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

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

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

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.

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

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

8
9 **Q: Whatcom County has advised BNSF that it counted an Average Annual Daily Traffic
10 Count of 365 at Valley View. Was that consistent with the AADT you measured?**

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

13
14 **Q: Do the collected traffic volumes accurately represent the average weekday conditions?**

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

18
19 **Q: What were the conclusions of the TIS?**

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

23
24 **Q: What were the recommendations for mitigation?**

25 A: The recommendations were as follows:

- 26 1. Installing gates at the Ham/Arnie Road crossing,
27 2. Constructing a southbound right turn lane at Portal Way and Main Street,
28 3. Appropriately signing the change in access north of the closure, and

1 4. Redesign of the intersection at Valley View Road and Creasey Road to allow design
2 vehicles to turn around.
3

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

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

- 9 1. The analysis in the TIS suggests that there will be an overall reduction in the number of
10 vehicles traversing at-grade crossing with the railroad, which results in an overall
11 reduction in exposure factor as well. Therefore, the number of conflicts between
12 trains and vehicles would decrease; creating less risk of a crash occurring at a crossing.
- 13 2. Crashes are random occurrences, and it can be misleading when trying to predict
14 increases or decreases of occurrences at specific locations depending on the situation.
- 15 3. The Federal Railroad Administration (FRA) inventory was used to identify crashes that
16 have occurred at the five (5) crossings in the TIS area. A query of the inventory did
17 not show any reported crashes at any of the five (5) at-grade crossings within the last
18 ten (10) years. Standard practice is to use five (5) years of crash data in crash
19 prediction methodologies. This would mean that any prediction method would show
20 there to be an increase in crashes over the existing condition.
- 21 4. The TIS predicts that traffic volumes will only increase across at-grade crossings where
22 either the existing or proposed protection is lights and gates.
- 23 5. For crash prediction on the roadway system, the characteristics of the majority of
24 roadways in the study area are similar in nature to Valley View Road as it relates to
25 cross-section. Based on this and the general disbursement of a relatively low volume
26 of vehicles from Valley View Road, crashes would not be expected to increase
27 anywhere other than the intersection of Main Street and Portal Way. The condition at
28

1 Main Street and Portal Way is proposed to be mitigated by constructing a southbound
2 right turn lane.

3
4 Q: Are the content, data, findings and recommendations in the TIS true and correct
5 to the best of your knowledge?

6 A: Yes, they are.

7
8
9
10 DECLARATION

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

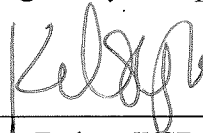
14 DATED this 11th day of September, 2015.



15
16 _____
KURT BIALOBRESKI

17
18 DATED this 15th day of September, 2015.

19
20 Montgomery Scarp, PLLC



21
22 _____
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