

UTC STAFF DATA REQUEST NO. 2:

Please provide a copy of any agreement reached with property owners west of the tracks who currently use Pederson Lane (a private crossing) to access their property. If no agreement has been reached, please provide copies of any correspondence related to this crossing in reference to the siding project.

RESPONSE:

There is no agreement with any property owners west of the tracks who use Pederson Lane to access their property. All correspondence regarding Pederson Lane is attached to this submittal.

Closing Pederson Lane private crossing is not part of the siding extension project.

UTC STAFF DATA REQUEST NO. 3:

Please provide a brief description of the work described in Mr. Schultz's testimony as "Phase 1" rehabilitating the existing siding track. What specific work was done, and where was it done?

RESPONSE:

BNSF Railway was issued a task order under our Capital Improvement Agreement RR-0278 in 2005 to do the following Phase 1 upgrade and rehabilitation work to the Mt. Vernon siding:

BNSF shall rehabilitate the storage track know as Mt. Vernon Siding to provide a 20 MPH controlled siding at Mt Vernon WA to accommodate WSDOT intercity passenger program. Railroad shall relay 6480 TF (track feet) of 115 CBR (bolted rail) with 136 CWR (continuous welded rail), install 1,400 crossties, upgrade the Blackburn Crossing and perform signal modifications as required.

The Mt. Vernon Siding is located on BNSF Railway's Bellingham Subdivision, milepost 66 and 67.4. These improvements occurred over the length of the siding track.

UTC STAFF DATA REQUEST NO. 4:

Please indicate where in the traffic study it addresses specifically the question "whether the alternate crossings are less hazardous," as referenced in Mr. Schultz's testimony on page 14, line 25?

WSDOT'S RESPONSES TO
WUTC'S FIRST DATA REQUESTS

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

RESPONSE:

The traffic study did not specifically address whether the alternative crossings would be less hazardous than the Hickox Road crossing. The remaining railroad/highway intersections in the traffic study area will experience a modest increase in vehicle usage compared to the existing conditions. However, the overall study area will experience a risk reduction of "potential accidents" due to the elimination of 1 crossing from the roadway network.

We have assumed that if the Hickox Road crossing is closed, the existing warning devices would be relocated to the Stackpole Road crossing.

UTC STAFF DATA REQUEST NO. 5:

Please describe how Mr. Norris analyzed the question posed by WSDOT of whether the alternative crossings (those that motorists would use instead of Hickox) are less hazardous than Hickox.

RESPONSE:

Please see the answers to UTC Staff Data Request No. 4:

UTC STAFF DATA REQUEST NO. 6:

Both the traffic study and Mr. Norris's testimony (page 14, line 6) assert that there is a single, mainline track through the Blackburn crossing. Please admit that there are two tracks, a mainline track and the existing siding track, running through Blackburn.

RESPONSE:

Yes, running through Blackburn there is a mainline track and the existing siding track.

UTC STAFF DATA REQUEST NO. 7:

Please admit that two highways—South Second Street/Old Highway 99 and Blackburn—intersect with each other and with two BNSF tracks at the same location.

WSDOT'S RESPONSES TO
WUTC'S FIRST DATA REQUESTS

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