



ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

2 COMMISSIONERS

- 3 MIKE GLEASON, Chairman
- 4 WILLIAM A. MUNDELL
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2008 SEP 11 A 9:05  
 AZ CORP COMMISSION  
 DOCKET CONTROL

8 IN THE MATTER OF THE APPLICATION OF  
 9 UNION PACIFIC RAILROAD COMPANY TO  
 10 ALTER THREE CROSSINGS OF THE UNION  
 11 PACIFIC RAILROAD IN THE CITY OF CASA  
 12 GRANDE, PINAL COUNTY, ARIZONA AT  
 13 SACATON, FLORENCE AND HERMOSILLA  
 14 STREETS.

DOCKET NO. RR-03639A-07-0520

**STAFF'S NOTICE OF FILING  
LATE-FILED EXHIBIT**

15 Staff of the Arizona Corporation Commission ("Staff") hereby files late-filed Exhibit No. S-2,  
 16 which is a revised version of the FHWA Guidelines chart from the staff report. Pursuant to the  
 17 request during the hearing, Staff has recalculated the projected crossing exposure and projected  
 18 vehicle delay for the crossing at Florence Street, using the updated projection of 11,000 for Average  
 19 Daily Traffic (ADT) as provided by the City of Casa Grande.

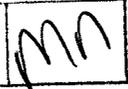
20 RESPECTFULLY SUBMITTED this 11th day of September, 2008.

21 *Nancy Scott*  
 22 \_\_\_\_\_  
 23 Nancy Scott, Attorney  
 24 Legal Division  
 25 Arizona Corporation Commission  
 26 1200 West Washington Street  
 27 Phoenix, Arizona 85007  
 28 (602) 542-3402

29 Original and thirteen (13) copies  
 30 of the foregoing filed this  
 31 11th day of September, 2008 with:

32 Docket Control  
 33 Arizona Corporation Commission  
 34 1200 West Washington Street  
 35 Phoenix, Arizona 85007

Arizona Corporation Commission  
**DOCKETED**  
 SEP 11 2008

DOCKETED BY 

1 Copies of the foregoing mailed  
this 11th day of September, 2008 to:

2  
3 Ariz Aman, Manager of Special Projects  
4 Union Pacific Railroad Company  
1301 East Harrison Street  
Phoenix, Arizona 85234-2336

5 Anthony J. Hancock, Esq.  
Terrance L. Sims, Esq.  
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Attorney for Union Pacific Railroad Company

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Pinal County  
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13 Florence, Arizona 85232

14 Brett D. Wallace, City Attorney  
City of Casa Grande  
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Casa Grande, Arizona 85222

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17 Bruce Vana, P.E., Engineer-Manager  
Utility & Railroad Engineer Section  
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**FHWA Guidelines Regarding Grade Separation (Revised 9/9/08)**

The Federal Highway Administration (FHWA) Railroad-Highway Grade Crossing Handbook (Revised Second Edition August 2007) provides nine criteria for determining whether highway-rail crossings should be considered for grade separation or otherwise eliminated across the railroad right of way. The Crossing Handbook indicates that grade separation or crossing elimination should be considered whenever one or more of the nine conditions are met. The nine criteria are applied to this crossing application as follows:

		<b>Sacaton</b>	<b>Florence</b>	<b>Hermosillo</b>
The highway is a part of the designated Interstate Highway System	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030	No	No	No
The highway is otherwise designed to have full controlled access	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030	No	No	No
The posted highway speed equals or exceeds 70 mph	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030	No	No	No
AADT exceeds 100,000 in urban areas or 50,000 in rural areas	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030 <sup>1</sup>	N/A	No	N/A
Maximum authorized train speed exceeds 110 mph	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030	No	No	No
An average of 150 or more trains per day or 300 million gross tons/year	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030 <sup>2</sup>	Yes	Yes	Yes
Crossing exposure (trains/day x AADT) exceeds 1M in urban or 250k in rural; or passenger train crossing exposure exceeds 800k in urban or 200k in rural[1]	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030 <sup>3</sup>	N/A	No	N/A
Expected accident frequency for active devices with gates, as calculated by the US DOT Accident Prediction Formula including five-year accident history, exceeds 0.5	Crossing Currently meets the criteria <sup>4</sup>	No	No	No
	Crossing meets the criteria by 2030	Unknown	Unknown	Unknown
Vehicle delay exceeds 40 vehicle hours per day	Crossing Currently meets the criteria	No	No	No
	Crossing meets the criteria by 2030 <sup>5</sup>	N/A	No	N/A

N/A = Information not available

<sup>1</sup> This table utilizes the most recent projected ADT data as follows: Sacaton – N/A, Florence – 11,000, Hermosillo – N/A.

<sup>2</sup> The Railroad is projected to exceed 300 million gross tons as of 2016. This projection is based on the fact that the Railroad is currently exceeding 217 million gross tons with 46 trains per day and is projected to run twice the number of trains (at lengths of up to 8,000 feet instead of the current length of 6,000 feet) by 2016.

<sup>3</sup> The projected crossing exposure utilizing the most recent projected VPD data is as follows: Florence – 924,000, which does not exceed 1M for an urban area. The US 2000 Census considers an area with 50,000 population or more as urban. The City of Casa Grande estimates its population will exceed 50,000 by the year 2030.

<sup>4</sup> The expected accident predictions for these crossings are as follows: Sacaton- .028, Florence - .031, Hermosillo - .0004.

<sup>5</sup> Projected vehicle delay per day utilizing the most recent projected VPD data are as follows: Sacaton –N/A Florence – 16.2 hours, Hermosillo –N/A.