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October 25, 2018

Mr. Bruce Smith, PE  
Principal Engineer  
San Diego Association of Governments (SANDAG)  
401 B Street, Suite 800  
San Diego, CA 92101

Re: Access Ramp at Mile Post 240.2

Dear Mr. Smith:

As part of the ongoing San Elijo Lagoon Double Track (SELDT) project located in Encinitas, the approved design calls for the construction of an at-grade crossing at Mile Post (MP) 240.2 to provide future maintenance access to the new railroad bridge constructed at MP 240.4. The at-grade crossing will require maintenance workers to cross two sets of railroad tracks three times to access the bridge – twice on foot to remove the chains restricting access to the crossing, and once in their vehicle. Maintenance workers will cross the tracks an additional three times when their activities are complete. The timetable speed for passenger trains through this section of track is 90 miles per hour. An incident involving a high-speed passenger train and a maintenance worker or vehicle could lead to serious injury or loss of life for the workers or passengers onboard the train.

Currently, the construction contractor accesses Bridge 240.4 using a temporary access ramp which begins on San Elijo Avenue near Kilkenny Drive, and terminates on the railroad right-of-way on the east side of the tracks. The North County Transit District (NCTD) requests that SANDAG leave the access ramp in place as a permanent means of maintenance access and eliminate the at-grade crossing at MP 240.2. The access ramp will enhance the safety for maintenance workers by eliminating the need to cross two sets of high-speed tracks a total of six times per trip to the bridge.

Additionally, the Federal Railroad Administration (FRA) and California Public Utilities Commission (CPUC), the two public agencies which regulate NCTD's rail operations, have identified the reduction in the number of at-grade crossings as a goal. The FRA states that the safest grade crossing is one that doesn't exist and their first engineering strategy for reducing risk at grade crossings is to eliminate crossings whenever possible. CPUC General Order 75-D Section

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2 – Policy on Reducing Number of At-Grade Crossings states, “As part of its mission to reduce hazards associated with at-grade crossings, and in support of the national goal of the Federal Railroad Administration (FRA), the Commission's policy is to reduce the number of at-grade crossings on freight or passenger railroad mainlines in California.”

Utilizing the existing access ramp for maintenance activities after the completion of the SELDT project and eliminating the at-grade crossing at MP 240.2 will achieve the goals of NCTD, the FRA, and the CPUC in reducing hazards on the railroad right-of-way and improving the safety of the general public and NCTD's maintenance staff.

Accordingly, NCTD respectfully requests that the existing access ramp be retained at MP 240.4. Please advise SANDAG's position on this request by no later than November 9, 2018. Please do not hesitate to contact me directly at 760-966-6773 or [dfilippi@nctd.org](mailto:dfilippi@nctd.org) should have any questions regarding this important safety improvement.

Sincerely,



Donald Filippi  
Chief Operations Officer – Rail

cc: Sean Loofbourrow, NCTD, Chief of Safety and Security  
Eric Roe, NCTD, Deputy Chief Operations Officer – Rail  
Stephen Fordham, NCTD, Director of Railroad Engineering  
Scott Shroyer, NCTD, Senior Rail Engineer