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

<p>CITY OF SPOKANE VALLEY, a municipal corporation,</p> <p style="text-align: center;">Complainant,</p> <p style="text-align: center;">v.</p> <p>UNION PACIFIC RAILROAD COMPANY (aka UPRR)</p> <p style="text-align: center;">Respondent.</p>	<p>DKT. NO. TR-210814 TR-210809</p> <p>REBUTTAL TESTIMONY OF GLORIA MANTZ</p>
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Please state your full name and job title.

My name is Gloria Mantz. I am the City Engineer for the City of Spokane Valley Engineering Division, and was previously the Engineering Manager until February 2022.

Have you reviewed the pre-filed testimony prepared by UPRR in support of its opposition to the City’s petition to modify the at-grade crossing at Barker Road and Euclid Avenue?

Yes. I would like to respond in particular to the testimony of Peggy Ygbuhay and Ellis May.

What comments do you have in response to the testimony of Peggy Ygbuhay?

Specifically, I would like to respond to Ms. Ygbuhay’s assumption that the Barker Road Corridor Project is the cause of increased traffic volumes along Barker Road. That assumption is fundamentally incorrect. In fact, the opposite is true. Traffic volumes along

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the Barker Road Corridor have been increasing for years, and will continue to increase as the area north of Barker Road continues to develop. Based on the latest counts outside of the construction season, Barker Road sees 6,600 vehicles per day from Euclid Avenue to Trent Avenue and 12,800 vehicles per day from the Spokane River to Euclid Avenue. Traffic volumes have historically grown by more than 5% annually and are projected to grow even faster when the Barker Grade Separation Project is completed.

These traffic volumes will increase regardless of whether or not the City is able to complete its Barker Road Corridor Project, including the at-grade crossing at Barker Road and Euclid Avenue. Therefore, contrary to Ms. Ygbuahy's position, the Barker Road Corridor project and the modifications to the at-grade crossing will improve public safety as it will allow the increased traffic volumes to safely traverse Barker Road by providing a center turn lane that allows for left turn movements and a shared used path that provides safe facilities for pedestrians and bike users. Without the center turn lane, there will be queuing issues, which will cause traffic to back up, decrease Level of Service, and result in more rear-end and turning related crashes. Without the shared use path, pedestrians and bikers must share the existing narrow lanes on Barker with freight and vehicular traffic. Currently, Barker Road does not have sidewalks or bike lanes.

Further, contrary to Ms. Ygbuahy's concerns, the widening of Barker Road and the improvements to the crossing area will improve the safety of the crossing. In addition to the actual warning devices, the City will be adding eight-inch high concrete medians to Barker Road to both the southbound and northbound approaches to block traffic from trying to go around the railroad crossing arms while they are down. This median curb also extends further south to block left turns out from Hattamer Lane. The City will also increase the

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roadway's radius for eastbound Euclid Avenue traffic turning southbound on Barker Road. The City will also increase the southbound lane width. This allows for larger trucks to make the right turn from Euclid Avenue onto Barker Road without encroaching into opposite lanes of travel and/or jumping over the curb/guardrail and hitting the railroad crossing structures on the inside of the turn.

What comments do you have in response to the testimony of Ellis May?

Specifically, I would like to respond to Mr. May's statement that the City approved the signal maintenance fees via email on December 8th, 2020. Neither I nor Mr. Lochmiller had the authority to approve agreements regarding maintenance fees in 2020. The authority to approve contracts is vested exclusively with the City Council. Pursuant to Spokane Valley Municipal Code (SVMC) 3.35.010, the City Council delegated limited authority to the City Manager to execute certain contracts, including of the type and amount alleged by Mr. May. Pursuant to SVMC 3.35.020, the City Manager may develop policies to implement chapter 3.35 SVMC, which may include delegations of authority. Prior to 2022, the City Manager has never delegated authority to any other staff member to enter into an agreement regarding maintenance fees.

DECLARATION

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

DATED THIS 25 day of April, 2022.


Digitally signed by Gloria M Mantz
DN: C=US,
E=gmantz@spokanevalley.org,
O=City of Spokane Valley,
CN=Gloria M Mantz
Date: 2022.04.25 09:33:37-07'00'

GLORIA MANTZ

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CERTIFICATE OF SERVICE

I certify, under penalty of perjury, under the laws of the State of Washington, that on this day, I caused to be served a true and correct copy of the foregoing document by the method indicated before, and addressed to the following:

Washington Utilities & Transportation Commission	<input checked="" type="checkbox"/> efiling.utc.wa.gov/form
Jeff Roberson Assistant Attorney General Office of the Attorney General Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 (360) 664-1188	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-Mail: jeff.roberson@utc.wa.gov <input type="checkbox"/> Via Hand Delivery
Ellis Mays 3017 Douglas Boulevard Suite 300 Roseville, CA 95661 (916) 774-7165 (Contact for Union Pacific Railroad)	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-Mail: emays@benesch.com <input type="checkbox"/> Via Hand Delivery
Josephine S. Jordan Union Pacific Railroad 1400 Douglas Street, MS 1580 Omaha, NB 68179 (402) 544-4554 (Counsel for Union Pacific Railroad)	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-Mail: jjordan1@up.com <input type="checkbox"/> Via Hand Delivery
Rachel Tallon Reynolds Jean Y. Kang 1111 Third Avenue, Suite 2700 Seattle, Washington 98101 (206) 436-2020 (Counsel for Respondent)	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-Mail: Rachel.Reynolds@lewisbrisbois.com Jean.Kang@lewisbrisbois.com <input type="checkbox"/> Via Hand Delivery

Dated in Yakima, Washington, this 26th day of April, 2022

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Cindy Maley
CINDY MALEY