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ENTERED
Office of Proceedings
February 4, 2022
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February 4, 2022

Via Electronic Filing

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Oakland Global Rail Enterprise—Petition for Exemption—Authority to
Operate A Rail Line in Oakland, California—Finance Docket No. 36312

Dear Ms. Brown:

Enclosed please find for filing in the above-captioned proceeding the Oakland Global Rail Enterprise's Petition for Exemption from the prior approval requirements of 49 U.S.C. § 10901 to operate a rail line in Oakland, California. The Petitioner has electronically paid the filing fee pursuant to 49 C.F.R. § 1002.2(f)(11)(iii).

Please do not hesitate to contact me if you have any questions.

FEE RECEIVED
February 4, 2022
SURFACE
TRANSPORTATION BOARD

Sincerely,



Kathryn Kusske Floyd

*Counsel for Oakland Global Rail
Enterprise*

Enclosure

FILED
February 4, 2022
SURFACE
TRANSPORTATION BOARD

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 36312

**OAKLAND GLOBAL RAIL ENTERPRISE—
AUTHORITY TO OPERATE A RAIL LINE IN OAKLAND, CA**

PETITION FOR EXEMPTION

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Counsel to Oakland Global Rail Enterprise

Dated: February 4, 2022

Filing Contains Color Images

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**BEFORE THE
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Finance Docket No. 36312

**OAKLAND GLOBAL RAIL ENTERPRISE—
AUTHORITY TO OPERATE A RAIL LINE IN OAKLAND, CA.**

PETITION FOR EXEMPTION

Pursuant to 49 U.S.C. § 10502, Oakland Global Rail Enterprise (“OGRE” or “Petitioner”), a non-carrier, submits this Petition for Exemption (the “Petition”) from the prior approval requirements of 49 U.S.C. § 10901 for Petitioner to operate over approximately 18.2 miles of track located at the former Oakland Army Base (OAB) in Oakland, California (the “Operations”).

OGRE’s proposed operations would reestablish rail service to the West Gateway Area of the former OAB, providing a connection to the interstate rail network and multi-modal options for the movement of freight, and providing better rail service to existing Port of Oakland (the “Port”) customers. Granting this Petition will minimize the need for federal regulatory control over the transportation system, further the development of a sound rail transportation system, foster sound economic conditions in transportation and effective competition between differing modes of transportation, and reduce regulatory barriers to entry. As explained by Petitioner below, because the Operations are of limited scope and regulation is not needed to further the goals of the Rail Transportation Policy or protect shippers from abuse of

market power, the Board should exempt the Operations from the prior approval requirements of Section 10901.

The exemption is subject to the completion of environmental review by the Board's Office of Environmental Analysis ("OEA").

This Petition is supported by the Verified Statement of Mark McClure (attached hereto as Exhibit A).

BACKGROUND

The area comprising the OAB is located in western Oakland, partially along the eastern shoreline of the San Francisco Bay, and has been operating as a seaport since the 1800s. In 1941, the War Department began construction and commissioned the OAB as a trans-shipment facility, sending tens of thousands of soldiers and 25 million tons of supplies to the Pacific during World War II, much of which was handled by rail. The Army continued to use the OAB as a major cargo port and warehousing center, employing approximately 2,040 individuals, until 1995 when it was announced the OAB would be closed as part of the Base Realignment and Closure program. The federal government officially decommissioned the OAB in 1999.

In August 2006, approximately 170 acres of the former OAB were conveyed to the City of Oakland (the "City), and another 200 acres were transferred to the Port. The land sat underutilized until approximately 2008, when the City and the Port began redeveloping the OAB. As part of this redevelopment, Oakland Bulk and Oversized Terminal ("OBOT") entered into a ground lease with the City for the portions of the OAB known as the West Gateway and the existing railroad right of

way located on the City-controlled portion of the OAB (the “Rail Right of Way”).¹ OBOT plans to develop a rail-to-ship bulk commodity marine terminal (“Terminal”) at the West Gateway.²

Oakland Global Rail Enterprise (“OGRE”), an affiliate of OBOT, has subleased the Rail Right of Way and plans to rehabilitate 22,202 feet of track in the Rail Right of Way.³ After the completing the track rehabilitation, OGRE intends to operate as a Class III rail carrier over approximately 18.2 miles of track at the former OAB.⁴

As the Board is aware, OGRE’s efforts to rehabilitate the rail line have been delayed by an ongoing legal dispute with the City.⁵ The current lack of rail service has also hindered OBOT’s ability to fully develop the Terminal and to secure rail-served tenants at the site.⁶ There has been recent interest from a tenant that would like to export iron ore and copper concentrate through the Terminal, but OGRE is struggling to provide a competitive rate because it is not a common carrier.⁷

¹ Verified Statement of Mark McClure in Support of Petition for Exemption (“VS”) at ¶ 4.

² VS at ¶ 4.

³ VS at ¶ 5. On March 15, 2019, the Board issued a decision finding that OGRE’s rehabilitation of this track did not constitute construction requiring the Board’s prior approval. *Oakland Global Rail Enterprise—Petition for Declaratory Order*, STB Docket No. FD 36168 (STB served Mar. 15, 2019).

⁴ VS at ¶ 5. Map showing the line of track on which OGRE proposes to operate is provided as Exhibit B.

⁵ VS at ¶ 6.

⁶ VS at ¶ 6.

⁷ VS at ¶ 6.

Reestablishing the West Gateway Area's access to the interstate rail network is thus an integral component of OGRE and OBOT's plans to revitalize the former OAB.⁸ As stated in the City of Oakland May 20, 2013 Long-Range Management Plan:

The transition by the major U.S. ports to container terminal and mechanized operations has forced break bulk products, mainly commodities (e.g. lumber, coal, sulfur), to be transported via truck to vessel, or to operate from secondary, smaller ports (e.g. Stockton) both of which limit the capacity, decrease the efficiency and increase the cost of these types of bulk product shipping operations. The proposed [] Terminal . . . would link rail to vessel break bulk shipping operations.

In turn, the Terminal will help decrease the cost of these bulk goods (the cost of which is currently skyrocketing), decrease truck traffic at the Port, result in a number of high paying rail jobs, and reestablish rail transport at one of the busiest marine terminals on the West Coast.⁹

SUMMARY OF PROPOSED OPERATIONS

OGRE is a non-carrier and does not currently conduct any rail operations.¹⁰ In this Petition for Exemption, OGRE seeks an exemption from 49 U.S.C. § 10901 to operate over an approximately 18.2 miles (or 95,950 feet) of track located at the former OAB to provide rail service to future tenants of the redeveloped West Gateway Area at the OAB, most of which is parallel track located within a smaller real property footprint. This track includes:

⁸ VS at ¶ 6.

⁹ VS at ¶ 7.

¹⁰ VS at ¶ 8.

- the approximately 22,202 feet of rehabilitated track located in the Rail Right of Way, approximately 1,000 feet of which is track controlled by Burlington Northern Santa Fe (“BNSF”);¹¹
- approximately 60,800 feet of existing track owned by the Port of Oakland (“Port”);¹²
- approximately 6,000 feet of existing track owned by OGRE and located on land owned by the City and controlled by the Port.
- Approximately 1,500 feet of existing track owned by Union Pacific (“UP”), connecting the Rail Right of Way to the Port rail yard;¹³ and
- Approximately 4,525 feet of existing “on docks” track in the West Gateway area.¹⁴

There are no milepost designations for the track over which OGRE plans to operate.¹⁵

At this, time, OGRE does not anticipate that the proposed operation will involve any

¹¹ OGRE is working to finalize an industrial track agreement with BNSF for this segment of OGRE’s planned operations. VS at ¶ 11.

¹² OGRE plans to enter into a rail operating agreement with the Port. VS at ¶ 11. However, progress on this Agreement has been hindered by the current legal dispute with the City. VS at ¶ 11. In any case, the Board routinely grants operating authority prior to the carrier obtaining the necessary rights, as such authority is permissive only. *See, e.g. Ohio River Partners LLC—Acquis. & Operation Exemption—Hannibal Dev., LLC*, STB Docket No. FD 35984, slip op. at 3 (STB served Apr. 1, 2016) (“[T]he Board’s grant of authority to operate under a notice of exemption is permissive only, and in order to exercise that authority and commence operations, the carrier must still obtain the necessary rights under state property and/or contract law.”).

¹³ OGRE has entered into an Industrial Track Agreement with UP providing for OGRE’s operations over this segment of track. *See* Statement of Support from Union Pacific, Oakland Global Rail Enterprise—Petition for Declaratory Order—STB Docket No. FD 361680 (filed March 13, 2019).

¹⁴ VS at ¶ 9.

¹⁵ VS at ¶ 10.

agreement that will limit future interchange with a third-party connecting carrier.¹⁶ OGRE will provide last mile rail service for both Union Pacific Railroad and BNSF.¹⁷

OGRE's planned operations will provide rail service between the Terminal and the UP main line adjacent to Interstate-880.¹⁸ This connection will also provide access to BNSF.¹⁹ Presently, the Terminal is under development and there are no shippers located on the City-controlled portion of the OAB that will be served by OGRE's operations. Instead, the area is currently utilized primarily for truck related operations and services.²⁰ OGRE's proposed operations will enable further development of the Terminal by providing a transportation alternative to trucking.²¹

While OGRE's planned track rehabilitation project has been delayed due to the ongoing legal dispute with the City, it is OGRE's intent, assuming it has the necessary authority, to begin operations as soon as the rehabilitation is complete and tenants that desire rail service are secured for the Terminal.²²

Representatives of OGRE have consulted with OEA on the environmental review process and that process is ongoing. OGRE has been working with OEA and

¹⁶ VS at ¶ 12.

¹⁷ VS at ¶ 12.

¹⁸ VS at ¶ 13.

¹⁹ VS at ¶ 13.

²⁰ VS at ¶ 14.

²¹ VS at ¶ 14.

²² VS at ¶ 15.

OEA’s third-party contractor to support the environmental review for the proposed Operations.²³

DISCUSSION

The operation of a rail line by a new carrier requires prior Board approval pursuant to 49 U.S.C. § 10901. However, 49 U.S.C. § 10502(a) provides that the Board “shall” exempt a proposed rail line operations from formal regulation under Section 10901 if it finds that (1) such regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101; and (2) either (a) the transaction or service is of limited scope, or (b) regulation is not necessary to protect shippers from the abuse of market power.²⁴

The legislative history of the exemption provision, as well as ICC, Board and court precedent demonstrate that the Board should apply the exemption provision broadly, and that the proposed operations are the type of transaction for which the exemption provision was designed.²⁵ In discussing the exemptions powers of the Board’s predecessor—the ICC—the Staggers Act legislative history states:

²³ VS at ¶ 16.

²⁴ See, e.g., *DesertXpress Enterprises, LLC—Construction & Operation Exemption—In Victorville, CA and Las Vegas, NV*, STB Docket No. FD 35544, at 3 (STB served Oct. 25, 2011); *Alaska Railroad Corp.—Construction and Operation Exemption—Rail Line between North Pole and Delta Junction, AK*, STB Docket No. FD 34658, at 5-6 (STB served Jan. 6, 2010).

²⁵ See, e.g., *Am. Trucking Assoc. v. ICC*, 656 F.2d 1115, 1119 (5th Cir. 1981) (explaining that the ICC was charged with the responsibility of actively pursuing exemptions for transportation and services that comply with the section’s standards).

The policy underlying this provision is that while Congress has been able to identify broad areas of Commerce where reduced regulation is clearly warranted, the Commission is more capable through the administrative process of examining specific regulatory provisions and practices not yet addressed by Congress to determine where they can be deregulated consistent with the policies of Congress. The conferees expect that, consistent with the policies of this Act, the Commission will pursue partial and complete exemptions from remaining regulation.²⁶

The Board has thus been charged with removing as many restrictions as possible and reducing regulation wherever possible.²⁷

As explained in detail below, the proposed rail line operations meet the Section 10502 exemption criteria and accordingly should be exempted from the requirement of obtaining Board approval under Section 10901.

I. An exemption will promote the Rail Transportation Policy.

Regulation of the operation of the OGRE Rail Line is not necessary to carry out the Rail Transportation Policy expressed in Section 10101. Rather, granting an exemption—as opposed to subjecting the Project to burdensome regulation—will promote several provisions of the Rail Transportation Policy and will not run counter to any of those goals.

²⁶ H.R. Rep. No. 96-1430, 96th Cong. 2d Sess. 105 (1980). *See also* Class Exemption for the Acquisition and Operation of Rail Lines Under 49 U.S.C. 10901, 1 I.C.C.2d 810, 811 (1985); Class Exemption for Acquisition or Operation of Rail Lines by Class III Rail Carriers Under 49 U.S.C. 10902, 1 S.T.B. 95, *6 (1996).

²⁷ H.R. Rep. No. 96-1430, at 105 (1980) (House Report on Staggers Act explaining that the ICC was charged with removing “as many as possible of the Commission’s restrictions”).

First, granting an exemption for OGRE's operations is consistent with the mandate of Sections 10101(4) and 10101(5) that the Board promote effective competition and coordinate among rail carriers and other modes of transportation by ensuring the development and continuation of a sound transportation system and fostering sound economic conditions. It is also consistent with the aim of Section 10101(1) to allow, to the maximum extent possible, competition and the demand for service to establish reasonable rates and service terms. Specifically, OGRE's proposed operations will reestablish rail service to the West Gateway Area of the OAB (a freight transportation option that does not currently exist), offering shippers access to two class I rail carriers (BNSF and UP) on the national rail network and enhancing intermodal competition with trucking.²⁸

Second, consistent with Sections 10101(2) and 10101(7), an exemption will minimize the need for federal regulatory control over the rail transportation system and reduce regulatory barriers to entry. An exemption here will promote these policies by minimizing the time and administrative expense associated with the commencement of operations.²⁹

In short, an exemption from regulatory review (excepting environmental review and regulation) will promote a number of Rail Transportation Policy goals,

²⁸ See *Wisconsin & Southern Railroad Company—Acquisition and Operation Exemption—Union Pacific Railroad Company*, STB Docket No. FD 35144, at 2-3 (STB served Apr. 22, 2009).

²⁹ See *id.*

including minimizing the need for federal regulatory control, ensuring the development and continuation of a sound rail transportation system with effective competition and coordination among differing modes of transportation, allowing competition and demand for service to establish transportation rates and service terms, and encouraging the efficient management of railroads. In contrast, none of the goals in the Rail Transportation Policy will be hindered by granting this Petition.

Formal and potentially protracted Board review and approval pursuant to Section 10901 is not necessary to carry out the goals of the Rail Transportation Policy. In fact, to require such approval by means other than exemption undermines the aims of the Rail Transportation Policy.

II. The OGRE Rail Line is of limited scope and regulation is not needed to protect shippers from the abuse of market power.

The second element of Section 10502's standard for granting an exemption is stated in the alternative: either "the transaction or service is of limited scope" or formal regulation of the transaction or service "is not needed to protect shippers from the abuse of market power."³⁰ The proposed operation of the OGRE Rail Line satisfies both tests.

First, OGRE is seeking to operate over approximately 18.2 miles of track. The majority of this track runs parallel, meaning that the actual linear distance amounts to only approximately 14,160 linear feet or 2.68 miles. The Board and its predecessor

³⁰ 49 U.S.C. § 10502(a)(2).

have found the acquisition and operation of longer lengths of rail line to be limited in scope.³¹

Second, OGRE's operations will enhance transportation service to tenants in the West Gateway area, and therefore regulation is unnecessary to protect shippers from an abuse of market power.³² Currently, there are no active shippers on the line of proposed operations. Rather, the proposed operations will restore rail service to a shipping terminal that has been dormant for many years and will provide future

³¹ See, e.g., *Ind. R.R. Co.—Acquisition & Operation—Ill. Cent. R.R. Co.*, 6 I.C.C.2d 1004, 1011 (1990) (acquisition of 90.3 miles of rail line found limited in scope).

³² See, e.g., *Six County Association of Governments—Construction and Operation Exemption—Rail Line Between Levan and Selina, UT*, STB Docket No. FD 34075, at 3 (STB served Oct. 19, 2001) (finding that regulation of the proposed construction and operation of a 43-mile rail line was not needed to protect shippers from an abuse of market power because the line would “provide the area with another transportation option and would enhance competition”); *Texas Railway Exchange—Construction and Operation Exemption—Galveston Cty., TX*, STB Docket No. FD 36186, at 4-5 (STB served Jan. 17, 2020) (finding that the proposed rail line “would enhance competition by providing a new rail option”); *Palmetto Railways—Construction and Operation Exemption—In Berkeley Cty., SC*, STB Docket No. FD 36095, at 3 (STB served July 22, 2019) (finding the proposed rail line “would enhance competition by providing rail service where it does not currently exist, and thereby create an alternative mode of transportation”); *Ameren Energy Generating Company—Construction and Operation Exemption—In Coffeen and Walshville, IL*, STB Docket No. FD 34435, at 4 (STB served Feb. 17, 2006) (finding that exemption was appropriate where the proposal would “increase the rail transportation options available to [shippers]”); *Illinois Central Railroad Company—Construction and Operation Exemption—in East Baton Rouge Parish, LA*, STB Docket No. FD 33877, at 5 (STB served Oct. 25, 2001) (finding an exemption to be appropriate where the proposed rail line would enhance a shippers transportation options and eliminate its existing dependence on one carrier).

tenants with increased intermodal competition with commercial freight by truck.³³ Further, the operations will provide shippers with access to both UP and BNSF Railway Company lines. Thus, OGRE's operations will only serve to increase the competitive options available to these future shippers.

Because the Project meets the goals of the Rail Transportation Policy, is of limited scope, and does not threaten any abuse of market power, the Board should grant Petitioner an exemption from the prior approval requirements of 49 U.S.C. § 10901 for the proposed operations.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board grant this Petition and issue a decision exempting the operation of the OGRE Rail Line from the prior approval requirements of 49 U.S.C. § 10901.

Respectfully submitted,



Kathryn Kusske Floyd

³³ See *Wisconsin & Southern Railroad Company* at 2-3.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this February 4, 2022, I caused a copy of the foregoing Petition for Exemption to be served on all parties of record by email or first-class mail, postage prepaid.



Margaret K. Fawal

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 36312

**OAKLAND GLOBAL RAIL ENTERPRISE—
AUTHORITY TO OPERATE A RAIL LINE IN OAKLAND, CA**

PETITION FOR EXEMPTION

EXHIBIT A

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 36312

**OAKLAND GLOBAL RAIL ENTERPRISE—
AUTHORITY TO OPERATE A RAIL LINE IN OAKLAND, CA.**

**VERIFIED STATEMENT OF MARK MCCLURE
IN SUPPORT OF PETITION FOR EXEMPTION**

1. My name is Mark McClure. I am the President of Oakland Global Rail Enterprise, LLC ("OGRE"). My office is located at 300 Frank H. Ogawa Plaza, Suite 340, Oakland, CA 94612.

2. As President of the OGRE, I have been actively involved in and am familiar with OGRE's planned track rehabilitation project to reestablish rail service to the West Gateway Area of the former Oakland Army Base ("OAB") and operate over approximately 18.2 miles of track located there (the "Project").

3. I am submitting this Verified Statement in support of OGRE'S Petition for Exemption in the above proceeding. This Verified Statement is based on firsthand knowledge from my involvement, as President of OGRE, in the planning of the Project.

Background to the Project

4. In August 2006, approximately 170 acres of the former OAB were conveyed to the City of Oakland (the "City"), and another 200 acres were transferred to the Port. In 2008, the City and the Port began redeveloping the OAB. As part of this redevelopment, Oakland Bulk and Oversized Terminal ("OBOT") entered into a

ground lease with the City for the portions of the OAB known as the West Gateway and the existing railroad right of way located on the City-controlled portion of the OAB (the "Rail Right of Way"). OBOT plans to develop a rail-to-ship bulk commodity marine terminal ("Terminal") at the West Gateway.

5. Oakland Global Rail Enterprise ("OGRE"), an affiliate of OBOT, has subleased the Rail Right of Way and plans to rehabilitate 22,202 feet of track in the Rail Right of Way. After the completing the track rehabilitation, OGRE intends to operate as a Class III rail carrier over approximately 18.2 miles of track at the former OAB.

6. OGRE's efforts to rehabilitate the rail line have been delayed by an ongoing legal dispute with the City. The current lack of rail service has also hindered OBOT's ability to fully develop the Terminal and to secure rail-served tenants at the site. For example, there has been recent interest from a tenant that would like to export iron ore and copper concentrate through the Terminal, but OGRE is struggling to provide a competitive rate because it is not a common carrier. Reestablishing the West Gateway Area's access to the interstate rail network is thus an integral component of OGRE and OBOT's plans to revitalize the former OAB.

7. By linking rail to vessel break bulk shipping operations, the Terminal will offer a number of benefits, including decreasing the cost of bulk goods (the cost of which is currently skyrocketing), decrease truck traffic at the Port, result in a number of high-paying rail jobs, and reestablish rail transport at one of the busiest marine terminals on the West Coast.

The Proposed Project

8. OGRE is a non-carrier and does not currently conduct any rail operations.

9. The track for which OGRE seeks an exemption to operate includes:

- i. Approximately 22,202 feet of rehabilitated track located in the Rail Right of Way, approximately 1,000 feet of which is track controlled by Burlington Northern Santa Fe (“BNSF”);
- ii. Approximately 60,800 feet of existing track owned by the Port of Oakland (“Port”);
- iii. Approximately 6,000 feet of existing track owned by OGRE and located on land owned by the City and controlled by the Port;
- iv. Approximately 1,500 feet of existing track owned by Union Pacific (“UP”), connecting the Rail Right of Way to the Port rail yard; and
- v. Approximately 4,525 feet of existing “on docks” track in the West Gateway area.

10. There are no milepost designations for the track over which OGRE plans to operate.

11. OGRE is working to finalize an industrial track agreement with BNSF and plans to enter into a rail operating agreement with the Port. Progress on the agreement with the Port has been hindered by OBOT’s current legal dispute with the City.

12. At this, time, OGRE does not anticipate that the proposed operation will involve any agreement that will limit future interchange with a third-party connecting carrier. OGRE will provide last mile rail service for both Union Pacific Railroad and BNSF.

13. OGRE's planned operations will provide rail service between the Terminal and the UP main line adjacent to Interstate-880. This connection will also provide access to BNSF.

14. Presently, the Terminal is under development and there are no shippers located on the City-controlled portion of the OAB that will be served by OGRE's operations. Instead, the area is currently utilized primarily for truck related operations and service. OGRE's proposed operations will enable further development of the Terminal by providing a transportation alternative to trucking.

15. While OGRE's planned track rehabilitation project has been delayed due to the ongoing legal dispute with the City, it is OGRE's intent, assuming it has the necessary authority, to begin operations as soon as the rehabilitation is complete and tenants that desire rail service are secured for the Terminal.

16. Representatives of OGRE have consulted with OEA on the environmental review process and that process is ongoing. OGRE has been working with OEA and OEA's third-party contractor to support the environmental review for the proposed Operations.

VERIFICATION

I, Mark McClure, declare under penalty of perjury that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this statement.

Executed on this 3rd day of February, 2022.

A handwritten signature in cursive script, appearing to read 'Mark McClure', written over a horizontal line.

Mark McClure

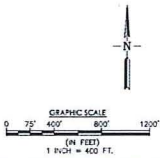
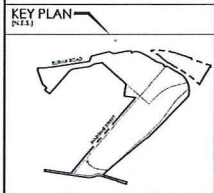
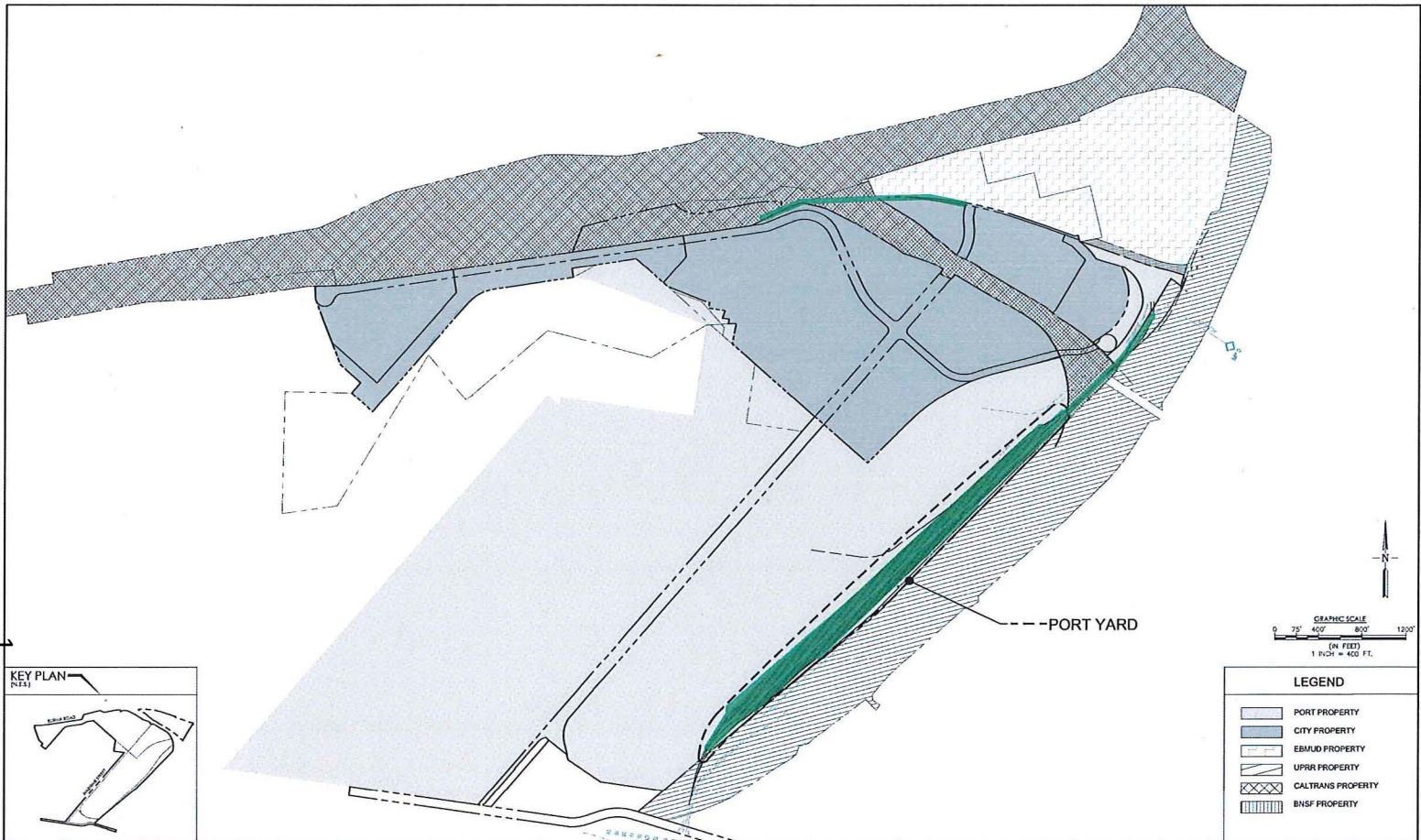
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**OAKLAND GLOBAL RAIL ENTERPRISE—
AUTHORITY TO OPERATE A RAIL LINE IN OAKLAND, CA**

PETITION FOR EXEMPTION

EXHIBIT B



LEGEND	
	PORT PROPERTY
	CITY PROPERTY
	EBUILD PROPERTY
	UPRR PROPERTY
	CALTRANS PROPERTY
	BNSF PROPERTY



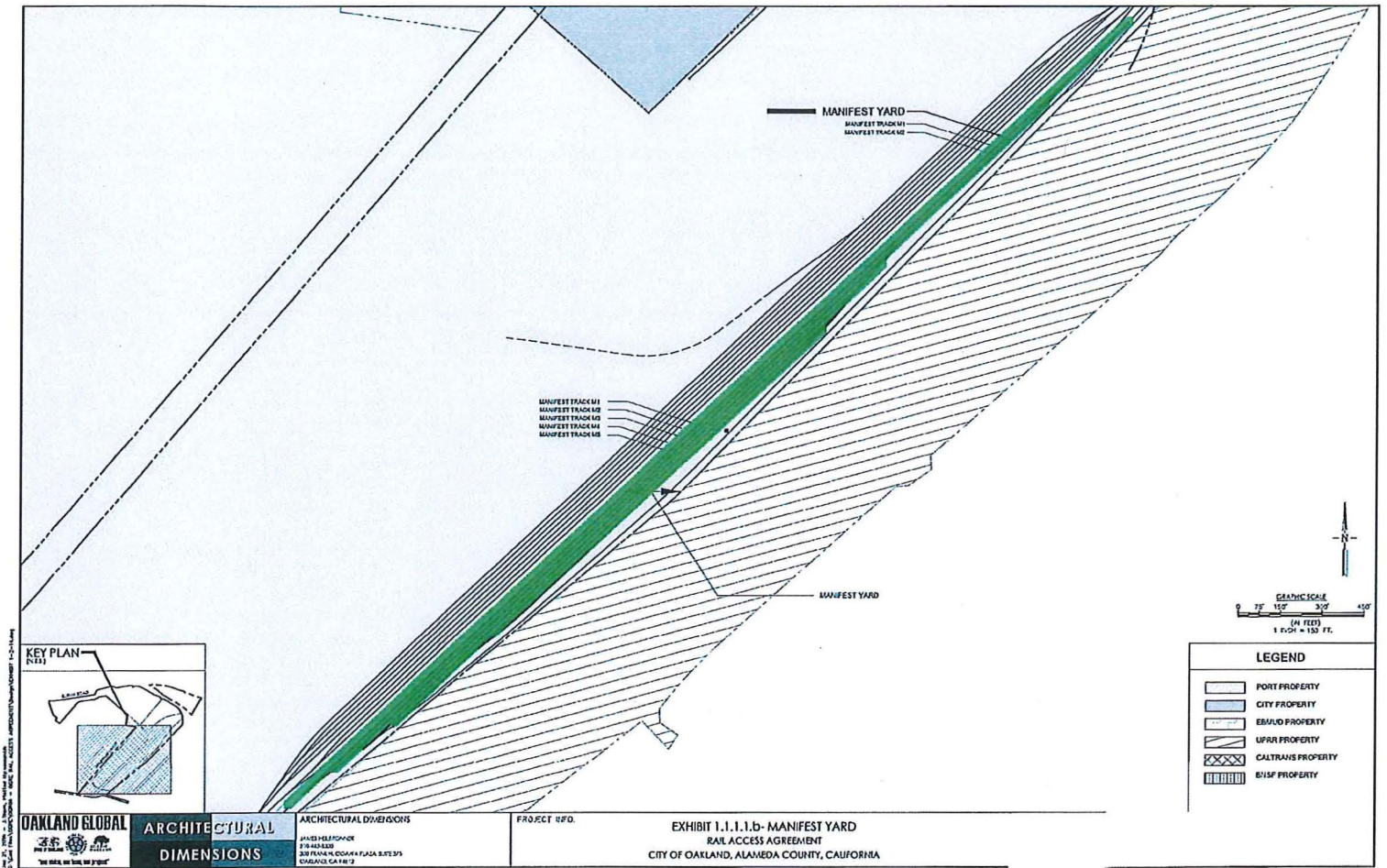
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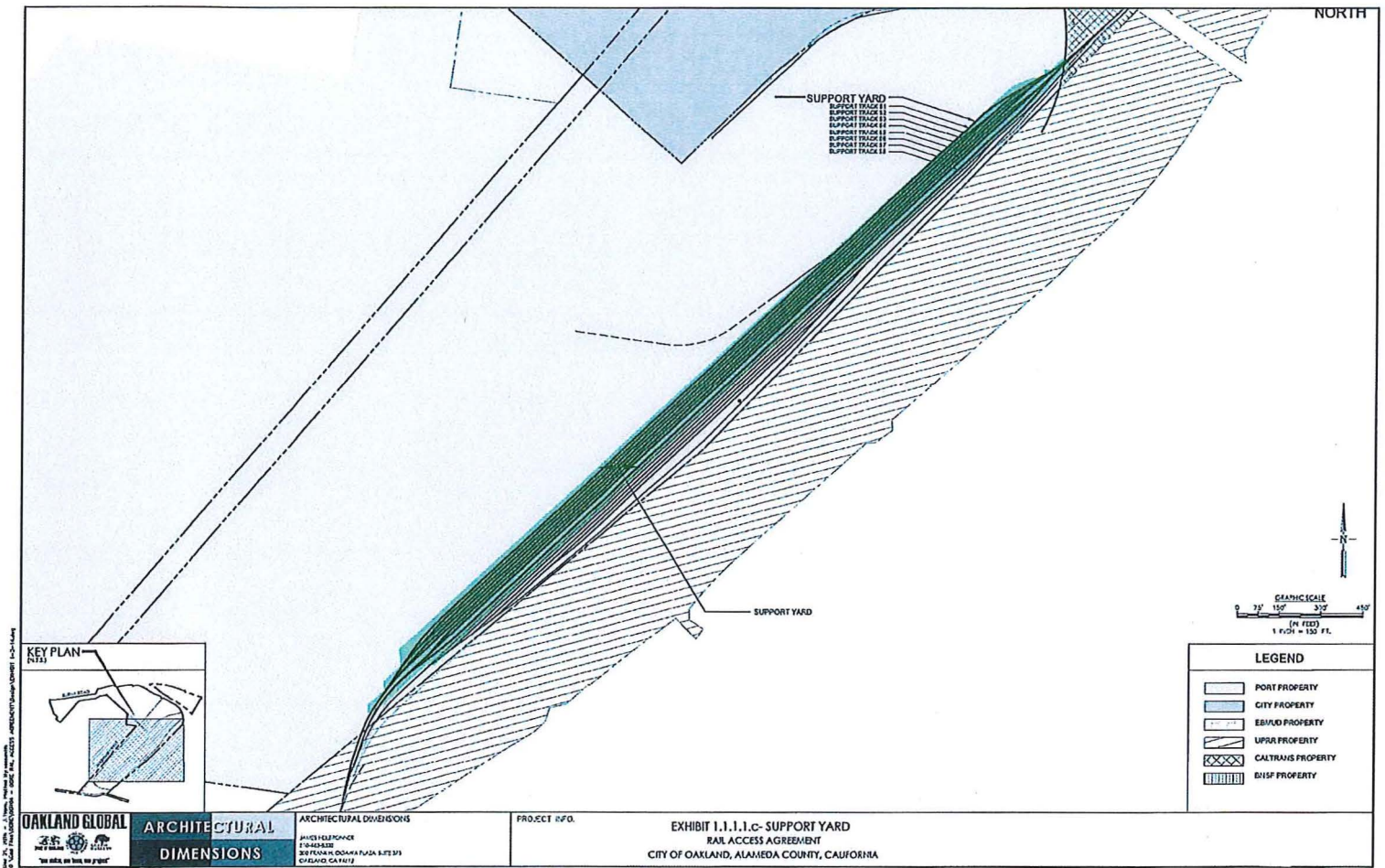
ARCHITECTURAL DIMENSIONS
JAMES HOLIFORD
310-443-8300
300 FRANKLIN CIRCLE, SUITE 305
OAKLAND, CA 94612

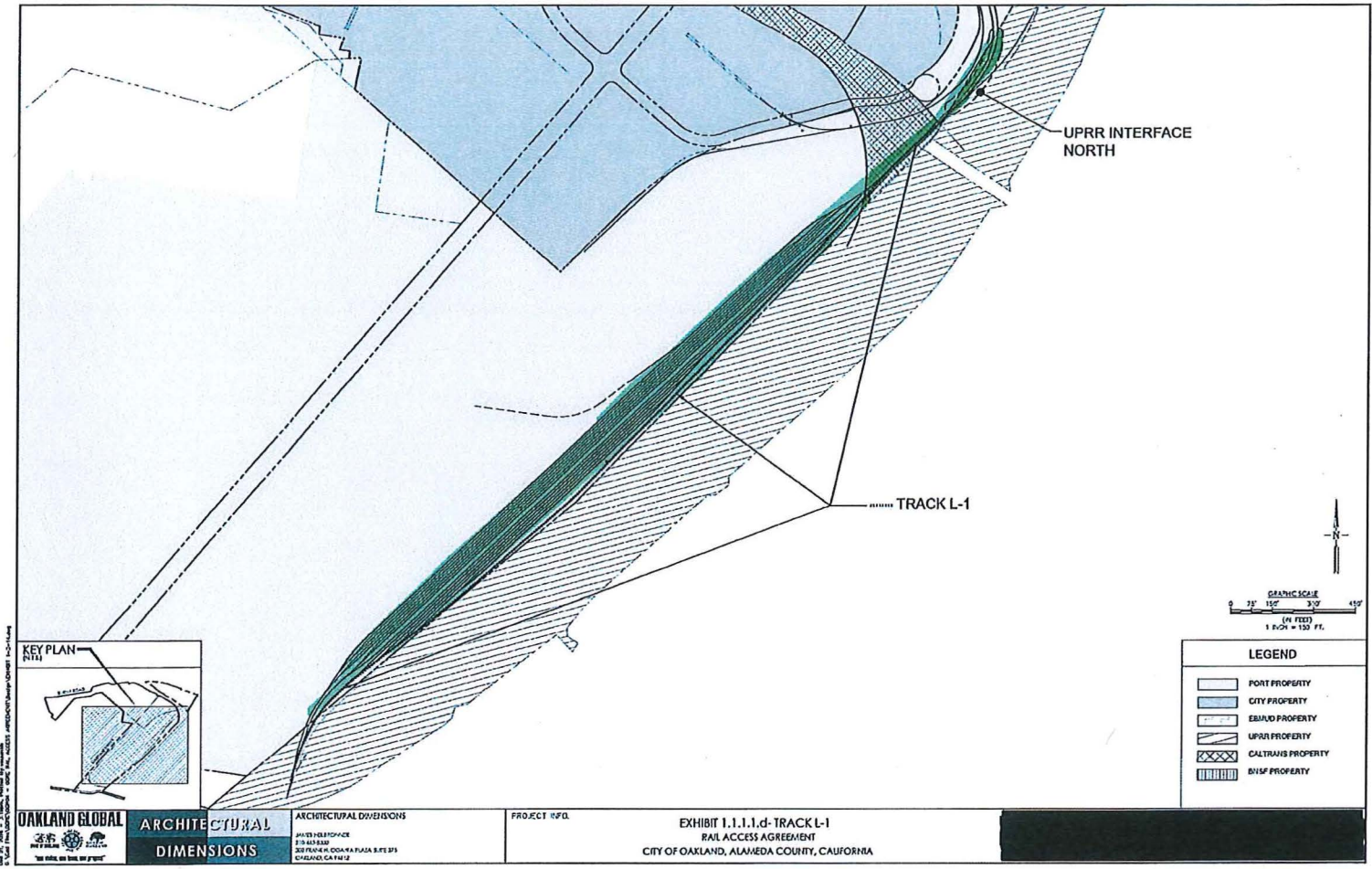
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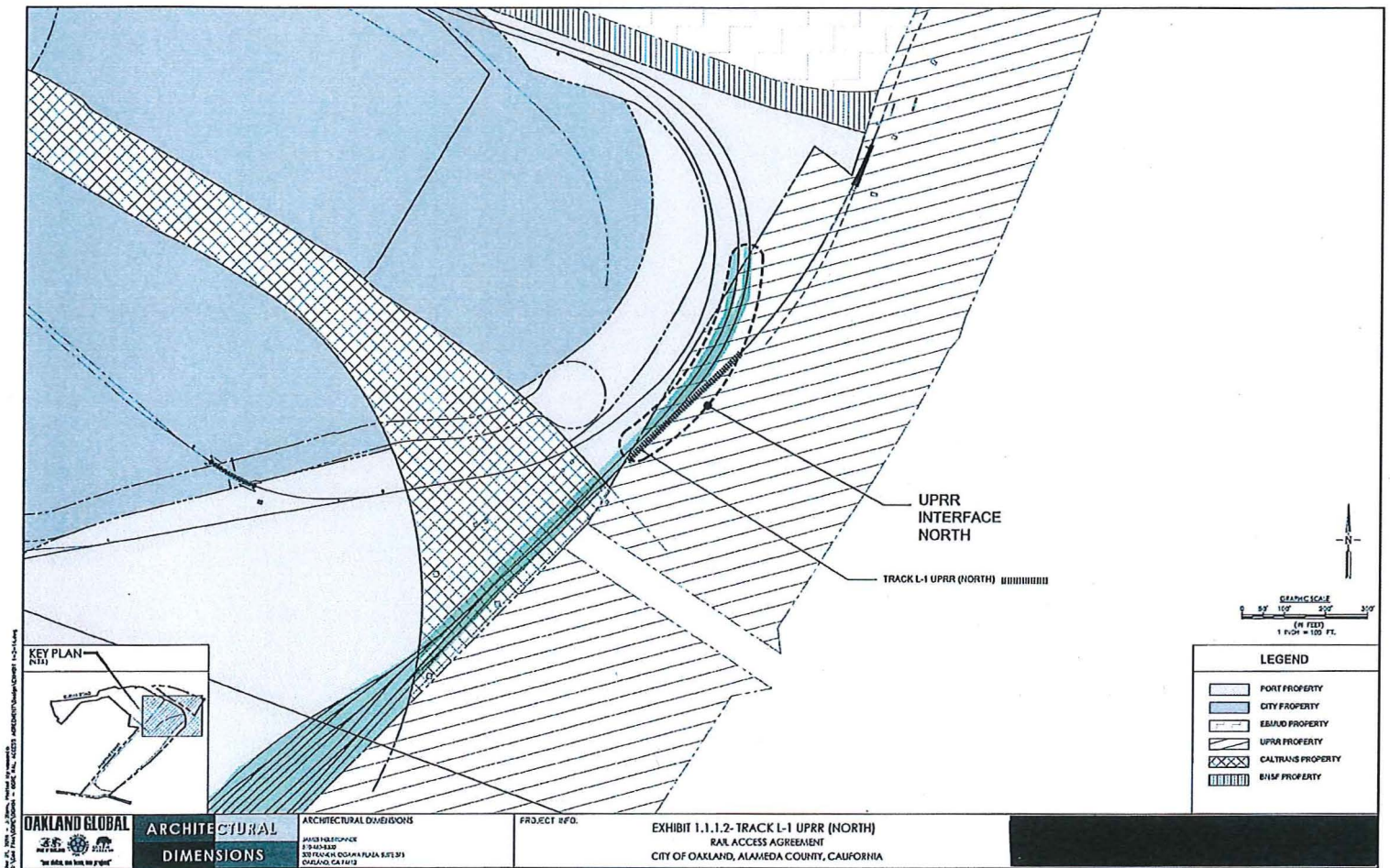
EXHIBIT 1.1.1.1.a- PORT RAIL YARD
RAIL ACCESS AGREEMENT
CITY OF OAKLAND, ALAMEDA COUNTY, CALIFORNIA

REV	DATE	COMMENT	JOB NO.	QAB02	DRAWING NO.
1	12/21/2014	ADD UPRR INTERFACE SOUTH SIDE	SCALE:	1" = 400'	X-1 SHEET 1 OF 14
			DATE:	12/21/2015	
			DRAWN BY:	V. BRISCA	
			CHECKED BY:	V. BRISCA	

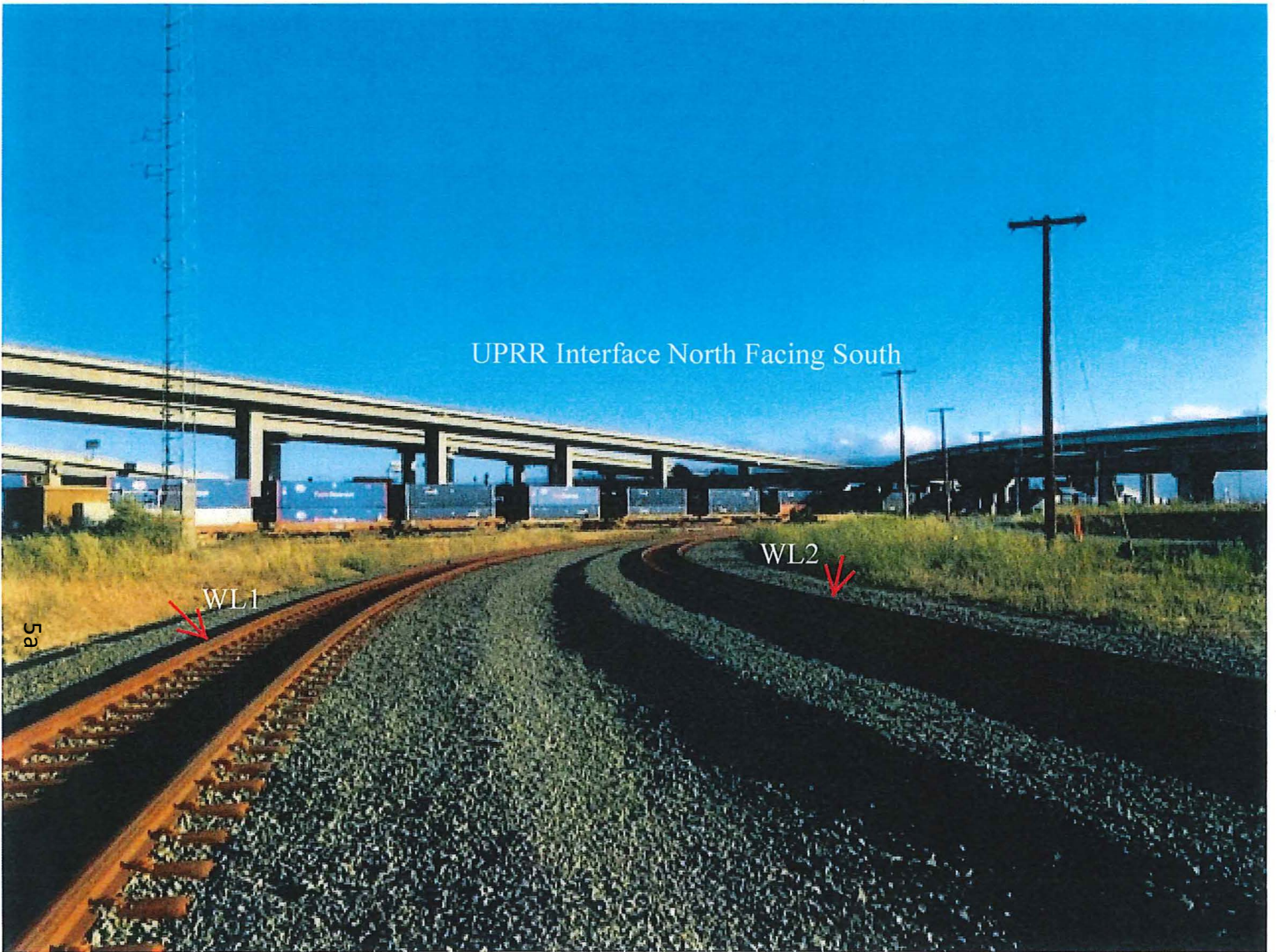




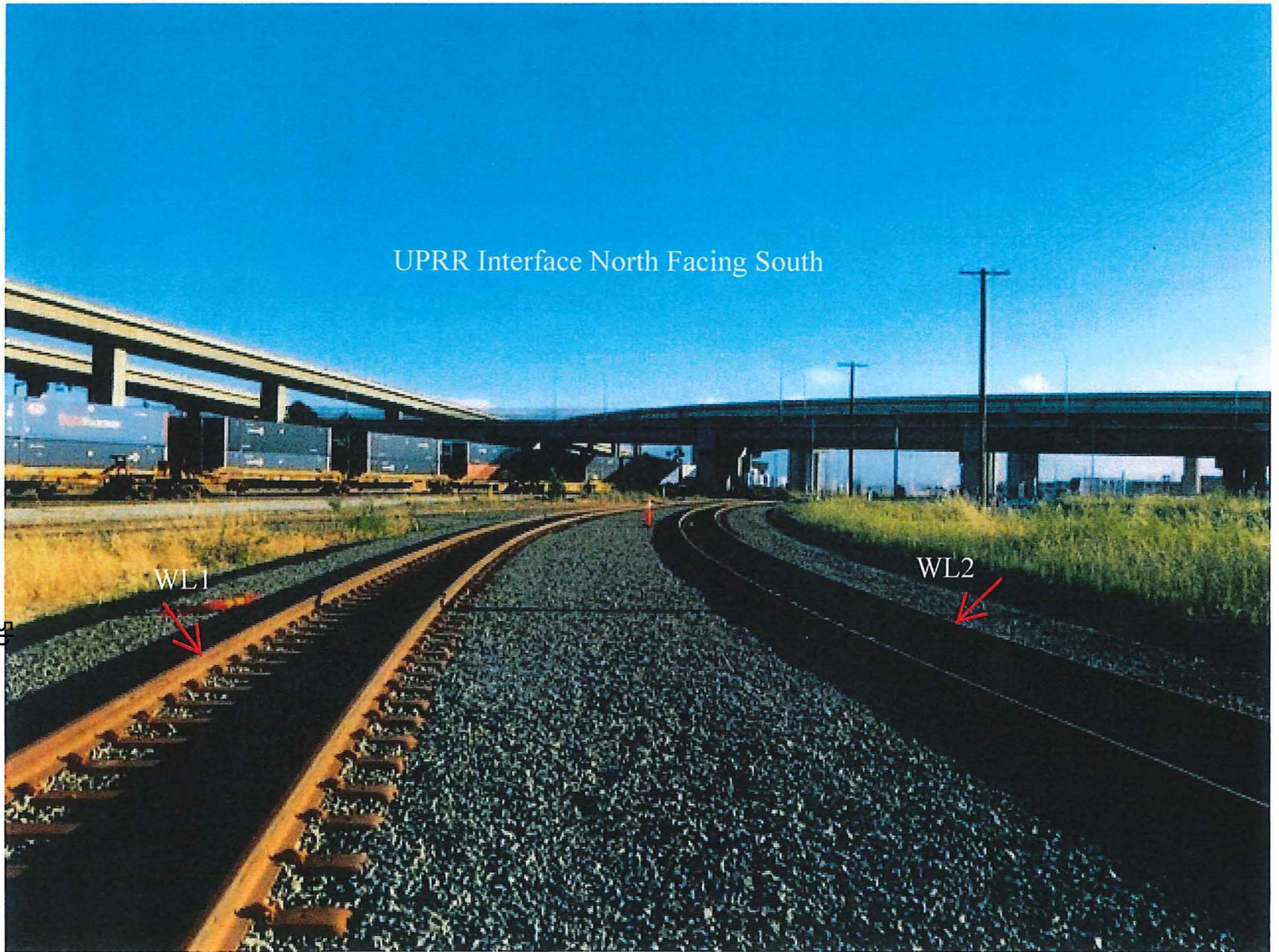




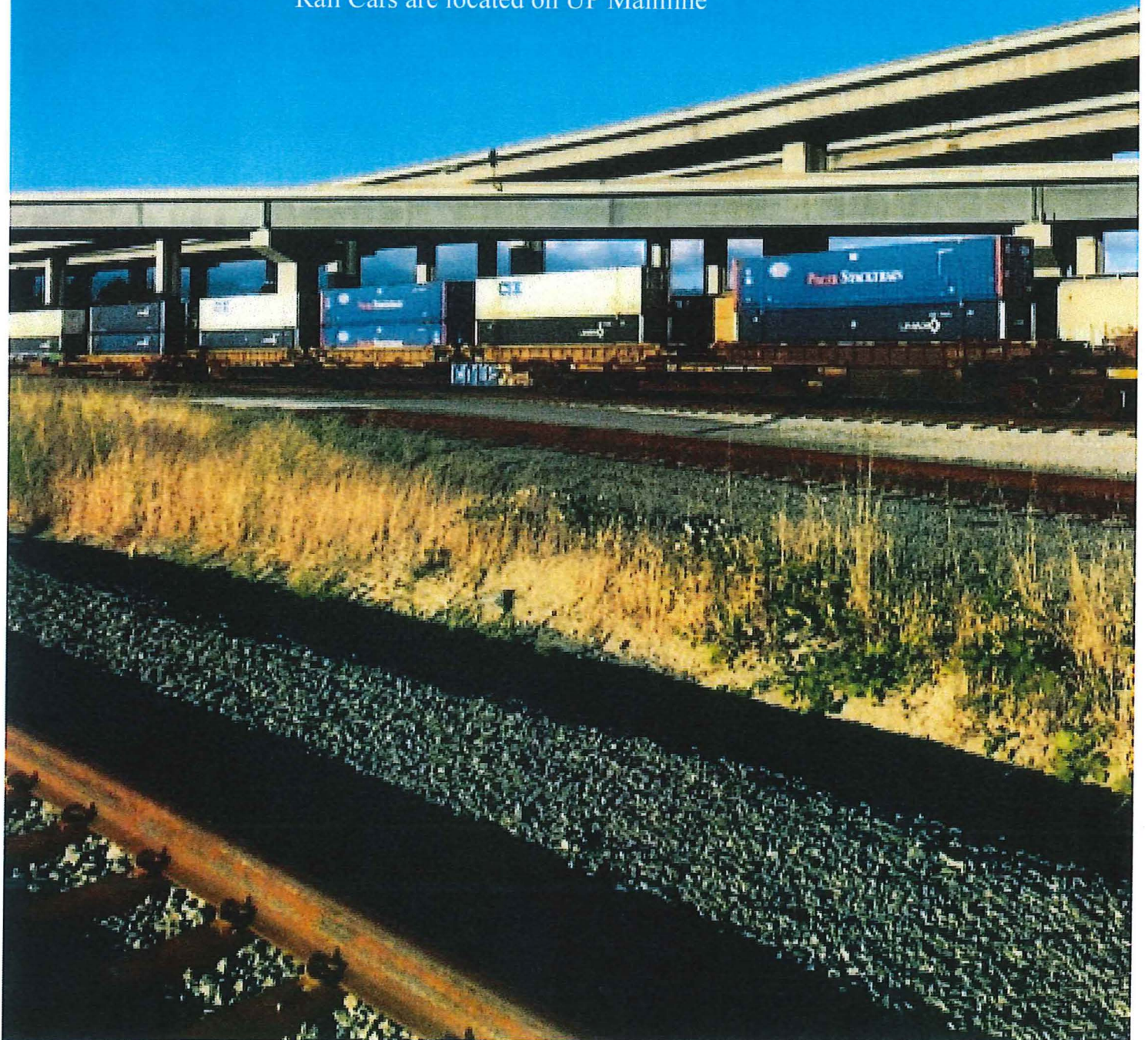
UPRR Interface North Facing South



UPRR Interface North Facing South



UPRR Interface North Facing North East
Rail Cars are located on UP Mainline

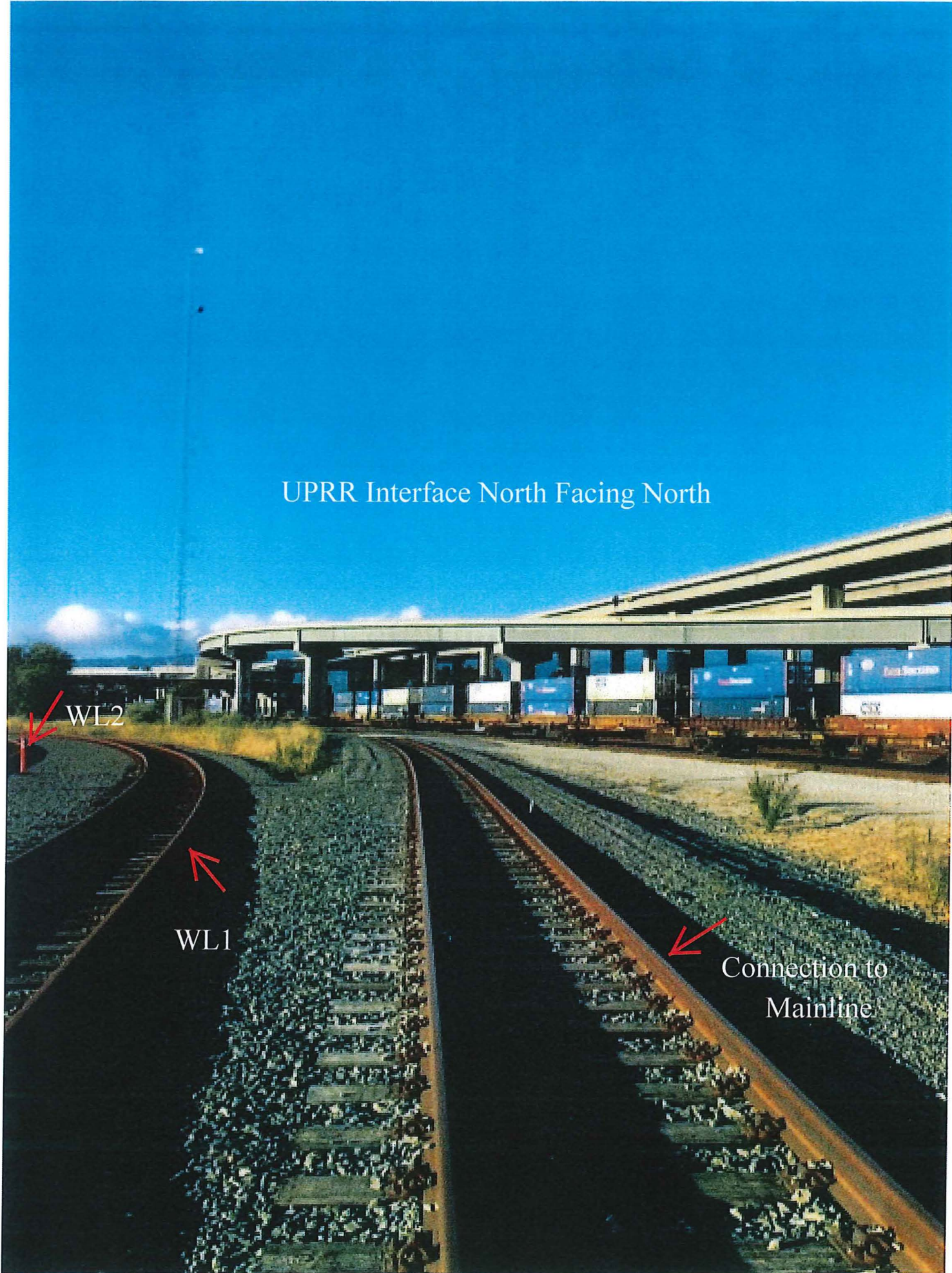


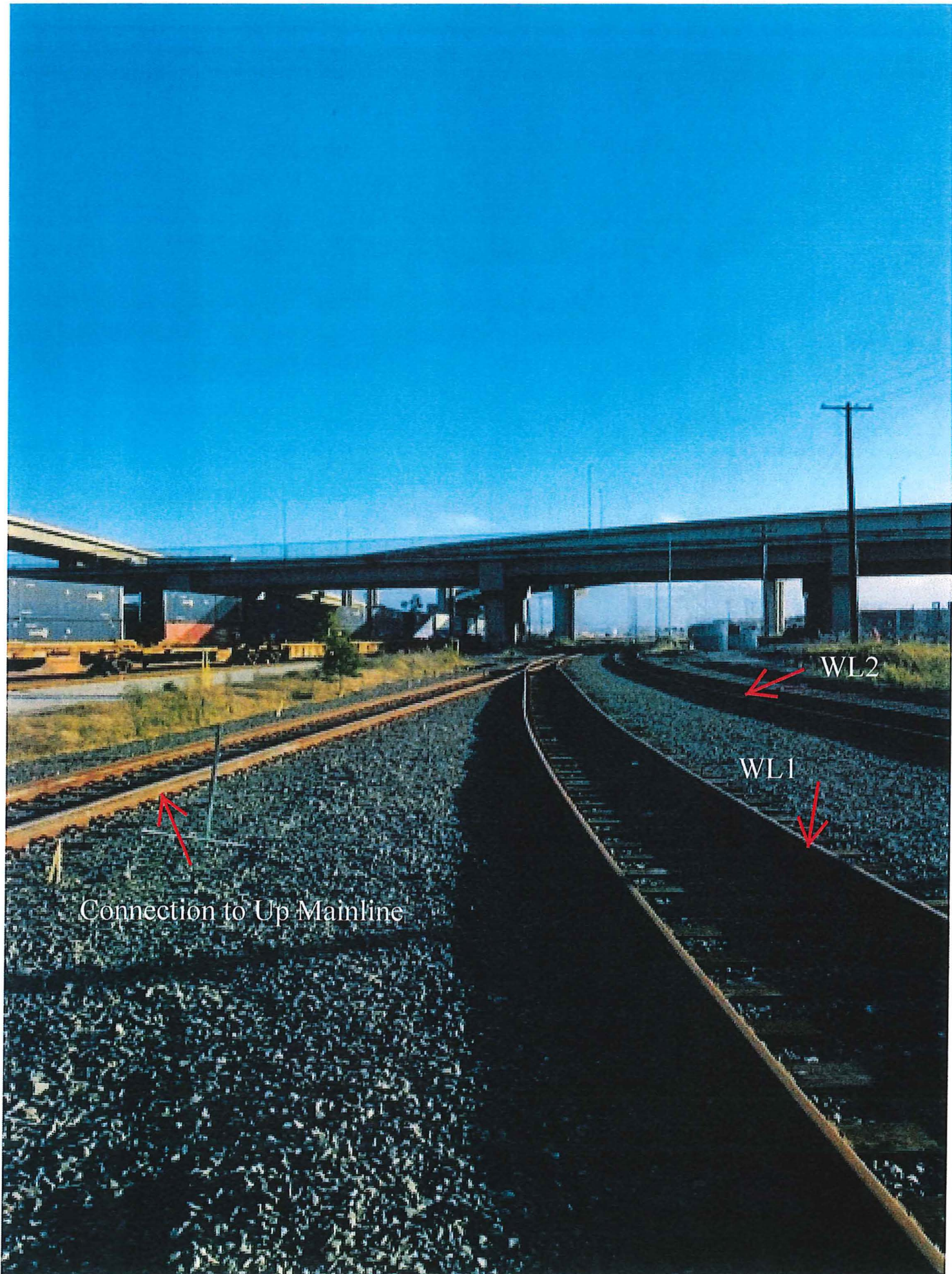
UPRR Interface North Facing North

WL2

WL1

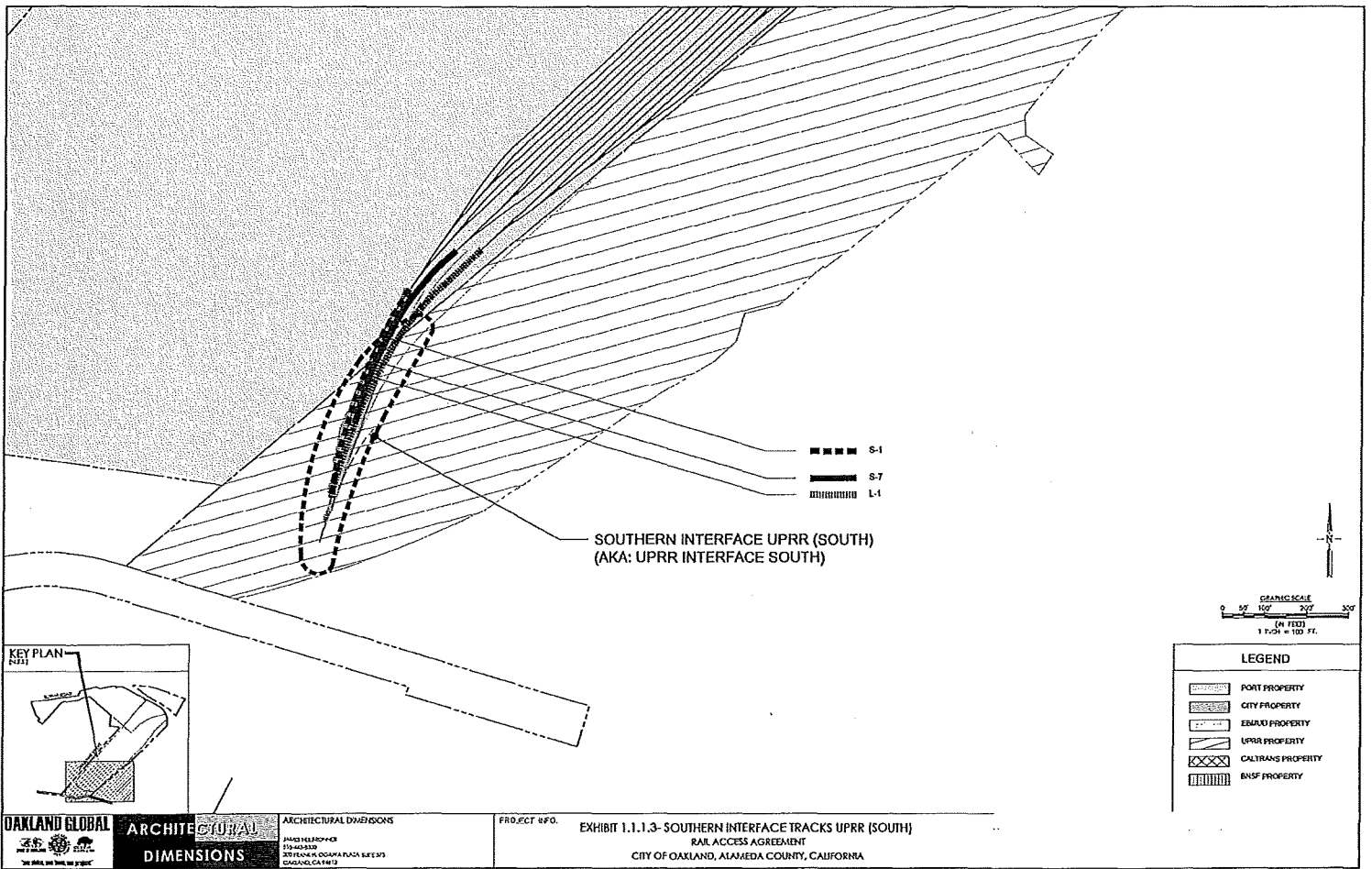
Connection to
Mainline

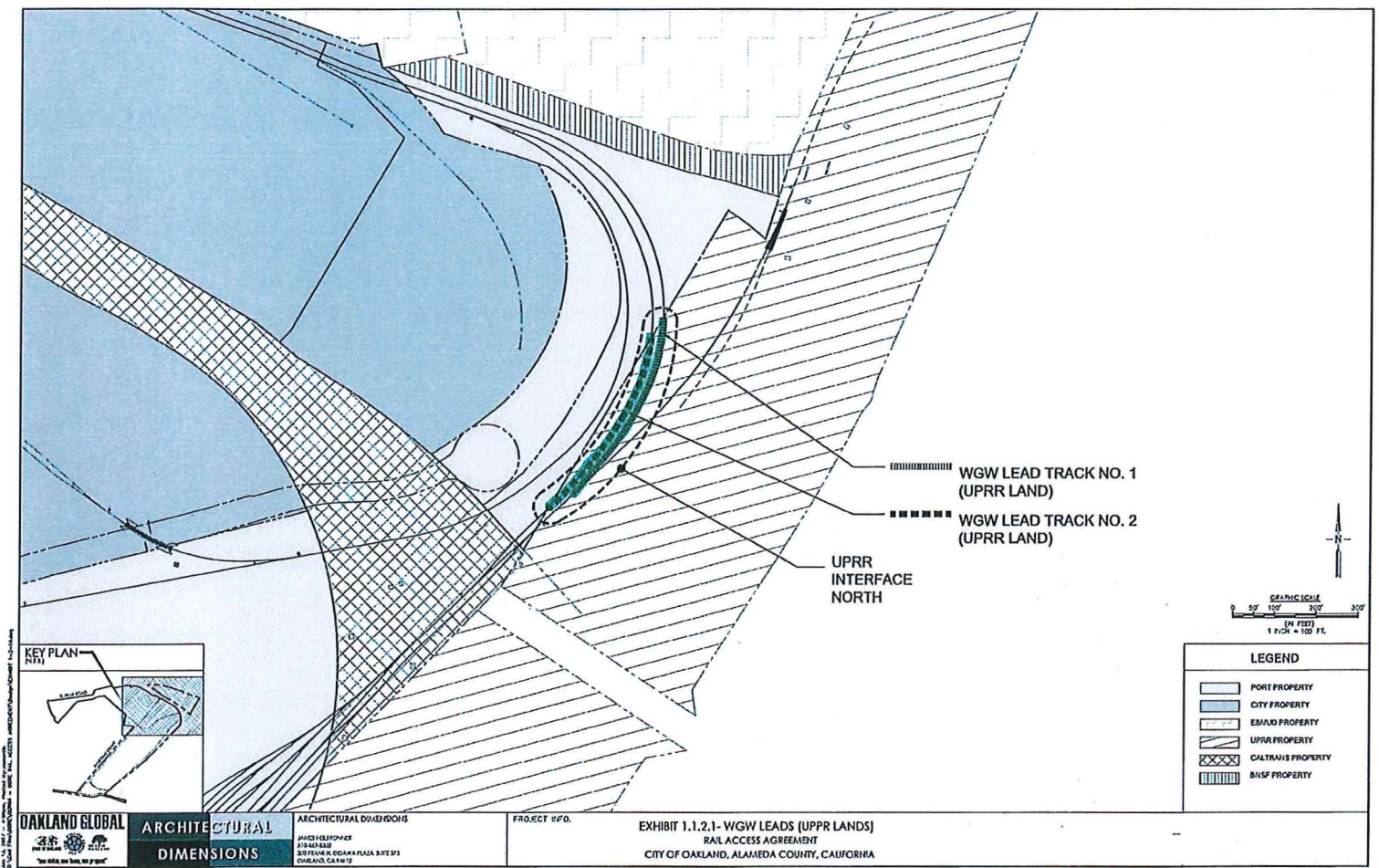


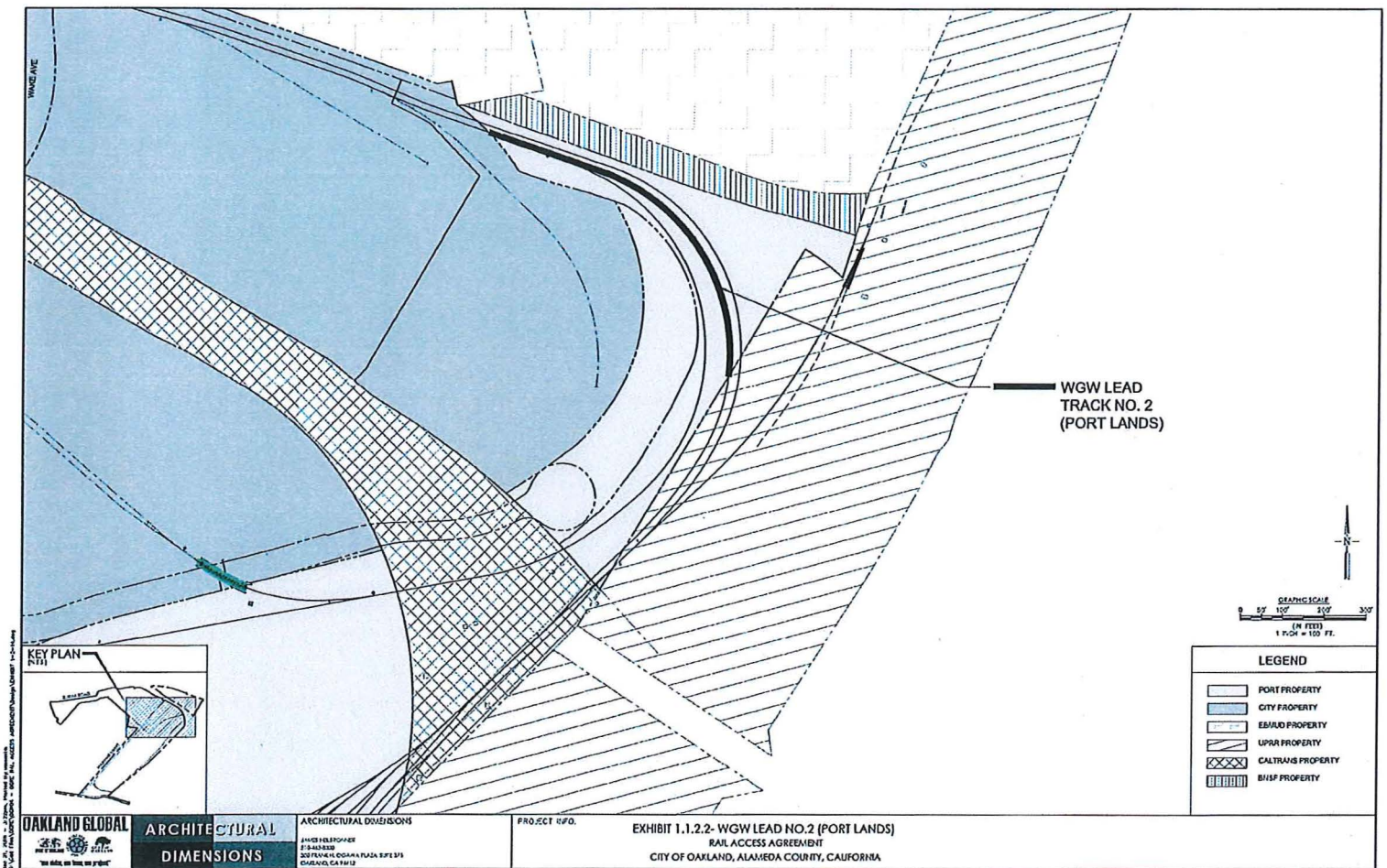


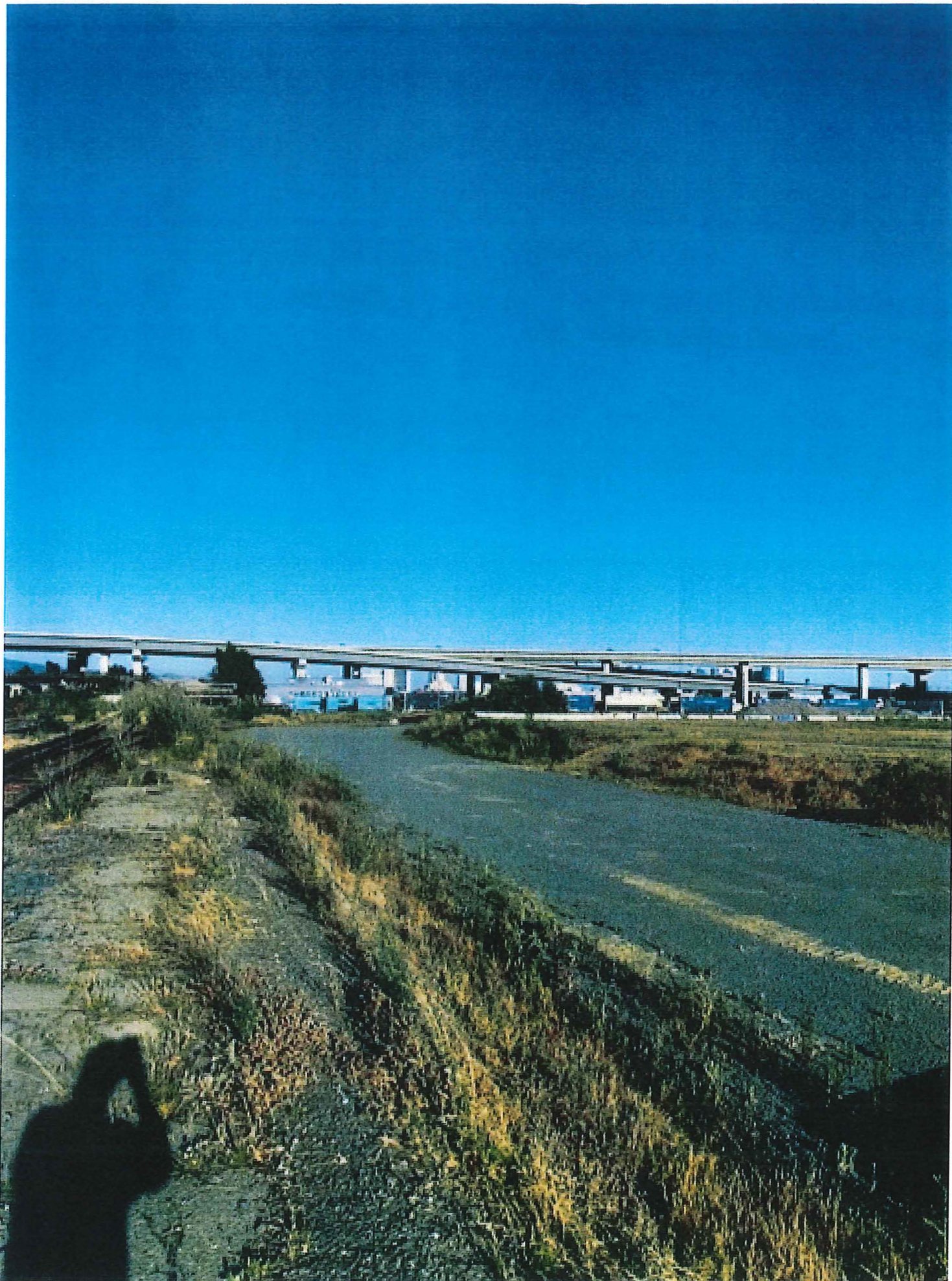


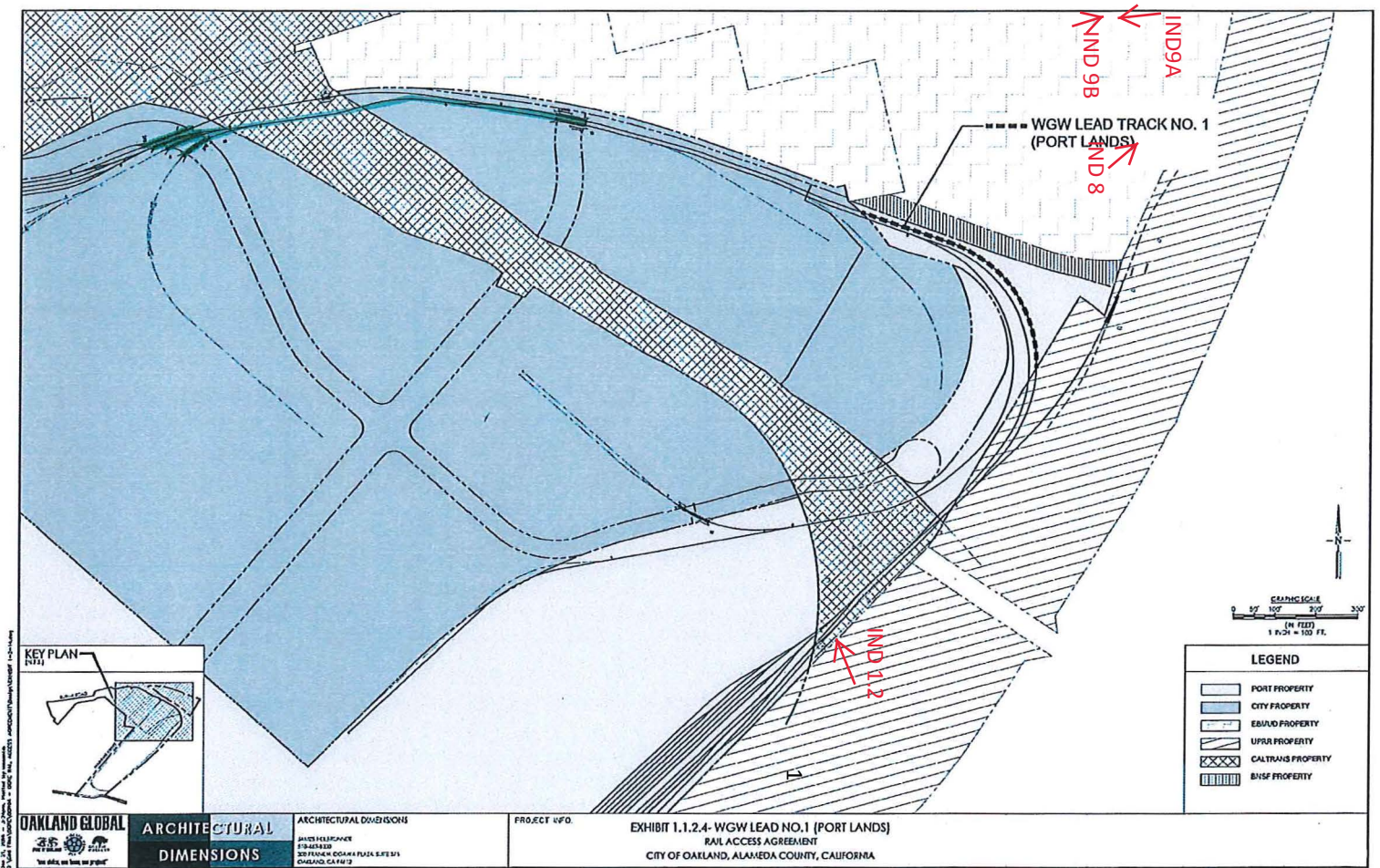


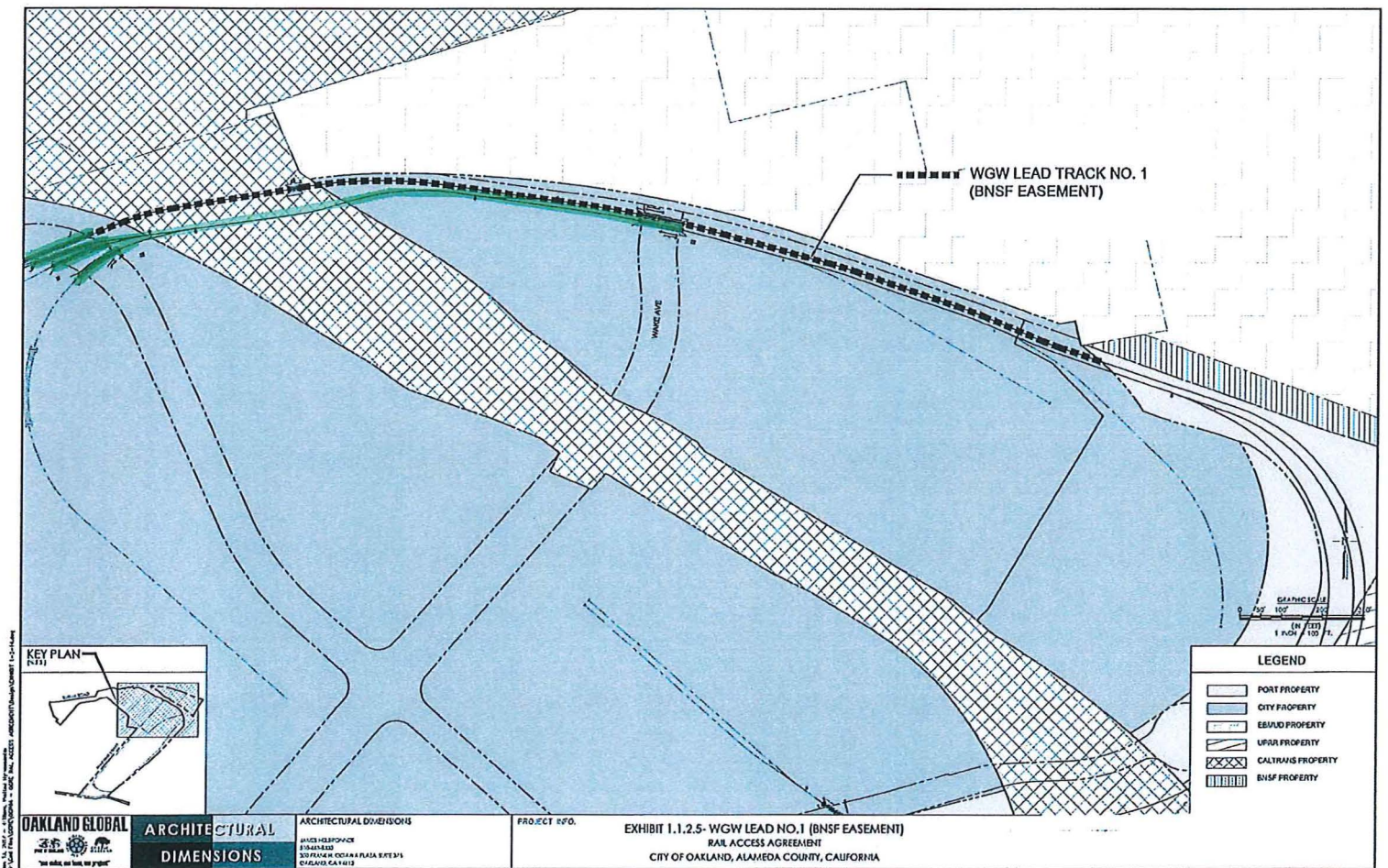




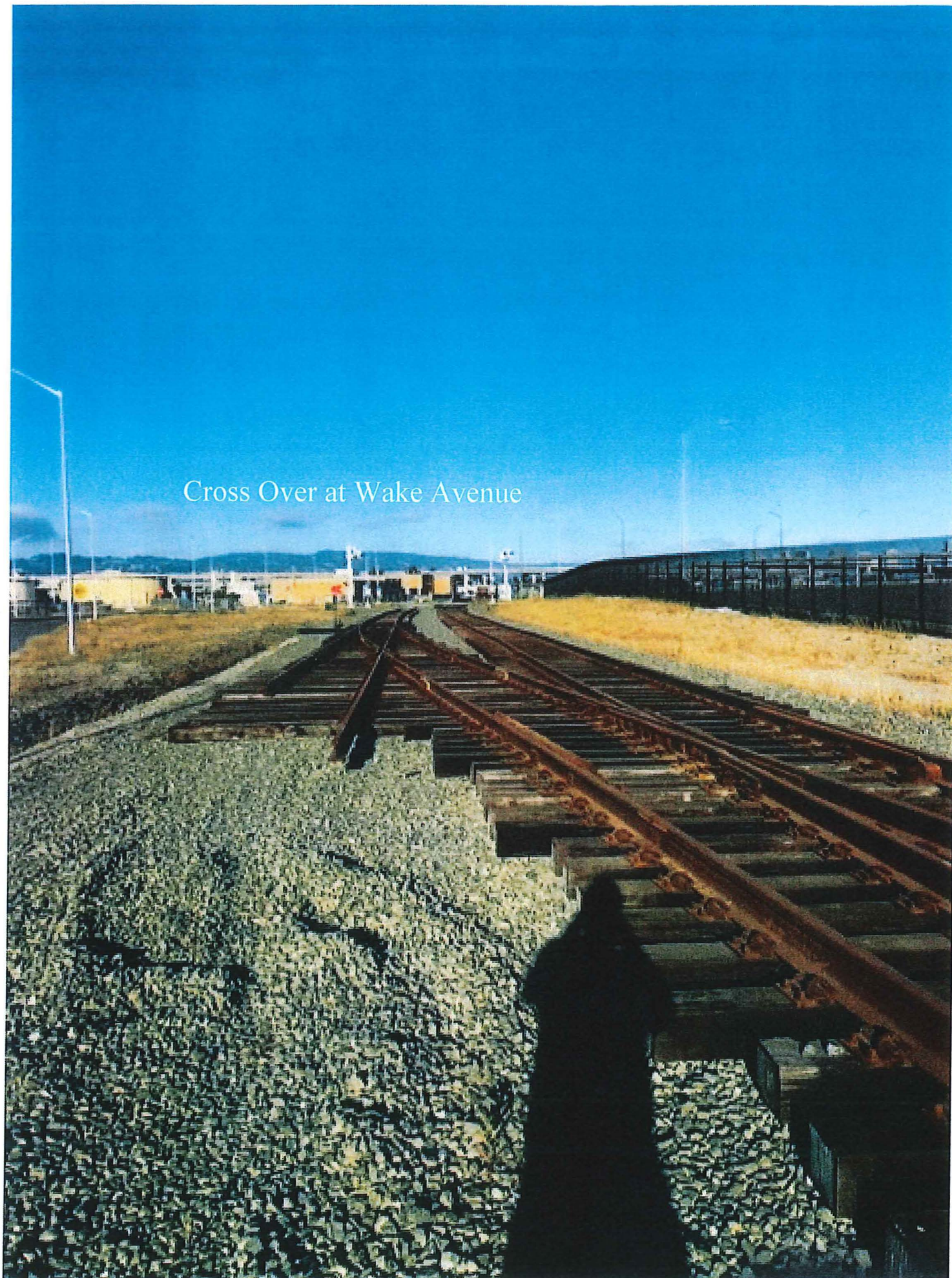


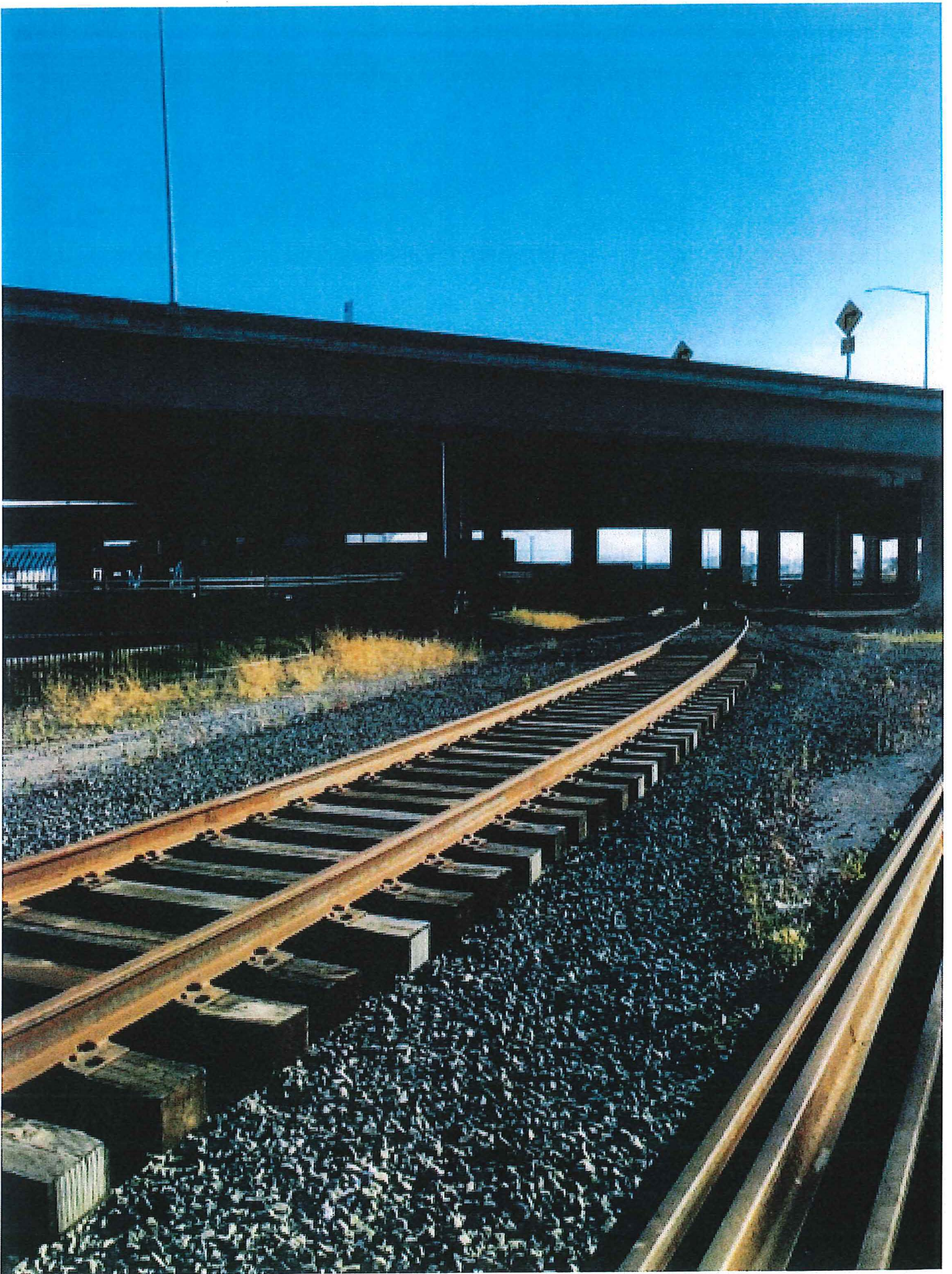






Cross Over at Wake Avenue







Crossover at West Burma





Crossover at West Burma

