

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Petition of CSX
Transportation, Inc. to Close to Vehicular
Traffic the Bloominggrove-New Winchester
Road (Crawford-Morrow County Line Road)
Crossing in Washington Township, Morrow
County, Ohio

Case No. 14-0379-RR-UNC

PUCO

2015 FEB 25 PM 5:03

RECEIVED-DOCKETING DIV

* * *

**NOTICE OF FILING OF THE DEPOSITION TRANSCRIPT OF CHIEF PHILLIP JACKSON
IN LIEU OF LIVE TESTIMONY AT THE HEARING SCHEDULED FOR MARCH 3, 2015**

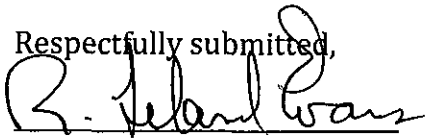
Now comes CSX Transportation, Inc. ("CSXT"), pursuant to Section 4901-1-21 of the Ohio Administrative Code and the Attorney Examiner's Entry dated February 2, 2015, and hereby notifies the Commission and the Hearing Examiner that it has filed the deposition transcript of Chief Phillip Jackson of the Galion City Fire Department.

CSXT has obtained the agreement of the representatives of Crawford and Morrow Counties to file this deposition transcript in lieu of live testimony at the Evidentiary Hearing scheduled for March 3, 2015, including the use of any exhibits identified therein. (See Correspondence with Mr. Charles Howland and Mr. Robert Kidd of the Morrow County and Crawford County Prosecutors offices, respectively, confirming this agreement, contemporaneously filed with this deposition). No other¹ parties have moved to intervene pursuant to the Commission's February 9, 2015 deadline, and no parties object to the use of this transcript and any related exhibits in lieu of the live testimony from Chief Phillip Jackson.

¹ Based upon a review of the PUCO docket, it also does not appear that Morrow and Crawford Counties have moved to intervene to the extent such intervention is required and is contemplated by the Attorney Examiner.

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business
Technician IN Date Processed **FEB 25 2015**

CSXT is filing the deposition transcript of Dean Van Horn with the Docketing Division of the Public Utilities Commission of Ohio pursuant to Rule 4901-1-21(N) of the Ohio Administrative Code.

Respectfully submitted,

R. Leland Evans (0006833)
Eric D. Thompson (0088166)
DICKIE, MCCAMEY & CHILCOTE, P.C.
2109 Stella Court
Columbus, Ohio 43215
(614) 258-6000 Telephone
(614) 258-6006 Facsimile
revans@dmclaw.com
ethompson@dmclaw.com
Attorneys for CSX Transportation, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing *Notice Filing Deposition Transcript of Chief Phillip Jackson In Lieu of Live Testimony* was served by mailing same, regular U.S. mail, postage prepaid, this 28th day of February, 2015 upon the following:

Charles S. Howland
Morrow County Prosecutor
60 E. High Street
Mount Gilead, Ohio 43338

Matthew R. Dietrich
Executive Director
Ohio Rail Development Commission
1980 West Broad Street
Columbus, Ohio 43223

Sandra Coffey
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Crawford County Commissioners
Donald E. Long, Auditor
112 E. Mansfield Street, Suite 304
Bucyrus, Ohio 44820

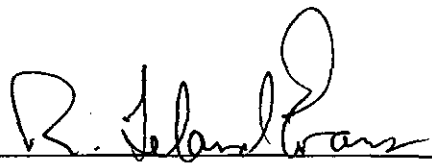
Robert Kidd
Assistant Prosecutor
Crawford County Prosecutor
112 E. Mansfield Street, Suite 305
Bucyrus, Ohio 44820

Morrow County Commissioners
80 N. Walnut Street, Suite A
Mt. Gilead, Ohio 43338

Morrow County Engineer
50 East High Street, Courthouse
Mt. Gilead, Ohio 43338

Cathy Stout
Ohio Rail Development
Commission
1980 West Broad Street, 2nd Floor
Columbus, Ohio 43223

Dwain Peak
Chairman
Washington Township Trustees
3563 State Route 309
P.O. Box 11
Iberia, Ohio 43325


R. Leland Evans

In the Matter Of:
PETITION OF CSX TRANSPORTATION

14-0379-RR-UNC

CHIEF PHILLIP JACKSON

October 02, 2014



ESQUIRE
S O L U T I O N S

800.211.DEPO (3376)
EsquireSolutions.com

BEFORE THE PUBLIC UTILITIES
COMMISSION OF OHIO

IN THE MATTER OF THE PETITION
OF CSX TRANSPORTATION INC., TO
CLOSE TO VEHICULAR TRAFFIC THE
BLOOMINGGROVE-NEW WINCHESTER ROAD
(CRAWFORD-MORROW COUNTY LINE ROAD)
CROSSING IN WASHINGTON TOWNSHIP,
MORROW COUNTY, OHIO

Case No.
14-0379-RR-UNC

DEPOSITION OF CHIEF PHILLIP JACKSON

Thursday, October 2, 2014
Commencing at 11:30 a.m.
Taken at the Galion Public Library
123 North Market Street
Galion, Ohio 44833
Before Sharon Deliberato, Court Reporter

1 APPEARANCES:

2 MR. LEE EVANS
3 MR. ERIC D. THOMPSON
4 Dickie, McCamey & Chilcote, P.C.
5 2109 Stella Court
6 Columbus, Ohio 43215
7 (614)258-6000

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
Appearing on behalf of the Petitioner,

TABLE OF CONTENTS

| WITNESS | PAGE: |
|---------|-------|
|---------|-------|

| | |
|-----------------------|--|
| CHIEF PHILLIP JACKSON | |
|-----------------------|--|

| | |
|--------------------------|---|
| Examination by Mr. Evans | 4 |
|--------------------------|---|

INDEX OF EXHIBITS

| | PAGE: |
|-------------------|-------|
| Jackson Exhibit 1 | 9 |
| Jackson Exhibit 2 | 10 |
| Jackson Exhibit 3 | 10 |
| Jackson Exhibit 4 | 25 |

MR. EVANS: Let the record reflect that it's 11:31 a.m. on Thursday, October 2, and that this is the deposition of Chief Phillip Jackson scheduled for 11:30 on today's date in the CSX Transportation petition pending before the Public Utilities Commission regarding the potential closure of the Crawford Morrow County Line Road grade crossing.

PHILLIP JACKSON, of lawful age, a witness herein, called by the Petitioner for purposes of Discovery, pursuant to the Rules of Civil Procedure, being first duly sworn according to law, was examined and testified as follows:

EXAMINATION OF CHIEF PHILLIP JACKSON

BY MR. EVANS:

Q Chief Jackson, just for the record will you state your full name?

A Phillip D. Jackson.

Q What is your business address?

A It would be 301 Harding Way East.

Q And that is what community?

A In Galion, Ohio.

Q Okay. By whom are you employed?

A The City of Galion.

1 Q I referred to you a couple of times as Chief.
2 I understand you are Chief of the Fire
3 Department?

4 A Chief of the Fire Division for the City of
5 Galion.

6 Q How long have you held that position?

7 A I've been employed at the company quite a
8 while, 20 years, but four years as Chief.

9 Q What, in a nutshell, as Chief of the Fire
10 Division, what are your duties and
11 responsibilities?

12 A To manage the department and its emergency
13 responses as I see fit. That includes not
14 only fire and hazard mitigation, but emergency
15 medical services.

16 Q Chief, we appreciate your time today. As I
17 said before we got started, I'll try to keep
18 this moving. I don't think it's going take
19 particularly long, but have you ever given a
20 deposition before?

21 A I have.

22 Q So you're familiar with the process. If I ask
23 any question of you that is not clear or for
24 some reason you don't hear a portion of the
25 question, please let me know that and I'll

1 remedy that by either stating it again or
2 having the court reporter read it back to you.
3 Okay?

4 A Sure.

5 Q Otherwise we'll assume that when you respond
6 you are responding and understood what the
7 question was. Okay?

8 A Yes.

9 Q And as you just did, it is necessary to
10 respond verbally just so the court reporter
11 can take down your answer. Okay?

12 A Yes.

13 Q Do you have a general understanding as to the
14 nature of the proceeding that you're here to
15 testify about in relation to the potential
16 closure of a grade crossing on the County Line
17 Road?

18 A I do.

19 Q Are you familiar with that crossing
20 personally?

21 A I am.

22 Q Through your work here in this area and you've
23 indicated you've been with the fire division
24 for 20 years. You've been to that particular
25 crossing or across that crossing at one time

1 or another?

2 A I'm very familiar with the crossing. Again,
3 not only through employment, but through being
4 born and raised in town and utilizing that
5 street/crossing often.

6 Q Okay. Do you live here in Galion?

7 A I do not. I live just outside of Galion. It
8 has a Mansfield mailing address, but it's just
9 east of the town.

10 Q When you grew up in this area, did you grow up
11 specifically in the vicinity of where this
12 crossing is located?

13 A Within three-quarters of a mile.

14 Q Where are the -- where is the -- strike that.
15 How many fire stations are there in Galion or
16 at least that you're responsible for?

17 A Technically three and I say technically --
18 would you like me to clarify?

19 Q Please.

20 A Technically because two of them are unmanned,
21 but do house equipment. So we do have three
22 stations, but one manned station.

23 Q Where is the manned station?

24 A That is the address I gave you previously, 301
25 Harding Way East in Galion.

1 Q Can you tell me where the two unmanned
2 stations are?

3 A One is located on Murray Street.
4 Unfortunately the number I can't recall which
5 is east of our present fire station, that main
6 station that address I've given you.

7 Q Okay.

8 A And the other one is just disconnected from
9 the fire station of the address I've given
10 you. It's considered the same address, but
11 it's connected to our Street Department
12 building. So it would somewhat south of our
13 station there, just separate buildings.

14 Q But it's in close proximity to the main
15 station?

16 A It is.

17 Q Okay. How would you describe the general
18 location or do you reference it in any
19 particular way the location where this
20 crossing that we're here to talk about today
21 is located?

22 A When we reference it we talk about it as the
23 Morrow County Line crossing or the crossing
24 near the natural gas pipeline area.

25 Q Okay. So if I understand the location of the

1 unmanned stations correctly, neither of those
2 are located in close proximity to this
3 crossing?

4 A Correct.

5 MR. EVANS: Let's mark as Exhibit A an
6 aerial photograph that is intended to
7 depict the general area including the
8 crossing.

9 THE COURT REPORTER: I happened to use
10 numbers, is that okay?

11 MR. EVANS: That's fine.

12 (Jackson Exhibit 1, was marked for
13 identification.)

14 Q Chief, I've marked as Exhibit 1, actually
15 Jackson Exhibit 1 for identification an aerial
16 photograph that we obtained of the general
17 area and are you able to from looking at that
18 determine what you're looking at?

19 A I am, yes.

20 Q Okay. Tell you what, it's going to be a lot
21 easier to take care of the administrative
22 stuff right now.

23 MR. EVANS: So let's go ahead and mark
24 as Jackson 2 and 3 these other two.

1 (Jackson Exhibits 2 and 3, were marked for
2 identification.)

3 Q Now I've actually placed in front of you
4 Jackson Exhibits 1, 2, 3. Take whatever time
5 you need to look at those. Are you able to
6 orient yourself and determine what you're
7 looking at in those pictures?

8 A I am. The one that is further away just takes
9 some time to locate. I'm thinking I'm there
10 just because of the non-clarity, but I think I
11 know where we're at.

12 Q Okay. In Exhibit 1 in the top right corner,
13 you can see is that an area of greater
14 population and buildings. Is that your
15 understanding that would be Galion?

16 A That would be the City of Galion.

17 Q Or at least a portion of Galion?

18 A Correct.

19 Q In Exhibit 2, would you agree that's a closer
20 aerial photo that shows the general area where
21 this Morrow Crawford County Line Road is
22 located and this particular crossing?

23 A Yes.

24 Q And you just pointed to that on Exhibit 2;
25 correct?

1 A Yes.

2 Q And Exhibit 3 would be just for the record an
3 even closer aerial view that shows the
4 crossing, the road going across the two sets
5 of tracks and on the north or top side of that
6 photograph there is a driveway that comes off
7 and goes to the right; correct?

8 A That is correct.

9 Q Do you know the residents that live in that
10 particular location?

11 A I do.

12 Q Okay. I understand their name to be Mr. and
13 Mrs. Fox?

14 A That's correct.

15 Q Okay. And you know them through just --

16 A More professionally. She happens to be a
17 business owner in the area and through my work
18 of inspecting her buildings and stuff, so I've
19 had occasion to meet her.

20 Q Okay. So the photographs we're looking there
21 depict the Morrow Crawford County Line
22 crossing that we've referenced and just so the
23 record is clear, we're talking about the
24 crossing you were envisioning we were talking
25 about is the one we're looking at here?

1 A Yes; that is correct.

2 Q Using one of those photographs, I guess in
3 particular -- well, I'll let you decide how
4 best to do it. Using one of those photographs
5 are you able to give me some understanding as
6 to where your fire department EMS department
7 territory covers in this area of the county?

8 A I can. I'm looking at Jackson Exhibit 2.

9 Q Okay.

10 A And as you see the residence, anything south
11 of that Morrow County Line that you see
12 approaching the tracks and curving, anything
13 south of that is not City of Galion property.
14 That is not our territory.

15 Q Okay.

16 A And I say that because the City of Galion owns
17 the reservoir. It's their personal property.
18 However, it's located in Morrow County. So
19 although that's our property, that's
20 technically not our response area.

21 Q If I understand correctly you would respond to
22 something happening at or about the reservoir?

23 A Correct, because it's our property. However,
24 we would also probably receive response from
25 Morrow County as that's their jurisdictional

1 area including the Sheriff's Department, not
2 our Police Department.

3 Q So something that would occur there would more
4 typically, I don't know if it's ever happened
5 before, but would it be in all likelihood a
6 joint response?

7 A It would be, exactly.

8 Q Now I should have asked you, obviously in
9 those photographs we can only see a portion of
10 the territory that your department covers?

11 A In that particular photo, yes.

12 Q If I asked you to give me, to verbally explain
13 to me the territory that the City of Galion
14 Fire Division is responsible for, could you do
15 that?

16 A I can give you measurements. It's 20.6 square
17 miles. It is both the City of Galion and Polk
18 Township, anything that lies in those areas
19 and what we discussed earlier would also be
20 city property that outlies which then would be
21 our airport to the east and our reservoirs to
22 the south as we've indicated.

23 Q Now, a couple of additional questions on that.
24 So the City of Galion I understand. Where is
25 Polk Township in relation to the City of

1 Galion?

2 A Polk Township actually surrounds the City of
3 Galion similar to a donut.

4 Q So this area we're talking about where the Fox
5 residence is and this particular crossing at
6 least the Crawford side of it would be within
7 Polk Township?

8 A It would be, yes.

9 Q And as far as the city property, the airport
10 is located in what direction?

11 A East of the city.

12 Q And the reservoir is to the south and in fact,
13 it's in the vicinity of this crossing; is that
14 correct?

15 A That is correct.

16 Q When you say the city, that Galion owns that
17 reservoir, do they own just the reservoir
18 itself or is there a park like area around it
19 that is also owned by the city?

20 A There is some grassy lands around it that is
21 owned by the city. So the reservoir and
22 surrounding property areas are owned by the
23 city as well as even further to the south it
24 joins with one called a mix reservoir and the
25 surrounding property to that which abuts

1 Amann's Reservoir.

2 Q Is that also owned by Galion?

3 A It is.

4 Q Do you from time to time get calls that
5 require you to respond to the reservoir?

6 A We do, yes.

7 Q And what are the nature of those calls?

8 A Many of them are vehicular accidents due to
9 the east there would be some highways that
10 cross, some intersections that cross State
11 Route 309 and 61. Those things as well as
12 we've had multiple instances of vehicles in
13 the reservoirs. That area is utilized by our
14 high school's cross country team. So we've
15 had emergency medical calls during their
16 meets.

17 Q Okay. Setting aside the reservoir for a
18 moment, in terms of your department's
19 responsibility, am I correct that you would
20 typically respond to calls that come in from
21 properties or residences that are located on
22 the compass of north side of County Line Road?

23 A That's correct.

24 Q So if you don't mind part because of the glare
25 it's hard for me to see what I'm looking at,

1 if we use Exhibit 2 as a reference just to
2 orient myself and make sure we're talking
3 about the same thing. If I understand it
4 correctly if you would go from the crossing in
5 that direction that would be generally an east
6 direction; correct?

7 A That's correct.

8 Q There is a little dip here at that time
9 crossing itself, but if you go in the
10 direction my pen is pointing now that would be
11 west?

12 A That's correct.

13 Q The direction of the Fox residence would be
14 compass north from the crossing roughly?

15 A Yes.

16 Q And of course, the reservoir I think is over
17 in this area?

18 A Right here.

19 Q Right there is essentially compass south of
20 the tracks?

21 A Right, yes.

22 Q Okay. If your department is in a position
23 where it needs to respond to the reservoir you
24 would be coming from Galion which is up in
25 this location?

1 A That's correct.

2 Q General location? Well, let me go back. Do
3 you have as a department, do you establish any
4 prescribed routes, if you will, that your
5 firefighters and EMS squads are supposed to
6 take depending upon the area that they're
7 going to for the call?

8 A We have no standard operating procedure as to
9 which routes. We have deemed the most
10 expedient route as the term of the response at
11 all times. Therefore, if they're out training
12 in another area of town to having a set route
13 might not be conducive to the best response.
14 So it's at the officer's discretion that's on
15 that truck which route they take.

16 Q Do you have discussions within the department
17 is there an effort to try to reduce or
18 minimize interaction with railroad tracks and
19 crossings?

20 A Yeah, there is as well as with times of day
21 and traffic conditions dealing with our school
22 release, our uptown busy areas and potential
23 railroad crossings that we might not have an
24 overpass for. We try to avoid those things.

25 Q Because of the uncertainty as to whether there

1 might be a train there and an inability to get
2 through?

3 A Yes.

4 Q So if you were responding to the reservoir
5 from and I understand what you said earlier,
6 that a squad or a truck could be somewhere
7 else, but if we assume it's coming from the
8 station, what would be the typical route that
9 they would take to get to the reservoir?

10 A Assuming that traffic is not an issue uptown
11 or construction we would head uptown which is
12 considered 309 or Harding Way to the
13 intersection of Portland Way which is also 309
14 heading south at that point all the way to
15 County Line which we would head west to the
16 property if we were responding to that
17 railroad crossing or the Fox residence that's
18 the route we would take.

19 Q So for purposes of a reservoir response, you
20 would typically go down 309, go across that
21 crossing there and make a right turn onto
22 County Line Road to go west to get to the
23 reservoir?

24 A Correct.

25 Q Okay. You mentioned some other runs that

1 there is another reservoir as I understand it
2 that is sort of associated or connected with
3 this particular reservoir?

4 A It is connected loosely by some gravel roads,
5 yes.

6 Q That would be a little bit further what
7 compass?

8 A Compass south and our route would take us
9 further on 309 and turn into that particular
10 reservoir's drive.

11 Q So it would be the same basically as you
12 described earlier, you would go past County
13 Line Road to another drive that would take you
14 back into that area?

15 A That's correct.

16 Q So again, as we look at this photograph, I'm
17 not actually sure. Well, I can see a few
18 structures on there. I think if I recall
19 correctly if you go further east on the County
20 Line Road from what we can see in Exhibit 2,
21 there are some additional structures that are
22 on the north side of the road; correct?

23 A That's correct, yes.

24 Q Those structures we can see here that I'm
25 pointing to on the north side of the road as

1 well as those others we can't see would be
2 within your jurisdiction?

3 A They would be correct.

4 Q And the response to those locations would
5 similarly, would be essentially the same of
6 what you've described to get to the reservoir?

7 A That's correct.

8 Q Do you ever use Biddle Road to get there? I
9 believe this is called Biddle Road?

10 A You're correct. That is Biddle Road. We
11 don't typically use that for no other reason
12 than we think that's our shortest route the
13 way I described, but we have been on Biddle
14 when there are a few residences on Biddle we
15 will then take another route going Biddle.
16 That way it's easier to track the numbers as
17 they count down.

18 Q Now, if we go to what would be the west side
19 of the crossing, your department once again
20 would be responsible for structures that are
21 on the north side of County Line Road?

22 A Correct.

23 Q As we look at what we've captured in Jackson
24 Exhibit 2, there really aren't any -- it's
25 farmland in that area?

1 A It is. There are no residences.

2 Q Do you know how far out the County Line Road
3 in a westerly direction you would need to get
4 before there are additional buildings or
5 residences?

6 A I believe the next road is Taylor if I'm not
7 mistaken. It's little past Taylor. I don't
8 know, maybe a half mile.

9 Q In terms of responding to -- strike that. How
10 far west then, we don't have a picture I don't
11 think shows it unless this one, this Exhibit 1
12 does, but how far west does your territory go?
13 I guess we're talking about how far west is
14 Polk?

15 A Polk Township reaches past Iberia Road. There
16 is no hard staked delineation between their
17 territory, but there should be some signs to
18 the west of Iberia Road.

19 Q We don't have that on this picture?

20 A That's different. Iberia Road is the one in
21 Jackson Exhibit 2 that comes into play past
22 Biddle, if I'm not mistaken. Maybe it's two
23 past. It might be the second one past. It
24 may be one that's not shown and maybe we can
25 see it on --

1 Q In Exhibit 1 that we have, is that Iberia or
2 is that a different road?

3 A That's a different road. That's 100.

4 Q Okay.

5 A We're out in here somewhere. So there is our
6 intersection. That would be --

7 Q Is that Taylor?

8 A That is Taylor. That's the one I'm thinking.
9 That is Taylor and then the next one up would
10 be Iberia.

11 Q That would be the rough explanation that you
12 would give as to how far out Polk Township and
13 therefore, your territory or jurisdiction
14 would go?

15 A That's correct.

16 Q I'm just going to make sure I do it right
17 here. So this was the north intersection?

18 A Right there and we got Taylor. We got another
19 one and then this one would be Iberia. No,
20 it's Biddle, Taylor, Iberia. So Biddle is
21 before. Biddle, Taylor. So that would be
22 Iberia right here.

23 Q Chief, just for the record so we know what
24 we're talking about later when we go back and
25 look at this, I've written sideways on the

1 photograph the word Iberia to reflect our
2 conclusion as to where Iberia Road is located
3 and again, that would be roughly the western
4 limit of your jurisdiction?

5 A It would be.

6 Q Okay. And when you respond to residents or
7 structures a call that is west of this
8 crossing, I think pretty much we've
9 established that any of those structures would
10 also be west of Taylor Road; correct?

11 A Yes.

12 Q If you're responding out that direction from
13 Galion, is there, from your experience is
14 there a typical route that you would take to
15 get to that general area?

16 A There is. We would typically take which our
17 309 goes straight which then becomes Galion
18 New Winchester Road which is a direct west
19 route out of our city and then pick up either
20 Biddle, Iberia or whatever road from that
21 point.

22 Q So you would be going west on -- tell me that
23 name of the road again?

24 A Galion New Winchester Road.

25 Q Okay.

1 A Not to be confused with Monnett New Winchester
2 Road.

3 Q So Galion New Winchester Road is essentially
4 an east/west roadway?

5 A It is.

6 Q And it would intersect with you mentioned
7 Biddle for one; correct?

8 A Yes.

9 Q It also intersects with Taylor?

10 A Yes.

11 Q And it would intersect with the Iberia Road
12 that we identified in the photograph?

13 A That's correct.

14 Q Depending on where you're going to an address
15 or location on this western portion of County
16 Line Road in your jurisdiction, you would go
17 out instead of coming south first on 309 you
18 would go out west and then on Galion New
19 Winchester Road and cut down whichever street
20 made the most sense based upon where you're
21 going?

22 A That's correct.

23 Q Do you as a department, do you have any data
24 and maybe we'll be getting into the document
25 that I know you brought with you today in

1 relation to this, but do you have any data
2 regarding response times?

3 A I do.

4 Q Typical response times, I guess it would be?

5 A Is your question about response times to this
6 area?

7 Q Yes, to this area.

8 A The report I brought which was in the subpoena
9 lists the numbers of calls and the calls in
10 that area that were past the address and the
11 response times for those three calls, yes.

12 Q Okay. Why don't we go ahead and I can mark
13 you have your original there?

14 A I do.

15 Q Let's mark as Exhibit 4 to this deposition the
16 documents that you've brought with you.

17 (Jackson Exhibit 4, was marked for
18 identification.)

19 Q I've marked as Exhibit 4, Chief Jackson, just
20 for the record it's a composite exhibit that
21 consists of five pages. The first three have
22 some typewritten writing as well as some
23 handwriting or marking on it. The second two
24 appear to be maps; is that correct?

1 A That's correct.

2 Q Can you just go ahead and tell me what it is
3 these documents are, what they show us?

4 A The subpoena asked for runs within a mile of
5 the intersection to which we're discussing,
6 the railroad intersection. We had contacted
7 our county EMA and through their GIS system
8 which is a mapping system in our dispatch logs
9 came up with a list of addresses that fit the
10 criteria. Further, they listed addresses that
11 were what they considered past the railroad
12 that possibly could be affected by this
13 closing. Those are listed on Page 1 on the
14 top right. It looks to be about ten. On the
15 left are addresses that just plainly fit the
16 criteria a mile from that crossing. Because
17 we're utilizing multiple reporting software
18 vendors from our system from a change a few
19 years ago, it was impossible to have one
20 printed report. So we had to then utilize the
21 address and search each address for its
22 response since I think it was January 1, 2010
23 as per the subpoena. Therefore, those numbers
24 then reflect both on the list on the left and
25 the list on the right how many calls of which

1 type we went on. You'll see on the right any
2 tallies or numbers you see on the right of a
3 list of addresses are those of an emergency
4 medical response. Those listed on the left
5 are those on the exhibit it says engine
6 response, but it's a fire department response.
7 Even though we're one department that does
8 both, we try to separate which calls are fire
9 based and which calls are emergency medical
10 based. So you'll see some handwriting, number
11 of calls at certain addresses. Particularly
12 the ones that the address is past the railroad
13 listed by the closing you'll see some times
14 written there for the numbers or the calls
15 that we have that are past that intersection.
16 I did not go through on the ones that were
17 within a mile and put all response times to
18 that.

19 Q If I can stop you there just to ask a few
20 questions to clarify. So first of all, this
21 is the first three pages are this listing of
22 runs or calls, but it's essentially two
23 different columns. The left-hand column being
24 the runs that met the criteria for the
25 location of the property being within that

1 radius?

2 A Sort of correct and sort of incorrect. That
3 list is all addresses within that criteria,
4 not just runs. It was impossible to search by
5 runs without knowing which addresses that we
6 were going to have to research. So that lists
7 all of the addresses and the tallies list all
8 of the number of runs to that address.

9 Q The tallies you've described it as being on
10 the right-hand side and the left-hand side
11 distinguishing between EMS versus other fire
12 runs?

13 A That's correct.

14 Q But the reason that this list goes onto
15 essentially three pages is because we're
16 capturing all of those addresses that are
17 within that radius?

18 A We're capturing all addresses in that mile
19 radius; correct.

20 Q The list on the right-hand at the top right of
21 the first page of Exhibit 4 is considerably
22 shorter and does not go onto Pages 2 and 3;
23 correct?

24 A That's correct.

25 Q That's because that's just looking at those

1 addresses that are compass west of the
2 crossing in question?

3 A That's correct.

4 Q As we look at this crossing in terms of its
5 impact, if any, on being closed upon your
6 department's operation, would I be correct in
7 understanding that any of the properties --
8 that with the exception of those properties on
9 the right-hand column having to do with
10 crossings that -- I'm sorry, properties west
11 of this crossing, none of the other
12 properties, runs to those properties would
13 involve this particular crossing? That's not
14 a very well worded question.

15 A Involve or affect?

16 Q Affect.

17 A They would not affect. The addresses listed
18 on the left would not be affected by this
19 crossing closing; correct.

20 Q So when we say that, any of those addresses if
21 you were responding as you have on some of
22 these occasions indicated by the tally marks,
23 when you responded, your response did not
24 require you to go across this crossing?

25 A Correct. We were either east of the crossing

1 or a different route was taken.

2 Q That was the case on these particular runs and
3 from your knowledge of the geography going
4 forward, it would be your understanding that
5 if you had to go back to these residences,
6 that trip would not involve going across this
7 crossing?

8 A That is correct.

9 Q And just so then going back to the photograph
10 for a second -- well, on Exhibit 4, the right-
11 hand column having to do with addresses past
12 railroad possibly affected by closing, we're
13 talking about 11 crossings or 11 addresses?

14 A 11 addresses; correct.

15 Q Three of those are on Crawford Morrow Line
16 Road which would be the County Line Road we've
17 been talking about?

18 A That's correct.

19 Q And then the remainder are on Taylor Road
20 which is a north/south street that intersects
21 with County Line Road?

22 A That's correct.

23 Q Am I correct from what you just said earlier
24 that in responding to Taylor Road, Taylor Road
25 is one of the roads that I think we talked

1 about earlier that intersects with Galion New
2 Winchester?

3 A Correct.

4 Q From what I understood you to say earlier in
5 terms of your typical response from the fire
6 station to that area of Polk Township, am I
7 correct that you would typically to get to
8 Taylor Road go out Galion New Winchester and
9 then make a left onto Taylor going down Taylor
10 to whichever address you were headed to?

11 A That is correct.

12 Q I don't know if there is any way for you to
13 know this, as we look at the list of Taylor
14 Road addresses on the right-hand column on
15 Exhibit 4, it looks like there was one --
16 let's see, the right side is EMS?

17 A The ride side is EMS; correct.

18 Q It looks like there was one EMS run to 338
19 Taylor Road that you captured here; is that
20 correct?

21 A That's correct.

22 Q And there was one fire or at least non-EMS run
23 to 302 Taylor Road that you've captured here?

24 A That's correct.

25 Q And you have indicated response times for

1 those. The first one I referenced being if
2 I'm reading this right 5 minutes 34 seconds.

3 A That's correct. That is from the time our
4 department received word from dispatch that
5 there was a call to our arrival on scene.

6 Q And the other one at the 302 is 5 minutes 14
7 seconds?

8 A That's 19. 5 minutes 19 seconds.

9 Q I'm sorry. Would it be your belief and
10 understanding based upon the way the
11 department normally does thing, if you in fact
12 know this, you can let me know that, that
13 those response times reflect a response to
14 those Taylor Road addresses that would have
15 been the route we talked about a couple
16 minutes ago, Galion New Winchester to Taylor
17 making a left?

18 A It would be an assumption, but I would assume
19 that they took the Galion New Winchester and
20 left on Taylor Road route.

21 Q Okay. Do you as a department have either a
22 goal or is there any type of actual
23 requirement that you're aware of as far as
24 response times within your jurisdiction?

25 A There is not a requirement and previously

1 we've had things written in contracts dealing
2 with response times, but that's no longer the
3 case. So the answer to that question would be
4 no, currently we don't.

5 Q Is the same answer that there is no stated or
6 written goal, I mean outside goal that you
7 have as a department?

8 A The goal is probably as fast as you can get
9 there, that's what I like to say, but
10 currently no, there is no stated goal. We
11 have used in the past five minutes for certain
12 areas and up to seven minutes in others.

13 Q Again, looking at this list, I'm focusing on
14 the properties listed on the right side of
15 Exhibit 4, regarding the Crawford Morrow Line
16 Road it looks like there was at least
17 initially one response by EMS that was
18 intended to be the 6040 Crawford Morrow Line
19 Road?

20 A That's incorrect.

21 Q Okay.

22 A Actually on the left you'll see actually the
23 numbering and I apologize for the confusion.
24 There were two calls to that 6040 Crawford
25 Morrow County Line Road you'll see on the

1 left.

2 Q I see that.

3 A On the right is the response times.

4 Unfortunately, I listed them on the right
5 where the medic response tallies would be, but
6 those are times.

7 Q All right. So the only responses to these
8 Crawford Morrow Line Road during the time
9 period you were asked to look for were two
10 fire or at least non-EMS responses to 6040
11 Crawford Morrow Line Road; correct?

12 A That's correct.

13 Q And the first response at the time was 8
14 minutes and 17 seconds?

15 A That's correct.

16 Q And it looks like the second one was actually
17 it says cancelled, does it mean it was
18 cancelled before they had even left or
19 enroute?

20 A It was cancelled enroute.

21 Q Do you happen to know were those two related
22 to one another, where they the same --

23 A They were ironically within a few months of
24 each other. One was a false alarm, that was
25 cancelled enroute, the second call. The first

1 call that's listed there with the 8 minutes 17
2 seconds response was a small fire in the
3 furnace blower.

4 Q Are these structures, these potentially
5 affected structures on Crawford Morrow Line
6 Road, do you know from your knowledge of the
7 area are these residences?

8 A I do know that one we just spoke of is a
9 residence. I don't know the other one.

10 Q Now, if we could use the photograph one more
11 time here, I guess we've been -- probably the
12 best one is going to be either 2 or 3, I'll
13 let you decide where best to do it, but
14 Exhibit 1 is where we indicated Iberia Road.
15 So from your understanding your jurisdiction
16 or territory the three Crawford Morrow Line
17 Road addresses would be somewhere inside or to
18 the right of Iberia Road between there and
19 this crossing; is that right?

20 A As I stated earlier our territory is not a
21 hard delineation to Iberia Road. So there
22 could be an address past that marking.
23 However, the general area that you're speaking
24 of, that's correct, where those other
25 residences would fall.

1 Q Do you for a fact know what route your
2 personnel would have taken to I guess we're
3 just talking about two responses, fire
4 responses to the same address, 6040, do you
5 know how they got there?

6 A I can speak from experience because I was on
7 that call. We took the route discussed
8 earlier, out 309 and down County Line because
9 it was our dispatch also has the ability to
10 give us cross streets and that was marked as
11 right past that railroad crossing. So we knew
12 exactly where that was. So that was our most
13 expedient route.

14 Q Are you able to -- well, I guess Exhibits 2
15 and 3 would not depict that residence. Are
16 you able on Exhibit 1 to point out where that
17 residence is located?

18 A It's not very -- the residence that we're
19 speaking of?

20 Q Yes.

21 A It's right there.

22 Q I'm just going to put a circle around that.
23 So that would be 6040?

24 A That's correct. That's what it appears to be,
25 yes.

1 Q So between where that residence is located --
2 I also have trouble finding the crossing on
3 this thing?

4 A The crossing is right here.

5 Q So it's actually located -- this is Mr. Fox?

6 A That's what 6040 is.

7 Q That's 6040?

8 A Yes, it's one in the same.

9 Q Okay. So there's my confusion. So 6040 is
10 the Fox residence?

11 A That's correct.

12 Q And tell me one more time. The one was a
13 false alarm. The other one, what was the
14 nature?

15 A It was a minor fire within the furnace. The
16 blower motor that was minimal and was out upon
17 arrival.

18 Q Okay. The response time was 8 minutes and 17
19 seconds. Is that consistent with a normal
20 response time to that area?

21 A It is. I mean I'm unable to ascertain if we
22 were on another call prior to that and why 8
23 minutes, but that's pretty consistent.

24 Q If to get to that location from the Galion
25 station if that's where you were and I

1 understand you might have the been somewhere
2 else?

3 A Correct.

4 Q If we assume for the moment you're responding
5 from the station, to go the route that you
6 recall you did that night, you would have had
7 to first cross the tracks on Route 309;
8 correct?

9 A That's correct.

10 Q You would then make a right onto the County
11 Line Road and then you would have the crossing
12 that's the subject of this proceeding and you
13 would have to go back across that to get to --

14 A That's correct.

15 Q So you were crossing the tracks essentially
16 twice?

17 A Correct.

18 Q If you were to go that other route that
19 involves Galion New Winchester Road down
20 Taylor Road and then you say when you got to
21 the County Line Road you would have to make a
22 left onto County Line Road; correct?

23 A Correct.

24 Q That would not involve any grade crossings or
25 not involve any grade crossings, I don't know

1 what's in town?

2 A It would not involve any crossings whatsoever.

3 Q Have you ever to your knowledge responded
4 to -- strike that. Is there any other
5 residence other than the Fox residence that
6 would be if you come down Taylor Road and make
7 a left and go towards this crossing, is there
8 any other residence that would be between that
9 left from Taylor Road and the crossing?

10 A I don't believe so.

11 Q Do you have any idea what the response time
12 going that Galion New Winchester to Taylor and
13 then Taylor into the Fox residence what that
14 response time would be?

15 A I don't. I don't have that information.

16 Q If this crossing through this proceeding or
17 otherwise were ultimately closed, is that
18 route that I described going out New
19 Winchester to Taylor and then Taylor and
20 County Line Road to the Fox residence the
21 route that you would assume your department
22 would take?

23 A I'm going to assume either that route or the
24 one to which when I was researching for this
25 deposition that came up with the least amount

1 of travel and time differential according to
2 Google Map would be out 309 and then Monnett
3 New Winchester which also avoided the railroad
4 tracks, but kept us gaining some ground on
5 309. The benefit of the 309 route is the fact
6 that you start heading somewhat easterly as
7 you're coming down that area as opposed to
8 going straight west and coming back. So the
9 route that you list, however, would be
10 speculation would be slightly longer than the
11 alternate route that I have chosen.

12 Q Okay.

13 A However, it may with less turns it may prove
14 to be equally as fast.

15 Q All right. You brought with you in addition
16 to what we marked -- well, I guess this is
17 part of what we've already marked; is that
18 correct?

19 A Yes.

20 Q Let's get to those. Part of Exhibit 4 is two
21 maps. Why don't you go ahead and tell me what
22 it is we're looking at here?

23 A It's two maps. It's the current route that we
24 utilize to respond to that address which is
25 out 309, also 309 South and turning east on --

1 west, I'm sorry, on County Line Road over the
2 crossing in question to 6040 Crawford Morrow
3 County Line Road. The second paper is an
4 alternate route and I apologize for not
5 bringing the third, but this shows the likely
6 route of heading out if that crossing were to
7 be closed and we needed to access it via a
8 different route what that would be and this is
9 printed from Google utilizing Google Maps.

10 Q Okay. Is this something you personally did?

11 A I did.

12 Q Just so we're clear and so the record will be
13 clear, what I'm going to do, Chief, is the
14 first three pages of Exhibit 4 are not maps
15 and I think we've talked about those to some
16 extent. Actually what I'll do just so the
17 whole thing is clear, I'm going to label at
18 the bottom and a circle on each page I'm just
19 going to number each page so we can be clear
20 what map we're talking about. So the maps
21 will now be marked as -- or part of Exhibit 4,
22 but they're on Pages 4 and 5. Exhibit 4, Page
23 4 if I understand correctly is the old route,
24 if you will, or the route that was taken when
25 you actually responded to 6040?

1 A That is correct.

2 Q At the bottom right-hand corner it looks like
3 there is a mileage total. Is that just a
4 mileage total for a portion?

5 A It is and I am holding a two-page print and
6 maybe you are as well on the back side which
7 will continue with that each turn and the
8 mileage estimate from Google Maps.

9 Q So the record should just reflect there is and
10 I didn't catch this, but on the back side of
11 the document Number 4 and back side of the
12 document Number 5, there is continuation of
13 those respected documents; correct?

14 A That's correct.

15 Q So again, Exhibit 4, Page 4 including both
16 sides of Page 4, that's the complete Map Quest
17 route or Google Maps route from your station
18 to the 6040 location?

19 A That's correct.

20 Q And the document marked as Exhibit 4, Number 5
21 is this alternate route that you believe is
22 probably the most expedient alternative route,
23 if you will?

24 A That's correct.

25 Q This route, this alternative route using

1 Monnett New Winchester Road also does not
2 involve any grade crossings between the
3 station and the 6040 address?

4 A That's correct.

5 Q And you haven't done and you weren't asked to
6 do, but I'm just confirming, you haven't done
7 any study or anything to determine the actual
8 times between these two routes whether there
9 is any significant difference between those
10 two?

11 A I have not. Mainly due to safety I don't want
12 to run a truck emergency for timing sake. So
13 I did Google Maps to estimate out time.

14 Q Right. Have you tallied up the number of
15 miles and I quickly tried to do it in my head,
16 I didn't see a total, but did you tally up the
17 mile difference between the prior route and
18 this other route?

19 A I did. Actually Google at the top of each
20 document has listed one being 3.2 and the
21 alternate route being 4.2.

22 Q So the alternate route would be obviously
23 approximately one mile longer?

24 A That's correct.

25 Q From your standpoint as a fire chief and I

1 guess we should be clear here what we're
2 really talking about an alternate response
3 route assuming this crossing was arguably
4 closed for one residence within your entire
5 jurisdiction; correct?

6 A That's correct.

7 Q We're talking about a one mile difference in
8 response to that one particular residence?

9 A That's correct.

10 Q From your standpoint as the fire chief
11 realizing that you always would want to get to
12 the scene as quickly as you can, does that
13 give you any particular concern or do you feel
14 you're within the reasonable response time
15 that you would hope to have as a fire
16 department to that location?

17 A As you said, obviously my concern is always
18 with getting to and taking the most expedient
19 route somewhere. However, the number of
20 residences affected by the potential closing
21 and the extra mile will not in my opinion make
22 a huge difference in the results.

23 Q And I guess it's fair to say, you know, it
24 also as to responding on that alternative
25 route, it eliminates any possibility that you

1 would get hung up by a train at a grade
2 crossing?

3 A That's true.

4 Q If you were to respond the way the department
5 went on the night that you actually responded
6 there, if by chance if there was a train
7 passing through or even blocking the crossing,
8 you would need to reroute yourself. There
9 would be a way to get there, but you would
10 probably be adding additional mileage and
11 time?

12 A That is correct. Our alternative route would
13 had to have been used because those are the
14 same tracks that would have contained a train.
15 So we wouldn't be able to cross that first
16 crossing on 309. We would have to head west
17 on that Monnett New Winchester as we were
18 talking about on Page 5.

19 Q There are a couple of markings on, a little
20 bit of information on Exhibit 4 that I didn't
21 specifically ask you about. It says medic
22 response. That's where you're confirming
23 first of all in parentheses what is indicated
24 on the right side of each chart; correct?

25 A That's correct.

1 Q And the number there am I correct that that's
2 just the total number of medic responses
3 reflected here?

4 A In the whole parameter in which we were given
5 in the one mile it was 72; that's correct.

6 Q That would include -- are all of the addresses
7 that are on the right side in which the table
8 called addresses past railroad possibly
9 affected by crossing, are all of those
10 addresses also on the listing on the left?

11 A They are not.

12 Q Okay. So they were segregated out for
13 purposes of this report?

14 A And that was done at the county level. I
15 didn't specifically request that. They
16 understand the scenario and did that on their
17 behalf.

18 Q The engine response again there's a total of
19 20, that's the number of engine responses that
20 are reflected on this entire document?

21 A That's correct.

22 Q But we've already in terms of responses to the
23 addresses past the railroad possibly affected
24 by the closing, we've talked about all of
25 those and they were a total, if you combine

1 medic and engine, it would be a total of four
2 with one of those being a cancelled run?

3 A That is correct.

4 Q Am I correct in understanding with the
5 exception of the properties owned by Galion
6 that are outside your territory to which you
7 would respond that anything on the south side
8 of County Line Road would be a different fire
9 department that would respond?

10 A That's correct.

11 Q Just for my knowledge can you tell me which
12 department responds where or where they would
13 be coming from?

14 A I've seen a couple of signs out there, but
15 whichever township that jurisdiction is.
16 Morrow County Fire would respond to anything
17 south of that.

18 Q They come out of Mount Gilead?

19 A They do come out of Mount Gilead and multiple
20 places in the county as well as Iberia. That
21 would come out of Iberia, the fire would.
22 Morrow County EMS, they have multiple stations
23 and I don't know where that one would come
24 from. There is also it looks like I thought I
25 saw West Holmes Township signs out there when

1 I took a drive by. I don't know where them
2 and Polk Township's areas meet.

3 Q Okay. Fair enough. It's not your department?

4 A No, unfortunately.

5 Q All right. A few more questions. Chief, to
6 your knowledge has your department ever
7 responded to a train motor vehicle accident at
8 this crossing?

9 A To my knowledge, no.

10 Q And whether your department responded are you
11 just personally aware of any train motor
12 vehicle accidents at this crossing?

13 A I'm not aware of any.

14 Q How is it currently set up at this particular
15 crossing to the extent it's now an opened and
16 used crossing jurisdictionally with it being
17 on County Line Road, how is it set up? Would
18 your department respond or would somebody else
19 respond?

20 A Our department would respond as well as Iberia
21 Fire or Iberia Fire would as well.

22 Q Okay.

23 A Until we put boots on the ground and see if
24 it's on the right side of the road or the left
25 side of the road and unfortunately, we're

1 unable to tell by dispatch information.

2 Q That would be an instance where both would
3 respond?

4 A Both would respond; correct.

5 Q Is Iberia a volunteer fire department?

6 A They are.

7 Q And do you know where their equipment would be
8 housed?

9 A It's in that Village of Iberia on a side road.
10 I can't think of the name of the street, but
11 it's in the center of their area and their
12 town.

13 Q Chief, you said you've been out to this
14 crossing many times both in your professional
15 capacity and otherwise, but despite the fact
16 that you're not aware of accidents that have
17 occurred there, would you agree that that
18 doesn't necessarily mean that this crossing
19 doesn't present a certain set of challenges to
20 motor vehicle drivers?

21 A I would agree with that.

22 Q Particularly if motor vehicles traveling from
23 east to west on County Line Road from having
24 been out there, would you agree that there is
25 kind of a mound or a raised area of ground

1 that basically prohibits you from seeing the
2 tracks until you get up closer to the tracks?

3 A That's correct.

4 Q And in any event, you're traveling on County
5 Line Road essentially parallel to the tracks
6 such that a train could be coming sort of over
7 your shoulder, if you will?

8 A That's correct.

9 Q And this particular set of tracks you're aware
10 there are two sets of tracks there?

11 A I am aware.

12 Q There is a gap of some distance between those
13 two sets; correct?

14 A That's correct.

15 Q And that would raise at least the possibility
16 that somebody could get across one and be
17 trapped between two sets of tracks because of
18 a train?

19 A That is possible.

20 Q So based upon the accident history it would
21 appear that if motor vehicle drivers are using
22 care they can successfully negotiate that
23 crossing, but nevertheless you recognize it as
24 one that is perhaps more of a challenge to
25 motor vehicle drivers then say Biddle Road or

1 County Road 309, some other crossing in that
2 vicinity?

3 A I would agree with that.

4 Q You referenced earlier I think in the
5 deposition that you're aware that there is a
6 facility located just north of the tracks
7 related to an underground pipeline; correct?

8 A That's correct.

9 Q Are you generally familiar with that pipeline
10 and where it runs within your territory?

11 A I am not.

12 Q Has your department that you know of ever
13 received any special or particular training or
14 information from whoever owns that pipeline as
15 far as hazards associated with it or response
16 thereto?

17 A We have, yes.

18 Q Do you know who the owner of that pipeline is?

19 A PGNS.

20 Q What kinds of materials have you received from
21 them?

22 A We annually receive an update on that area
23 from the company. It goes straight to my Fire
24 Prevention Bureau. So I don't have firsthand
25 knowledge, but I do know we receive that. We

1 receive mailings about trainings for gas
2 disasters or gas if it were to be exposed to
3 air and out response to that and some we
4 attend and some we don't.

5 Q Are those trainings and information you
6 receive specific to that location I'm going
7 refer to it as a substation, I don't know what
8 they would refer to it as, but to that
9 substation or is it intended to provide you
10 with information and training that would
11 relate to essentially the entire length of
12 that pipeline where something may occur?

13 A Originally when they first built this facility
14 we were trained out there on the location
15 specifically since it's been more just on the
16 natural gas itself.

17 Q Has anybody indicated to you that there is any
18 greater likelihood of a natural gas -- of a
19 failure of the natural gas pipeline at that
20 particular location where the substation is as
21 compared to anywhere along that line that may
22 run through your territory?

23 A No.

24 Q And to this point in time based upon your
25 20 -- strike that. How long to your knowledge

1 has that substation been there?

2 A It would be a guess, but it would be a dozen
3 years, 12 years maybe.

4 Q Would that coincide, did that go in at a time
5 that the pipeline associated with it was
6 installed in this area?

7 A I don't recall exactly why. I just know that
8 there was a larger project which included that
9 facility.

10 Q But it would be your understanding that there
11 is a pipeline associated with that substation?

12 A That's correct.

13 Q And it goes in some direction. I think
14 Mr. Fox may have recalled that it passes in
15 the general direction of his somewhere
16 underground under his property and I don't
17 know where it goes from there. It's going
18 north and south or east and west from that
19 substation?

20 A I think that's true.

21 Q So getting back to the question, your best
22 recollection sounds like is that the
23 substation itself has been there somewhere in
24 the vicinity of 12 years?

25 A To my best recollection.

1 Q During that time has there ever been an
2 incident there, an emergency incident to which
3 you or your department had to respond?

4 A There was responses that turned out to be next
5 to nothing. We had to respond a couple of
6 times to odors or some slight leakages.
7 Nothing that we could remedy and ended up
8 calling PGNS.

9 Q Do you have a particular contact person or I
10 assume you have at least a contact number that
11 your department would call if there is a need
12 to get somebody from the pipeline or
13 substation owner involved?

14 A We do. Not only do we have that computerized,
15 but that's information located in our dispatch
16 center which connects with our police
17 department.

18 Q Okay. You mentioned some reports that come in
19 annually from the pipeline or substation
20 owner. Do you have any idea as to what kind
21 of information they're providing?

22 A Usually it's contact information. You know, I
23 think they update their contact information.

24 Q Are you aware of what inspection procedures or
25 requirements there are related to the

1 pipelines or the substation?

2 A I'm not. I just know that we don't inspect it
3 ourselves.

4 Q Is it your belief or understanding that they
5 are regularly inspected by somebody or do you
6 know?

7 A I would not know. I would hope so.

8 MR. EVANS: I think I'm about done.

9 Give me a second here.

10 A No problem.

11 Q As Fire Chief are you advised or made aware of
12 for any reason school bus routes?

13 A No.

14 Q Do the school systems in this area ever seek
15 your input or your department's input as to
16 what the best school bus routes would be for
17 safety purpose or anything like that?

18 A They don't. Our communication with the
19 transportation department at the schools is
20 simply no matter where you're at, our trucks
21 will respond to them, but not any information
22 shared as far as routes go.

23 Q Have you aside from our discussion here today
24 and any discussions you may have had in just
25 setting this deposition up, have you ever

1 discussed the potential closure of the
2 crossing with anyone?

3 A Outside of the subpoena and utilizing my crew
4 to help gather data, no.

5 Q Have any complaints of any kind or concerns of
6 any kind been registered with you by any
7 citizens that you're aware of related to the
8 potential or possible closure of this?

9 A The short answer is no. I do recall the Polk
10 Township fiscal officer briefing me on the
11 situation that there was a potential closing
12 many months ago before I heard from your
13 office or from anybody about it.

14 Q Okay. Do you recall from your knowledge of
15 the area that the Biddle Road crossing and
16 Route 309 -- by the way 309 and 61 at that
17 location are one in the same?

18 A They are one in the same.

19 Q Is it generally referred to as 309 or 61?

20 A Multiple references. It could be Portland
21 Way. It could be 598. It could be 309 and it
22 could be 61.

23 Q Same road?

24 A Same road.

25 Q But Biddle and that road Route 61 or Route 309

1 I'll refer to it as, those crossings are
2 protected by or equipped by flashers and
3 gates; correct?

4 A The State Route 309 and 598 crossing is.
5 Biddle I would not really. I think it is as
6 well just recent memory, but I haven't been
7 there.

8 MR. EVANS: I think that's all of the
9 questions that I have. Anything?

10 MR. THOMPSON: No.

11 MR. EVANS: I think we're good. This
12 will be typed up into writing. You have
13 the right as a witness to review the
14 transcript or you can waive that right.
15 It's totally up to you. You just need
16 to indicate on the record which it is
17 you would like to do. It's really just
18 for accuracy.

19 A I'll review it.

20 (Deposition concluded.)

21 - - - - -

22

23

24

25

1 STATE OF OHIO)
2) SS.
3 COUNTY OF WAYNE)

4 CERTIFICATE OF NOTARY PUBLIC

5 I do hereby certify the witness, whose
6 attached testimony was taken in the above matter, was
7 first duly sworn to tell the truth. The testimony
8 contained herein was reduced to writing in the
9 presence of the witness, by means of stenography;
10 afterwards transcribed; and is a true and complete
11 transcript of the testimony given. I further certify
12 that I am not connected by blood or marriage with any
13 parties, their attorneys or agents, and that I am not
14 interested directly, indirectly or financially in the
15 matter of controversy.

16 In witness whereof, I have hereunto set my
17 hand this day, October 10, 2014, at West Salem,
18 Ohio, County of Wayne, State of Ohio.

19 *Sharon Deliberato*

20 Sharon Deliberato
21 Notary Public
22 Wayne County, Ohio
23 My Commission expires: 6-8-2019
24
25

DEPOSITION ERRATA SHEET

Assignment No. 206415.239831

Case Caption: In The Matter of the Petition of CSX
Transportation, Inc., to close to
vehicular traffic the Bloominggrove New
Winchester Road (Crawford Morrow County
Line Road) crossing in Washington
Township, Morrow County, Ohio

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I
have read the entire transcript of my Deposition
taken in the captioned matter or the same has been
read to me, and the same is true and accurate,
and except for changes and/or corrections, if any,
as indicated by me on the DEPOSITION ERRATA SHEET
hereof, with the understanding that I offer these
changes as if still under oath.

Signed on the _____ day of

_____, 20____.

CHIEF PHILLIP JACKSON

DEPOSITION ERRATA SHEET

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

SIGNATURE: _____ DATE: _____

CHIEF PHILLIP JACKSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DEPOSITION ERRATA SHEET

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

SIGNATURE: _____ DATE: _____

CHIEF PHILLIP JACKSON

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: 1..affected

| | | | | |
|-----------|-------------|-----------|-------------------|--------------------|
| | 36:14 | | | 13:23 |
| <u>1</u> | <u>20</u> | <u>4</u> | <u>7</u> | 19:21 |
| | 5:8 6:24 | | | 21:4 |
| 1 | 46:19 | 4 | 72 | 45:10 |
| 9:12,14, | 52:25 | 25:15,17, | 46:5 | address |
| 15 10:4, | <u>20.6</u> | 19 28:21 | | 4:20 7:8, |
| 12 21:11 | 13:16 | 30:10 | <u>8</u> | 24 8:6,9, |
| 22:1 | <u>2010</u> | 33:15 | | 10 24:14 |
| 26:13,22 | 26:22 | 40:20 | 8 | 25:10 |
| 35:14 | | 41:14,21, | 34:13 | 26:21 |
| 36:16 | | 22,23 | 35:1 | 27:12 |
| 100 | <u>3</u> | 42:11,15, | 37:18,22 | 28:8 |
| 22:3 | | 16, 45:20 | | 31:10 |
| 11 | 3 | 4.2 | | 35:22 |
| 30:13,14 | 9:24 | 43:21 | <u>A</u> | 36:4 |
| 11:30 | 10:1,4 | | | 40:24 |
| 4:4 | 11:2 | <u>5</u> | a.m. | 43:3 |
| 11:31 | 28:22 | | 4:2 | addresses |
| 4:2 | 35:12 | 5 | ability | 26:9,10, |
| 12 | 36:15 | 32:2,6,8 | 36:9 | 15 27:3, |
| 53:3,24 | 3.2 | 41:22 | abuts | 11 28:3, |
| 14 | 43:20 | 42:12,20 | 14:25 | 5,7,16,18 |
| 32:6 | 301 | 45:18 | access | 29:1,17, |
| 17 | 4:21 7:24 | 598 | 41:7 | 20 30:11, |
| 34:14 | 302 | 56:21 | accident | 13, 32:14 |
| 35:1 | 31:23 | 57:4 | 48:7 | 35:17 |
| 37:18 | 32:6 | | 50:20 | 46:6,8, |
| 19 | 309 | <u>6</u> | accidents | 10,23 |
| 32:8 | 15:11 | | 15:8 | administrat |
| | 18:12,13, | 6040 | 48:12 | ive |
| <u>2</u> | 20 19:9 | 33:18,24 | 49:16 | advised |
| | 24:17 | 34:10 | | 55:11 |
| 2 | 36:8 38:7 | 36:4,23 | accuracy | aerial |
| 4:2 9:24 | 40:2,5,25 | 37:6,7,9 | 57:18 | 9:6,15 |
| 10:1,4, | 45:16 | 41:2,25 | actual | 10:20 |
| 19,24 | 51:1 | 42:18 | 32:22 | 11:3 |
| 12:8 16:1 | 56:16,19, | 43:3 | 43:7 | affect |
| 19:20 | 21,25 | 61 | adding | 29:15,16, |
| 20:24 | 57:4 | 15:11 | 45:10 | 17 |
| 21:21 | 338 | 56:16,19, | addition | affected |
| 28:22 | 31:18 | 22,25 | 40:15 | 26:12 |
| 35:12 | 34 | | additional | 29:18 |
| | 32:2 | | | 30:12 |

| | | | | |
|--------------------|--------------------|-------------------|------------------|------------------|
| 35:5 | appears | assume | 52:24 | 24:25 |
| 44:20 | 36:24 | 6:5 18:7 | | 25:8,16 |
| 46:9,23 | approaching | 32:18 | basically | 40:15 |
| age | 12:12 | 38:4 | 19:11 | |
| 4:10 | approximate | 39:21,23 | 50:1 | building |
| agree | ly | 54:10 | behalf | 8:12 |
| 10:19 | 43:23 | assuming | 46:17 | buildings |
| 49:17,21, | area | 18:10 | belief | 8:13 |
| 24 51:3 | 6:22 7:10 | 44:3 | 32:9 55:4 | 10:14 |
| ahead | 8:24 9:7, | assumption | benefit | 11:18 |
| 9:23 | 17 10:13, | 32:18 | 40:5 | 21:4 |
| 25:12 | 20 11:17 | attend | Biddle | built |
| 26:2 | 12:7,20 | 52:4 | 20:8,9, | 52:13 |
| 40:21 | 13:1 | avoid | 10,13,14, | Bureau |
| air | 14:4,18 | 17:24 | 15 21:22 | 51:24 |
| 52:3 | 15:13 | avoided | 22:20,21 | bus |
| airport | 16:17 | 40:3 | 23:20 | 55:12,16 |
| 13:21 | 17:6,12 | aware | 24:7 | business |
| 14:9 | 19:14 | 32:23 | 50:25 | 4:20 |
| alarm | 20:25 | 48:11,13 | 56:15,25 | 11:17 |
| 34:24 | 23:15 | 49:16 | 57:5 | busy |
| 37:13 | 25:6,7,10 | 50:9,11 | bit | 17:22 |
| alternate | 31:6 | 51:5 | 19:6 | |
| 40:11 | 35:7,23 | 54:24 | 45:20 | C |
| 41:4 | 37:20 | 55:11 | blocking | |
| 43:21,22 | 40:7 | 56:7 | 45:7 | |
| 44:2 | 49:11,25 | | blower | call |
| alternative | 51:22 | B | 35:3 | 23:7 32:5 |
| 42:22,25 | 53:6 | | 37:16 | 34:25 |
| 44:24 | 55:14 | back | boots | 35:1 36:7 |
| 45:12 | 56:15 | 17:2 | 48:23 | 37:22 |
| Amann's | areas | 19:14 | born | 54:11 |
| 15:1 | 13:18 | 22:24 | 7:4 | called |
| amount | 17:22 | 30:5,9 | bottom | 4:11 |
| 39:25 | 33:12 | 38:13 | 41:18 | 14:24 |
| annually | 44:3 | 40:8 | 42:2 | 20:9 46:8 |
| 51:22 | arguably | 42:6,10, | briefing | calling |
| 54:19 | 48:2 | 11 53:21 | 56:10 | 54:8 |
| apologize | arrival | based | bringing | calls |
| 33:23 | 32:5 | 24:20 | 41:5 | 15:4,7, |
| 41:4 | 37:17 | 27:9, | brought | 15,20 |
| | ascertain | 32:10 | | 25:9,11 |
| | 37:21 | 50:20 | | 26:25 |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: cancelled..correct

| | | | | |
|---|--|---|---|--|
| 27:8,9, 11,14,22 33:24 cancelled 34:17,18, 20,25 47:2 capacity 49:15 captured 20:23 31:19,23 capturing 28:16,18 care 9:21 50:22 case 30:2 33:3 catch 42:10 center 49:11 54:16 challenge 50:24 challenges 49:19 chance 45:6 change 26:18 chart 45:24 chief 4:3,15,17 5:1,2,4, 8,9,16 9:14 22:23 | 25:19 41:13 43:25 44:10 48:5 49:13 55:11 chosen 40:11 circle 36:22 41:18 citizens 56:7 city 4:25 5:4 10:16 12:13,16 13:13,17, 20,24,25 14:2,9, 11,16,19, 21,23 23:19 Civil 4:12 clarify 7:18 27:20 clear 11:23 41:12,13, 17,19 44:1 close 8:14 9:2 closed 29:5 39:17 41:7 44:4 closer 10:19 | 11:3 50:2 closing 27:13 29:19 30:12 44:20 46:24 56:11 closure 4:8 6:16 56:1,8 coincide 53:4 column 27:23 29:9 30:11 31:14 columns 27:23 combine 46:25 Commission 4:7 communicati on 55:18 community 4:22 company 5:7 51:23 compared 52:21 compass 15:22 16:14,19 19:7,8 29:1 complaints 56:5 | complete 42:16 composite 25:20 computerize d 54:14 concern 44:13,17 concerns 56:5 concluded 57:20 conclusion 23:2 conditions 17:21 conductive 17:13 confirming 43:6 45:22 confused 24:1 confusion 33:23 37:9 connected 8:11 19:2,4 connects 54:16 considerabl y 28:21 considered 8:10 18:12 26:11 | consistent 37:19,23 consists 25:21 constructio n 18:11 contact 54:9,10, 22,23 contacted 26:6 contained 45:14 continuatio n 42:12 continue 42:7 contracts 33:1 corner 10:12 42:2 correct 9:4 10:18,25 11:7,8,14 12:1,23 14:14,15 15:19,23 16:6,7,12 17:1 18:24 19:15,22, 23 20:3, 7,10,22 22:15 23:10 24:7,13, 22 25:24 26:1 |
|---|--|---|---|--|

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: correctly..direct

| | | | | |
|------------------|-----------------|------------------|--------------------|--------------------|
| 28:2,13, | 15:22 | cross | CSX | 44:16 |
| 19,23,24 | 18:15,22 | 15:10,14 | 4:5 | 45:4 |
| 29:3,6, | 19:12,19 | 36:10 | current | 47:9,12 |
| 19,25 | 20:21 | 38:7 | 40:23 | 48:3,6, |
| 30:8,14, | 21:2 | 45:15 | curving | 10,18,20 |
| 18,22,23 | 24:15 | crossing | 12:12 | 49:5 |
| 31:3,7, | 26:7 | 4:9 6:16, | cut | 51:12 |
| 11,17,20, | 30:16,21 | 19,25 | 24:19 | 54:3,11, |
| 21,24 | 33:25 | 7:2,12 | | 17 55:19 |
| 32:3 | 36:8 | 8:20,23 | department' | |
| 34:11,12, | 38:10,21, | 9:3,8 | D | s |
| 15 36:24 | 22 39:20 | 10:22 | | 15:18 |
| 37:11 | 41:1,3 | 11:4,22, | data | 29:6 |
| 38:3,8,9, | 46:14 | 24 14:5, | 24:23 | 55:15 |
| 14,17,22, | 47:8,16, | 13 16:4, | 25:1 56:4 | depending |
| 23 40:18 | 20,22 | 9,14 | date | 17:6 |
| 42:1,13, | 48:17 | 18:17,21 | 4:5 | 24:14 |
| 14,19,24 | 49:23 | 20:19 | day | depict |
| 43:4,24 | 50:4 51:1 | 23:8 | 17:20 | 9:7 11:21 |
| 44:5,6,9 | couple | 26:16 | dealing | 36:15 |
| 45:12,24, | 5:1 13:23 | 29:2,4, | 17:21 | deposition |
| 25 46:1, | 32:15 | 11,13,19, | 33:1 | 4:3 5:20 |
| 5,21 | 45:19 | 24,25 | decide | 25:15 |
| 47:3,4,10 | 47:14 | 30:7 | 12:3 | 39:25 |
| 49:4 | 54:5 | 35:19 | 35:13 | 51:5 |
| 50:3,8, | court | 36:11 | deemed | 55:25 |
| 13,14 | 6:2,10 | 37:2,4 | 17:9 | 57:20 |
| 51:7,8 | 9:9 | 38:11,15 | delineation | describe |
| 53:12 | covers | 39:7,9,16 | 21:16 | 8:17 |
| 57:3 | 12:7 | 41:2,6 | 35:21 | determine |
| correctly | 13:10 | 44:3 | department | 9:18 10:6 |
| 9:1 12:21 | Crawford | 45:2,7,16 | 5:3,12 | 43:7 |
| 16:4 | 4:8 11:21 | 46:9 | 8:11 12:6 | difference |
| 19:19 | 14:6 | 48:8,12, | 13:1,2,10 | 43:9,17 |
| 41:23 | 33:15,18, | 15,16 | 16:22 | 44:7,22 |
| count | 24 34:8, | 49:14,18 | 17:3,16 | differentia |
| 20:17 | 11 35:5, | 50:23 | 20:19 | 1 |
| country | 16 41:2 | 51:1 | 24:23 | 40:1 |
| 15:14 | crew | 56:2,15 | 27:6,7 | dip |
| county | 56:3 | 57:4 | 32:4,11, | 16:8 |
| 4:9 6:16 | criteria | crossings | 21 33:7 | direct |
| 8:23 | 26:10,16 | 17:19,23 | 39:21 | 23:18 |
| 11:21 | 27:24 | 29:10 | | |
| 12:7,11, | 28:3 | 30:13 | | |
| 18,25 | | 38:24,25 | | |
| | | 43:2 57:1 | | |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: direction..extra

| | | | | |
|--------------------|------------------|-------------------|--------------------|--------------------|
| direction | 42:11,12, | 25 8:5 | 34:19,20, | exhibit |
| 14:10 | 46:20 | 13:21 | 25 | 9:5,12, |
| 16:5,6, | documents | 14:11 | entire | 14,15 |
| 10,13 | 25:16 | 15:9 16:5 | 44:4 | 10:12,19, |
| 21:3 | 26:3 | 19:19 | 46:20 | 24 11:2 |
| 23:12 | 42:13 | 40:25 | 52:11 | 12:8 16:1 |
| 53:13,15 | donut | 49:23 | envisioning | 19:20 |
| disasters | 14:3 | 53:18 | 11:24 | 20:24 |
| 52:2 | dozen | east/west | equally | 21:11,21 |
| disconnecte | 53:2 | 24:4 | 40:14 | 22:1 |
| d | drive | easterly | equipment | 25:15,17, |
| 8:8 | 19:10,13 | 40:6 | 7:21 49:7 | 19,20 |
| Discovery | 48:1 | effort | equipped | 27:5 |
| 4:12 | drivers | 17:17 | 57:2 | 28:21 |
| discretion | 49:20 | eliminates | essentially | 30:10 |
| 17:14 | 50:21,25 | 44:25 | 16:19 | 33:15 |
| discussed | driveway | EMA | 20:5 24:3 | 35:14 |
| 13:19 | 11:6 | 26:7 | 27:22 | 36:16 |
| 36:7 56:1 | due | emergency | 38:15 | 40:20 |
| discussing | 15:8 | 5:12,14 | 50:5 | 41:14,21, |
| 26:5 | 43:11 | 15:15 | 52:11 | 22 42:15, |
| discussion | duly | 27:3,9 | establish | 45:20 |
| 55:23 | 4:13 | 43:12 | 17:3 | Exhibits |
| discussions | duties | 54:2 | established | 10:1,4 |
| 17:16 | 5:10 | employed | 23:9 | 36:14 |
| 55:24 | <hr/> | employment | estimate | expedient |
| dispatch | E | 7:3 | 42:8 | 17:10 |
| 26:8 32:4 | earlier | EMS | 43:13 | 36:13 |
| 36:9 49:1 | 13:19 | 12:6 17:5 | EVANS | 42:22 |
| 54:15 | 18:5 | 28:11 | 4:1,16 | 44:18 |
| distance | 19:12 | 31:16,17, | 9:5,11,23 | experience |
| 50:12 | 30:23 | 18 33:17 | 57:8,11 | 23:13 |
| distinguish | 31:1,4 | 47:22 | event | 36:6 |
| ing | 35:20 | ended | 50:4 | explain |
| 28:11 | 36:8 51:4 | 54:7 | EXAMINATION | 13:12 |
| division | easier | engine | 4:15 | explanation |
| 5:4,10 | 9:21 | 27:5 | examined | 22:11 |
| 6:23 | 20:16 | 46:18,19 | 4:14 | exposed |
| 13:14 | east | 47:1 | exception | 52:2 |
| document | 4:21 7:9, | enroute | 29:8 47:5 | extent |
| 24:24 | | | | 41:16 |
| | | | | 48:15 |
| | | | | extra |

| | | | | |
|-----------------|--------------------|----------------|------------------|--------------------|
| 44:21 | 7:15 8:5, | full | 6:13 8:17 | 19:4 |
| | 9 12:6 | 4:18 | 9:7,16 | |
| F | 13:14 | furnace | 10:20 | greater |
| | 27:6,8 | 35:3 | 17:2 | 10:13 |
| | 28:11 | 37:15 | 23:15 | 52:18 |
| facility | 31:5,22 | | 35:23 | grew |
| 51:6 | 34:10 | | 53:15 | 7:10 |
| 52:13 | 35:2 36:3 | G | generally | ground |
| 53:9 | 37:15 | | 16:5 51:9 | 40:4 |
| fact | 43:25 | gaining | 56:19 | 48:23 |
| 14:12 | 44:10,15 | 40:4 | | 49:25 |
| 32:11 | 47:8,16, | Galion | geography | grow |
| 36:1 40:5 | 48:21 | 4:23,25 | 30:3 | 7:10 |
| 49:15 | 49:5 | 5:5 7:6, | Gilead | |
| failure | 51:23 | 7,15,25 | 47:18,19 | guess |
| 52:19 | 55:11 | 10:15,16, | GIS | 12:2 |
| fair | firefighter | 17 12:13, | 26:7 | 21:13 |
| 44:23 | s | 16 13:13, | | 25:4 |
| 48:3 | 17:5 | 17,24 | give | 35:11 |
| fall | firsthand | 14:1,3,16 | 12:5 | 36:2,14 |
| 35:25 | 51:24 | 15:2 | 13:12,16 | 40:16 |
| false | fiscal | 16:24 | 22:12 | 44:1,23 |
| 34:24 | 56:10 | 23:13,17, | 36:10 | 53:2 |
| 37:13 | fit | 24 24:3, | 44:13 | |
| familiar | 5:13 | 18 31:1,8 | 55:9 | H |
| 5:22 6:19 | 26:9,15 | 32:16,19 | glare | |
| 7:2 51:9 | flashers | 37:24 | 15:24 | half |
| farmland | 57:2 | 38:19 | goal | 21:8 |
| 20:25 | focusing | 39:12 | 32:22 | hand |
| fast | 33:13 | 47:5 | 33:6,8,10 | 30:11 |
| 33:8 | forward | gap | good | handwriting |
| 40:14 | 30:4 | 50:12 | 57:11 | 25:23 |
| feel | Fox | gas | Google | 27:10 |
| 44:13 | 11:13 | 8:24 | 40:2 41:9 | happen |
| finding | 14:4 | 52:1,2, | 42:8,17 | 34:21 |
| 37:2 | 16:13 | 16,18,19 | 43:13,19 | happened |
| fine | 18:17 | gates | grade | 9:9 13:4 |
| 9:11 | 37:5,10 | 57:3 | 4:9 6:16 | happening |
| fire | 39:5,13, | gather | 38:24,25 | 12:22 |
| 5:2,4,9, | 20 53:14 | 56:4 | 43:2 45:1 | hard |
| 14 6:23 | front | gave | grassy | 15:25 |
| | 10:3 | 7:24 | 14:20 | 21:16 |
| | | general | gravel | 35:21 |

| | | | | |
|---|--|---|--|---|
| Harding 4:21 7:25 18:12 | huge 44:22 | includes 5:13 | interaction 17:18 | January 26:22 |
| hazard 5:14 | hung 45:1 | including 9:7 13:1 42:15 | intersect 24:6,11 | joins 14:24 |
| hazards 51:15 | I | incorrect 28:2 33:20 | intersectio n 18:13 22:6,17 26:5,6 27:15 | joint 13:6 |
| head 18:11, 43:15 45:16 | Iberia 21:15,18, 20 22:1, 10,19,20, 22 23:1, 2,20 24:11 35:14,18, 21 47:20, 21 48:20, 21 49:5,9 | information 39:15 45:20 49:1 51:14 52:5,10 54:15,21, 22,23 55:21 | intersectio ns 15:10 intersects 24:9 30:20 31:1 | jurisdictio n 20:2 22:13 23:4 24:16 32:24 35:15 44:5 47:15 |
| headed 31:10 | | | | jurisdictio nal 12:25 |
| heading 18:14 41:6 | | initially 33:17 | involve 29:13,15 30:6 38:24,25 43:2 | jurisdictio nally 48:16 |
| hear 5:24 | idea 39:11 54:20 | input 55:15 | | |
| heard 56:12 | identificat ion 9:13,15 10:2 25:18 | inside 35:17 | involved 54:13 | K |
| held 5:6 | | inspect 55:2 | involves 38:19 | kind 49:25 54:20 56:5,6 |
| high 15:14 | identified 24:12 | inspected 55:5 | ironically 34:23 | |
| highways 15:9 | impact 29:5 | inspecting 11:18 | issue 18:10 | kinds 51:20 |
| history 50:20 | impossible 26:19 28:4 | inspection 54:24 | J | knew 36:11 |
| holding 42:5 | inability 18:1 | installed 53:6 | jackson 4:4,10, 15,17,19 9:12,15, 24 10:1,4 12:8 20:23 21:21 25:17,19 | knowing 28:5 |
| hope 44:15 55:7 | incident 54:2 | instance 49:2 | | knowledge 30:3 35:6 39:3 47:11 48:6,9 52:25 56:14 |
| house 7:21 | include 46:6 | instances 15:12 | | |
| housed 49:8 | included 53:8 | intended 9:6 33:18 52:9 | | |

| | | | | |
|-------------------|-----------------|------------------|------------------|--------------------|
| | list | 44:16 | manage | measurement |
| L | 26:9,24, | 52:6,14, | 5:12 | s |
| | 25 28:3, | 20 56:17 | | 13:16 |
| | 7,14,20 | locations | manned | |
| label | 33:13 | 20:4 | 7:22,23 | medic |
| 41:17 | 40:9 | | Mansfield | 34:5 |
| lands | | logs | 7:8 | 45:21 |
| 14:20 | listed | 26:8 | map | 46:2 47:1 |
| | 26:10,13 | | 40:2 | medical |
| larger | 27:4,13 | long | 41:20 | 15:15 |
| 53:8 | 29:17 | 5:6,19 | 42:16 | 27:4,9 |
| law | 33:14 | 52:25 | | |
| 4:14 | 34:4 35:1 | longer | mapping | meet |
| | 43:20 | 33:2 | 26:8 | 11:19 |
| lawful | | 40:10 | | 48:2 |
| 4:10 | listing | 43:23 | maps | |
| | 27:21 | | 25:24 | meets |
| leakages | 46:10 | loosely | 40:21,23 | 15:16 |
| 54:6 | | 19:4 | 41:9,14, | memory |
| left | lists | lot | 20 42:8, | 57:6 |
| 26:15,24 | 25:9 28:6 | 9:20 | 17 43:13 | |
| 27:4 | | | | mentioned |
| 29:18 | live | | mark | 18:25 |
| 31:9 | 7:6,7 | | 9:5,23 | 24:6 |
| 32:17,20 | 11:9 | | 25:12,15 | 54:18 |
| 33:22 | locate | M | | |
| 34:1,18 | 10:9 | | marked | met |
| 38:22 | located | made | 9:12,14 | 27:24 |
| 39:7,9 | 7:12 8:3, | 24:20 | 10:1 | |
| 46:10 | 21 9:2 | 55:11 | 25:17,19 | mile |
| 48:24 | 10:22 | mailing | 36:10 | 7:13 21:8 |
| | 12:18 | 7:8 | 40:16,17 | 26:4,16 |
| left-hand | 14:10 | mailings | 41:21 | 27:17 |
| 27:23 | 15:21 | 52:1 | 42:20 | 28:18 |
| 28:10 | 23:2 | main | marking | 43:17,23 |
| | 36:17 | 8:5,14 | 25:23 | 44:7,21 |
| length | 37:1,5 | make | 35:22 | 46:5 |
| 52:11 | 51:6 | 16:2 | markings | mileage |
| level | 54:15 | 18:21 | 45:19 | 42:3,4,8 |
| 46:14 | location | 22:16 | marks | 45:10 |
| lies | 8:18,19, | 31:9 | 29:22 | miles |
| 13:18 | 25 11:10 | 38:10,21 | | 13:17 |
| likelihood | 16:25 | 39:6 | materials | 43:15 |
| 13:5 | 17:2 | 44:21 | 51:20 | mind |
| 52:18 | 24:15 | | matter | 15:24 |
| | 27:25 | making | 55:20 | minimal |
| limit | 37:24 | 32:17 | | 37:16 |
| 23:4 | 42:18 | | | |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: minimize..past

| | | | | |
|-------------------|--------------------|--------------------|-------------------|--------------------|
| minimize | mound | 15:22 | October | 54:13, 20 |
| 17:18 | 49:25 | 16:14 | 4:2 | owns |
| minor | Mount | 19:22, 25 | odors | 14:16 |
| 37:15 | 47:18, 19 | 20:21 | 54:6 | 51:14 |
| minutes | moving | 22:17 | office | |
| 32:2, 6, 8, | 5:18 | 51:6 | 56:13 | P |
| 16 33:11, | multiple | 53:18 | officer | |
| 12 34:14 | 15:12 | north/south | 56:10 | pages |
| 35:1 | 26:17 | 30:20 | officer's | 27:21 |
| 37:18, 23 | 47:19, 22 | number | 17:14 | 28:15, 22 |
| mistaken | 56:20 | 8:4 27:10 | Ohio | 41:14, 22 |
| 21:7, 22 | Murray | 28:8 | 4:23 | paper |
| mitigation | 8:3 | 41:19 | opened | 41:3 |
| 5:14 | | 42:11, 12, | 48:15 | parallel |
| mix | N | 20 43:14 | operating | 50:5 |
| 14:24 | | 44:19 | 17:8 | parameter |
| moment | natural | 46:1, 2, 19 | operation | 46:4 |
| 15:18 | 8:24 | 54:10 | 29:6 | parentheses |
| 38:4 | 52:16, 18, | numbering | opinion | 45:23 |
| Monnett | 19 | 33:23 | 44:21 | park |
| 24:1 40:2 | nature | numbers | opposed | 14:18 |
| 43:1 | 6:14 15:7 | 9:10 | 40:7 | part |
| 45:17 | 37:14 | 20:16 | orient | 15:24 |
| months | necessarily | 25:9 | 10:6 16:2 | 40:17, 20 |
| 34:23 | 49:18 | 26:23 | original | 41:21 |
| 56:12 | needed | 27:2, 14 | 25:13 | passes |
| Morrow | 41:7 | nutshell | Originally | 53:14 |
| 4:8 8:23 | negotiate | 5:9 | 52:13 | passing |
| 11:21 | 50:22 | O | outlies | 45:7 |
| 12:11, 18, | night | obtained | 13:20 | past |
| 25 33:15, | 38:6 45:5 | 9:16 | overpass | 19:12 |
| 18, 25 | non-clarity | occasion | 17:24 | 21:7, 15, |
| 34:8, 11 | 10:10 | 11:19 | owned | 21, 23 |
| 35:5, 16 | non-ems | occasions | 14:19, 21, | 25:10 |
| 41:2 | 31:22 | 29:22 | 22 15:2 | 26:11 |
| 47:16, 22 | 34:10 | occur | 47:5 | 27:12, 15 |
| motor | normal | 13:3 | owner | 33:11 |
| 37:16 | 37:19 | 52:12 | 11:17 | 35:22 |
| 48:7, 11 | north | occurred | 51:18 | 36:11 |
| 49:20, 22 | 11:5 | 49:17 | | 46:8, 23 |
| 50:21, 25 | | | | |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: pen..questions

| | | | | |
|--|--|---|---|---|
| pen 16:10 | pick 23:19 | population 10:14 | printed 26:20 41:9 | 53:16 protected 57:2 |
| pending 4:6 | picture 21:10,19 | portion 5:24 10:17 13:9 24:15 42:4 | prior 37:22 43:17 | prove 40:13 |
| period 34:9 | pictures 10:7 | Portland 18:13 56:20 | problem 55:10 | provide 52:9 |
| person 54:9 | pipeline 8:24 51:7,9, 14,18 52:12,19 53:5,11 54:12,19 | position 5:6 16:22 | procedure 4:13 17:8 | providing 54:21 |
| personal 12:17 | pipelines 55:1 | possibility 44:25 50:15 | procedures 54:24 | proximity 8:14 9:2 |
| personally 6:20 41:10 48:11 | places 47:20 | possibly 30:12 46:8,23 | proceeding 6:14 38:12 39:16 | Public 4:6 |
| personnel 36:2 | plainly 26:15 | potential 4:8 6:15 17:22 44:20 56:1,8,11 | process 5:22 | purpose 55:17 |
| petition 4:6 | play 21:21 | potentially 35:4 | professiona l 49:14 | purposes 4:11 18:19 46:13 |
| Petitioner 4:11 | point 18:14 23:21 36:16 52:24 | prescribed 17:4 | professiona lly 11:16 | pursuant 4:12 |
| PGNS 51:19 54:8 | pointed 10:24 | present 8:5 49:19 | project 53:8 | put 27:17 36:22 48:23 |
| Phillip 4:4,10, 15,19 | pointing 16:10 19:25 | pretty 23:8 37:23 | properties 15:21 29:7,8, 10,12 33:14 47:5 | Quest 42:16 |
| photo 10:20 13:11 | police 13:2 54:16 | Prevention 51:24 | property 12:13,17, 19,23 13:20 14:9,22, 25 18:16 27:25 | question 5:23,25 6:7 25:5 29:2,14 33:3 41:2 53:21 |
| photograph 9:6,16 11:6 19:16 23:1 24:12 30:9 35:10 | Polk 13:17,25 14:2,7 21:14,15 22:12 31:6 48:2 56:9 | previously 7:24 32:25 | questions 13:23 27:20 48:5 57:9 | |
| photographs 11:20 12:2,4 13:9 | | print 42:5 | | |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: quickly..response

| | | | | |
|-------------------|--------------------|-------------------|--------------------|-------------------|
| quickly | recalled | 26:24 | 15:5 | 21:1, |
| 43:15 | 53:14 | 32:13 | 29:24 | 30:5 |
| 44:12 | receive | 42:9 | requirement | 35:7,25 |
| | 12:24 | reflected | 32:23,25 | 44:20 |
| R | 51:22,25 | 46:3,20 | requirement | residents |
| | 52:1,6 | registered | s | 11:9 23:6 |
| radius | received | 56:6 | 54:25 | respected |
| 28:1,17, | 32:4 | regularly | reroute | 42:13 |
| 19 | 51:13,20 | 55:5 | 45:8 | respond |
| railroad | recent | relate | research | 6:5,10 |
| 17:18,23 | 57:6 | 52:11 | 28:6 | 12:21 |
| 18:17 | recognize | related | researching | 15:5,20 |
| 26:6,11 | 50:23 | 34:21 | 39:24 | 16:23 |
| 30:12 | recollectio | 51:7 | reservoir | 23:6 |
| 36:11 | n | 54:25 | 12:17,22 | 40:24 |
| 40:3 | 53:22,25 | 56:7 | 14:12,17, | 45:4 |
| 46:8,23 | record | relation | 21,24 | 47:7,9,16 |
| raise | 4:1,17 | 6:15 | 15:1,5,17 | 48:18,19, |
| 50:15 | 11:2, | 13:25 | 16:16,23 | 20 49:3,4 |
| raised | 22:23 | 25:1 | 18:4,9, | 54:3,5 |
| 7:4 49:25 | 25:20 | release | 19,23 | 55:21 |
| reaches | 41:12 | 17:22 | 19:1,3 | responded |
| 21:15 | 42:9 | remainder | 20:6 | 29:23 |
| read | 57:16 | 30:19 | reservoir's | 39:3 |
| 6:2 | reduce | remedy | 19:10 | 41:25 |
| reading | 17:17 | 6:1 54:7 | reservoirs | 45:5 |
| 32:2 | refer | report | 13:21 | 48:7,10 |
| realizing | 52:7,8 | 25:8 | 15:13 | responding |
| 44:11 | 57:1 | 26:20 | residence | 6:6 18:4, |
| reason | reference | 46:13 | 12:10 | 16 21:9 |
| 5:24 | 8:18,22 | reporter | 14:5 | 23:12 |
| 20:11 | 16:1 | 6:2,10 | 16:13 | 29:21 |
| 28:14 | referenced | 9:9 | 18:17 | 30:24 |
| 55:12 | 11:22 | reporting | 35:9 | 38:4 |
| reasonable | 32:1 51:4 | 26:17 | 36:15,17, | 44:24 |
| 44:14 | references | reports | 18 37:1, | responds |
| recall | 56:20 | 54:18 | 10 39:5, | 47:12 |
| 8:4 19:18 | referred | request | 8,13,20 | response |
| 38:6 53:7 | 5:1 56:19 | 46:15 | 44:4,8 | 12:20,24 |
| 56:9,14 | reflect | require | residences | 13:6 |
| | 23:1 | | 15:21 | 17:10,13 |
| | | | 20:14 | 18:19 |
| | | | | 20:4 |
| | | | | 25:2,4,5, |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: responses..side

| | | | | |
|-------------|-----------|-----------|------------|-----------|
| 11 26:22 | 42:2 | roughly | 29:12 | separate |
| 27:4,6,17 | road | 16:14 | 30:2 | 8:13 27:8 |
| 29:23 | 4:9 6:17 | 23:3 | 51:10 | services |
| 31:5,25 | 10:21 | route | | 5:15 |
| 32:13,24 | 11:4 | 15:11 | S | set |
| 33:2,17 | 18:22 | 17:10,12, | | 17:12 |
| 34:3,5,13 | 19:13,20, | 15 18:8, | safety | 48:14,17 |
| 35:2 | 22,25 | 18 19:8 | 43:11 | 49:19 |
| 37:18,20 | 20:8,9, | 20:12,15 | 55:17 | 50:9 |
| 39:11,14 | 10,21 | 23:14,19 | sake | sets |
| 44:2,8,14 | 21:2,6, | 30:1 | 43:12 | 11:4 |
| 45:22 | 15,18,20 | 32:15,20 | scenario | 50:10,13, |
| 46:18 | 22:2,3 | 36:1,7,13 | 46:16 | 17 |
| 51:15 | 23:2,10, | 38:5,7, | scene | setting |
| 52:3 | 18,20,23, | 39:18,21, | 32:5 | 15:17 |
| responses | 24 24:2, | 23 40:5, | 44:12 | 55:25 |
| 5:13 | 3,11,16, | 9,11,23 | scheduled | shared |
| 34:7,10 | 19 30:16, | 41:4,6,8, | 4:4 | 55:22 |
| 36:3,4 | 19,21,24 | 23,24 | school | Sheriff's |
| 46:2,19, | 31:8,14, | 42:17,21, | 17:21 | 13:1 |
| 22 54:4 | 19,23 | 22,25 | 55:12,14, | short |
| responsibil | 32:14,20 | 43:17,18, | 16 | 56:9 |
| ities | 33:16,19, | 21,22 | school's | shorter |
| 5:11 | 25 34:8, | 44:3,19, | 15:14 | 28:22 |
| responsibil | 11 35:6, | 25 45:12 | schools | shortest |
| ity | 14,17,18, | 56:16,25 | 55:19 | 20:12 |
| 15:19 | 21 38:11, | 57:4 | search | shoulder |
| responsible | 19,20,21, | routes | 26:21 | 50:7 |
| 7:16 | 22 39:6, | 17:4,9 | 28:4 | show |
| 13:14 | 9,20 | 43:8 | seconds | 26:3 |
| 20:20 | 41:1,3 | 55:12,16, | 32:2,7,8 | shown |
| results | 43:1 47:8 | 22 | 34:14 | 21:24 |
| 44:22 | 48:17,24, | Rules | 35:2 | shows |
| review | 25 49:9, | 4:12 | 37:19 | 10:20 |
| 57:13,19 | 23 50:5, | run | seek | 11:3 |
| ride | 25 51:1 | 31:18,22 | 55:14 | 21:11 |
| 31:17 | 56:15,23, | 43:12 | segregated | 41:5 |
| right- | 24,25 | 47:2 | 46:12 | side |
| 30:10 | roads | 52:22 | sense | 11:5 14:6 |
| right-hand | 19:4 | runs | 24:20 | 19:22,25 |
| 28:10,20 | 30:25 | 18:25 | | |
| 29:9 | roadway | 26:4 | | |
| 31:14 | 24:4 | 27:22,24 | | |
| | rough | 28:4,5,8, | | |
| | 22:11 | | | |

| | | | | |
|--------------------|--------------------|-----------------|--------------------|----------------|
| 20:18,21 | 12:10,13 | start | strike | |
| 28:10 | 13:22 | 40:6 | 7:14 21:9 | T |
| 31:16,17 | 14:12,23 | started | 39:4 | |
| 33:14 | 16:19 | 5:17 | 52:25 | table |
| 42:6,10, | 18:14 | | structures | 46:7 |
| 11 45:24 | 19:8 | state | 19:18,21, | takes |
| 47:7 | 24:17 | 4:18 | 24 20:20 | 10:8 |
| 48:24,25 | 40:25 | 15:10 | 23:7,9 | taking |
| 49:9 | 47:7,17 | 57:4 | 35:4,5 | 44:18 |
| sides | 53:18 | stated | study | talk |
| 42:16 | speak | 33:5,10 | 43:7 | 8:20,22 |
| sideways | 36:6 | 35:20 | stuff | talked |
| 22:25 | speaking | stating | 9:22 | 30:25 |
| significant | 35:23 | 6:1 | 11:18 | 41:15 |
| 43:9 | 36:19 | station | subject | 46:24 |
| signs | special | 7:22,23 | 38:12 | talking |
| 21:17 | 51:13 | 8:5,6,9, | subpoena | 11:23,24 |
| 47:14,25 | specific | 13,15 | 25:8 | 14:4 16:2 |
| similar | 52:6 | 18:8 31:6 | 26:4,23 | 21:13 |
| 14:3 | specificall | 37:25 | 56:3 | 22:24 |
| similarly | y | 38:5 | substation | 30:13,17 |
| 20:5 | 7:11 | 42:17 | 52:7,9,20 | 36:3 |
| simply | 45:21 | 43:3 | 53:1,11, | 41:20 |
| 55:20 | 52:15 | stations | 19,23 | 44:2,7 |
| situation | speculation | 7:15,22 | 54:13,19 | 45:18 |
| 56:11 | 40:10 | 8:2 9:1 | 55:1 | tallied |
| slight | spoke | 47:22 | successfull | 43:14 |
| 54:6 | 35:8 | stop | y | tallies |
| slightly | squad | 27:19 | 50:22 | 27:2 |
| 40:10 | 18:6 | straight | supposed | 28:7,9 |
| small | squads | 23:17 | 17:5 | 34:5 |
| 35:2 | 17:5 | 40:8 | surrounding | tally |
| software | square | 51:23 | 14:22,25 | 29:22 |
| 26:17 | 13:16 | street | surrounds | 43:16 |
| sort | staked | 8:3,11 | 14:2 | Taylor |
| 28:2 50:6 | 21:16 | 24:19 | sworn | 21:6, |
| sounds | standard | 30:20 | 4:13 | 22:7,8,9, |
| 53:22 | 17:8 | 49:10 | system | 18,20,21 |
| south | standpoint | street/ | 26:7,8,18 | 23:10 |
| 8:12 | 43:25 | crossing | systems | 24:9 |
| | 44:10 | 7:5 | 55:14 | 30:19,24 |
| | | streets | | 31:8,9, |
| | | 36:10 | | |

CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

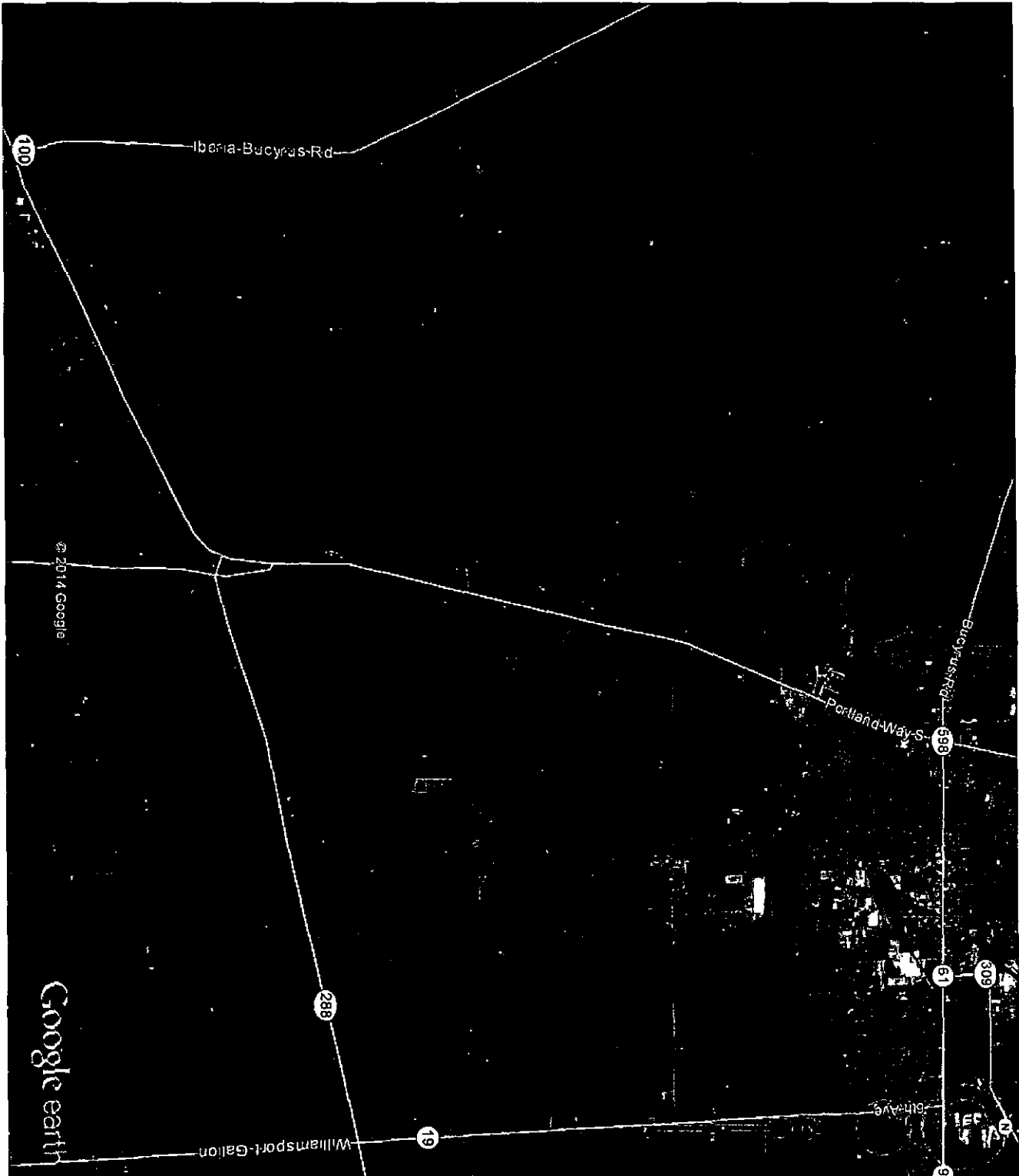
October 02, 2014
Index: team..uncertainty

| | | | | |
|-------------|-----------|------------|-------------|-------------|
| 13,19,23 | 33:1 | 24:25 | 10,17 | 45:3 |
| 32:14,16, | thinking | 55:23 | 51:6 | 53:20 |
| 38:20 | 10:9 22:8 | today's | traffic | turn |
| 39:6,9, | THOMPSON | 4:5 | 17:21 | 18:21 |
| 12,13,19 | 57:10 | top | 18:10 | 19:9 42:7 |
| team | thought | 10:12 | train | turned |
| 15:14 | 47:24 | 11:5 | 45:1,6,14 | 54:4 |
| technically | three- | 26:14 | 48:7,11 | turning |
| 7:17, | quarters | 28:20 | 50:6,18 | 40:25 |
| 12:20 | 7:13 | 43:19 | trained | turns |
| ten | Thursday | total | 52:14 | 40:13 |
| 26:14 | 4:2 | 42:3,4 | training | two-page |
| term | time | 43:16 | 17:11 | 42:5 |
| 17:10 | 5:16 6:25 | 46:2,18, | 51:13 | type |
| terms | 10:4,9 | 25 47:1 | 52:10 | 27:1 |
| 15:18 | 15:4 16:8 | totally | trainings | 32:22 |
| 21:9 29:4 | 32:3 | 57:15 | 52:1,5 | typed |
| 31:5 | 34:8,13 | town | transcript | 57:12 |
| 46:22 | 35:11 | 7:4,9 | 57:14 | typewritten |
| territory | 37:12,18, | 17:12 | transportat | 25:22 |
| 12:7,14 | 20 39:11, | 39:1 | ion | typical |
| 13:10,13 | 14 40:1 | 49:12 | 4:5 55:19 | 18:8 |
| 21:12,17 | 43:13 | township | trapped | 23:14 |
| 22:13 | 44:14 | 13:18,25 | 50:17 | 25:4 31:5 |
| 35:16,20 | 45:11 | 14:2,7 | travel | typically |
| 47:6 | 52:24 | 21:15 | 40:1 | 13:4 |
| 51:10 | 53:4 54:1 | 22:12 | traveling | 18:20 |
| 52:22 | times | 31:6 | 49:22 | 20:11 |
| testified | 5:1 | 47:15,25 | 50:4 | 23:16 |
| 4:14 | 17:11,20 | 56:10 | trip | 31:7 |
| testify | 25:2,4,5, | Township's | 30:6 | |
| 6:15 | 11 27:13, | 48:2 | trouble | U |
| thereto | 17 31:25 | track | 37:2 | |
| 51:16 | 32:13,24 | 20:16 | truck | ultimately |
| thing | 33:2 | tracks | 17:15 | 39:17 |
| 16:3 | 34:3,6 | 11:5 | 18:6 | unable |
| 32:11 | 43:8 | 12:12 | 43:12 | 37:21 |
| 37:3 | 49:14 | 16:20 | trucks | 49:1 |
| 41:17 | 54:6 | 17:18 | 55:20 | uncertainty |
| things | timing | 38:7,15 | true | 17:25 |
| 15:11 | 43:12 | 40:4 | | |
| 17:24 | today | 45:14 | | |
| | 5:16 8:20 | 50:2,5,9, | | |

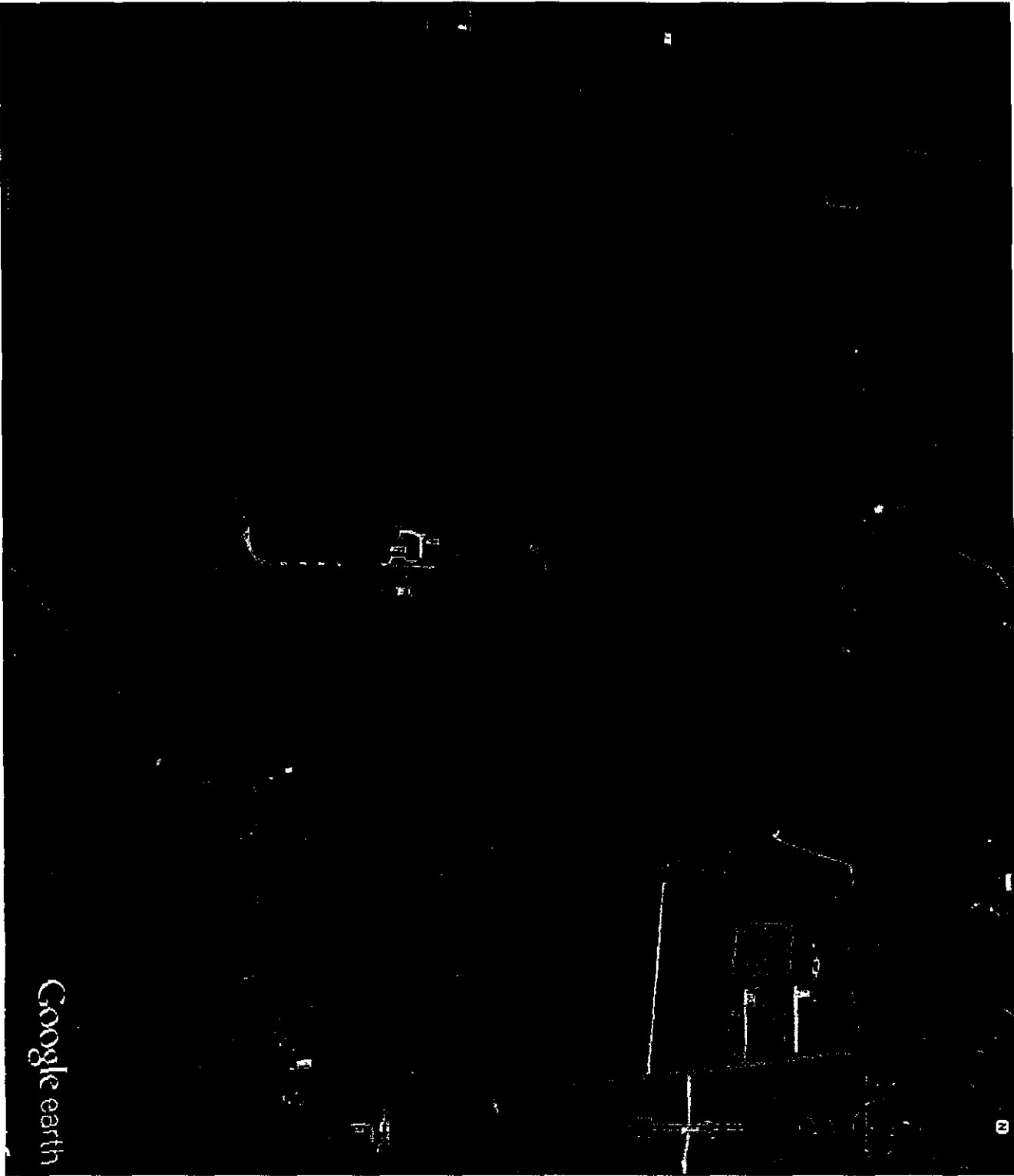
CHIEF PHILLIP JACKSON
PETITION OF CSX TRANSPORTATION

October 02, 2014
Index: underground..years

| | | | |
|--------------------|------------------|-------------------|--------------|
| underground | 41:9 56:3 | 21:10,12, | 22:25 |
| 51:7 | | 13,18 | 27:14 |
| 53:16 | | 23:7,10, | 33:1,6 |
| | V | 18,22 | |
| understand | | 24:18 | |
| 5:2 8:25 | | 29:1,10 | Y |
| 11:12 | vehicle | 40:8 41:1 | |
| 12:21 | 48:7,12 | 45:16 | years |
| 13:24 | 49:20 | 47:25 | 5:8 6:24 |
| 16:3 18:5 | 50:21,25 | 49:23 | 26:19 |
| 38:1 | vehicles | 53:18 | 53:3,24 |
| 41:23 | 15:12 | | |
| 46:16 | 49:22 | westerly | |
| | | 21:3 | |
| understandi | vehicular | | |
| ng | 15:8 | western | |
| 6:13 | | 23:3 | |
| 10:15 | vendors | 24:15 | |
| 12:5 29:7 | 26:18 | | |
| 30:4 | verbally | whatsoever | |
| 32:10 | 6:10 | 39:2 | |
| 35:15 | 13:12 | whichever | |
| 47:4 | | 24:19 | |
| 53:10 | versus | 31:10 | |
| 55:4 | 28:11 | 47:15 | |
| | vicinity | | |
| understood | 7:11 | Winchester | |
| 6:6 31:4 | 14:13 | 23:18,24 | |
| | 51:2 | 24:1,3,19 | |
| unmanned | 53:24 | 31:2,8 | |
| 7:20 9:1 | | 32:16, | |
| | | 38:19 | |
| update | view | 39:12,19 | |
| 51:22 | 11:3 | 40:3 43:1 | |
| 54:23 | Village | 45:17 | |
| | 49:9 | | |
| uptown | | | |
| 17:22 | volunteer | word | |
| 18:10,11 | 49:5 | 23:1 32:4 | |
| | | | |
| Utilities | | worded | |
| 4:7 | | 29:14 | |
| | W | | |
| utilize | | work | |
| 26:20 | waive | 6:22 | |
| 40:24 | 57:14 | 11:17 | |
| | | | |
| utilized | west | writing | |
| 15:13 | 16:11 | 25:22 | |
| | 18:15,22 | 57:12 | |
| utilizing | 20:18 | written | |
| 7:4 26:17 | | | |

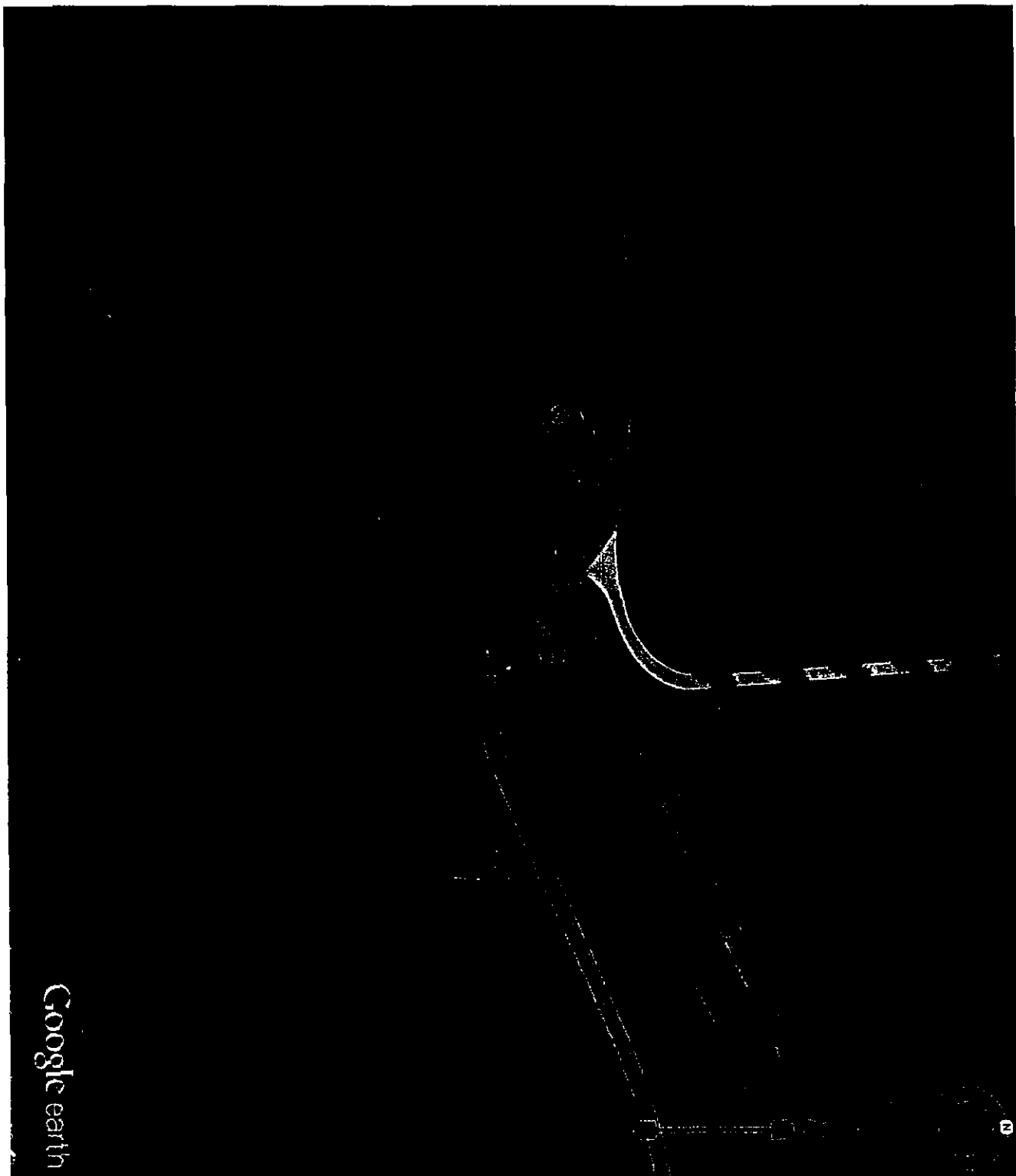


JACKSON
I
10.8.14
PENSA 802-671-0000



Google earth

JACKSON
2
10.2.14
PENGAD 000-071-0003



Google earth

Jackson
3
10.2.14
P0000 8/0-021-0000

| Addresses within 1 mile of Railroad Crossing | | |
|--|---------------------------|-----------|
| House Number | Street | Community |
| 464 | Biddle Rd | Polk Twp |
| 385 | St Rt 309 | Polk Twp |
| 373 | St Rt 309 | Polk Twp |
| 365 | St Rt 309 | Polk Twp |
| 357 | St Rt 309 | Polk Twp |
| 355 | St Rt 309 | Polk Twp |
| 228 | St Rt 309 | Polk Twp |
| 6308 | Crawford Morrow Line Rd | Polk Twp |
| 6298 | Crawford Morrow Line Rd | Polk Twp |
| 6288 | Crawford Morrow Line Rd | Polk Twp |
| 6276 | Crawford Morrow Line Rd | Polk Twp |
| 6262 | Crawford Morrow Line Rd | Polk Twp |
| 6258 | Crawford Morrow Line Rd | Polk Twp |
| 6248 | Crawford Morrow Line Rd | Polk Twp |
| 6244 | Crawford Morrow Line Rd | Polk Twp |
| 6236 | Crawford Morrow Line Rd | Polk Twp |
| 6232 | Crawford Morrow Line Rd | Polk Twp |
| 6226 | Crawford Morrow Line Rd | Polk Twp |
| 6218 | Crawford Morrow Line Rd | Polk Twp |
| 6210 | Crawford Morrow Line Rd | Polk Twp |
| 6196 | Crawford Morrow Line Rd | Polk Twp |
| 6176 | Crawford Morrow Line Rd | Polk Twp |
| 6174 | Crawford Morrow Line Rd | Polk Twp |
| 6170 | Crawford Morrow Line Rd | Polk Twp |
| 6106 | Crawford Morrow Line Rd | Polk Twp |
| 595 | Biddle Rd | Polk Twp |
| 591 | Biddle Rd | Polk Twp |
| 577 | Biddle Rd | Polk Twp |
| 571 | Biddle Rd | Polk Twp |
| 563 | Biddle Rd | Polk Twp |
| 553 | Biddle Rd | Polk Twp |
| 543 | Biddle Rd | Polk Twp |
| 533 | Biddle Rd | Polk Twp |
| 530 | Biddle Rd | Polk Twp |
| 525 | Biddle Rd | Polk Twp |
| 517 | Biddle Rd | Polk Twp |
| 507 | Biddle Rd | Polk Twp |
| 457 | Biddle Rd | Polk Twp |
| 453 | Biddle Rd | Polk Twp |
| 333 | Biddle Rd | Polk Twp |
| 324 | Biddle Rd | Polk Twp |
| 240 | Biddle Rd | Polk Twp |
| 227 | Biddle Rd | Polk Twp |
| 217 | Biddle Rd | Polk Twp |
| 6410 | Monnett New Winchester Rd | Polk Twp |
| 6373 | Monnett New Winchester Rd | Polk Twp |
| 6366 | Monnett New Winchester Rd | Polk Twp |
| 6351 | Monnett New Winchester Rd | Polk Twp |
| 6343 | Monnett New Winchester Rd | Polk Twp |
| 6335 | Monnett New Winchester Rd | Polk Twp |
| 6291 | Monnett New Winchester Rd | Polk Twp |
| 6292 | Monnett New Winchester Rd | Polk Twp |
| 6274 | Monnett New Winchester Rd | Polk Twp |
| 6259 | Monnett New Winchester Rd | Polk Twp |
| 6249 | Monnett New Winchester Rd | Polk Twp |
| 6248 | Monnett New Winchester Rd | Polk Twp |
| 6243 | Monnett New Winchester Rd | Polk Twp |
| 6234 | Monnett New Winchester Rd | Polk Twp |
| 6228 | Monnett New Winchester Rd | Polk Twp |

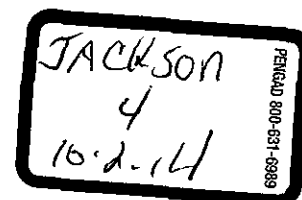
| Addresses Past Railroad possibly affected by closing | | |
|--|-------------------------|----------|
| 5700 | Crawford Morrow Line Rd | Polk Twp |
| 5860 | Crawford Morrow Line Rd | Polk Twp |
| 6040 | Crawford Morrow Line Rd | Polk Twp |
| 220 | Taylor Rd | Polk Twp |
| 264 | Taylor Rd | Polk Twp |
| 272 | Taylor Rd | Polk Twp |
| 292 | Taylor Rd | Polk Twp |
| 302 | Taylor Rd | Polk Twp |
| 338 | Taylor Rd | Polk Twp |
| 359 | Taylor Rd | Polk Twp |
| 250 | Taylor Rd | Polk Twp |

8:17 Response
 ② cancelled

5:34

Medic Response
 (on RIGHT)
 72

ENGINE RESPONSE (on LEAD)
 20



| | | | | |
|---|------|---------------------------|----------|----|
| | 6220 | Monnett New Winchester Rd | Polk Twp | |
| | 6214 | Monnett New Winchester Rd | Polk Twp | |
| | 6141 | Monnett New Winchester Rd | Polk Twp | |
| | 6075 | Monnett New Winchester Rd | Polk Twp | |
| | 6068 | Monnett New Winchester Rd | Polk Twp | |
| | 6069 | Monnett New Winchester Rd | Polk Twp | |
| | 6055 | Monnett New Winchester Rd | Polk Twp | |
| | 6024 | Monnett New Winchester Rd | Polk Twp | |
| | 6020 | Monnett New Winchester Rd | Polk Twp | |
| 3 | 5998 | Monnett New Winchester Rd | Polk Twp | |
| 2 | 5920 | Monnett New Winchester Rd | Polk Twp | 15 |
| | 5917 | Monnett New Winchester Rd | Polk Twp | 2 |
| | 5827 | Monnett New Winchester Rd | Polk Twp | |
| | 5826 | Monnett New Winchester Rd | Polk Twp | |
| | 5822 | Monnett New Winchester Rd | Polk Twp | 7 |
| | 5802 | Monnett New Winchester Rd | Polk Twp | |
| | 5798 | Monnett New Winchester Rd | Polk Twp | |
| | 5797 | Monnett New Winchester Rd | Polk Twp | |
| | 5782 | Monnett New Winchester Rd | Polk Twp | |
| | 5766 | Monnett New Winchester Rd | Polk Twp | |
| | 5700 | Crawford Morrow Line Rd | Polk Twp | |
| 2 | 5860 | Crawford Morrow Line Rd | Polk Twp | |
| | 6040 | Crawford Morrow Line Rd | Polk Twp | |
| | 220 | Taylor Rd | Polk Twp | |
| | 264 | Taylor Rd | Polk Twp | |
| | 272 | Taylor Rd | Polk Twp | |
| | 292 | Taylor Rd | Polk Twp | |
| 1 | 302 | Taylor Rd | Polk Twp | 1 |
| | 338 | Taylor Rd | Polk Twp | |
| | 359 | Taylor Rd | Polk Twp | |
| | 546 | Taylor Rd | Polk Twp | |
| | 555 | Taylor Rd | Polk Twp | |
| | 6226 | Glade | Polk Twp | 2 |
| | 6222 | Galde | Polk Twp | |
| | 576 | Clarendon | Polk Twp | |
| | 579 | Clarendon | Polk Twp | |
| | 533 | McCloskey | Polk Twp | |
| | 6235 | Trempleau | Polk Twp | |
| | 570 | Clarendon | Polk Twp | |
| | 567 | Clarendon | Polk Twp | |
| | 560 | Clarendon | Polk Twp | 1 |
| | 559 | Clarendon | Polk Twp | |
| | 556 | Clarendon | Polk Twp | |
| | 555 | Clarendon | Polk Twp | |
| | 546 | Clarendon | Polk Twp | |
| | 543 | Clarendon | Polk Twp | |
| | 538 | Clarendon | Polk Twp | |
| | 531 | Clarendon | Polk Twp | 1 |
| | 532 | Clarendon | Polk Twp | |
| | 522 | Clarendon | Polk Twp | |
| | 519 | Clarendon | Polk Twp | |
| | 516 | Clarendon | Polk Twp | |
| | 508 | Clarendon | Polk Twp | |
| | 505 | Clarendon | Polk Twp | 3 |
| | 6212 | Hosford Rd | Polk Twp | |
| | 6215 | Hosford Rd | Polk Twp | |
| | 6225 | Hosford Rd | Polk Twp | |
| | 6228 | Hosford Rd | Polk Twp | 2 |
| | 6245 | Hosford Rd | Polk Twp | |
| 1 | 6250 | Hosford Rd | Polk Twp | 1 |
| | 6278 | Hosford Rd | Polk Twp | |

~~McCloskey~~

2

| | | | |
|------|------------|----------|---|
| 6368 | Hosford Rd | Polk Twp | ✓ |
| 6318 | Hosford Rd | Polk Twp | ✓ |
| 6336 | Hosford Rd | Polk Twp | ✓ |
| 6374 | Hosford Rd | Galion | ✓ |
| 6337 | Hosford Rd | Polk Twp | ✓ |
| 560 | McCloskey | Polk Twp | ✓ |
| 362 | Biddle Rd | Polk Twp | ✓ |
| 366 | Biddle Rd | Polk Twp | ✓ |
| 229 | Biddle Rd | Polk Twp | ✓ |
| 250 | Taylor Rd | Polk Twp | ✓ |

(3)

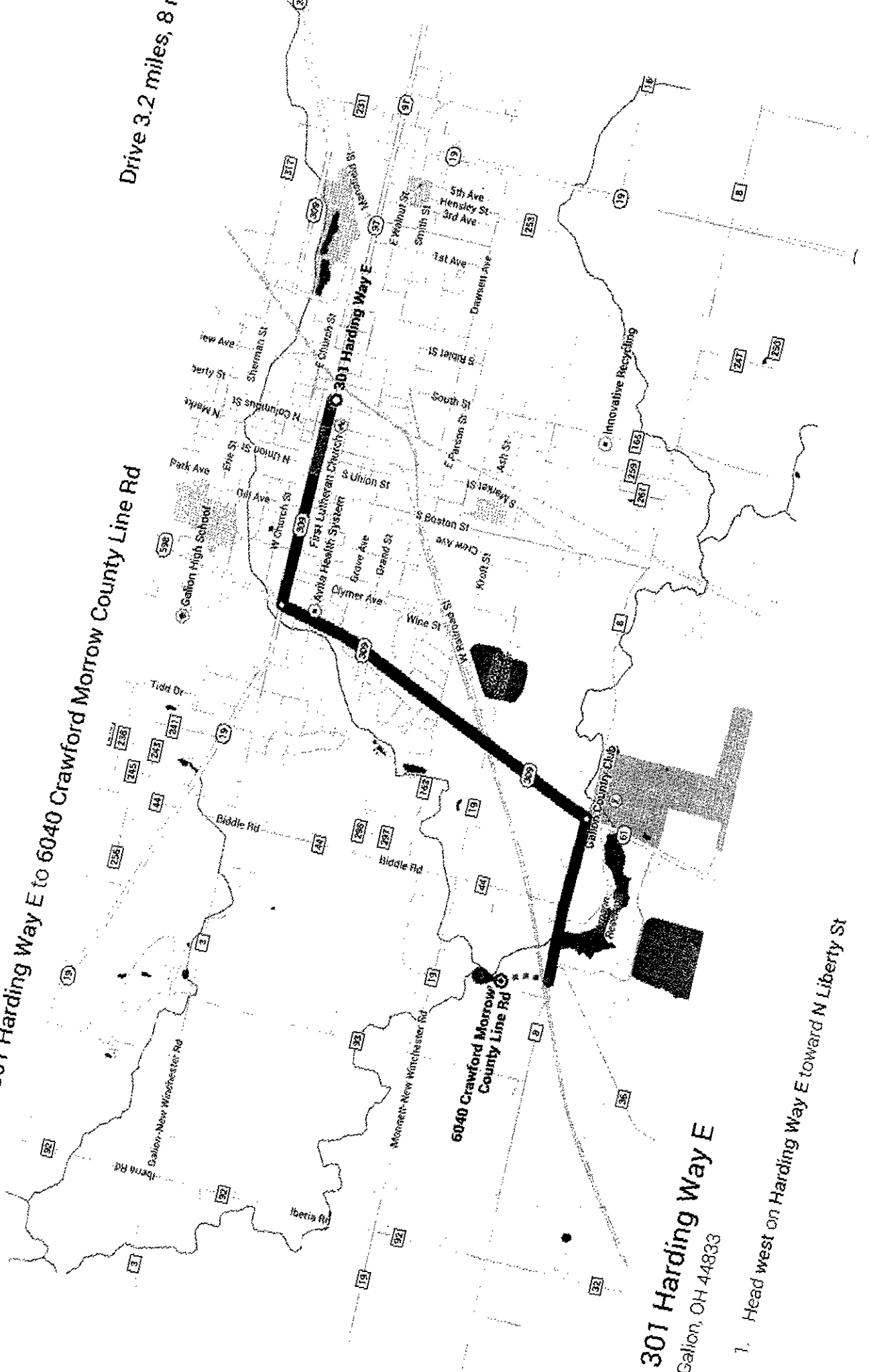
gic

Drive 3.2 miles, 8

Directions from 301 Harding Way E to 6040 Crawford Morrow County Line Rd

○ 301 Harding Way E
Gallion, OH 44833

1. Head west on Harding Way E toward N Liberty St



2. Turn left onto OH-309 W/OH-61 S/Portland Way S

Continue to follow OH-309 W/OH-61 S

1.6 mi

3. Turn right onto Bloominggrove-New Winchester Rd/Crawford-Morrow County Line Rd

Destination will be on the right

0.7 mi

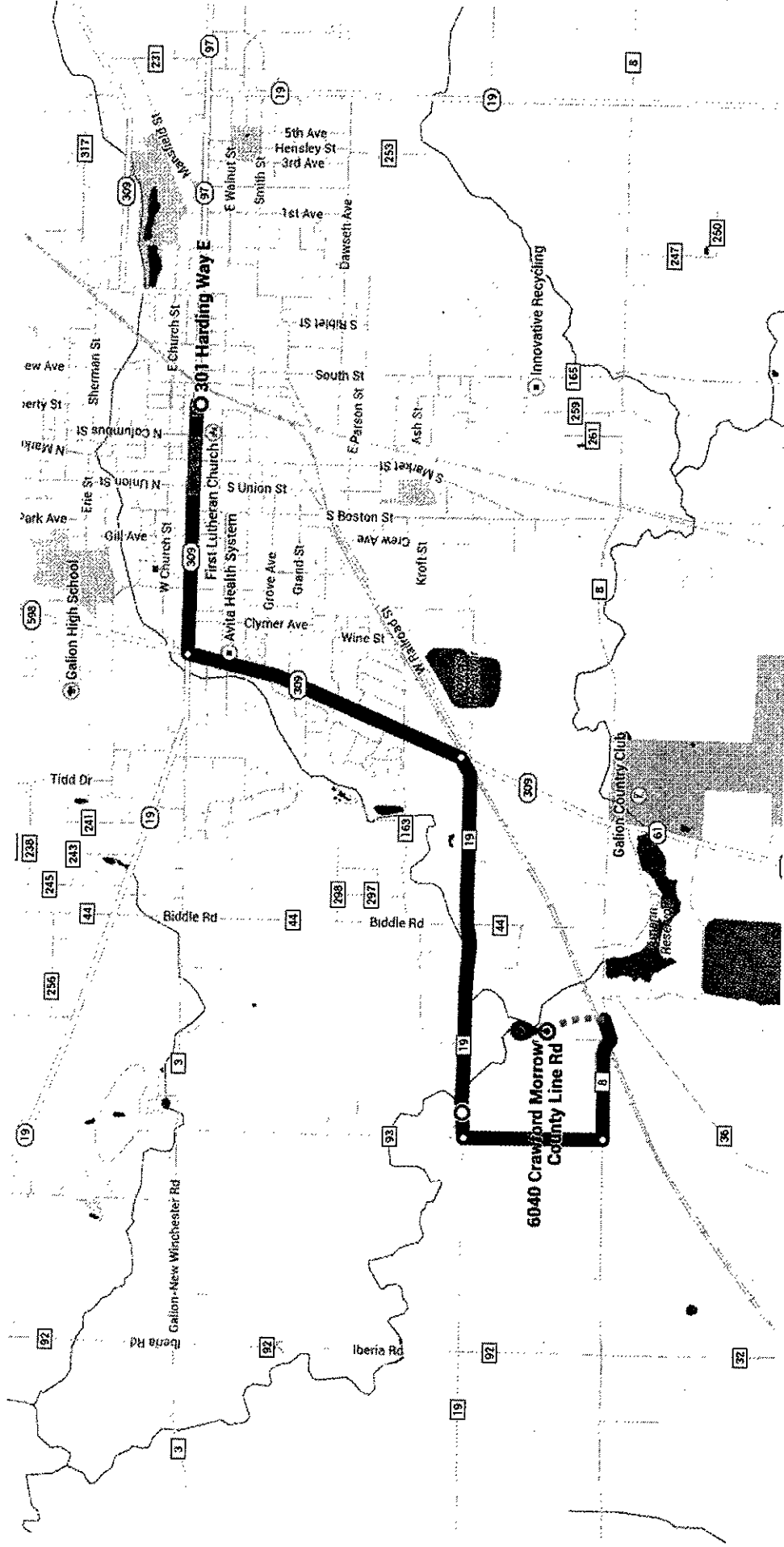
6040 Crawford Morrow County Line Rd

Gallion, OH 44833

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2014 Google

Directions from 301 Harding Way E to 6040 Crawford Morrow County Line Rd



○ 301 Harding Way E

Galion, OH 44833

1. Head west on Harding Way E toward N Liberty St



2. Turn left onto OH-309 W/OH-61 S/Portland Way S

1 Continue to follow OH-309 W/OH-61 S

1.0 mi

3. Turn right onto Monnett New Winchester Rd

1.4 mi

4. Turn left onto Taylor Rd

0.5 mi

5. Turn left onto Bloominggrove-New Winchester Rd/Crawford-Morrow County Line Rd

1 Destination will be on the left

0.4 mi

6040 Crawford Morrow County Line Rd

Galion, OH 44833

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2014 Google