

## COMMISSION STAFF CROSS-EXAMINATION EXHIBITS

### Peterson

1. City of Mount Vernon Response to Staff Data Request No. 2 (also listed above for McIntyre)
2. City of Mount Vernon Response to Staff Data Request No. 3

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

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BNSF RAILWAY COMPANY,	)	<b>DOCKET NO. TR-070696</b>
Petitioner	)	
	)	CITY'S RESPONSES TO UTC'S
	)	FIRST DATA REQUESTS
v.	)	
CITY OF MOUNT VERNON,	)	
Respondent	)	
And	)	
SKAGIT COUNTY, WASHINGTON	)	
STATE DEPARTMENT OF	)	
TRANSPORTATION, WEST VALLEY	)	
FARMS LLC, and SKAGIT COUNTY,	)	
Intervenors	)	

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**UTC STAFF DATA REQUEST NO. 1:**

Please provide copies of any and all data requests submitted to you by any party to this proceeding and your corresponding responses to those data requests.

*Date Prepared: November 6, 2007*

*Response: The City has not received other data requests pertaining to Docket No. TR-070696.*

**UTC STAFF DATA REQUEST NO. 2:**

Please provide a summary of traffic accidents at, or near, the intersection of Blackburn – South Second Street/Old Highway 99 for a three-year period ending September 30, 2007.

Nature

*Heidi Kjos Mount Vernon Police Department Records Specialist  
Date Prepared: November 1, 2007*

Response: Attached is a list prepared by the MVPD providing a summary involving traffic accidents at the location provided above. Below is a list of acronyms used in the attached list and their meaning:

MVA: "Motor Vehicle Accident"

DUI: "Motor Vehicle Accident which resulted in DUI charge"

MVAU: "Motor vehicle Accident Unknown Injury"

Loctn ("Location")- Location of officers patrol area

RCMAS: City of Mount Vernon Annex South

RCMS: City of Mount Vernon South

RCMD: City of Mount Vernon Downtown

Dsd ("Disposition")

INA: "inactive"

ACT: "active"

CAA: "cleared adult arrest"

### **UTC STAFF DATA REQUEST NO. 3:**

Please provide a summary of complaints received by the city of trains blocking the crossing at the Blackburn-South Second Street/Old Highway 99 intersection.

*Heidi Kjos Mount Vernon Police Department Records Specialist*

*Date Prepared: November 5, 2007*

Response: A search for complaints received by the Mount Vernon Police Department was unable to locate complaints regarding trains blocking the crossing.

*Attached is a list of complaints identified as "traffic hazard" for the location described above. All traffic hazards identified on the list involve complaints of malfunctioning of the safety crossing arms which blocked the intersection. Please refer to answer two for the list of acronyms and definitions used.*

### **UTC STAFF DATA REQUEST NO. 4:**

Please state the width of the existing road surface and the width of city-owned right-of-way on Hickox Road.

*From Mikael Love, City of Mount Vernon Assistant Public Works Director*

*Date prepared: October 31, 2007*

**Response:**

*The existing road surface width is 20-feet. The right of way on Hickox is 60-feet wide.*

# DATA REQUEST #3

CallID	When Reported	Typ	Nature	P	Location	Cty
6028303	15:07 04/05/06	1	TRAFFIC HAZAR	3	1999 S 2ND ST & W BLACK	MVW
C06037705	16:30 05/04/06	1	TRAFFIC HAZAR	3	100 E BLACKBURN RD & OI	MVS
C06041209	19:39 05/15/06	1	TRAFFIC HAZAR	3	100 W BLACKBURN RD & S	MVS
C06080345	22:08 09/06/06	1	TRAFFIC HAZAR	2	100 E BLACKBURN RD & S	MVS
C07035827	18:45 04/25/07	1	TRAFFIC HAZAR	2	100 E BLACKBURN RD & OI	MVS
<del>C07036636</del>	<del>10:28 04/28/07</del>	<del>1</del>	<del>TRAFFIC HAZAR</del>	<del>2</del>	<del>100 E BLACKBURN RD</del>	<del>MVS</del>
C07036866	21:10 04/28/07	1	TRAFFIC HAZAR	2	2000 OLD HWY 99 S RD &	MVS
C07063302	09:35 07/16/07	1	TRAFFIC HAZAR	3	1999 S 2ND ST & E BLAC	MVW
C07074165	06:40 08/16/07	1	TRAFFIC HAZAR	3	100 E BLACKBURN RD & OI	MVW
C07079143	07:25 08/30/07	1	TRAFFIC HAZAR	3	2000 OLD HWY 99 S RD &	MVW
C07081472	17:23 09/05/07	1	TRAFFIC HAZAR	3	1999 S 2ND ST & E BLACK	MVW
<del>C07082822</del>	<del>14:35 09/09/07</del>	<del>1</del>	<del>TRAFFIC ENFOR</del>	<del>2</del>	<del>101 W BLACKBURN RD &amp; S</del>	<del>MVW</del>
C07082822	14:35 09/09/07	1	TRAFFIC ENFOR	2	101 W BLACKBURN RD & S	MVW
C07083162	14:15 09/10/07	1	TRAFFIC HAZAR	3	100 E BLACKBURN RD & S	MVW

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 Secondary Dissemination  
 Prohibited unless in Com-  
 pliance with RCW 10.97.050