

## DOCKETED

<b>Docket Number:</b>	16-AFC-01
<b>Project Title:</b>	Stanton Energy Reliability Center
<b>TN #:</b>	217698
<b>Document Title:</b>	Union Pacific Railroad Company Comments On Response to the Notice on the Stanton Energy Reliability Center
<b>Description:</b>	N/A
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*Comment Received From: Union Pacific Railroad Company*

*Submitted On: 5/23/2017*

*Docket Number: 16-AFC-01*

**On Response to the Notice on the Stanton Energy Reliability Center**

*Additional submitted attachment is included below.*

May 15, 2017

VIA EMAIL ONLY: [publicadviser@energy.ca.gov](mailto:publicadviser@energy.ca.gov)

Energy Resources Conservation and Development  
Commission of the State of California  
Attn: Alana Matthews  
1516 Ninth Street  
Sacramento, California 95814

Re: Comments to proposed Stanton Energy Reliability Center at 10711 Dale Avenue,  
Stanton, California (the "Project")

Dear Ms. Matthews:

Thank you for allowing Union Pacific Railroad Company ("UP") the opportunity to submit the following comments in response to the notice on the above-referenced Project. The proposed Project location is adjacent to UP's Stanton Industrial Lead. Additionally, there are at-grade rail crossings over these tracks in nearby locations, including at Dale Avenue which is adjacent to the Project location. Any land planning decisions should consider that train volumes near the Project area may increase in the future. UP also asks that the Commission and the applicant keep in mind that this is a vital rail corridor and nearby land uses should be compatible with the safe operation of continued rail use.

#### Mitigation Study and Engineering Review

UP requests that approval of the Project be subject to a full mitigation study at the expense of the Applicant. Any concerns resulting from the mitigation study must be required to be addressed to avoid any damage to UP's adjacent signal and communication facilities. Safety is the primary driver for this requested requirement. Unmitigated high voltage power in close proximity to railroad tracks can have an adverse affect upon railroad signals, especially grade crossing warning devices. In general, the more power that flows through, the greater effect it has upon the railroad equipment. Other adverse affects on railroad equipment come from ground fault events. These events cause energy to flow through the ground from 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 and the destruction of railroad equipment for several miles. In addition to the potential to cause damage to railroad equipment, railroad personnel or other individuals touching the rails can be subject to injury from electrical shock. In order for UP to assess the risks associated with this Project, UP requests that the Applicant forward its engineering and design drawings to UP for its review and approval. These plans must specify the distance of infrastructure and equipment to the railroad right of way and centerline of the nearest railroad tracks.

#### At-Grade Rail Crossing and Sight Line Safety

The safety of UP's employees, customers, adjoining land owners, and the communities we operate through is our top priority. At-grade rail crossings are areas where railroad operations and the public come into close contact. Appropriate modifications to the street and warning devices on the nearby rail crossings may need to be included as part of the Project. Development at the Project location may result in poor site lines for vehicular traffic approaching the at-grade crossings. Should this Project continue, UP requests that the Commission require appropriate setbacks to mitigate any safety risks resulting from reduced visibility.

#### Increased Traffic Impact

Rail crossing safety is critical to the public and to UP. Any increase in traffic from the Project may render inadequate the current safety devices in place on the nearby at-grade crossings. Additionally, an increase of pedestrian and vehicular traffic may conflict with train operations causing trains to proceed more slowly through the crossing, and/or make more frequent emergency stops, which would make rail service less effective and efficient. Should this Project be approved, UP requests that the Project developer and the Commission examine any increase in vehicular and pedestrian traffic and the impacts on the nearby at-grade road crossings to see if any additional mitigation measures should be included in the Project.

#### Drainage and Project Construction

UP requests the Commission ensure that the drainage plan relating to the Project does not shift storm water drainage toward UP property and infrastructure. Any runoff onto UP's property may cause damage to its facilities resulting in a potential public safety issue. If the Project is approved, we ask that the Commission require the applicant to mitigate all safety risks and the impacts of the railroad's 24-hour operations during the construction of the Project, including contacting UP to arrange for flaggers for work performed within twenty-five feet (25') of the nearest track. Additionally, any proposed pipeline encroachments or crossings on UP right-of-way will need to be requested and complete engineering plans submitted through UP's online application. Information and application forms concerning these requests may be found on UP's website at: [http://www.up.com/real\\_estate/utilities/index.htm](http://www.up.com/real_estate/utilities/index.htm).

Energy Resources Conservation and Development  
May 15, 2017

UP appreciates the developer and the Commission giving due consideration to the above concerns, as this proposed Project may result in impacts to land use and public safety. Please give notice to UP of all future hearings and other matters with respect to the Project as follows:

Peter Kenney, Manager - Real Estate  
Union Pacific Railroad Company  
1400 Douglas Street - STOP 1690 Omaha, NE 68179  
(402) 544-8581  
[pkenny@up.com](mailto:pkenny@up.com)

Please do not hesitate to contact Peter Kenney if you have any questions or concerns.

Sincerely,



Madeline E. Roebke  
Senior General Counsel  
Union Pacific Railroad Company

cc: Peter Kenney