

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**PUGET SOUND AND PACIFIC  
RAILROAD,**

**Petitioner,**

**v.**

**GRAYS HARBOR COUNTY,**

**Respondent**

.....  
**PUGET SOUND AND PACIFIC  
RAILROAD,**

**Petitioner,**

**v.**

**CITY OF ELMA,**

**Respondent**

**DOCKET TR-110157  
DOCKET TR-110162**

**DOCKET TR-110159  
DOCKET TR-110160  
DOCKET TR-110161**

**TESTIMONY OF  
RUSSELL D. ESSES  
ROAD ENGINEER  
FOR  
GRAYS HARBOR COUNTY**

**November 8, 2011**

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1                   **I.       WITNESS QUALIFICATIONS AND EXPERIENCE**

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

A.     My name is Russell D. Esses. The business address for my employer Grays Harbor County is 100 West Broadway Avenue, Suite 31, Montesano, Washington 98563-3614.

**Q.     Where do you work?**

A.     I work for Grays Harbor County (“the County”).

**Q.     How long have you worked for the County?**

A.     I have worked for the County for 35 years, since 1976.

**Q.     What is your current title?**

A.     I am the County Engineer.

**Q.     What is your work history at the County?**

A.     I began work for the County in 1976 as a Bridge Engineer, responsible for designs, bridge inspections and ratings and preparation of contract specifications. From 1979 to 1983, I served as a Project Engineer. In 1983, I began serving as the Deputy Director of Design and Construction, responsible for the County’s Capital Improvement Program. I became the County Engineer in July 1985, and have served in that capacity since that time.

1 **Q. What is your professional training?**

2 A. I received a Bachelor of Science Degree (BS) in Civil Engineering in 1974, and a BS  
3 in Industrial Engineering in 1975. I am a licensed civil engineer in the State of  
4 Washington.

5  
6 **Q. How does your experience directly apply to this docket?**

7 A. My experience as an engineer and as Road Engineer for the County gives me  
8 familiarity with proper design and function of road traffic crossings, including  
9 crossings involving train-motor vehicle traffic. I have supervised a number of road  
10 projects over the years that involve at-grade railroad crossings and have other  
11 projects that involve closing railroad crossings at county roads.

12

13 **II. SUMMARY OF TESTIMONY**

14

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

16 A. The purpose of my testimony is to make a recommendation on the two petitions filed  
17 by Puget Sound and Pacific Railroad (PSAP) with respect to their request to close  
18 two at-grade railroad crossings at Hewitt Street (TR-110157), and North 17<sup>th</sup> Street  
19 (TR-11062).

20

21 **Q. Would you please summarize your recommendation?**

22 A. I recommend that PSAP's petitions to close the Hewitt Street (TR-110157) and  
23 North 17<sup>th</sup> Street (TR-11062) crossings be denied.

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**III. DESCRIPTION OF THE CROSSING SITES**

**Q. What does the Petitioner propose to do?**

A. According to the petitions PSAP filed in these consolidated dockets, it proposes to close the grade crossings at the intersection of Hewitt Street in Grays Harbor County identified as USDOT Crossing No. 096649C, and at the intersection of North 17<sup>th</sup> Street in Grays Harbor County identified as USDOT Crossing No. 096649C.

**Q. Are you familiar with the location of the proposed crossing closures located in the County at Hewitt and North 17<sup>th</sup> Streets, and with the physical characteristics of each crossing location and surrounding area?**

A. Yes. There are several exhibits that have been submitted by PSAP, which I will refer to as showing each crossing location and surrounding area. See Exhibit No. \_\_\_\_ (PK-15), which is an aerial view showing the location of the proposed crossing closure at North 17<sup>th</sup> Street and the surrounding area. See also Exhibit Nos. \_\_\_\_ (PK-16.1 to PK-16.5), which are photographs showing approaches to the North 17<sup>th</sup> Street crossing and the surrounding area. An aerial view showing the Hewitt Street, as well as the Foss/Ash Road crossings is filed by PSAP as Exhibit No. \_\_\_\_ (PK-18) and photographs showing approaches to the Hewitt Street crossing and surrounding area are filed as Exhibit Nos. \_\_\_\_ (PK-19.1 to PK-19.4). Lastly, Exhibit Nos. \_\_\_\_ (PK-20.1 to PK-20.5) are photographs showing approaches to the Foss/Ash crossings

1 and the surrounding area. These exhibits were submitted to the County on  
2 September 16, 2011 by PSAP.

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4 **IV. REVIEW OF THE COUNTY CROSSING SITES**

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6 **Q. Have you visited the Hewitt Street and N. 17<sup>th</sup> Street locations at issue in this**  
7 **case?**

8 A. Yes, on several occasions.

9  
10 **Q. Did you review other materials in analyzing the proposal in this docket?**

11 A. Yes.

12  
13 **Q. What were those?**

14 A. I reviewed the testimony of Cary Stewart and a document he prepared containing his  
15 analysis of proposed railroad crossing closures dated September 9, 2011. Exhibit  
16 No. \_\_\_ (CS-3) is a copy of that document.

17  
18 **Q. Do you agree with his analysis in this document?**

19 A. Although I agree with some of Mr. Stewart's observations, I believe his analysis is  
20 more telling for what it neglects to discuss, rather than for what it does discuss. The  
21 omission of any discussion concerning chronic train blockages impacting the North  
22 17<sup>th</sup> Street crossing and other crossings within Elma City limits, inadequate  
23 alternatives for fire apparatus access at alternative approaches to the Hewitt Street

1 crossing, and accident history at alternative crossings leads me to disagree with his  
2 conclusion that the closure of the railroad crossings at N. 17<sup>th</sup> Street and Hewitt  
3 Street will not result in unsafe conditions with respect to emergency response.  
4

5 **Q. What factors are not considered in Mr. Stewart's analysis of potential closure of**  
6 **the Hewitt Street and N. 17<sup>th</sup> Street railroad crossings?**

7 A. First, there is no mention of frequent train stoppages and "train-building" that block  
8 public traffic access simultaneously over several crossings, including those at N. 3<sup>rd</sup>  
9 Street, N. 6<sup>th</sup> Street, N. 11<sup>th</sup> Street, and N. 13<sup>th</sup> Street in the City of Elma. PSAP uses  
10 its track through these crossing locations to built trains, resulting in train stoppages  
11 blocking crossings anywhere from a few minutes to up to forty (40) minutes on  
12 occasion. Mr. Stewart's analysis mentions "shortest current route and longest  
13 potential route," but does not identify what those routes are nor discuss the impact of  
14 having most or all of those routes blocked for substantial lengths of time during train  
15 stoppages. See Exhibit No. \_\_\_\_ (CS-3), at pages 6-7. Second, there is no discussion  
16 of the impact of closing the Hewitt Street crossing by diverting traffic to the Foss  
17 Avenue crossing at Monte-Elma Road, which has an extremely sharp turning angle  
18 that makes access by large fire trucks difficult and more hazardous, as well as more  
19 time-consuming. Access by school buses over this alternative Foss Avenue crossing  
20 will also be problematic given the sharp turning radius at that intersection. Finally,  
21 there will be a significant economic impact to the community at large through the  
22 increase in driving and/or waiting time caused by these crossing closures and  
23 continued train blockages of remaining crossings.

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**Q. Do you agree with the Level of Service (LOS) and traffic flow analysis submitted by PSAP?**

A. I agree that both Hewitt and N. 17<sup>th</sup> Streets have relatively low daily traffic volumes, but previous County traffic counts show higher average daily trips (ADT) at Hewitt Street than is presented by Mr. Stewart's analysis. For example, the Hewitt Street crossing ADT in July 1994 was 203 vehicles per day. While not specific to the railroad crossing location itself, other ADT counts for Hewitt Street over the years are as follows: 252 (1976); 195 (10/1980); 163 (11/1984); 131 (09/1987); 163 (06/2001). During these same periods of time, the ADT at Foss Avenue was 146 (1976); 45 (10/1980); 35 (11/1984); 34 (10/1987); 39 (06/2001). Although I do agree that the ADT for both Monte-Elma Road (Foss) and N. 13<sup>th</sup> Street alternate crossing locations would be within acceptable LOS C capacities if the Hewitt Street and N. 17<sup>th</sup> Street crossings were closed, the negative impact of the extreme turning angle at the Monte-Elma Road (Foss) crossing on school bus, fire and emergency vehicle access will remain.

**Q. How does the proposed crossing closure at Hewitt Street impact public necessity and convenience?**

A. Closing the Hewitt Street crossing will require the traveling public, fire and emergency vehicles to detour to the residential area lying north of this crossing using a crossing at Monte-Elma Road that has a very sharp turning angle. This residential area is not accessible through another crossing if the Hewitt Street crossing is closed



1 and, since both crossings are only about 660 feet apart, it is likely any train stoppage  
2 at the Monte-Elma Road crossing will totally block all vehicular access to these  
3 homes. Given the sharp turning angle of the only other available crossing at Monte-  
4 Elma Road and the difficulty in its utilization by larger fire apparatus, it seems  
5 evident that the Hewitt Street crossing is the one utilized by emergency fire vehicles  
6 traveling to a structure lying north of this crossing. It should be noted that the United  
7 States Department of Transportation Railroad-Highway Grade Crossing Handbook  
8 states that “[c]rossings frequently utilized by emergency vehicles should not be  
9 closed.” See Exhibit No. \_\_\_\_ (PK-4), at page 79.

10

11 **Q. How does the proposed crossing closure at N. 17<sup>th</sup> Street impact public necessity**  
12 **and convenience?**

13 A. Closing the N. 17<sup>th</sup> Street crossing will require the public to use alternate crossings  
14 that have shown to be often blocked in Elma due to train building by PSAP, which  
15 results in train stoppages for a few minutes up to a reported forty minutes at a time.

16

17 **Q. Are there mitigation steps that must be made to the Monte-Elma Road (Foss**  
18 **Avenue) crossing to reduce or eliminate safety and access concerns?**

19 A. Yes, there are.

20

21 **Q. Please explain what mitigation steps are needed.**

22 A. Because of the sharp turning angle at the Monte-Elma Road crossing, movement of  
23 large commercial and fire equipment trucks over that crossing will be hazardous and

1 difficult without substantial design changes that improve turn radii through the one  
2 hundred fifty degree angle to present day standards to make it safer to accommodate  
3 large vehicles through it.

4  
5 **Q. Are there factors that influence the level of safety at a crossing?**

6 A. Yes.

7  
8 **Q. What are those factors?**

9 A. One of the factors is the type of warning given to motorists approaching the crossing.  
10 The warning may be either a passive or active warning device. Another factor is  
11 whether there is accident history at the crossing.

12  
13 **Q. Is there any accident history at the Hewitt Street or N. 17<sup>th</sup> Street crossing sites?**

14 A. No. The County has no record of vehicle-train collisions at either crossing.

15  
16 **Q. Have you evaluated the economic impact to public travel if N. 17<sup>th</sup> Street  
17 crossing is closed?**

18 A. Yes. People will have to drive further which will add cost and time to their trip.  
19 Assuming 90 trips daily, ½ mile additional travel per trip, \$0.55 travel cost per mile,  
20 it will add \$180,675 of travel cost over a 20 years period.

1 **Q. Have you evaluated the economic impact to public travel if Hewitt Street**  
2 **crossing is closed?**

3 A. Yes. People will have to drive further which will add cost and time to their trip.  
4 Assuming 95 trips daily, 0.1 mile additional travel per trip, \$0.55 travel cost per  
5 mile, it will add \$38,142 of travel cost over a 20 year period.

6

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

8 A. Yes.

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