

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

BNSF RAILWAY COMPANY,

Petitioner,

v.

CITY OF MOUNT VERNON,

Respondent

SKAGIT COUNTY, WASHINGTON  
STATE DEPARTMENT OF  
TRANSPORTATION, WEST VALLEY  
FARMS LLC, and SKAGIT COUNTY,

Intervenors.

DOCKET NO. TR-070696

DECLARATION OF JEFFREY T.  
SCHULTZ IN SUPPORT OF JOINT  
RESPONSE IN OPPOSITION TO THE  
CITY'S MOTION IN LIMINE AND  
MOTION FOR SUMMARY  
JUDGMENT

Jeffrey T. Schultz declares and says:

I am an employee of Washington State Department of Transportation (WSDOT) in the Freight Systems Division, State Rail Office. Among other duties, I have served as Project Manager for the Mount Vernon Siding Extension Project since 2005, until recently. I make this declaration based on my personal knowledge.

DEC. OF JEFFREY T. SCHULTZ IN SUPPORT  
OF JOINT RESPONSE IN OPP. TO  
THE CITY'S MOTION IN LIMINE AND  
MOTION FOR SUMMARY JUDGMENT

1

ATTORNEY GENERAL OF WASHINGTON  
Transportation & Public Construction Division  
7141 Cleanwater Drive SW  
PO BOX 40113  
Olympia, WA 98504-0113  
(360) 753-6126 Facsimile: (360) 586-6847

1. As the project manager for this project throughout the relevant time period, I am familiar with the various community outreach efforts made by WSDOT, directly and through its contracted consultants, to the local community and government officials. Those efforts include the following:

2. On November 16, 2005, WSDOT signed a task order with on-call consultant firm Gary Struthers Associates, Inc. to conduct a traffic study on the impacts of closing Hickox Road at the BNSF Railway crossing in Skagit County. The consultant was instructed to gather traffic data from public entities, interview emergency responders and public agencies on potential impacts, model traffic flows and impacts due to the crossing closure now and 20 years in the future and set up meetings to discuss issues with interested agencies.

3. On approximately May 15, 2006, I received a copy of a letter from the Skagit County Department of Emergency Management addressed to Gary Struthers Associates, Inc.'s staff member, Lesley Struthers, expressing their support to keep Hickox Road open. A true copy is attached as Exhibit A to this declaration.

4. On May 16, 2006, Gary Struthers Associates, Inc.'s staff members, Lesley Struthers, Gary Norris and I traveled to Skagit County to meet with three public agencies to discuss the project and gather comments on a draft report entitled: "Hickox Road Railway Crossing Closure Traffic Impact Analysis."

5. We met with Skagit County Fire District No. 3 (SCFD) staff and commissioners. SCFD staff provided some limited data on response times and stated that they were opposed to closure. We requested more complete data on the number of responses and response times from

the SCFD staff. We also asked them to consider how the impacts could be mitigated. We presented them with a copy of a draft report entitled: "Hickox Road Railway Crossing Closure Traffic Impact Analysis" and requested that they review it and provide us with comments and/or suggestions by the end of June, 2006.

6. We met with the City of Mount Vernon Public Works Director, Esco Bell, and Jana Hanson, Community and Economic Development Director. We presented them with a copy of a draft report entitled: "Hickox Road Railway Crossing Closure Traffic Impact Analysis" and requested that they review it and provide us with comments and/or suggestions by the end of June 2006. Mr. Bell expressed the City of Mount Vernon's opposition to the road closure at this time because of its future expansion plans south of Hickox Road.

7. We met with Skagit County Public Works' staffers, Given Kutz and Ann Marie Gutwein. We presented them with a copy of a draft report entitled: "Hickox Road Railway Crossing Closure Traffic Impact Analysis" and requested that they review it and provide us with comments and/or suggestions by the end of June 2006. Mr. Kutz and Ms. Gutwein did not indicate any preliminary support or opposition to the proposal.

8. On May 17, 2006, I sent letters to all three of the above-referenced agencies to thank them for participating in our meetings and to document the June 30, 2006 date for comments on the draft report. A true copy is attached as Exhibit B to this declaration.

9. On July 7, 2006, we received a letter from Esco Bell, City of Mount Vernon Public Works Director with comments on the draft report. The letter expressed the City's opposition to the proposed closure due to perceived impacts on potential for commercial

development, transportation impacts and emergency vehicle access. A true copy is attached as Exhibit C to this declaration. Esco Bell's comments were forwarded to our consultants for review and discussion.

10. On July 12, 2006, I called Mr. John Van Pelt, of SCFD to ask if they were going to send any comments on the draft report. Mr. Van Pelt said he would and asked me to follow up with him and the SCFD's commissioners with a letter responding to some of the questions from the district. I said I would be happy to send a letter explaining the project in more detail.

11. On July 19, 2006, I called Given Kutz at Skagit County Public Works to ask if they were going to send comments on the draft traffic study. Mr. Kutz said they would.

12. On July 19, 2006, I called John Van Pelt at SCFD and asked if they were going to send comments on the draft traffic study. He said they would. He also asked me to meet with the district commissioners and staff again on August 8, 2006. I agreed.

13. On July 21, 2006, I received comments on the "Hickox Road Railway Crossing Closure Traffic Impact Analysis" from Mr. Kutz via e-mail. His comments included a number of technical changes to information on some of the roadways in the area. Skagit County also suggested that we analyze a new location for the siding and close another road instead of Hickox Road. Finally, Mr. Kutz informed me that Skagit County was preparing a resolution opposing the closure of the Hickox Road railway crossing. His comments were forwarded to our consultants for review and discussion. A true copy is attached as Exhibit D to this declaration.

14. On August 3, 2006, I mailed a follow-up letter to Mr. Van Pelt of SCFD as requested. I explained the reasons why the project could not be physically moved to a different

location as suggested by the district. I re-emphasized WSDOT's willingness to discuss mitigation options with the district, and that the project had a specific schedule and budget to meet, and that we would like SCFD's comments on the report as soon as possible. I provided a copy of this letter to Given Kutz at Skagit County Public Works. A true copy is attached as Exhibit E to this declaration.

15. On August 8, 2006, I received a telephone call from Ann Gutwein from Skagit County Public Works. She informed me that the Skagit County Commissioners had passed a resolution in opposition to the Hickox Road grade crossing closure at their July 31, 2006 meeting. I asked her to fax me a copy of the resolution and she did. A true copy is attached as Exhibit F to this declaration.

16. On August 8, 2006, WSDOT Rail Office staffer, Ebrahim Sahari, and I met with SCFD staff, Brian Snure, counsel for SCFD, and SCFD Commissioners at their headquarters in Skagit County at 7 p.m. Given Kutz from Skagit County was also in attendance. I provided a background of the Amtrak *Cascades*' program for the group to put the project into a context. I explained the reasons why the siding project could not be moved. We discussed mitigation proposals and I asked again for any comments on our report and for the response time information that we had requested in May. A follow-up meeting was set for August 22, 2006.

17. On August 22, 2006, I met with Brian Snure, counsel for SCFD, and the SCFD Commissioners at their headquarters in Skagit County. I was informed by the SCFD that I would be receiving comments on the draft report from Mr. Snure shortly. I asked again about additional response time data. I was told that since the agency was voluntarily staffed, that they

were unable to provide much information to us due to time constraints. I was told to work with Chief Dave Skrinde to get the information and to develop a mitigation proposal that would be acceptable to SCFD.

18. On August 25, 2006, I received a letter dated August 23, 2006 from Gary Jones, an attorney representing a concerned citizen, Richard Smith, with comments on the draft report. A true copy is attached as Exhibit G to this declaration.

19. On August 30, 2006, I received a letter dated August 25, 2006 from Brian Snure, representing SCFD. The letter contained comments on the draft report. A true copy is attached as Exhibit H to this declaration. His comments were forwarded to our consultants for review and discussion.

20. On August 30, 2006, I received a call from Esco Bell, Mount Vernon Public Works Director. He told me that the mayor had discussed the closure issue with Senator Haugen and informed her that the City of Mount Vernon was opposed to the closure. Esco Bell asked me what the process was to closing the crossing. I informed him that the WUTC had jurisdiction on grade crossing closures, and they would be the lead on the official closure process. I added that the crossing closure process would take some time.

21. On September 20, 2006, I made a joint presentation along with Rail Office staffer, Kirk Fredrickson, on the Amtrak *Cascades* program and the Mount Vernon Siding project at the Skagit Sub-Regional Regional Transportation Planning Organization Public Meeting. The Hickox Road closure was discussed at length, and a public question and answer session was

held. Kathy Hunter from the WUTC also made a presentation about the grade crossing closure process at the meeting. The meeting was attended by the Mayor of Mount Vernon.

22. On September 21, 2006, I received a letter dated August 31, 2006 from Skagit County Diking District No. 3 Commissioners. This letter expressed opposition to the proposed closure of Hickox Road. It indicated that Hickox Road was important to the district for flood evacuations and flood fighting. It also suggested that the siding be moved to one of two other possible locations. A true copy is attached as Exhibit I to this declaration.

23. On September 24, 2006, the Skagit Valley Herald ran a front page article entitled: "*Closure of street crossing tracks proposed,*" in which Rail Office Capital Projects Manager, Kevin Jeffers and I are quoted about the project and its impacts. A true copy is attached as Exhibit J to this declaration.

24. On October 31, 2006, I e-mailed both Dave Skrinde and Brian Snure to confirm a meeting on November 8, 2006, and provided a list of questions on response times from our consultant. A true copy is attached as Exhibit K to this declaration.

25. On November 8, 2006, Dave Skrinde of SCFD returned my call and left a message cancelling the meeting for November 8, 2006, due to weather, and rescheduled the meeting to November 15, 2006.

26. On November 15, 2006, WSDOT's consultant, Gary Norris and I met with SCFD representatives to discuss response times and mitigation options. The district explained that it is their policy to dispatch units from both stations (Conway and Cedardale) to areas west of the tracks. They also have a mutual aid agreement with the City of Mount Vernon. This would

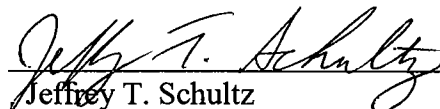
enable units from other locations to reach the locations west of the tracks with a minor increase in response times. Staff informed us that they were instructed by the SCFD commissioners not to work on any potential mitigation until the BNSF Railway filed the petition to close the crossing.

27. On March 2, 2007, I mailed the final "Hickox Road Railway Crossing Closure Traffic Impact Analysis" dated January 2007 to the City of Mount Vernon, Skagit County, the Skagit County Council of Governments, and the SCFD.

28. During the preparation of the SEPA and NEPA documents, I conferred with Ken Uznanski, the Manager of the Rail Office at that time, and Elizabeth Phinney, the Environmental Manager for the Mount Vernon Extension project. The three of us discussed the potential impacts of the project, and were in agreement that the environmental impacts were non-significant. Thus, a SEPA DNS (and Checklist) and a NEPA Documented Categorical Exclusion (DCE) were prepared for the project. Each of these documents was supported by the above referenced studies; the studies were available for review by anyone who requested a copy.

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 14 day of September, 2007, at Olympia, Washington.

  
\_\_\_\_\_  
Jeffrey T. Schultz



DECLARATION OF SERVICE

Lisa M. Savoia states and declares that I am a citizen of the United States of America, over 18 years old and competent to testify to the matters herein. On September 12, 2007, I caused to be served by e-mail and first class mail, postage prepaid, a true and correct copy of the foregoing document on the following:

BRADLEY P. SCARP, ESQ.  
1218 THIRD AVENUE, 27<sup>TH</sup> FLOOR  
SEATTLE WA 98101  
E-MAIL: [brad@montgomeryscarp.com](mailto:brad@montgomeryscarp.com)

STEPHEN FALLQUIST  
SKAGIT COUNTY DEPUTY PROSECUTING ATTORNEY  
605 S. 3<sup>RD</sup> STREET  
MOUNT VERNON WA 98273  
E-MAIL: [stephenf@co.skagit.wa.us](mailto:stephenf@co.skagit.wa.us)


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OLYMPIA WA 98504-0128  
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KEVIN ROGERSON, CITY ATTORNEY  
P. O. BOX 809  
MOUNT VERNON, WA 98273  
E-MAIL: [kevinr@ci.mount-vernon.wa.us](mailto:kevinr@ci.mount-vernon.wa.us)

DATED this 12 day of September, 2007 at Tumwater, Washington.

  
\_\_\_\_\_  
Lisa Savoia, Legal Assistant

DEC. OF JEFFREY T. SCHULTZ IN SUPPORT  
OF JOINT RESPONSE IN OPP. TO  
THE CITY'S MOTION IN LIMINE AND  
MOTION FOR SUMMARY JUDGMENT

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**SKAGIT COUNTY  
DEPARTMENT OF EMERGENCY MANAGEMENT**

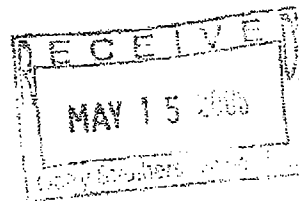
EMERGENCY  
Mitigation  
Preparedness  
Response  
Recovery

2911 East College Way, Suite B, Mount Vernon, WA 98273  
Phone: (360) 428-3250; FAX: (360) 428-3255



SERVING  
Anacortes  
Burlington  
Concrete  
Hamilton  
La Conner  
Lyman  
Mount Vernon  
Sedro-Woolley  
Skagit County

May 11, 2006



Ms. Lesley A. Struthers  
Gary Struthers Associates, Inc.  
3150 Richards Road, Suite 200  
Bellevue, WA 98005

RE: Proposed closure of Hickox Road

Dear Ms. Struthers;

This letter is written in support of the wishes of Skagit County Fire District #3 to maintain the existing Hickox Road crossing.

As you know, emergency medical and fire suppression services are provided to the area west of the Burlington Northern-Sante Fe tracks by Skagit County Fire District #3 from the Cedardale Station. Cedardale Station is located on Hickox Road near the intersection of Blodgett Road, less than one 1 mile east of the Burlington Northern-Sante Fe tracks.

As it has for many years, Hickox Road provides the most direct and timeliest access to the area lying west of the Burlington Northern-Sante Fe tracks. The elimination of the Hickox Road crossing will directly result in delaying the arrival of emergency personnel and equipment to the entire area located west of the tracks.

I respectfully request that Burlington Northern-Sante Fe reconsider its proposal to close the Hickox Road crossing and suggest that other options be seriously considered.

Sincerely,

Thomas J. Sheahan  
Director

**EXHIBIT**

A



**Washington State  
Department of Transportation**  
**Douglas B. MacDonald**  
Secretary of Transportation

**Transportation Building**  
310 Maple Park Avenue S.E.  
P.O. Box 47300  
Olympia, WA 98504-7300  
  
360-705-7000  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

May 17, 2006

Mr. Esco Bell  
Public Works Director  
City of Mount Vernon  
1024 Cleveland Avenue  
Mount Vernon, WA 98273

RE: Draft Hickox Road Report

Dear Mr. Bell:

Thank you so much for taking the time to meet with us on Tuesday, May 16, 2006, to discuss our draft report on Hickox Road. It was a pleasure meeting you and Jana Hanson.

As we discussed, this report is a preliminary draft, and we want to gather input from the city on the transportation impacts of the potential crossing closure. It's possible we missed something in the analysis, or an assumption was wrong. Finally, as I mentioned, we would like to have any comments and/or suggestions on the preliminary draft report by the end of June.

In the mean time if you have any questions, please call me at 360-705-7981.

Sincerely,

Jeffrey T. Schultz  
Rail Operations and Technical Expert

JTS:trg

cc: Edward Allard, BNSF Railway  
Danniel MacDonald, BNSF Railway  
Gary Norris, Gary Struthers Associates  
Jana Hanson, City of Mount Vernon

**EXHIBIT** B



**Washington State  
Department of Transportation**  
**Douglas B. MacDonald**  
Secretary of Transportation

**Transportation Building**  
310 Maple Park Avenue S.E.  
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Olympia, WA 98504-7300

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May 17, 2006

Mr. John Van Pelt  
Skagit County Fire District #3  
19746 East Hickox Road  
Mount Vernon, WA 98273

RE: Draft Hickox Road Report

Dear Mr. Van Pelt:

Thank you so much for taking the time to meet with us on Tuesday, May 16, 2006, to discuss our draft report on Hickox Road. It was a pleasure meeting you and the rest of the members of Fire District #3.

As we discussed, this report is a preliminary draft, and we want to gather input from the fire district on the emergency response impacts of the potential crossing closure. It's possible we missed something in the analysis, or an assumption was wrong. It is our goal to make sure that we get it right.

Moreover, we want to explore with you some options to mitigate the impacts of the potential closure. It was clear from our discussions that the district is already investigating how it can reduce its already long response times. Perhaps there is something that we can do that will provide a win-win solution to the problem of increased response times and the potential of reduced access at the Hickox Road at-grade crossing. We are open to your suggestions.

Finally, we would like to have any comments and/or suggestions on the preliminary draft report by the end of June. In the mean time if you have any questions, please call me at 360-705-7981.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey T. Schultz'.

Jeffrey T. Schultz  
Rail Operations and Technical Expert

JTS:trg

cc: Edward Allard, BNSF Railway  
Danniel MacDonald, BNSF Railway  
Gary Norris, Gary Struthers Associates



**Washington State**  
**Department of Transportation**  
**Douglas B. MacDonald**  
Secretary of Transportation

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[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

May 17, 2006

Mr. Given Kutz  
Skagit County Public Works  
1800 Continental Place  
Mount Vernon, WA 98273

RE: Draft Hickox Road Report

Dear Mr. Kutz:

Thank you so much for taking the time to meet with us on Tuesday, May 16, 2006, to discuss our draft report on Hickox Road. It was a pleasure meeting you.

As we discussed, this report is a preliminary draft, and we want to gather input from the county on the transportation impacts of the potential crossing closure. It's possible we missed something in the analysis, or an assumption was wrong. Moreover, if there is some additional safety improvement(s) that Skagit County would like to see implemented in the event that the crossing is closed, we would like to know that as well. Finally, as I mentioned, we would like to have any comments and/or suggestions on the preliminary draft report by the end of June.

In the mean time if you have any questions, please call me at 360-705-7981.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey T. Schultz'.

Jeffrey T. Schultz  
Rail Operations and Technical Expert

JTS:trg

cc: Edward Allard, BNSF Railway  
Danniel MacDonald, BNSF Railway  
Gary Norris, Gary Struthers Associates

City of **Mount  
Vernon**

Public Works Department

1024 Cleveland Avenue  
Post Office Box 809  
Mount Vernon, WA 98273

Phone (360) 336-6204

FAX (360) 336-6299

E-Mail: [mvengineering@ci.mount-vernon.wa.us](mailto:mvengineering@ci.mount-vernon.wa.us)

[www.ci.mount-vernon.wa.us](http://www.ci.mount-vernon.wa.us)

June 30, 2006

Jeffrey T. Schultz  
Rail Operations Technical Expert  
Washington State Department of Transportation  
Transportation Building  
310 Maple Park Avenue S.E.  
P.O. Box 47300  
Olympia, WA 98504-7300

**RECEIVED**

**JUL 07 2006**

**WSDOT RAIL OFFICE**

**RE: Draft Hickox Road Report**

Dear Mr. Schultz:

Thank you for meeting with Jana Hanson and me last month to discuss the proposed closure of the rail crossing at Hickox Road in South Mount Vernon. I have reviewed the draft report that you provided to me at the meeting, and this letter provides a brief summary of my comments.

The technical methods used in the report appear to be thorough in analyzing traffic impacts based upon current usage and planning documents. Even so, the report does not adequately assess the importance of the rail crossing to the City.

For example, the City and WSDOT want to eventually improve the Hickox Road interchange on I-5 from its current "north bound off" and "south bound on" limitations to a full access interchange. This improvement will increase the importance of the Hickox Road rail crossing.

Secondly, the City has analyzed the buildable lands in its urban growth area (UGA) and identified an important need for an additional 800 acres of commercial land during the next twenty years. There are only two feasible regions to locate this added commercial land—in the river bend area and/or in South Mount Vernon. Additional commercial land in South Mount Vernon would greatly increase the need for the rail crossing to remain open at Hickox Road.

Lastly, the importance of the Hickox rail crossing to the City is made greater by the fact that there are no other public rail crossings in the City's UGA south of Blackburn Road—a distance of approximately one and a half miles.

For the above reasons, the proposed closure would (1) reduce the ease with which Mount Vernon can attract needed commercial development, (2) limit traffic options for the existing transportation grid in the City's UGA, and (3) reduce access across the railroad for traffic and emergency vehicles in South Mount Vernon. We believe that these impacts are significant to the City, and we are opposed to the proposed rail crossing closure at Hickox Road.

Thank you for your consideration.

Sincerely,

  
Esteo Bell, PE  
Public Works Director

**EXHIBIT**     C

**Savoia, Lisa (ATG)**

---

**From:** GivenKutz [givenk@co.skagit.wa.us]  
**Sent:** Friday, July 21, 2006 8:33 AM  
**To:** Schultz, Jeff  
**Cc:** AnnMGutwein  
**Subject:** Comments on Draft "Hickox Road Railway Crossing Closure Traffic Impact Analysis"

Greetings Jeff,

I have a few comments. Please forgive their tardiness; I had nothing in hand that gave a deadline for comments.

1. Every map in the Analysis incorrectly shows Johnson Road, Stackpole Road, and Hickox Road crossing Interstate 5. This gives the false impression to the reader unfamiliar with the area that access from the east side to the west side of Interstate 5 is far greater than it really is on the ground.
2. There are a number of inaccuracies regarding the posted speed limits and road names stated in Chapter 2: Existing Conditions. The corrections, beginning on page six, are as follows:
  - a. Hickox Road – the speed limit from the RxR to Dike Road (county portion) is 35-mph not 30-mph.
  - b. Stackpole Road – the speed limit is 35-mph not 30-mph
  - c. West Johnson Road – the actual name of the road is **Peter Johnson Road** and its speed limit is 35-mph not 30-mph
  - d. Fir Island Road – the speed limit is 35-mph **in the study section** from Pioneer Hwy to ¼ mile past Mann Road on Fir Island then changes to 50-mph. It then changes again to 40-mph near Maupin Road
  - e. Dike Road – the entire County portion of Dike Road is 40-mph from Fir Island Road to the Mount Vernon city limits
3. On the Executive Summary, page i, we recommend under the title “What alternatives are available?” that the proposed two alternatives be expanded to three to include:
  - **Build a new side track – build a new side track from just north of Fir Island Road through Peter Johnson Road to just south of Stackpole Road.**

This would give WSDOT and BNSF a side track up to just under 2 miles in length. This would also leave Hickox Road as is and close the Peter Johnson Road crossing which is the least used, least populated crossing in the study area. Emergency response would not be affected at all given the close proximity of the Conway Fire Hall.

This proposed third alternative has been discussed with your office and your consultant by both Skagit County Public Works and the Fire District. We urge you to consider this alternative and include it in your final Analysis.

Thanks Jeff, for allowing us to respond to your Draft Analysis.

I should also inform you that our Board of County Commissioners is preparing a Resolution opposing the proposed closure of the Hickox Road rail grade crossing.

Given T. Kutz  
**Traffic Engineering -  
Pavement & Road Log Management**  
Skagit County Public Works  
1800 Continental Place  
Mount Vernon, WA 98273  
**360.336.9400**



**Washington State  
Department of Transportation**  
Douglas B. MacDonald  
Secretary of Transportation

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August 3, 2006

Mr. John Van Pelt  
Skagit County Fire District 3  
19746 East Hickox Road  
Mount Vernon, WA 98273

RE: Draft Hickox Road Railway Crossing Closure Traffic Impact Analysis

Dear Mr. Van Pelt:

Thank you for taking the time to talk with me on the telephone on Wednesday, July 12, to discuss comments from Skagit County Fire District 3 on the draft Hickox Road Railway Crossing Closure Traffic Impact Analysis. As you requested, I am writing this follow-up letter for you and the Skagit County Fire District 3 Commissioners.

At the May 16 meeting with you, your staff, and the Commissioners of Skagit County Fire District 3, you suggested building an entirely new railroad passing siding between Stackpole Road and Fir Island Road, and closing Peter Johnson Road, rather than extending the existing Mount Vernon siding (and closing Hickox Road). While this concept could provide an alternative siding, it is not viable for several reasons:

1. The budget for this project is very limited. A new 9,000-foot railroad siding costs approximately three times as much as the planned Mount Vernon railroad siding extension, and there are no additional funds for such a project.
2. The state already invested \$1.2 million in upgrading the track at the existing Mount Vernon siding in 2005, the benefits of which would be lost.
3. The environmental impacts at the alternative location are unknown.
4. Even if additional funding was obtained, a new siding at that location would push the project schedule back at least two years while it is redesigned and environmental impacts assessed.

Therefore, delaying the project and building an entirely new siding is not a realistic or cost-effective alternative to extending the existing Mount Vernon railroad siding.

**EXHIBIT**

E



Mr. John Van Pelt  
August 3, 2006  
Page 2

The Washington State Department of Transportation (WSDOT) wishes to continue to work with Skagit County Fire District 3 to find a solution that works for both WSDOT and the fire district. We need to answer several important questions regarding potential impacts of the Mount Vernon siding project and the proposed closure of the Hickox Road/BNSF Railway at-grade crossing. As discussed in our May meeting, and outlined in my follow-up letter dated May 17, we requested that the district provide comments and additional data by June 30, 2006, on the emergency response impacts of the potential crossing closure, as outlined in the draft Hickox Road Railway Crossing Closure Traffic Impact Analysis report that we provided to the district. As of August 3, we have not received this data nor have we received any comments from the district on the draft report.

As required by the project as currently designed, the closure of Hickox Road/BNSF Railway at-grade crossing is real and near term. The Mount Vernon siding extension project is a state-funded transportation project, with a construction completion date of June 30, 2007. In order to meet the project's construction schedule, we had requested that you and the Skagit County Fire District 3 Commissioners consider what mitigation options and strategies would help the district effectively deal with the impacts of the proposed Hickox Road/BNSF Railway at-grade crossing closure. Since the district was already investigating how it could reduce its already long response times, there seemed to be an opportunity to work jointly to develop a mutually-beneficial solution to mitigate the problem of increased response times in the district, resulting from the potential railway crossing closure. However, per our telephone call, you mentioned that no one at Fire District 3 has examined or developed any possible mitigation strategies for the potential Hickox Road railway crossing closure.

In order to meet the project schedule, it is WSDOT's intention to work with BNSF Railway to begin the petition process to the Washington Utilities and Transportation Commission to close the Hickox Road/BNSF Railway crossing. WSDOT and BNSF Railway must begin this process in August to keep the Mount Vernon siding project on budget and on schedule for completion by June 30, 2007. Nevertheless, WSDOT still wants to work with you to develop solutions to mitigate any potential significant impacts brought about by the closure of the Hickox Road/BNSF Railway at-grade crossing. It is my hope that at our August 8 work session we can reach agreement on some preliminary mitigation strategies that would work for the district and WSDOT.

Finally, for your information, we have briefed Senator Mary Margaret Haugen on the status of this project. Based on conversations with the Senator, we are examining the costs and feasibility of re-routing Hickox Road. I hope to have that information by our August 8 meeting date.

Mr. John Van Pelt  
August 3, 2006  
Page 3

In the meantime if you have any questions, please call me at 360-705-7981.

Sincerely,



Jeffrey T. Schultz  
Rail Operations and Technical Expert

JTS:trg

cc: Edward Allard, BNSF Railway  
Danniel MacDonald, BNSF Railway  
Gary Norris, Gary Struthers Associates  
Dan Sneva, SCFD3 Commissioner  
Carl Stadler, SCFD3 Commissioner  
Vic Benson, SCFD3 Commissioner  
Given Kutz, Skagit County Public Works  
Thomas Sheahan, Skagit County Emergency Management  
Dory On, Counsel, Washington State Senate  
Todd Carlson, WSDOT

**SKAGIT COUNTY PUBLIC WORKS DEPARTMENT**

1800 Continental Place, Mount Vernon, WA 98273-5625

<u>Telephone Numbers</u>	<u>Division</u>	<u>Fax Number</u>
(360) 336-9400	Administration/Solid Waste Department	(360) 336-9478
(360) 336-9333 + ext.	Engineering and Accounting Departments	(360) 336-9369
(360) 755-9531	Burlington Maintenance Department	(360) 755-0950
(360) 424-7817	Resource Recovery Facility	(360) 424-1899
(360) 293-4433	Guemes Ferry Office	(360) 293-1899

**FAX MESSAGE**

DATE: 8/8/06  
 TO: Jeffrey Schultz  
 FAX NO: 360.705.6821  
 FROM: AnnMarie Gutwein  
 FAX NO: \_\_\_\_\_

This message consists of 3 pages including this cover sheet.

COMMENTS:  
Hickox Road Resolution

This message is being transmitted from a Cannon-L775 automatic telecopy. If this message is incomplete or illegible, please call the Skagit County Public Works Department at (360) 336-9400.

**EXHIBIT** F

SKAGIT COUNTY  
Resolution # R20060258

Page 1 of 2

RESOLUTION NO. \_\_\_\_\_

**RESOLUTION IN OPPOSITION TO THE PROPOSED CLOSURE OF  
HICKOX ROAD #70000 RAIL GRADE CROSSING**

**WHEREAS**, the Board of Skagit County Commissioners received notice of the Washington Department of Transportation's (WSDOT) proposed closure of the Hickox Road (#70000) rail grade crossing with the Burlington Northern Santa Fe (BNSF) railway; and,

**WHEREAS**, Skagit County Public Works received a draft Impact Analysis from WSDOT regarding said closure, proposed in order to facilitate expansion of the existing side track in south Mount Vernon; and,

**WHEREAS**, the Board of Skagit County Commissioners received public comment regarding said closure from Fire District 3, the agricultural community, and affected landowners; and,

**WHEREAS**, having considered the draft Impact Analysis, as well as public comment, the Board of Skagit County Commissioners wishes to state its opposition to the closure of the BNSF rail grade crossing on Hickox Road;

**NOW, THEREFORE BE IT RESOLVED** that the Board of Skagit County Commissioners hereby opposes the closure of the Hickox Road #70000 rail grade crossing with the BNSF rail line and encourages WSDOT to seek any and all alternatives to said closure.

PASSED this 31<sup>st</sup> day of July, 2006.



BOARD OF COUNTY COMMISSIONERS  
SKAGIT COUNTY, WASHINGTON

Kenneth A. Dahlstedt  
Kenneth A. Dahlstedt, Chairman

**ABSENT**

Ted W. Anderson, Commissioner

Don Munks  
Don Munks, Commissioner

ATTEST: Michelle Collins Assistant  
Joanne Giesbrecht, Clerk of the Board

LEAP Transportation Document 2006-C Rail Capital Program (Y), As Developed on March 8th, 2006  
 Program - Rail Capital Program (Y)

(In Thousands)

Route	YR	Project Title	Line Item	Phase	06-07	07-09	09-11	11-12	12-15	FY09	Total
999	PNWTC	HIGH SPEED CORRIDORS-TRINITY	20	0	0	3,875	0	0	0	0	3,875
		National Account - State (2005)		0	0	3,875	0	0	0	0	3,875
999	PNWTA	High Speed Corridor - Cascade Int.	24	0	0	9	0	0	0	0	9
		National Account - State (2005)		0	0	9	0	0	0	0	9
999	PNWDB	HQA Special Corridor - Alouba	1A24	0	0	0	0	0	0	0	0
		National Account - State (2005)		0	0	0	0	0	0	0	0
999	PNWTC	HIGH SPEED CORRIDORS-WITHLOCK	20	0	3,925	0	0	0	0	0	3,925
		National Account - State (2005)		0	3,925	0	0	0	0	0	3,925
999	PNWTA	Ballinger-Of Area Upgrades	02	20	0	180	0	0	0	0	200
		National Account - State (2005)		20	0	180	0	0	0	0	200
999	PNWDB	HQA Special Corridor - Alouba	10	1,300	2,679	0	0	0	0	0	3,979
		National Account - State (2005)		1,300	2,679	0	0	0	0	0	3,979
999	PNWDB	PA ICT TO DUBLIN ACT. STATION IMPROVEMENTS	09	369	13,681	0	0	0	0	0	14,050
		National Account - State (2005)		369	13,681	0	0	0	0	0	14,050
999	PNWDB	STANWOOD STATION IMPROVEMENTS	09	0	230	1,790	0	0	0	0	2,020
		National Account - State (2005)		0	230	1,790	0	0	0	0	2,020
999	PNWDB	SWAN CURTAIN ZEPHYRUS & WHITE ROCK STATION IMPROVEMENTS	02	0	3,980	6,980	0	0	0	0	10,960
		National Account - State (2005)		0	3,980	6,980	0	0	0	0	10,960
999	PNWDB	KING STREET STATION IMPROVEMENTS	07	4,313	14,958	0	0	0	0	0	19,271
		National Account - State (2005)		4,313	14,958	0	0	0	0	0	19,271
999	PNWDB	KING STREET STATION TRACK IMPROVEMENTS	13	2,920	7,287	0	0	0	0	0	10,207
		National Account - State (2005)		2,920	7,287	0	0	0	0	0	10,207
999	PNWDB	KING STREET STATION CENTER	07	0	3,000	6,000	0	0	0	0	9,000
		National Account - State (2005)		0	3,000	6,000	0	0	0	0	9,000
999	PNWDB	Central to Tacoma Overhead	02,03,04,05,06	0	0	4,000	0	0	0	0	4,000
		National Account - State (2005)		0	0	4,000	0	0	0	0	4,000

Printed by the State of Washington - Ver: 06/05/05  
 LTR0001533

SKAGIT COUNTY  
 Resolution # R20060288  
 Page 2 of 2

# Jones & Smith

*Attorneys at Law*

Gary T. Jones

Gail R. Smith

August 23, 2006

**RECEIVED**

**AUG 25 2006**

**WSDOT RAIL OFFICE**

Jeffrey T. Schultz  
Rail Operations & Technical Expert  
WSDOT Rail Office  
PO Box 47387  
Olympia, WA 98504-7387

via First Class Mail and  
email to: [SchultJ@wsdot.wa.gov](mailto:SchultJ@wsdot.wa.gov)

**Re: Rail Crossing Closure Issues – Mount Vernon**

Dear Mr. Schultz:

Richard Smith has asked me to respond to the traffic study of the Hickox Road closure proposed by BNSF and WSDOT near Mount Vernon between Old Highway 99 and the Dike Road.

The first and most obvious problem with the study is that it collected data on traffic during January / February 2006. The timing is not compatible with finding the peak flows of traffic in the study area. If you are studying birds it would be like looking for Trumpeter Swans in the summer when they are fledging their young on Wrangell Island. There is significantly more traffic associated with the agricultural use of this study area between March 15 and October 15. So, the impact on property owners including dairy, crop farmers, nursery, stock producers and others in the agricultural community are significantly underestimated by the study. These users are potentially in need of emergency medical services and fire response which your study shows suffer a decline in level of service if the closure option is chosen. The study also fails to differentiate among uses.

Closing a crossing has one level of impact for emergency vehicles and another for agricultural use. Tractors, cultivators, planters, spray rigs, irrigation and harvest equipment can each have their own special needs. In general the vehicles and equipment necessary for farming are a hazard to higher speed traffic and themselves on the frontage roads. Thus, cutting off a crossing road has a very heavy impact on the agricultural use of the land between the railroad tracks and the Skagit River. Under the Growth Management Act the area west of the railroad tracks has been designated for agricultural use as land with long-term commercial value for agricultural production. The option you are proposing negates that planning to a significant degree. It subordinates agriculture to rail transport

This problem with land use must be looked at in the context of Mount Vernon's Urban Growth Area encroaching upon traditional agricultural land. Hickox Road on both sides of the railroad tracks forms the southern boundary of the Mount Vernon Urban Growth Area. Within the area

Pine Street Legal Center · 415 Pine Street  
P.O. Box 1245 · Mount Vernon, WA 98273  
Telephone (360) 336-6608 · Facsimile (360) 336-2094

**EXHIBIT**

G

east of the railroad tracks a substantial level of development has been achieved and the infrastructure investment made by Mount Vernon will transform this area.

This study does not recognize the need to coordinate crossing of I-5 and the rail road tracks. The relationship between Hickox crossing I-5 and the tracks is an important one.

The study fails to include contacts with the County and City of Mount Vernon transportation planners. For example, Dennis Carlson at Mount Vernon Development Services is usually contacted with regard to all Mount Vernon related transportation development issues. No where is his name or input recorded in the final report in draft form. Esco Bell, the Public Works Director for the City of Mount Vernon is also not mentioned and Jana Hansen, the Director of Development Services is not quoted or apparently contacted about this study.

Skagit County Public Works has a roads section headed by David Sheridan. Mr. Sheridan's input on the traffic impacts of the project are also not seen in the report. This may partially explain the opposition of the Skagit County Board of Commissioners. The Commissioners are very aware of the obligation under the Growth Management Act to protect long-term commercially significant farmland and to serve rural residences through fire protection and emergency services. The failure of the study to recognize the significance of Hickox Road as a border between City of Mount Vernon urban development and Skagit County agriculture is a fault, regardless of the levels of service.

Two alternatives are presented in the study. No mention is made of the alternative of rerouting Hickox Road around the proposed closure. There is also no mention of the alternative for providing a second track south of Stackpole Road and north of the Conway crossing. The area served and the loss of the level of service would be minimized by closing the Peter Johnson Road and leaving the Stackpole and Hickox Roads open for crossing. The desired length of siding for freight trains or other passing traffic could be achieved in the southern area. This would no doubt involve filling and grading some farm land. However, the remainder would be adequately served for transportation services, law enforcement and emergency response time. The heavy impacts on the Britt Road and Dike Road which flow from closing the Hickox crossing are avoided. The City of Mount Vernon plans for developing the urban growth area North of Hickox Road are preserved under this alternative.

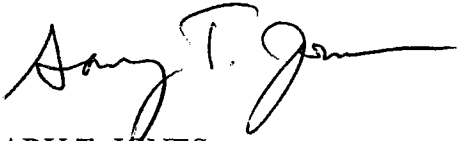
The report fails to explain why the particular length of siding is demanded. Is there an alternative which allows the track to be improved up to but not across the Hickox Road? Trains in the range of 100 cars can be held by lengthening the second track from Pedersen Road to Hickox Road, without closing the crossing at Hickox Road. A rough estimate would be 1-½ miles of available siding without impacting the intersection at Blackburn and the intersection of Hickox and the railroad tracks.

In summary, the rail transportation planning would fit better with the surface transportation needs if the Hickox Road were left open as a connection between the east and west sides of Interstate 5. Any alternative which closes the Hickox Road will have substantial impacts on

agriculture, future development of Mount Vernon, and on the present residents of rural Skagit County, especially those on the west side of the Burlington Northern Santa Fe rail line which would be closed by this proposed action.

Respectfully yours,

JONES & SMITH

A handwritten signature in black ink, appearing to read "Gary T. Jones", with a long horizontal flourish extending to the right.

GARY T. JONES  
GTJ/lfd

cc: Garry Struthers Associates Inc.  
Attn: Gary A. Norris, P.E.  
3150 Richards Road, Suite 100  
Bellevue, WA 98005-4446  
email: [garyn@gsassoc-inc.com](mailto:garyn@gsassoc-inc.com)

Richard Smith



**Savoia, Lisa (ATG)**

---

**From:** Brian Snure [Brian@snrlaw.net]  
**Sent:** Friday, August 25, 2006 3:06 PM  
**To:** Schultz, Jeff  
**Subject:** Hickox Road Crossing Skagit FPD No. 3 Comments  
**Attachments:** ST3LO8\_25\_06DOTComments.pdf; ATT396540.htm; Scan001.PDF; ATT396541.htm

Jeff,

Please see the attached letter.

Thank You.

--  
Sincerely,

Brian Snure  
Snure Law Office, PSC  
612 S. 227th St.  
Des Moines, WA 98198  
Phone: 206-824-5630  
Toll Free: 800-486-9484  
Fax: 206-824-9096  
Email: [Brian@snrlaw.net](mailto:Brian@snrlaw.net)

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# SNURE LAW OFFICE

A Professional Services Corporation

---

Clark B. Snure  
clark@snurelaw.com

Of counsel  
Thomas G. Burke

Brian K. Snure  
brian@snurelaw.com

August 25, 2006

Jeffrey T. Schultz  
Rail Operations & Technical Expert  
WSDOT Rail Office  
P.O. Box 47387  
Olympia, WA 98504-7387

**Email Transmittal**  
**schultj@wsdot.wa.gov**

**Original by Mail**

Re: Proposed Hickox Road Railway Crossing  
Comments on Draft Impact Analysis

Dear Mr. Schultz:

As you are aware, this firm represents Skagit County Fire Protection District No. 3. Our client appreciates your willingness to work with the District to address the impacts on fire protection and emergency medical services that would be created by the proposed closing of Hickox Road. The purpose of this letter is to provide additional comments on the Draft Impact Analysis. We will provide you with a more detailed summary of our mitigation position in a subsequent letter.

We have previously provided you with the enclosed response time summary. The summary documents that the closure of the Hickox Road crossing will have a significant detrimental impact on the District's ability to provide fire protection and emergency medical services to that portion of the District directly affected by the proposed closure. As the response time summary demonstrates, closure of Hickox Road crossing will increase response times by four and one half minutes. With the District's limited resources, its response time is already averaging 13 minutes. The closure would increase the average response time would to 17.5 minutes. The additional delay that would be created by closing Hickox Road places the residents at risk and is unacceptable to the District.

While the District is willing to work with DOT and the railroad toward a mitigation approach, this willingness should not be misinterpreted. The District does not support closing the Hickox Road crossing and believes the best alternative for fire protection and emergency medical services is to leave the Hickox Road crossing open.

## **General Comments:**

As a general matter we believe the study is flawed because of its narrow scope. The study considered only two alternatives, either leaving the crossing open or closing the crossing. We

believe the study should be expanded to consider the alternative of locating the second line south of Stackpole Road and north of the Conway crossing and to consider the alternative of constructing a Hickox Road bypass. Until these additional alternatives are considered, we do not believe that the consultant's analysis supports its conclusions. As the comments below reflect we also believe the consultant should perform a more comprehensive analysis of the response time impacts that the closing will create.

### **Specific Comments**

#### Page ii. Emergency Response.

This statement is confusing and wrong as it relates to emergency services provided by the District. As the District's response time summary demonstrates, the closing of the crossing will have a significant negative impact on the provision of services. This section must be revised to accurately reflect that a significant impact will occur.

#### Page 17. Fire Department.

The consultant states that the estimated response time to a point midway between old Highway 99 and Dike Road is approximately three minutes. The consultant did not base this conclusion on a review of the District's response records and provides no substantiation for this conclusion. The consultant should modify this section based on the District's response time summary or the consultant should conduct an independent review of the District's response times in the area.

#### Page 30. Emergency Response.

The reference to a three minute response time under the No Action alternative must be corrected.

#### Page 31.

The comments of the Skagit County Fire Marshall should be prefaced with language that recognizes that the "viable alternative routes" are all burdened by significantly longer response times.

The final paragraph should be modified to take into account the District's response time summary data presented by the District.

#### Page 42.

The 2026 Emergency response section should be modified to accurately reflect the impacts on response time contained in the District's response time summary.

August 25, 2006  
Page 3

Page 46 Impacts on emergency response services.

Revise response time comment to reflect actual response times. Include finding that the closing of the crossing will prevent the District from complying with NFPA response time standards and will interfere with the District's internal response time standards.

Clarify that Stackpole Road is an unacceptable alternative route due to the increased response times.

Remove reference to the 2004 Fire in Washington Report that understates responses to the area in question. In 2005, as the District's response time summary demonstrates, the District had 12 service calls in the area.

Page 48. Conclusions.

Modify conclusions to accurately reflect that closure of the Hickox Road crossing will have a significantly negative impact on response times by the District and will correspondingly have a significant negative impact on fire protection and emergency medical services received by residents and visitors in the affected area.

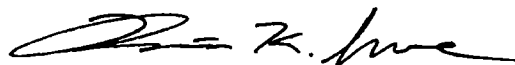
**Summary**

The District believes that the only acceptable option is to leave the Hickox Road crossing open. At a minimum, the District respectfully requests that the consultant broaden the focus of the study to identify alternatives that will allow the Hickox Road crossing to remain open.

We encourage the consultant to contact District personnel to obtain additional information and input regarding response times prior to releasing a final study. Thank you for your consideration of these comments, please contact the undersigned if you have any questions.

Very Truly Yours,

SNURE LAW OFFICE, PSC



Brian K. Snure

cc: client  
Garry Struthers Associates Inc.

enclosure  
ST3LT8\_25\_06

# Skagit County Diking District No. 3

PO Box 324  
Conway, WA 98238

**RECEIVED**

SEP 21 2006

WSDOT RAIL OFFICE

August 31, 2006

Jeffrey T. Schultz  
Rail Operations & Technical Expert  
WSDOT Rail Office  
PO Box 47387  
Olympia, WA 98504-7387

via First Class Mail and  
email to: SchultJ@wsdot.wa.gov

**Re: Hickox Road - Railroad Crossing Closure Issues - Mount Vernon**

Dear Mr. Schultz:

It has come to the attention of Skagit County Diking District No. 3 that a proposal for closing the Hickox Road on-grade crossing is under serious consideration. We are writing to express our opposition to this closure.

A map of Dike District No. 3 is attached hereto and incorporated herein by this reference. It should be noted that the railroad tracks and Interstate 5 split the District into two parts. Keeping the Hickox Road crossing open is an important part of maintaining access from one side of the District to the other during flood fighting and flood disaster evacuation. Hickox Road connects to a freeway crossing which is less urban and more accommodating to equipment, trucks, and slower moving vehicles.

During a flood emergency it is often necessary to bring material, including rock from Meridian Aggregates to fight floods or repair flood damage. Closing the Hickox Road would result in the loss of an important corridor for carrying on the Districts' business in a flood emergency.

The District has a dike parallel to BNSF tracks south of Conway. The Commissioners have approached BNSF about combining a flood control, rail improvement and fish habitat project on the west side of the mainline track in Sections 19, 30, and 31, Township 33 North, Range 4 East, W.M. This area could accommodate a second track 8,000 feet long and improve the flood protection for Pioneer Highway, Interstate 5, and the railroad tracks. This would require more permits and achieve more than one public benefit to passenger rail service.

Another alternative which is preferable to closing Hickox Road could be a side track located north of Conway. It would block Peter Johnson Road. That blockage would not diminish the

**EXHIBIT**

I

usefulness of a freeway crossing. It would inconvenience fewer people. It has less impact on emergency response times. It would have no impact on the Mount Vernon Urban Growth Area.

Respectfully yours,

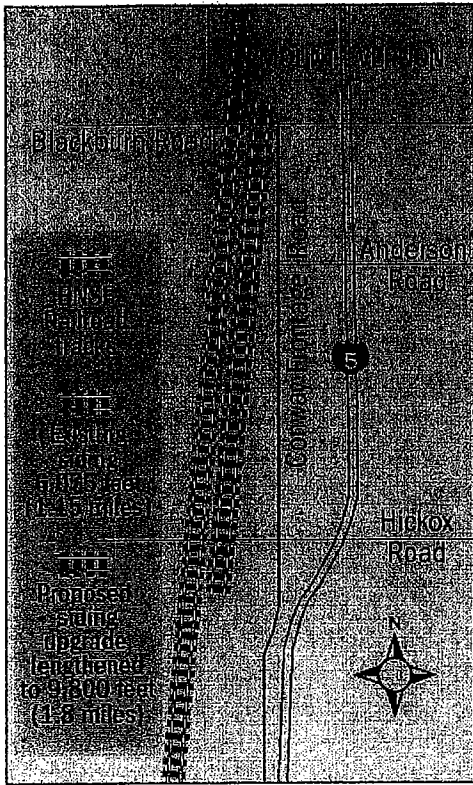
SKAGIT COUNTY DIKE DISTRICT NO. 3

  
DAVE OLSON, Chairman

DARRIN MORRISON, Commissioner

  
BRAD SMITH, Commissioner

cc: Garry Struthers Associates Inc.  
Attn: Gary A. Norris, P.E.  
3150 Richards Road, Suite 100  
Bellevue, WA 98005-4446  
email: garyn@gsassoc-inc.com



Kim Robinson / Skagit Valley Herald

# Closure of street crossing tracks proposed

*Area farmers, MV, county against Hickox Road plan*

**By JAMES GELUSO**  
Staff Writer

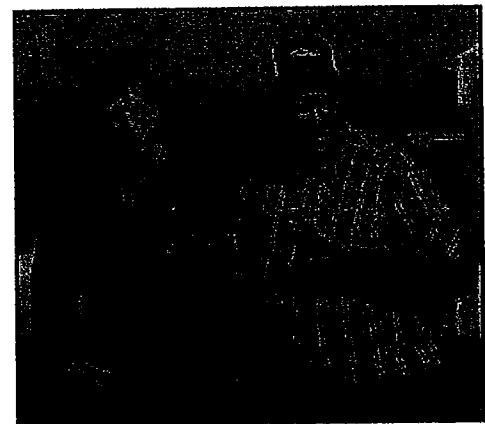
It's silage season for Dave Boon. That means trucks shuttling loads of corn silage back and forth between his farm and his dairy.

It also means trips down the west side of Hickox Road, across the railroad tracks. And, often, it means waiting for the train. There are a lot of trains these days — four Amtrak trains a day, plus a dozen freight trains that can be a mile and a half long.

But the trip could get a lot longer.

The state Department of Transportation wants more rail capacity on the BNSF Railroad line that runs from Everett to Vancouver, B.C., so that Amtrak and freight trains can run more efficiently. In order to get that, the DOT is installing sidings — a second track where trains can pull off and wait

See **CROSSING**, Page A8



Scott Terrell / Skagit Valley Herald

**Area farmers Dave Christlan (left) and Dave Boon** rely on being able to get across the BNSF rail line south of Mount Vernon. But the state Department of Transportation wants to close the Hickox Road crossing so it can install a new rail siding.

**EXHIBIT**     J

**Schultz, Jeff**

---

**From:** Schultz, Jeff  
**Sent:** Tuesday, October 31, 2006 3:59 PM  
**To:** 'Brian Snure'; 'Dskrinde@wavecable.com'  
**Cc:** Gary Norris; 'Lesley, Struthers'  
**Subject:** FW: Fire District Three Request for Additional Information  
**Importance:** High  
**Attachments:** Fire District Three Request for Additional Information.doc

Hi,

I understand we will be meeting on November 8th at 7 pm at the District offices. Here are some questions that we need some clarification on to finalize our traffic analysis. See you then.

Jeffrey T. Schultz  
Rail Operations and Technical Expert  
WSDOT Rail Office  
Ride the Amtrak *Cascades!*

---

**From:** Lesley, Struthers [mailto:lesleys@gsassoc-inc.com]  
**Sent:** Wednesday, October 25, 2006 3:03 PM  
**To:** Schultz, Jeff  
**Subject:** Fire District Three Request for Additional Information

Hi Jeff,

The additional question are attached.

*Lesley A. Struthers, E.I.T.  
Garry Struthers Associates, Inc  
3150 Richards Road, Suite 200  
Bellevue, WA 98005  
(425) 519-0300 ext. 223  
lesleys@gsassoc-inc.com*

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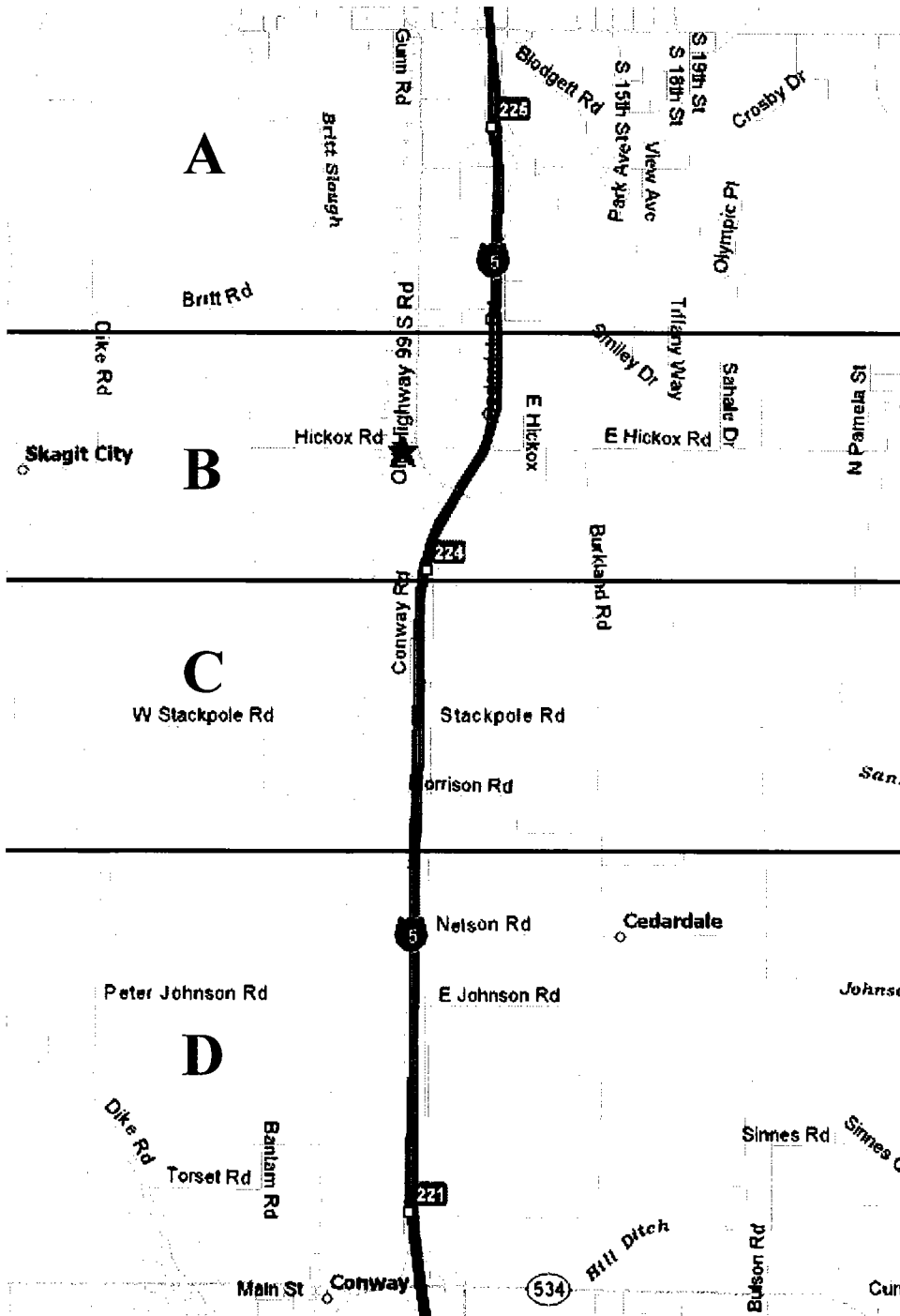
9/11/2007

**EXHIBIT**     K



### Additional Information Request for Fire District Three

1. Total number of call west of the tracks for 2005 for section A, B, C, and D (see map below)
  - a. Which station responded
  - b. Route used and mileage
  - c. Response time to location for the vehicle and required staff
  - d. Type of call
2. Internal response time standards
3. Evacuation routes
4. Mutual aid agreements



**Schultz, Jeff**

---

**From:** David Skrinde [dskrinde@wavecable.com]  
**Sent:** Wednesday, November 01, 2006 5:13 PM  
**To:** Schultz, Jeff  
**Subject:** Read: Fire District Three Request for Additional Information  
**Importance:** High  
**Attachments:** ATT653167.txt

Your message

To: Brian Snure; Dskrinde@wavecable.com  
Cc: Gary Norris; Lesley, Struthers  
Subject: FW: Fire District Three Request for Additional Information  
Sent: 10/31/2006 2:59 PM

was read on 10/31/2006 8:22 PM.

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