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Friday, July 20, 2018

Los Angeles Office of the City Clerk Attn: Erika Pulst R.M. 395 200 N. Spring Street Los Angeles, CA 90012

Via US Mail and Email

Subject: Meeting Regarding Proposed Underground Utility District File No. 17-0724

Dear Ms. Pulst:

Union Pacific Railroad Company notes that in your notice letter dated July 13, 2018 the project referenced above contemplates construction of an underground utility district and associated facilities near milepost 483 of the River East Bank Subdivision. Union Pacific Railroad will not be able to have a representative at the July 31, 2018 informational meeting but submits these comments and concerns for The Los Angeles Public Service Division's consideration.

Union Pacific Railroad objects to any route that runs parallel within three hundred (300) feet of railroad right of way, measured from the centerline of our track. All parallel lines must be three hundred (300) feet off of track. Union Pacific Railroad will only allow crossings of railroad right of way at a degree of ninety (90°), or as close to ninety degrees (90°) as possible without going beyond the degree range of forty-five (45°). Union Pacific Railroad does not allow for any structures to be erected on railroad right of way. All crossings and parallel lines will require a future agreement with Union Pacific Railroad as to how to construct and maintain.

This objection is based upon the lack of detailed information to fully understand the project and the impact this station and wirelines may have on Railroad property. If the above conditions cannot be met, all consideration of the project should be subject to a full mitigation study at the expense of The Los Angeles Public Service Division. Any concerns resulting from the mitigation study must be required to be addressed to avoid any damage to Union Pacific Railroad's signal and communication facilities.

Safety is the primary driver for this requested requirement. Unmitigated high voltage power lines in close proximity to railroad tracks can have an adverse affect upon railroad signals, especially grade crossing warning devices. For crossings in the vicinity of switches or signal facilities (especially when not crossing at a 90 degree angle), inductive interference has the potential to disrupt signal system in the track, causing failure in track signals, including highway grade crossing warning devices. In general, the more power that flows through the wires, the greater effect it has upon the railroad equipment. Union Pacific Railroad reviews proposed installations on or near its right of way by examining factors such as the distance between the wire and the rails and how far the power line parallels the tracks to evaluate the potential for the power lines to affect the safe operation of railroad signaling equipment.

Other adverse affects on railroad equipment come from ground fault events. These events cause a great deal of energy to flow through the ground from the power company's towers and/or substations, through the rails, and directly into signal equipment. Such events can cause tens or hundreds of thousands of dollars worth of damages during a single event. These occurrences can cause the destruction of railroad equipment for several miles. In one area, well documented events have repeatedly destroyed grade crossing warning devices for several miles. In addition to the potential to cause damage to railroad equipment, railroad personnel or anyone else touching the rails can be subject to injury from electrical shock.

Information and application forms concerning requests for wireline crossings across Union Pacific Railroad's property may be found on the internet at: <u>http://www.up.com/real_estate/utilities/index.htm</u>. Engineering specifications regarding crossings can be found as well at

<u>http://www.up.com/real_estate/utilities/wireline/wirespecs/index.htm</u>. Proposals that call for placement of improvements on or under our property require greater evaluation and tend to be more difficult to approve, particularly where wirelines parallel our tracks with voltage. Further information regarding requests for such encroachments may be found on our website at:

www.uprr.com/reus/encroach/procedur.shtml and www.uprr.com/reus/encroach/encguide.shtml. In all instances, there must also be a meeting of the minds on compensation for the right to cross the property.

By this letter, Union Pacific Railroad requests The Los Angeles Public Service Division to abide by these conditions presented above. If they have questions on requirements, please encourage them to reach out to me. The railroad reserves its rights to present comments on the proposal and to seek any legal, administrative, and other remedies that may be necessary to preserve Union Pacific Railroad's franchise and property rights.

Cordially,

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