Exhibit No.\_\_\_\_\_ (KB-2T)

**BEFORE THE WASHINGTON STATE**

**UTILITIES AND TRANSPORTATION COMMISSION**

BNSF RAILWAY COMPANY,

Petitioner

vs.

WHATCOM COUNTY,

Respondent.

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DOCKET NO: TR-150189

SUPPLEMENTAL PREFILED

TESTIMONY OF KURT Bialobreski

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Q: **Please state your name and business address.**

A: My name is Kurt N. Bialobreski, P.E., PTOE.

My business address is 7625 N. University Street, Suite 200, Peoria, IL 61614.

My business email address is: [kbialobreski@hanson-inc.com](mailto:kbialobreski@hanson-inc.com)

Q: **You submitted prefiled testimony on August 7, 2015, which referenced an ongoing Traffic Impact Study. Has that study been completed?**

A: Yes. It is attached as Exhibit No. (KB-3).

Q: **Did anyone else at your firm assist with the preparation of this report?**

A: Yes. Becca Wagner, E.I., helped prepare the report.

**Q: What is Ms. Wagner’s professional and educational background?**

A: Ms. Wagner has two years of experience with HSPI. She assists professional engineers on projects for municipal, county and state departments of transportation, Class I Railroads, and airport authorities across the country from the Peoria, IL office. She graduated from Bradley University in Peoria, IL with a BS in civil engineering, has her professional engineer intern license in Illinois, and is pursuing her professional engineer license and certification as a professional traffic and operations engineer.

**Q: Whatcom County has advised BNSF that it counted an Average Annual Daily Traffic Count of 365 at Valley View. Was that consistent with the AADT you measured?**

A: Yes. Traffic volumes collected on August 8, 2015 showed an ADT of 364 vehicles. Some variation between days is expected and accepted.

**Q: Do the collected traffic volumes accurately represent the average weekday conditions?**

A: Yes. The traffic data was collected on a Tuesday (average weekday), and we had no knowledge of special events that may cause us to expect unusual traffic patterns. This practice complies with the industry standard for collecting traffic data.

**Q: What were the conclusions of the TIS?**

A: Closing the Valley View and Cherry Point Subdivision Crossing is likely to reduce the overall exposure factor in the study area with minor impacts to the surrounding transportation network. These impacts can be mitigated.

**Q: What were the recommendations for mitigation?**

A: The recommendations were as follows:

1. Installing gates at the Ham/Arnie Road crossing,
2. Constructing a southbound right turn lane at Portal Way and Main Street,
3. Appropriately signing the change in access north of the closure, and
4. Redesign of the intersection at Valley View Road and Creasey Road to allow design vehicles to turn around.

**Q: Your TIS does not use crash prediction methodology to calculate the risk(s) of collisions at the various railroad crossings or on roads. Why not?**

A: The TIS does address risk of collision at the existing railroad crossings by using exposure factor, which is a metric that shows the potential for conflicts per day at a crossing. A crash prediction methodology was not used in the TIS for the following reasons:

1. The analysis in the TIS suggests that there will be an overall reduction in the number of vehicles traversing at-grade crossing with the railroad, which results in an overall reduction in exposure factor as well. Therefore, the number of conflicts between trains and vehicles would decrease; creating less risk of a crash occurring at a crossing.
2. Crashes are random occurrences, and it can be misleading when trying to predict increases or decreases of occurrences at specific locations depending on the situation.
3. The Federal Railroad Administration (FRA) inventory was used to identify crashes that have occurred at the five (5) crossings in the TIS area. A query of the inventory did not show any reported crashes at any of the five (5) at-grade crossings within the last ten (10) years. Standard practice is to use five (5) years of crash data in crash prediction methodologies. This would mean that any prediction method would show there to be an increase in crashes over the existing condition.
4. The TIS predicts that traffic volumes will only increase across at-grade crossings where either the existing or proposed protection is lights and gates.
5. For crash prediction on the roadway system, the characteristics of the majority of roadways in the study area are similar in nature to Valley View Road as it relates to cross-section. Based on this and the general disbursement of a relatively low volume of vehicles from Valley View Road, crashes would not be expected to increase anywhere other than the intersection of Main Street and Portal Way. The condition at Main Street and Portal Way is proposed to be mitigated by constructing a southbound right turn lane.

Q:  **Are the content, data, findings and recommendations in the TIS true and correct to the best of your knowledge?**

A: Yes, they are.

DECLARATION

I, KURT BIALOBRESKI, declare under penalty of perjury under the laws of the State of Washington that the foregoing SUPPLEMENTAL PREFILED TESTIMONY OF KURT BIALOBRESKI is true and correct to the best of my knowledge and belief.

DATED this 11th day of September, 2015.

KURT BIALOBRESKI

DATED this \_\_\_\_\_\_\_\_ day of September, 2015.

Montgomery Scarp, PLLC

Kelsey Endres, WSBA #39409

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