

**From:** Quinn Plant  
**To:** ["david.trautman@simplot.com"](mailto:david.trautman@simplot.com)  
**Subject:** bnsf pre-filed testimony  
**Date:** Thursday, November 06, 2014 3:58:00 PM  
**Attachments:** [Dave Trautman prefiled test 110614.doc](#)

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Hi Dave,

Please give me a call when you have had a chance to review the attached.

Thanks,

Quinn Plant  
Menke Jackson Beyer, LLP  
807 North 39th Avenue  
Yakima, WA 98902  
509-575-0313  
509-575-0351 fax  
[www.mjbe.com](http://www.mjbe.com)

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**4. Would the closure of the railroad at-grade crossings at N. Stevens Road and Barnhart Road divert Simplot’s trucks onto SR 22?**

Yes. If the N. Stevens Rd. crossing and the Barnhart Rd. crossing are eliminated, alternate routes will be required in some instances to cross the BNSF line. In some instances, the alternate route will include travel along SR 22.

DATED THIS \_\_\_\_\_ day of November, 2014.

\_\_\_\_\_  
DAVE TRAUTMAN

**MENKE JACKSON BEYER, LLP**

Attorneys at Law

807 NORTH 39<sup>TH</sup> AVENUE • YAKIMA, WASHINGTON 98902  
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November 20, 2014

Mr. Dave Trautman  
213 Riverside  
Sunnyside, WA 98944

RE: *BNSF v. Yakima County*  
*WUTC Docket Nos. TR-140382 and TR-140383*

Dear Mr. Trautman:

This letter and its enclosure follow our telephone call on October 17, 2014, and my email to you on November 6, 2014.

Enclosed for your review is Prefiled Testimony of Dave Trautman. If this testimony accurately reflects the information we discussed, please sign where indicated and return to our office in the enclosed, self-addressed, stamped envelope.

If you have any questions or concerns about this testimony, please contact me at your earliest convenience at 509-969-0317.

Thank you for your assistance in this pressing matter.

Very truly yours,



Quinn N. Plant

QNP:ksl  
Enclosure

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

BNSF RAILWAY COMPANY,	)	DOCKET TR140382 and
	)	DOCKET TR140383
Petitioner,	)	
vs.	)	
	)	PREFILED TESTIMONY OF
YAKIMA COUNTY,	)	DAVE TRAUTMAN
	)	
Respondent.	)	
_____	)	

**1. Please state your name and address.**

Dave Trautman, 213 Riverside, Sunnyside, WA 98944.

**2. What is your occupation?**

I am a Crop Advisor with Simplot Soilbuilders in Prosser, Washington. Simplot is a commercial fertilizer and company. Simplot operates four different facilities in the vicinity of the North Stevens Road and Barnhart Road railroad at-grade crossings. Simplot services many farms in the vicinity of the North Stevens Road and Barnhart Road at-grade crossings.

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3 **3. Does Simplot use the railroad at-grade crossings at North Stevens Road and**  
4 **Barnhart Road?**

5 Yes. Our trucks deliver fertilizer and chemicals to many farms near the crossings.  
6 We use large trucks that carry significant volumes of solid and liquid fertilizer. We rely  
7 on the crossings to make timely and efficient deliveries to our customers.

8 **4. Would the closure of the railroad at-grade crossings at North Stevens Road**  
9 **and Barnhart Road divert Simplot's trucks onto SR 22?**

10 Yes. If the North Stevens Road crossing and the Barnhart Road crossing are  
11 eliminated, alternate routes will be required to cross the BNSF line. In some instances,  
12 the alternate route will include travel along SR 22.

13 DATED THIS \_\_\_\_\_ day of November, 2014.

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16 DAVE TRAUTMAN  
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