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

	)	
BNSF RAILWAY COMPANY,	)	
	)	DOCKET NO: TR-150189
Petitioner	)	
	)	PREFILED TESTIMONY OF GRANT
vs.	)	HAAG
	)	
WHATCOM COUNTY,	)	
	)	
Respondent.	)	
_____	)	

**Q: Please state your full name and job title.**

A: My name is Grant Haag. I am currently the BNSF Terminal Superintendent of the Greater Seattle Terminal Complex. My territory runs from New Westminister British Columbia south to Vancouver, WA, east to Wenatchee, WA, and another line east to Pasco, WA

**Q: Please describe your position with BNSF Railway Company (BNSF).**

A: I have been employed by BNSF Railway Company (BNSF) for approximately 6.5 years. During my employment, I have worked as a Terminal Trainmaster, Division Trainmaster, Customer Integration Sales Manager, Terminal Manager, Assistant Terminal Superintendent, and Terminal Superintendent. In general, my duties as Terminal Superintendent include the supervision

1 of employees and management of train movement within the Greater Seattle Terminal Complex  
2 for BNSF Railway.

3  
4 **Q: Are you familiar with BNSF's transportation system? In a nutshell, can you describe**  
5 **it?**

6 A: Yes I am familiar with BNSF's transportation system. BNSF has approximately 48,000  
7 employees. Those men and women help BNSF operate an average of 1,600 trains per day over  
8 32,500 route miles across 28 states and three Canadian provinces. BNSF transports the products  
9 and materials that help feed, clothe, power, and supply communities throughout the country. BNSF  
10 moves these goods more safely and efficiently, using less fuel, with fewer emissions than trucks on  
11 the highway.

12  
13 **Q: Can BNSF choose what commodities it transports?**

14 A: No. BNSF is required, by federal law, to transport all kinds of commodities and cannot  
15 refuse to transport such products.

16  
17 **Q: What is the outlook regarding the demand for rail transport? Does it present any**  
18 **challenges?**

19 A: As our communities grow, the demand for freight and passenger rail services continues to  
20 increase. This presents a challenge to the capacity of the rail system. Train tracks are not like a  
21 highway; most of the time there is only one set of mainline tracks. BNSF has installed siding  
22 tracks to allow trains traveling in opposite directions to meet and pass each other or to allow higher  
23 priority trains like Amtrak and UPS trains to pass. The need for additional, or longer (as the  
24 average length of train increases), meet/pass siding tracks continues to present a challenge. BNSF,  
25 and other railroads, experienced backlogging of trains as recently as 2014, when a strengthening  
26 economy resulted in increased shipments of all types. BNSF (and other railroads) experienced  
27 significant delays in the ability to transport customer's products due to a lack of infrastructure to  
28 keep up with demand.

1 In Washington state, specifically, economic and community growth are expected to  
2 increase. Washington is a trade dependent state with major industries, including aircraft  
3 manufacturing, forest products, and agriculture. Rail plays an important role in exporting those  
4 products to other states and countries, and in attracting new industries to our state as well. The  
5 demand for passenger rail service has also increased. In order to meet the increasing need, and  
6 minimize shipping delays, BNSF must continue to upgrade its infrastructure which includes  
7 building and expanding siding tracks, to prevent unscheduled service outages that can slow down  
8 the rail network, reduce capacity, and delay freight reaching our customers. A train delay in  
9 Washington State can have a “domino effect” along the system and delay trains in other states as  
10 well. Everything is interconnected and impacts the fluidity of the rail system.

11  
12 **Q: What is BNSF doing to try to meet the increased demands for access to rail**  
13 **infrastructure?**

14 **A:** To ensure BNSF's network operates at optimal efficiency, each year the company allocates  
15 capital for infrastructure and expansion projects that will enable it to serve the growing needs of  
16 customers from a broad cross section of the economy. BNSF recently announced that its 2015  
17 capital program for its operations in Washington will be an estimated \$189 million for rail capacity  
18 improvement projects and maintenance. These investments in Washington are a clear reflection of  
19 how important our operations in the state are to our overall network and our unwavering  
20 commitment to operating safely. BNSF's 2015 capital projects in Washington include completing  
21 construction of double track from Ferndale to Custer totaling nearly seven miles; constructing the  
22 meet/pass siding track across Valley View Road to provide extra capacity; reconfiguring the  
23 Bayside and Delta rail yards located in Everett to improve efficiency and provide more capacity;  
24 and continuing to work through permitting and right-of-way issues involving the replacement of  
25 the Washougal River bridge in Camas. Construction should start this year and continue into 2016.

26 The planned capital investments in Washington are part of BNSF's record 2015 capital  
27 commitment of \$6 billion, which was announced last November and is the company's largest  
28 planned capital expenditure in its history.

1 **Q: What about rail safety? What safety implications are involved in expanding rail**  
2 **infrastructure?**

3 A: Safety is BNSF's highest priority. While BNSF works with communities and public  
4 agencies like WSDOT in an endeavor to minimize the potential negative impacts to the  
5 communities, there are times that safety considerations require some closure of existing at-grade  
6 road crossings, because of safety concerns, if adequate alternative routes exist for the traveling  
7 public. Nobody wants to see a safety-related incident at a railroad crossing.

8  
9 **Q: Are you familiar with the Intalco Yard Expansion project? What does it involve?**

10 A: This project is within my territory and involves an extension of the existing Intalco yard  
11 meet/pass siding track, currently located west of Valley View Road. The Intalco project will allow  
12 existing customers in the Cherry Point industrial area to receive and depart full length trains without  
13 blocking the main line, switches or roads (assuming the Valley View Road at-grade crossing is  
14 closed). Presently, trains need to go through multiple switching operations to break the train up and  
15 store portions of a train on the shorter yard tracks and existing meet/pass siding tracks, which  
16 increases congestion and road blockages. The Intalco project is required to serve existing customer  
17 needs and reduce impact on BNSF's other mainline tracks to reduce train congestion on a broader  
18 scale than is simply involved with the Intalco Yard. This work will allow trains to exit the main line  
19 and allow passenger and higher priority freight trains to clear through the Custer area, as well. The  
20 yard tracks and mainline will also be upgraded to improve efficiency and security. BNSF has worked  
21 with Whatcom County to mitigate the effects of this closure. And to reiterate, the new hazards  
22 associated with two tracks, stationary trains, and visibility issues justify closure of the Valley View  
23 crossing in the interest of public safety.

24  
25 **Q: Has BNSF considered ways to mitigate the impact of closure on the nearby**  
26 **community?**

27 A: Yes. We recognize that closing this crossing will be inconvenient for some motorists, but  
28 want to make sure that everyone is safe first and foremost. Some mitigation alternatives discussed

1 included the use of active warning devices, signage, and cul-de-sac construction. For instance, active  
2 warning devices and signals will be installed at the Ham Road Crossing where none exist presently;  
3 BNSF will install signage at the intersections of Arnie/Ham Road & Valley View Road and Creasey  
4 Road & Valley View Road to indicate no public thoroughfare. In addition, it is a general requirement  
5 that trains blow their whistle four times while approaching a public crossing, day or night. Trains  
6 will no longer need to blow their horn while approaching the Valley View Road; this combined with  
7 fewer vehicles driving on Valley View should increase the peace and quiet for nearby residents.  
8

9 **Q: What will the overall length of the meet/pass siding track measure when the project is**  
10 **completed?**

11 A: The Intalco Yard Improvement Project will extend both ends of the current track to create  
12 an overall length that is planned to be 7,230 feet once the project is complete. This will allow us to  
13 accommodate most of our customer's trains without having to break the train into multiple tracks  
14 or block the mainline.  
15

16 **Q: What are the lengths of the trains that will occupy the meet/pass siding track once it is**  
17 **put in use?**

18 A: The average length of a train is a mile or more, with each rail car measuring approximately  
19 50 feet. The meet/pass siding track will be able to accommodate much longer trains and/or many  
20 more rail cars than its current capacity allows. The purpose of this project is to enable BNSF to  
21 move full-length trains on and off the mainline without blocking the mainline, switches, or roads  
22 by allowing trains to exit the mainline onto the extended meet/pass siding track. The project  
23 reduces congestion, switching operations, and the need to break and rebuild full length trains to fit  
24 onto the shorter meet/pass siding and yard tracks.  
25

26 **Q: How often do trains currently use the existing track at Valley View Road, and is the**  
27 **current number expected to stay the same or change?**  
28

1 A: Currently, the train count through Valley View Road averages about four trains per day, for  
2 a total of eight trips through the crossing. These trains currently service six different customers.  
3 This number will fluctuate depending on customer demand; however, once the meet/pass siding  
4 track is extended through the crossing, trains will be parked on the meet/pass siding track as  
5 needed to accommodate customer operations and other train traffic through the area.

6  
7 **Q: What role does the meet/pass siding track play in that and what is its purpose?**

8 A: As I said above, meet/pass siding tracks allow trains to exit the main line and allow  
9 passenger and higher priority freight trains to clear through the Custer area off the Bellingham  
10 Subdivision. Meet/pass siding tracks near an industry can be necessary when trains run on a single  
11 track, like the track involved here. It will allow existing customers to receive and depart full length  
12 trains without blocking the main line. It will allow trains to exit the main line and allow passenger  
13 and higher priority freight trains to clear through the Custer area, as well. Amtrak passenger trains  
14 have priority on BNSF's other mainline tracks because they must meet time schedules and they  
15 travel faster- so BNSF's freight trains must wait on the various siding tracks until the Amtrak train  
16 passes. Extending this particular siding track will free up other tracks in the area and lead to  
17 less-congested train traffic.

18  
19 **Q: For how long can trains expect to be stopped on the meet/pass siding track?**

20 A: A train or cars placed onto the meet/pass siding track may be stopped a considerable time. A  
21 stopped train could easily stay on the meet/pass siding for hours or more, depending on the  
22 customer's needs and other train traffic in the area. The road could be blocked for hours.

23  
24 **Q: Where will the Valley View Road crossing be located in relation to the meet/pass  
25 siding track once that project is complete?**

26 A: The Valley View Road crossing will be located in the east half of the siding track.  
27  
28

1 **Q: Would trains block the Valley View Road crossing when they are stopped on the**  
2 **meet/pass siding track?**

3 A: In the majority of cases, yes. But even if a train is short enough and the conductor stops it  
4 to either side of the crossing, a visibility hazard is created for cars and pedestrians at the crossing  
5 (if the crossing is not closed). A parked train will prevent an open view of trains moving on the  
6 mainline for northbound drivers, and in the event that a train is stopped on the mainline, it would  
7 prevent an open view of trains moving on the siding track for southbound drivers. Trains do not  
8 move on particular schedules, so trains should always be expected at any time.

9  
10 **Q: If the Valley View Road crossing remains open, what are the hazards for cars and**  
11 **pedestrians created by the existence of a meet/pass siding track at the crossing?**

12 A: Even with lights and gates, there is always the concern that drivers tend to disregard  
13 warning devices when they believe the cause for the activation of gates is the nearby train that is  
14 not moving. This creates the potential for a driver to violate the warning devices and drive into the  
15 path of an oncoming train. It is very unsafe for the public to drive through flashing gates. Further,  
16 if the crossing remains open and trains are parked or even split, pedestrians may be tempted to  
17 walk under, over, near and around the trains which can cause fatal consequences. Removing the  
18 crossing discourages people from walking under, over and around trains. In addition, sometimes  
19 motorists drive into the side of parked trains. Barricading this crossing should prevent that from  
20 happening.

21  
22 **Q: Is it reasonable for BNSF to split a freight train that is stopped on the meet/pass**  
23 **siding track and blocking the crossing to open the crossing for an approaching emergency**  
24 **vehicle?**

25 A: No, it is not reasonable to split the train. First, splitting and then recombining a train can  
26 take a long time. In an emergency situation, the time it would take for the train crew to be notified,  
27 walk back to the crossing, and safely split the crossing would be a significant delay to the  
28 emergency vehicles. Second, splitting the train creates hazards for our train crews who must walk

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1 the length of the train to “split” it as well as put the train back together. BNSF operates 24 hours a  
2 day, 365 days a year regardless of weather conditions. It can also impede motorists’ visibility of  
3 oncoming trains on the mainline track, increasing the risk of rail accidents.

4  
5 **Q: Would splitting the train stopped on the meet/pass siding track to allow vehicle traffic**  
6 **through the blocked crossing have any effect on other rail traffic using the mainline?**

7 A: Recombining the split cars takes longer than the actual splitting of the crossing. This  
8 involves the trainman walking from the locomotive to the split cars, re-combining the cars,  
9 re-hooking the air brakes, releasing handbrakes and performing various required diagnostics  
10 depending on the amount of time the train has been separated. This could delay other trains that  
11 need to set or pick up cars from the siding track, delay the split train, and cause delays to other  
12 trains in the area. This would add at the very least 30 or 45 minutes to the train’s original wait  
13 time. In addition, waiting traffic would be subject to the same wait, if they did not choose to or  
14 were unable to turn around to use another crossing. In addition, the increased risk of rail accidents  
15 described above would present increased safety risks for trains running on the mainline track.

16  
17 **Q: Can you please describe the effect that leaving the Valley View Road crossing open**  
18 **once the meet/pass siding track is completed would have on BNSF’s railroad operations?**

19 A: If the crossing is left open, there will be a large inefficiency and train delay problem, but  
20 most importantly, an intolerable level of risk to public safety which can be prevented by closing  
21 the crossing.

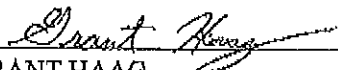


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DECLARATION

I, Grant Haag, declare under penalty of perjury under the laws of the State of Washington that the foregoing PREPARED TESTIMONY OF GRANT HAAG is true and correct to the best of my knowledge and belief.


DATED this 6 day of August 2015.

  
GRANT HAAG

DATED this ~~2~~<sup>3</sup>rd 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 GRANT HAAG 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:

Daniel L. Gibson  
Chief Civil Deputy  
Prosecuting Attorney  
Whatcom County  
311 Grand Ave., Suite 201  
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Joseph P. Rutan  
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Julian Beattie  
Assistant Attorney General  
1400 S. Evergreen Park Drive SW  
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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 7<sup>th</sup> day of August, 2015, at Seattle, Washington.

  
Pamela Ruggles, Paralegal