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Surface Transportation Board
395 E Street, SW
Washington, DC 20423

September 11, 2008

Ref: STB Finance Docket No. 35087

My name is Allen Persons. I currently serve the Village of Plainfield as the Director of Public Works and have been retained in this position for over 10 years.

I would like to thank the Surface Transportation Board (STB) for the opportunity to speak on this important issue.

The Village's Public Works Department currently has serious concerns with specific sections of the draft Environmental Impact Statement (EIS). Our concerns are as follows:

1. The study indicates that Plainfield's population is 13,038 when in fact we currently have over 37,000 residents. This type of error was common throughout the document as similar incorrect data was utilized to underestimate current and future traffic volumes.
2. Under the "Environmental Consequences" section it is noted that the existing "Quiet Zones" will not be adversely impacted up to the design year of 2015. As the Village has completed a great deal of work to establish these "Quiet Zones" we believe that some additional assurance should be provided so we can retain our "Quiet Zones" well beyond the year 2015.
3. Under the "Mitigation" section the study also recognizes that since Plainfield's 135th Street "at-grade" railway crossing is only 605' from the US Route 30 intersection, vehicular traffic on US Route 30 will be backed up at times and mitigation will be required. If we apply the same type of thinking to some of the other Plainfield crossings you will find:
 - The Naperville Road crossing is only 335' from the Route 59 intersection.
 - The Route 126 crossing is only 710' from the Route 59 intersection.
 - The 127th Street crossing is only 45' from the US Route 30 intersection.

We question as to why the EIS failed to recognize the actual traffic delays at these other locations? We believe that the EIS is deficient in this area.

4. Under the "Transportation System Analysis" section we believe that the traffic data that was utilized is outdated and incorrect. For example, the EIS failed to recognize that significant traffic pattern changes have occurred within a section of 143rd Street. Specifically, since this section of 143rd Street was designated by the Illinois Department of Transportation as US Route 30 earlier this year, the traffic volumes have more than doubled. Overall, we believe that the EIS is deficient in the area of current as well as projected traffic volumes.
5. We believe that the EIS failed to address and properly analyze the need for "grade separated crossings" within our community. As we foresee significant increases in vehicular traffic, additional rail traffic will bring problematic congestion at our sixteen grade level crossings. While it is commonly known that "grade separated crossings" are safer and reduce traffic congestion, the cost for this type of improvement is extremely high. As our estimated cost to construct just one "grade separated crossing" is over \$20,000,000, we simply do not have the funds to offer this type of improvement. We believe that this issue should be seriously considered to address the real impact that the proposed acquisition will have on our area.

Overall, as the EIS has failed to properly address many issues and is deficient in many areas, we recommend that the STB take the necessary time to complete an accurate study on the real impacts that the proposed acquisition will have on the residents within our community.

I thank you for your time and consideration.

Sincerely,


Allen R. Persons
Director of Public Works