Exhibit No._____ (KB-1T)

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

BNSF RAILWAY COMPANY, Petitioner vs. WHATCOM COUNTY, Respondent.	DOCKET NO: TR-150189 PREFILED TESTIMONY OF KURT BIALOBRESKI

Q: **Please state your name and business address.**

A: My name is Kurt N. Bialobreski, P.E., PTOE.

My business address is 7625 N. University Street, Suite 200, Peoria, IL 61614.

My business email address is: kbialobreski@hanson-inc.com

Q: **By whom are you employed and in what capacity?**

A: I am a Traffic Engineer for Hanson Professional Services Inc. (HPSI).

Q: **What are your qualifications?**

A: I manage traffic engineering services for Hanson Professional Services Inc., and serve municipal, county and state departments of transportation, Class I Railroads, and airport

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authorities across the country from the Peoria, IL office. I have 14 years' experience in traffic and transportation engineering, and am a frequent speaker at technical conferences and events, including Illinois APWA Conference, ISPE, ASCE, Illinois Association of Highway Engineers, and the Illinois Traffic and Safety Conference. I have a BS in civil engineering from the University of Illinois Urbana-Champaign, and have earned licensure as a P.E. in Illinois and Florida and certification as a Professional Traffic and Operations Engineer. My C.V. is attached as Exhibit No. (KB-2).

Q: **What is the purpose of your testimony?**

A: Rick Wagner of BNSF explained that he was recently provided with Whatcom County's reported Average Annual Daily Traffic counts for Valley View Road and Ham Road. We also understand that the County will likely provide a more detailed report or further information in their submitted materials. We have been asked to review and confirm the County's traffic counts and additional information to the extent applicable, under the assumption that the Ham Road crossing will be signalized, and analyze the impacts of closure. Once we generate the corresponding Traffic Impact Study, which should not take long, we will summarize the process, analysis, findings, conclusions, and recommendations related to the potential closure of the Valley View Road at-grade crossing. My understanding is that the report will then be provided to the other parties in this proceeding.

Q: What AADT counts were you provided?

A: We were advised that Whatcom County told Mr. Wagner that it had measured an Average Annual Daily Traffic (AADT) of 365 vehicles for Valley View Road (in 2014), and 198 vehicles for Ham Road (in 2011).

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Q: What work will you perform in response to the request to close the BNSF/Valley View Road railway crossing?

A: HPSI will prepare a traffic impact study to assess the impact of closing the Valley View Road at-grade to vehicular on the surrounding transportation system.

Q: What is a Traffic Impact Study (TIS)?

A: A traffic impact study evaluates the impacts to traffic operations on a transportation system related to a proposed action or change to the system.

Q: What guidelines are used in development of a TIS?

A: A standardized process for identifying impacts to traffic operations has been developed by the traffic engineering community and is commonly employed to address jurisdictional requirements. Different jurisdictions may have slightly different guidelines. There are common analysis techniques and accepted practices within the professional traffic engineering community. Many of the practices are documented by the Institute of Transportation Engineers in their Manual of Transportation Engineering Studies.

Q: What are TIS guidelines?

A: TIS guidelines are outlines of the desired scope of work to be performed. The guidelines focus the study on a specific area.

Q: What are some of the commonly accepted analysis practices and techniques?

A: The commonly accepted analysis practices may include, but are not limited to:

- Identification of the peak hour traffic flow during an average weekday,
- Evaluation of the existing crash data,
- Evaluation of changes to emergency response times, and
- Evaluation of changes to expected vehicular delay (level of service).

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The commonly accepted analysis techniques may include, but are not limited to:

- Counting peak hour traffic volumes from 6:30-9:30A and 3:00-6:00P in 15-minute increments while classifying vehicle types.
- Identifying crash rates and trends in different crash types that could be mitigated with different intersection traffic control or changes to roadway width or geometry.
- Determining changes to emergency response time based on adverse travel and/or congestion.
- Using Synchro or Highway Capacity Software to evaluate vehicle delay and determine level of service as determine by methodologies in the Highway Capacity Manual.

Q: Are these the practices and techniques and that you plan to use in generating the TIS?

A: Yes.

Q: You mentioned that the County measured an AADT of 365 vehicles at Valley View Road. If this traffic level is confirmed in your traffic study, what does this tell us about the Valley View Road crossing?

A: According to the Manual on Uniform Traffic Control Devices, Valley View is likely considered a low-volume road. A low-volume road is a road outside of built-up areas of cities, towns, and communities, with a traffic volume of less than 400 AADT. In addition, the peak traffic volume is generally 8-15% of the AADT. Therefore, we would expect that if the County's AADT is correct, that Valley View Road crossing would have an average peak traffic volume of 29-55 vehicles displaced during peak traffic times to alternate routes. We do not expect this to make a significant impact on alternate crossings, or intersections. This will be reviewed by the TIS.

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DECLARATION

I, KURT BIALOBRESKI, declare under penalty of perjury under the laws of the State of Washington that the foregoing PREFILED TESTIMONY OF KURT BIALOBRESKI is true and correct to the best of my knowledge and belief.

DATED this _6th_ day of August, 2015.

KURT BIALOBRESKI

DATED this 7th day of August, 2015.

Montgomery Scarp, PLLC

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CERTIFICATE OF SERVICE

I am over the age of 18; and not a party to this action. I am the assistant to an attorney with Montgomery Scarp PLLC, whose address is 1218 Third Avenue, Suite 2500, Seattle, Washington, 98101.

I hereby certify that the original and 1 copies of the PREFILED TESTIMONY OF KURT BIALOBRESKI have been sent by VIA FED EX to Steven King at WUTC and a PDF version sent by electronic mail. I also certify that true and complete copies have been sent to the following interested parties via U.S. Mail:

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Chief Civil Deputy
Prosecuting Attorney
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Joseph P. Rutan
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I declare under penalty under the laws of the State of Washington that the foregoing information is true and correct.

DATED this 7th day of August, 2015, at Seattle, Washington.

Pamela Ruggles, Paralegal

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