



1 Graduate of Spokane Falls Community College in Liberal Arts 1976.

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3 **3. How long have you been employed by the City of Kennewick?**

4 I began my employment with the City of Kennewick on July 31, 1989.

5  
6 **4. Please describe your work duties?**

7 Project management for the Columbia Center Boulevard/BNSF Grade Separation Project,  
8 the Center Parkway Extension/Gage Boulevard Widening Project, the Zone 3 Reservoir  
9 Project, the Zone 4 and 5 Reservoir Design, the City-wide Transportation System Plan,  
10 the Steptoe Street Project Development Plan, the City of Kennewick Storm Water  
11 Management Plan and the US 395/27<sup>th</sup> Avenue and 36<sup>th</sup> Avenue Intersection  
12 Improvements. I represent/have represented the City on the Eastern Washington Model  
13 Storm Water Program Sub-Committee, the Underground Injection Control Technical  
14 Advisory Committee, the NPDES Phase 2 General Permit for Construction Storm Water  
15 Activities Advisory Committee and the Eastern Washington Storm Water Manual  
16 Hydrologic Analysis Sub-Committee. I develop project estimates for grant applications,  
17 assist with biennial budget preparation, and assist with the development of the City Six-  
18 Year Capital Improvement Program.

19  
20 **5. Can you describe the Center Parkway Extension project?**

21 The Cities of Kennewick and Richland are working together, with Kennewick  
22 acting as lead agency, to extend Center Parkway from the existing intersection at Gage  
23 Boulevard in Kennewick to the existing intersection at Tapteal Drive in Richland. It is  
24 part of a larger project that includes the widening of Gage Boulevard from Leslie Road in  
25 Richland to Center Parkway in Kennewick, including the construction of a double lane

1 roundabout at the intersection of Gage Boulevard and Center Parkway. The Cities have  
2 decided to construct the project in phases due to the extended negotiations surrounding the  
3 crossing of the UPRR and Port of Benton tracks. Center Parkway will be the final phase.

4 Center Parkway is functionally classified as a minor arterial. When completed, it  
5 will have one travel lane in each direction, with adequate width to provide for left turn  
6 storage or median barriers as appropriate. The horizontal alignment of the street will cross  
7 the 4 existing railroad tracks, two belonging to Union Pacific Railroad and two belonging  
8 to the Port of Benton and that are under lease to Tri City and Olympia Railroad. A portion  
9 of the street, south of Tapteal Drive, was built in conjunction with the construction of a  
10 Holiday Inn Express. This will be incorporated into the overall project. The vertical  
11 alignment of the street has not been finalized, pending resolution of the railroad issues.  
12 The project could involve anywhere from one to four at-grade crossings.

13 The goal of the project is to stimulate economic development in both Cities and  
14 provide important access between the commercial areas along Tapteal Drive and in and  
15 around Columbia Center Mall.

16  
17 **6. *Can you describe your role on the Center Parkway extension project?***

18 Management of the consultant agreement for the design of this project. Coordination with  
19 other agencies and entities to resolve conflicts and design issues. Administration of the  
20 federal grants for the project.

21  
22 **7. *Has the City consulted with any outside sources on the Center Parkway***  
23 ***project?***

24 The firm of SCM Consultants, Inc. was hired to perform the design services for the  
25 project. The firm of HDR Engineers, Inc., as a sub-consultant to SCM Consultants, Inc.,

1 has performed conceptual design work regarding alternative track configurations for  
2 maintaining switching operations at Richland Junction. The firm of HDR Engineers, Inc.  
3 was also hired directly to assist with negotiations between the City and Union Pacific  
4 Railroad to relocate switching operations between Union Pacific Railroad and Tri-City &  
5 Olympia Railroad to another location. The firm of Foster, Pepper & Shefelman PLLC was  
6 consulted concerning the feasibility of condemning a crossing of the Union Pacific  
7 Railroad right-of-way.

8  
9 **8. *Can you identify each outside entity and its role on this project?***

10 The City of Richland is an equal partner in the project. Public Utility District #1 of Benton  
11 County has an electrical sub-station adjacent to the project. The City will be required to  
12 acquire right-of-way from the PUD as well as maintain ingress/egress for tractor/trailers  
13 post-project. Other right-of-way acquisition will be required from the Mall (Simon Corp.),  
14 Columbia Center West, Banner Bank, and Columbia Center Estates. Mail by the Mall will  
15 require relocation. We will require a crossing of the Union Pacific Railroad right-of-way  
16 and the Port of Benton right-of-way. The Port of Benton right-of-way was deeded to them  
17 by the Department of Energy and is under lease to the Tri-City & Olympia Railroad. The  
18 right-of-way within the Richland city limits was donated by developers. A Rural  
19 Economic Vitality grant was obtained through the Community Economic Revitalization  
20 Board, an STP Regional Competitive grant was obtained through the Benton Franklin  
21 Governmental Council and the City of Richland has dedicated a portion of its STP Direct  
22 Allocation funds to the project.

23  
24 **9. *Who would you consider to be the lead person in charge of making technical***  
25 ***decisions related to the grade crossing?***

1 SCM Consultants has been contracted to provide the design services for the project. As  
2 project engineer there are many design issues that can be resolved at my level, however,  
3 the City Engineer must ultimately approve the plans and specifications.  
4

5 **10. Who made the final decision on whether an above or below grade crossing**  
6 **was feasible?**

7 A grade separated crossing was not considered economically feasible from project  
8 inception by both Cities and our consultant.  
9

10 **11. Who made the final decision on whether an at-grade crossing was**  
11 **technically feasible?**

12 The Kennewick City Engineer, Kennewick Traffic Engineer, and myself determined the  
13 feasibility of an at-grade crossing.  
14

15 **12. In making that decision, who evaluated the safety issues related to an at-**  
16 **grade crossing?**

17 The Kennewick City Engineer, Kennewick Traffic Engineer, and myself.  
18

19 **13. In general, what are the risks of an at-grade crossing?**

20 The potential for vehicle-train conflicts, pedestrian-train conflicts, emergency vehicle  
21 delays, and general traffic delays.  
22

23 **14. What specific risks would this project present if an at-grade crossing is**  
24 **constructed?**  
25

1 There are no known risks specific to this project. The potential for vehicle-train conflicts  
2 and pedestrian-train conflicts at this crossing would be less than at a mainline crossing due  
3 to the low volume of train traffic, the low speed of train traffic and the low speed of  
4 vehicular traffic.

5  
6 **15. Has anyone projected the volume of traffic on Center Parkway if it is**  
7 **extended?**

8 The Transpo Group completed a study in July 1997 (see page 7 of the design report by  
9 SCM Consultants attached as Exhibit 1).

10  
11 **16. Can you describe the number of lanes of travel and the project speed limit in**  
12 **the area of the extension?**

13 One lane of traffic in each direction is proposed. The posted speed limit will depend on  
14 the final vertical alignment at the crossings and will be a minimum of 15 MPH to a  
15 maximum of 30 MPH.

16  
17 **17. Can you provide the projected traffic volume for this project?**

18 Projected volumes initially are 2,200 average daily traffic (ADT), increasing to 4,250  
19 ADT by the year 2023 (see figures 3b and 3c of the design report by SCM Consultants).

20  
21 **18. Please describe the topography of the area of the extension.**

22 The elevations are depicted in Exhibits 2 – 4 attached herein. Between Gage  
23 Boulevard and the UPRR tracks is developed commercial property and the BPUD sub-  
24 station. East of the proposed roadway in this area is undeveloped commercial property.

1 Between the UPRR tracks and the TC&ORR tracks is a tract used for RV storage  
2 and owned by the Columbia Center Estates Homeowners Association.

3 Between the TC&ORR tracks and Tapteal Drive is the partially constructed portion of  
4 Center Parkway. A Holiday Inn Express lies to the east and undeveloped commercial  
5 property to the west.

6 The length of the proposed roadway from the intersection at Gage Boulevard to the  
7 intersection at Tapteal Drive is approximately 1,670 linear feet. The elevation at Gage  
8 Boulevard is 447.50 feet; the elevation at the UPRR southerly track is 446.60 feet; the  
9 elevation at the UPRR northerly track is 446.07 feet; the elevation at the TC&ORR  
10 southerly track is 442.60 feet; the elevation at the TC&ORR northerly track is 442.69 feet;  
11 the elevation at Tapteal Drive is 409.39.

12  
13 **19. Please describe any difficulties that an at-grade crossing presents due to the**  
14 **topography of the area between the tracks.**

15 Attached herein as Exhibit 5 is an exhibit that depicts how an at-grade profile would be  
16 accomplished and look. If no changes were permitted to the existing tracks, the transition  
17 between the two crossings would be abrupt by roadway standards. It would be  
18 approximately the same as pulling into a driveway; therefore the posted speed limit would  
19 be 15 MPH.

20  
21 **20. If an at-grade crossing is granted, describe what it would look like? If**  
22 **helpful, refer to any exhibits that will depict the final product. Include in**  
23 **your description the lanes of travel, gates, and crossing signals.**

24 An at-grade crossing, with the tracks left in their existing position, would create a street  
25 profile very similar to a City of Kennewick standard driveway. This is not desirable, but

1 easily traversable by all vehicles, including low-boy tractor trailers. This configuration  
2 would require that the speed limit be set at 15 MPH. Traffic calming would likely be  
3 installed to ensure the reduced speeds. We will seek permission from the Federal Railroad  
4 Administration to installation a silent crossing. This will necessitate the installation of  
5 median barriers and crossing gates that fully block all four quadrants of the roadway to  
6 prevent motorists from trying to “sneak through.”  
7

8 **21. Are there any cost estimates for at-grade crossing?**

9 The cost for a silent at-grade crossing has been estimated at \$500,000.00.  
10

11 **22. Can you contrast those estimates with cost estimates associated with an  
12 above or below grade crossing?**

13 The cost of a grade separated crossing is estimated at \$15-20 million due to the extensive  
14 amount of retaining walls and the likelihood of additional business relocations, including  
15 the possible relocation of the Public Utility District #1 of Benton County electrical sub-  
16 station.  
17

18 **23. What is the distance of the next closest crossing of the UPRR lines that allow  
19 north/south crossing of Union Pacific’s tracks?**

20 There is an at-grade crossing at Edison Street approximately 1.8 miles east of Center  
21 Parkway. There is also an at-grade crossing at Steptoe Street approximately 0.6 miles west  
22 of Center Parkway, but the UPRR tracks have been removed at this location. There is also  
23 a grade separated overpass on Columbia Center Boulevard, approximately .38 miles east  
24 of Center Parkway.  
25



1       **24.    *Are there any other factors that impacted the decision to install an at-grade***  
2       ***crossing?***

3    Yes.

4  
5       **25.    *Please describe any of those factors.***

6    The cities of Kennewick and Richland have spent several years trying to negotiate an  
7    agreement with UPRR to relocate their switching operations with TC&ORR to another  
8    location, thus eliminating the need for an at-grade crossing. The negotiations were  
9    unsuccessful.

10

11       **26.    *You previously provided testimony in September of 2005 before these***  
12       ***proceedings were consolidated. Have any changes in the project occurred***  
13       ***since that time?***

14    Yes. Since that time we have analyzed the intersection of Gage Boulevard and Center  
15    Parkway and have determined that a double lane roundabout would be more efficient than  
16    a signalized intersection.

17

18       **27.    *At the time you provided testimony in 2005, the focus of the proceedings was***  
19       ***on crossing the tracks of Union Pacific. Are there any changes that can be***  
20       ***made to the siding tracks that would mitigate the humps in the road due to***  
21       ***changes in elevation between tracks?***

22    As shown in the rail alternatives in appendix C of Exhibit 1, it is possible to construct  
23    additional sidings for railcar storage that would allow for most switching operations to be  
24    carried out to the east of Center Parkway, thus minimizing the number of times trains  
25    would need to cross the roadway. This concept would eliminate the at-grade crossings on

1 both of the sidings and allow construction of a much more desirable roadway profile. In  
2 addition to the alternatives in these attachments, it is possible to relocate a portion of the  
3 existing Port of Benton siding to the west, again eliminating an at-grade crossing of a  
4 siding track, and moving the switching operations entirely to the west of Center Parkway.  
5 These options could be constructed at a fraction of the cost of an undercrossing.

6  
7 **28. Have you had an opportunity to review the testimony filed by UPRR's expert,**  
8 **Raymond Wright?**

9 Yes.

10  
11 **29. Mr. Wright has suggested that a grade separated crossing is a feasible**  
12 **alternative. You have provided testimony on the economic-based**  
13 **considerations that led the City to conclude that a grade separated crossing**  
14 **was not feasible. Can you discuss any additional considerations that go**  
15 **beyond the cost associated with a grade separated crossing?**

16 There are several significant costs that would be incurred as a part of a grade  
17 separated crossing. Significant amounts of additional right-of-way and construction  
18 easements would be required in order to build the 20-30 foot high walls. The existing  
19 portion of Center Parkway between Tapteal Drive and the Port of Benton tracks would be  
20 unusable. Access to the Holiday Inn Express would be lost and require mitigation. The  
21 parking lot for the hotel would need to be removed in order to construct the walls. This  
22 would effectively put the hotel out of business for an extended period of time. Access to  
23 the commercial property to the west of Center Parkway would be eliminated.

24 At a minimum, the PUD's grounding grid for their substation would need to be  
25 removed, a temporary one installed and a replacement grid constructed in order to build

1 the wall. Access to the substation from Center Parkway would be eliminated. Alternate  
2 access to the substation would need to be acquired from the Mall to permit ingress/egress  
3 by their portable substation, which is mounted on a lowboy. It is possible that the entire  
4 substation would need to be partially or entirely moved.

5 Access to the Mall's pad sites would be impacted.

6 There are underground utilities in the area, such as water, sewer and power that  
7 would need to be reconstructed.

8 **30. Have you had an opportunity to read the pre-filed testimony of John**  
9 **Trumbull?**

10 Yes.

11

12 **31. Mr. Trumbull makes reference to the potential for noise from train whistles.**  
13 **Are there options other than train horns available that will mitigate or**  
14 **eliminate the impact of train horn noise?**

15 Yes.

16

17 **32. Can you describe the options that are available?**

18 As stated previously, the Cities will be seeking approval from the Federal Railroad  
19 Administration to construct silent crossing(s). If we do not obtain this approval, the Cities  
20 will likely opt for wayside horns, which have significantly less noise impacts on nearby  
21 residences and businesses.

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DECLARATION

I, Steve Plummer, declare under penalty of perjury under the laws of the State of Washington that the foregoing PREPARED TESTIMONY OF STEVE PLUMMER is true and correct to the best of my knowledge and belief.

DATED this 19<sup>th</sup> day of June, 2006.

  
\_\_\_\_\_  
STEVE PLUMMER