

**Exhibit No. ___ (KH-24)
Docket TR-100098
Witness: Kathy Hunter**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

CITY OF FIFE,

Petitioner,

v.

UNION PACIFIC RAILROAD,

Respondent.

DOCKET TR-100098

EXHIBIT TO REBUTTAL TESTIMONY OF

Kathy Hunter

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

UTC Staff Analysis of Union Pacific Spreadsheet (KH-23)

January 19, 2011

WASHINGTON
UTC
UTILITIES AND TRANSPORTATION
COMMISSION

TO: Kathy Hunter, Deputy Assistant Director
FROM: Paul Curl, Policy Specialist
DATE: January 5, 2011
SUBJECT: Staff Analysis – Union Pacific Railroad (UPRR) Data

At your request, I performed an analysis of train movements in the UPRR Fife yard, based on data provided by the company in response to UTC Staff Data Requests dated September 9, 2010. In particular, you asked me to determine if, and how often, a train moving in to or out of the Fife yard would block the crossing at 54th Avenue East in Fife for more than ten minutes.

My analysis covers the period of August 21, 2010, through September 25, 2010. It is based on a spreadsheet provided by UPRR in response to Staff Data Request No. 3. The spreadsheet provides information on train moves at the Fife Yard for five UPRR trains: IDUSE, IG4SE, IBASE, MHKFI, and MPTFI. In its narrative response to Staff Data Request No. 03, UPRR concluded that the information on the spreadsheet shows that 96 of 120 trains would have stopped on the 54th Avenue East grade crossing.

In my analysis, I looked at facilities beyond the 54th Avenue East crossing. I identified those where neighborhood residents would likely go over the railroad tracks to get to the facilities. One such facility is Columbia Junior High School (CJHS), where school children residing south of the tracks would very likely cross the tracks at 54th Avenue East on their way to and from school. The school day at CJHS begins at 7:40 a.m. and ends at 2:30 p.m. For the purpose of this analysis, I assumed that the prime time periods for students to use the proposed pedestrian grade crossing to be between 7:10 and 7:40 in the morning and again between 2:30 – 3:00 in the afternoon, although students may be using the crossing at any time between those hours.

In addition to CJHS, there are other public facilities in the vicinity that could cause pedestrians to cross the tracks, including a city park, museum, multi-purpose pathway, playground and athletic fields. Residents from the housing developments south of the 54th Avenue East crossing would likely use the crossing to access these facilities. For the purpose of this analysis, I assumed that residents (including children) would generally use the crossing from 7:00 a.m. to 8:00 p.m. daily.

In terms of the information provided by UPRR, I looked for trains that appeared likely to have blocked the 54th Avenue East crossing for more than ten minutes during times that pedestrians

would potentially be using the crossing. While UPRR stated that the information covered 120 trains during the test period, I found only 74 train movements where the data was complete enough to perform a reasonable analysis. I assumed that any train longer than 2,827 net feet¹ would stop on the crossing. This is the distance between the edge of Fife yard and the crossing (see UPRR response to Staff Data Request No. 2). I also assumed that if a train was at the yard for more than 30 minutes, it likely blocked the 54th Avenue East grade crossing for at least ten minutes.

Of the 74 train movements, I categorized the potential conflict between trains and pedestrians as high or low risk. I assumed that pedestrians could potentially be using the crossing at any time between the hours between 7:00 a.m. and 8:00 p.m. daily. If a train likely stopped on the crossing for more than ten minutes at any time during these hours, I categorized it as high risk. All other movements, I categorized as low risk.

Summary: During the approximately one-month period UPRR provided data, it performed 15 high risk movements and 59 low risk movements. The high risk movements are listed in the chart, below. I identified one movement, listed as #3 in the chart below, as particularly risky because it occurred during a time when students from CJHS would be walking home from school.

	Train	Date	Arrival	Departure	Train Length (net feet)
1.	IDUSE	Sunday, September 5, 2010	1:36 p.m.	2:31 p.m.	6,330
2.	IDUSE	Tuesday, September 7, 2010	10:58 a.m.	11:56 a.m.	2,924
3.	IDUSE	Wednesday, September 8, 2010	2:40 p.m.	3:40 p.m.	3,261
4.	IDUSE	Monday, September 20, 2010	10:40 a.m.	11:29 a.m.	3,834
5.	IG4SE	Saturday, August 28, 2010	6:53 p.m.	7:57 p.m.	4,449
6.	IG4SE	Sunday, August 29, 2010	10:01 a.m.	11:04 a.m.	4,430
7.	1G4SE	Monday, August 30, 2010	4:27 p.m.	6:02 p.m.	5,698
8.	IG4SE	Saturday, September 4, 2010	2:40 p.m.	3:57 p.m.	5,476
9.	IG4SE	Monday, September 6, 2010	10:41 a.m.	11:36 a.m.	5,248
10.	IG4SE	Tuesday, September 7, 2010	2:00 p.m.	2:32 p.m.	3,361
11.	1G4SE	Wednesday, September 8, 2010	5:53 p.m.	6:59 p.m.	4,215
12.	IG4SE	Thursday, September 9, 2010	6:22 p.m.	7:33 p.m.	5,122
13.	IG4SE	Wednesday, September 15, 2010	6:14 p.m.	6:46 p.m.	3,027
14.	MPTFI	Monday, August 23, 2010	4:06 p.m.	6:04 p.m.	4,028
15.	MHKFI	Thursday, September 2, 2010	12:21 p.m.	1:05 p.m.	4,109

Please let me know if you have comments or questions.

¹ Total length of train less length of block of cars behind Tacoma cars.