that most accidents occur at signalized crossings is that there is
15 significantly more traffic crossing at signalized crossings than at passively protected crossings. The
16 use of crossing signals and gates does improve grade crossing safety.


17 In page 4 of his testimony, Mr. Anderson states that it is his understanding “that the majority
18 of students living south of the tracks ride the school bus and do not cross the tracks illegally.” The
19 reason many of the students living south of the tracks have to take the bus to school is because the
20 nearest pedestrian crossings are approximately one mile in either direction from 54th Avenue. Even if
21 a majority of the students living south of the tracks do not cross the tracks to get to/from school, that
22 leaves a substantial number of students that do. Also, although school busing may be available right
23 before and right after school, it is not available at other times and on weekends.
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Declaration

I, Charles E. Burnham, declare under penalty of perjury under the laws of the State of Washington that the foregoing Testimony of Charles E. Burnham, P.E. is true and correct to the best of my knowledge and belief.

Dated this 17TH day of January, 2011



Charles E. Burnham