

**Exh. BY-6T
Docket TR-180466
Witness: Betty Young**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WHATCOM COUNTY

Petitioner,

v.

BNSF RAILWAY COMPANY

Respondent.

DOCKET TR-180466

CROSS-ANSWERING TESTIMONY OF

Betty Young

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

January 18, 2019

TABLE OF CONTENTS

I. INTRODUCTION 1

II. SCOPE AND SUMMARY OF TESTIMONY 1

III. THE QUIET ZONE RISK INDEX (QZRI) FOR THE CLIFFSIDE DRIVE
CROSSING..... 1

List of Exhibits

- Exh. BY-7 FRA Quiet Zone Calculator screen shot dated Jan. 29, 2018
- Exh. BY-8 FRA Quiet Zone Calculator screen shot dated Jan. 15, 2019

1 **I. INTRODUCTION**

2

3 **Q. Please state your name.**

4 A. Betty Young.

5

6 **Q. Are you the same Betty Young who provided direct testimony on behalf of**
7 **Commission Staff in this proceeding?**

8 A. Yes.

9

10 **II. SCOPE AND SUMMARY OF TESTIMONY**

11

12 **Q. What is the purpose of your testimony?**

13 A. I respond to the testimony filed by Messrs. Stephen Semenick and Dusty Arrington
14 on behalf of Burlington Northern Santa Fe Railroad (BNSF) in this docket.

15

16 **III. THE QUIET ZONE RISK INDEX (QZRI) FOR THE**
17 **CLIFFSIDE DRIVE CROSSING**

18

19 **Q. Did you review the testimony filed by BNSF in this docket?**

20 A. Yes.

21

22 **Q. Does Mr. Semenick take issue with Whatcom County's calculation of the QZRI**
23 **for the Cliffside Drive crossing?**

1 A. Yes. Mr. Semenick testified that when he ran the Federal Rail Administration's
2 (FRA's) Quiet Zone Calculator for the Cliffside Drive crossing with the Average
3 Annual Daily Traffic (AADT) count of 450, the QZRI was 15,707.

4

5 **Q. In your direct testimony, you stated that the QZRI for the Cliffside Drive**
6 **crossing was below the threshold was below the Nationwide Significant Risk**
7 **Threshold (NSRT), correct?**

8 A. Yes.

9

10 **Q. What basis did you have for providing that testimony?**

11 A. I ran the Quiet Zone Calculator for the Cliffside Drive crossing on Jan. 29, 2018,
12 with an AADT of 450. The resulting QZRI was 14,589.26, which is below the NSRT
13 of 14,723.¹

14

15 **Q. When you used the Quiet Zone Calculator in 2018, did you modify any of the**
16 **preset inputs for the Cliffside Drive crossing?**

17 A. No.

18

19 **Q. Do you know how Mr. Semenick produced a QZRI number above the NSRT?**

20 A. No.

21

¹ Exh. BY-7.

1 **Q. Did you rerun the Quiet Zone Calculator to attempt to confirm Mr. Semenick's**
2 **results?**

3 A. Yes.

4

5 **Q. What happened when you did so?**

6 A. I re-ran the calculator without modifying any preset inputs, including the 450 AADT,
7 on Jan. 15, 2019, and arrived at the same QZRI result I had previously: 14,589.26.² I
8 asked a colleague in my office to run the calculator separately and she also arrived at
9 14,589.26.

10

11 **Q. Does Staff continue to recommend that the Commission approve Whatcom**
12 **County's petition?**

13 A. Yes.

14

15 **Q. Why?**

16 A. Whatcom County proposes to install FRA-approved supplemental safety measures at
17 the Cliffside Drive crossing. Staff supports the County's efforts to improve safety at
18 this crossing, which currently qualifies for quiet zone establishment without any
19 modifications.

20

21 **Q. Does this conclude your testimony?**

22 A. Yes.

² Exh. BY-8.