

FOREST PRESERVE DISTRICT OF WILL COUNTY

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February 12, 2008

Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423
Attention: Phillis Johnson-Ball
Environmental Filing
STB Finance Docket No. 35087

Re: STB Finance Docket No. 35087
Canada National Railroad Acquisition of EJ&E

Surface Transportation Board

CN-EJ&E EIS - 872-35087

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Dear Mrs. Johnson-Ball:

FOR

The Forest Preserve District of Will County (FPDWC) currently owns and manages over 20,000 acres for the educational, recreational, and environmental benefit of Will County residents. The proposed acquisition and modifications of Elgin Joliet & Eastern Railway (EJ&E) by Canadian National Railway (CN) has the potential to impact several FPDWC properties including four forest preserves, three dedicated state nature preserves, three existing recreational trails, one proposed trail, and other Will County natural and cultural resources. The comments/recommendations included in this letter will provide information on our preserves and other Will County resources to consider for the Environmental Impact Statement (EIS).

The following is a list of potential impacts and items to consider for the EIS relative to the mainlines and FPDWC properties and recreational trails (see attached mapping for more details):

Vermont Cemetery Nature Preserve

Concerns:

- Dedicated State Nature Preserves holds higher level of protection through the Illinois Nature Preserve Commission (INPC). Any impacts to property must be reviewed and signed off by INPC.
- Federally endangered Mead's Milkweed (*Asclepias meadii*) existing in the nature preserve in prairie habitat adjacent to tracks.
- There is a prairie remnant existing in railroad right of way adjacent to Vermont Cemetery.



- A prairie restoration of additional land adjacent to the nature preserve is currently underway by the FPDWC.
- \$1,000,000 in COLT grant money from Illinois Department of Natural Resources (IDNR) was used to acquire land adjacent to the nature preserve.
- Vibration impacts to historic grave stones, some dating to the mid-1800s.

Recommendations:

- Identify any direct areas of impact to Vermont Cemetery Nature Preserve.

Future Normantown Trail/Virgil Gilman Trail

Concerns:

- Railroad runs directly across trail that is currently under construction.

Recommendations:

- Identify any direct areas of impact to proposed trails.

Weisbrook Access

Concerns:

- Potential impacts to Wolf Creek.
- Normantown Trail at Weisbrook Access is adjacent to railroad.

Recommendations:

- Identify direct area of impact to property.

Lake Renwick Nature Preserve

Concerns:

- Railroad transects property and crosses recreational trail in two places.
- Dedicated State Nature Preserve holds higher level of protection through the INPC. Any impacts to property must be reviewed and signed off by INPC
- Co-owned by IDNR.
- Wetland habitat supports 12 endangered and threatened species including the State Endangered Black-Crowned Night-Heron and Iowa Darter.
- Over \$1.3 million in State grants have been used to acquire and develop.
- Single track exists on very narrow and steep berms above lakes and wetlands used by resident waterfowl. How much area will they need for doubling track?
- Potential impacts to existing grades from track modifications.

Recommendations:

- Identify potential impacts to existing hydrology including groundwater on wildlife and lake and fisher management.
- Identify potential impacts to surface water and jurisdictional wetlands.
- Identify potential impacts on existing heron nesting structures from noise, vibration and pollution.
- Identify behavioral impacts to nesting birds from noise and other changes to their environment.
- Public education programs currently exist on site. Consider impacts relative to educational programs.
- Identify direct impacts to recreational trail and nature preserve.

Joliet Iron Works and Heritage Trail

Concerns:

- Railroad crosses Heritage Trail (aka I&M Canal Trail) part of the I & M Canal National Heritage Corridor.
- \$1.3 million ISTEA Grant through the State of Illinois used for development.
- Vibration impact on trail and other infrastructure on site.

Recommendations:

- Public education programs currently exist on Joliet Iron Works site. Consider impacts relative to educational programs.
- Identify any direct area of impact on Joliet Iron Works Site and Heritage Trail.
- Identify potential impacts to adjacent national registry site (U.S. Steel Corporation) and County Landmark to the north.

Wauponsee Glacial Trail

Concerns:

- Adjacent to Wauponsee Glacial Trail (WGT) from Mills to Rowell Roads.
- \$200,000 grant from IDNR used for trail development.
- Easement held by IDNR along trail.
- Impacts to rider enjoyment.

Recommendations:

- Consider the possibility of a recreational trail along proposed CN ROW to make a regional trail connection from WGT to Old Plank Road Trail.
- Identify direct areas of impact of property.

Sugar Creek Preserve

Concerns:

- Currently, there is a single track running through Sugar Creek Preserve and over Sugar Creek.

Recommendations:

- Identify potential hydrological impacts.
- Identify areas of impact of property.

Sauk Trail Preserve

Concerns:

- Reservoir on site provides stormwater management for neighboring communities. Vibrations may affect stormwater management structures.

The following is a list of potential impacts and items to consider for the EIS relative to the unnamed spur line that runs from Joliet to 135th in Romeoville.

Lockport Prairie Nature Preserve

Concerns:

- Dedicated State Nature Preserves holds higher level of protection through the INPC. Any impacts to property must be reviewed and signed off by INPC.
- Lockport Prairie contains high quality globally rare dolomite prairie and wetland.
- Railroad track transects wetland and any changes to tracks, ballasts, number of trains, weight of trains, length of trains will affect existing surface and groundwater hydrology including seeps that support endangered and threatened species.
- Site supports habitat for the Federally Endangered Hines Emerald Dragon Fly (*Somatochlora hineana*), Leafy Prairie Clover (*Petalostemum foliosum*), and Federally Threatened Lakeside Daisy (*Actinea patula*) and other state endangered and threatened species.
- Potential impacts to mitigation site for the I355 extension by Illinois State Toll Highway Authority.
- Potential impacts to wildlife behavior and movement near and over tracks.
- Management impact for FPDWC natural resource staff, including the ability to conduct prescribed burns.
- The only access in and out of the site is on Division. How will increased trains affect access especially emergency access?
- Leased property from Chicago Area Metropolitan Water Reclamation District.

- Potential impacts on prairie from wildfires started by sparks from trains.

Recommendations:

- Identify areas of impact to Lockport Prairie Nature Preserve

The following is a breakdown of the EIS categories and general items to consider including:

Safety Recommendations:

- Study impacts to pedestrian and bicycle safety at crossings.
- Insure modifications of crossings comply with AASHTO and ADA standards.
- Study impacts to adjacent FPDWC preserves and trail user safety and enjoyment.

Transportation Recommendations:

- Study impacts to pedestrian and bicycle users of recreational trails with increased train traffic.
- Assess vehicular access impacts at Lockport Prairie Nature Preserve.

Energy Recommendations:

- Include evaluation of increased idling time at intersections.

Noise and Vibration Recommendations:

- Include Parks, Forest Preserves, and other Wildlife Sanctuaries under sensitive receptors.
- Address vibration impact on wildlife and wildlife habitat especially in areas where Federal and State Endangered, Threatened and Rare species occur.
- Address vibration impacts to flood control structures.
- Address vibrations impact to existing recreational infrastructure.
- Review noise impact on preserve and recreational trail user enjoyment.

Biological Resources Recommendations:

- Include State Endangered, Threatened and Rare Species.
- Analyze possible impacts to existing natural remnants along railroad ROW.

- Critical habitats reviewed should include Illinois Natural Area Inventory sites.
- Investigate potential increase in invasive species transport into preserves, especially Nature Preserves.
- Evaluate contamination concerns:
 - Increasing the amount of trains increases the potential for derailments and hazardous waste spills.
 - Typically creosote soaked rail ties have the potential to pollute surrounding aquatic habitats.
 - Train track lubricant may also have pollution impacts on surrounding aquatic habitats.

Water Resources Recommendations:

- Assess groundwater impacts especially in areas that support wildlife habitat.
- Consider potential impacts to existing wetlands that support Federal and State Endangered and Threatened species.

Secondary and Cumulative Effects Recommendations:

- Identify impacts to preserve and park users.
- Assess impacts to non-endangered wildlife

Once complete the FPDWC requests the opportunity to review and comment on the draft EIS. If you have any questions or need more information please contact Cori Crawford, Planning and GIS Coordinator, at 815-722-9128. Thank you for your time and consideration.

Sincerely,



Marcella M. DeMauro
Executive Director

cc: Kim Roman, Illinois Nature Preserve Commission
Colin Duesing, Will County Land Use Department
Keith Shank, Illinois Department of Natural Resources
Janice Hill, Real Estate Coordinator, Metropolitan Water Reclamation District

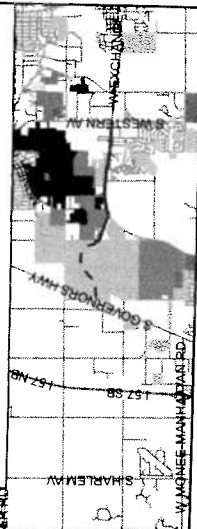
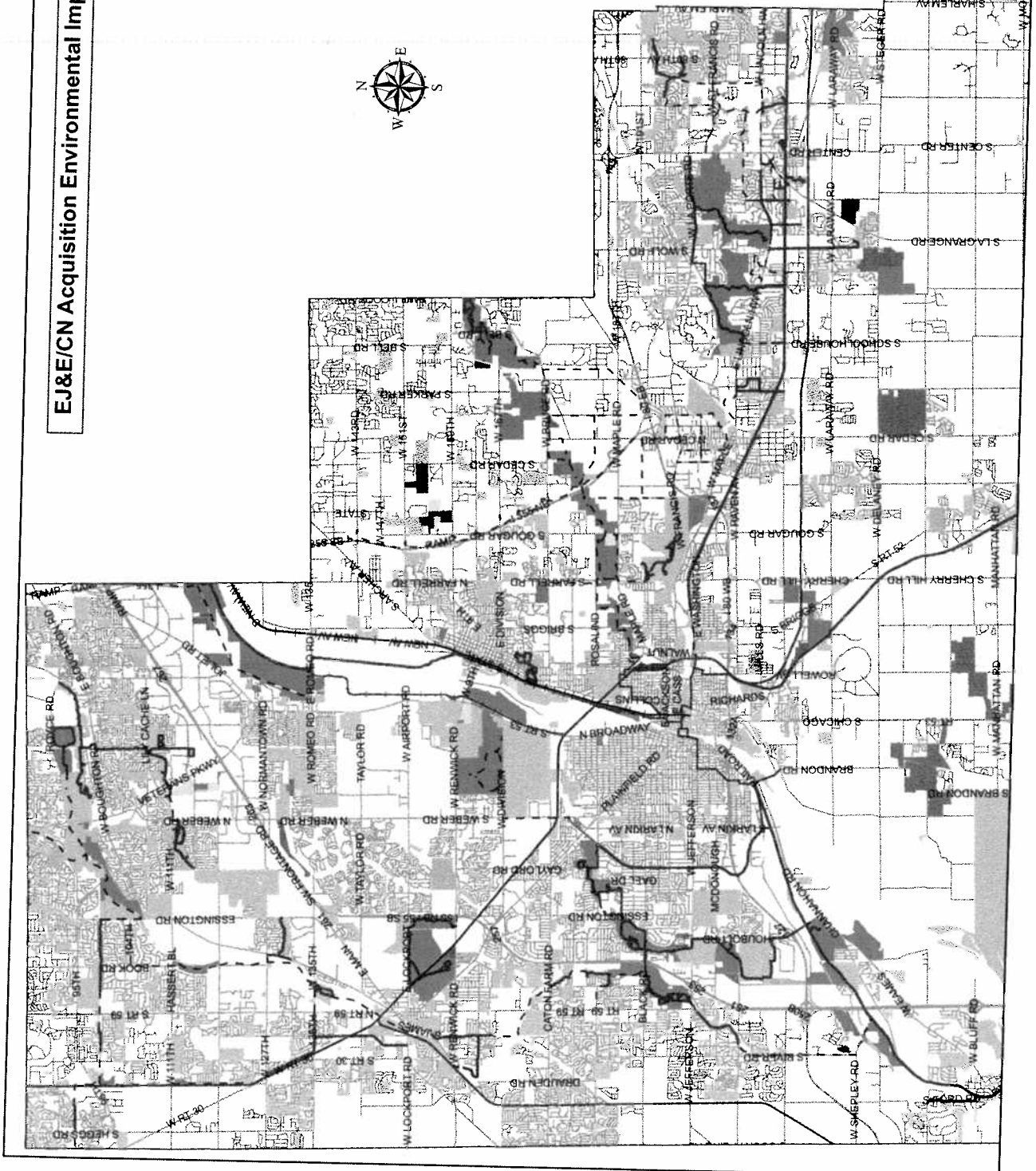
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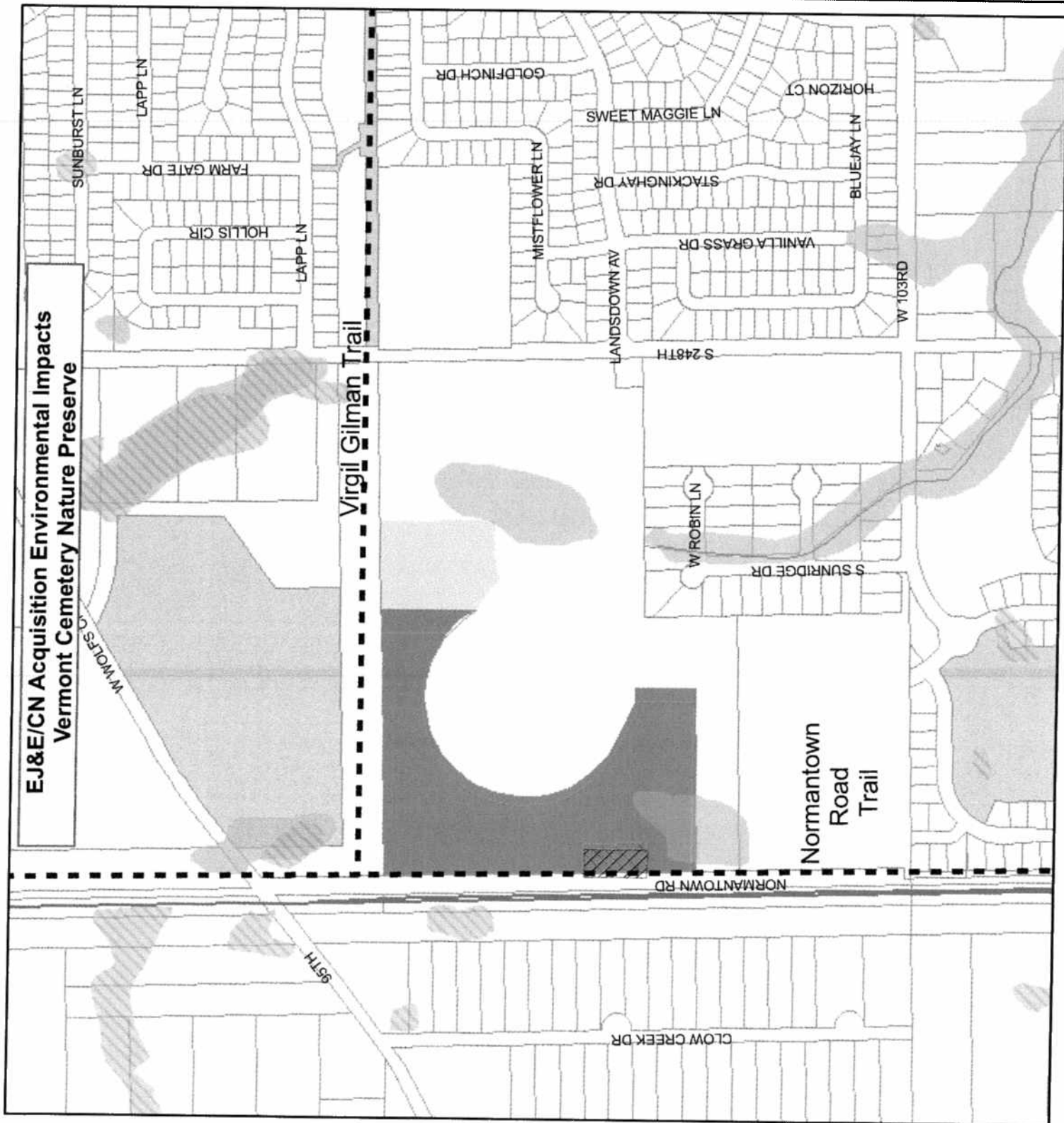
EJ&E/CN Acquisition Environmental Impacts

- Railroad**
 - EJ&E
 - CN
 - Unknown
- Forest Preserves**
 - Owned
 - Leased
 - Easement
 - Managed
 - Pending
- Acquisition Plan**
 - Public Properties
- Trail Systems**
 - Existing
 - Proposed
 - Road Route
 - Undeveloped



2/2/2008
C. Crawford
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Railroad

- ~ EJ&E
- ~ CN
- ~ Unknown

Forest Preserves

- Owned
- Leased
- Easement
- Managed
- Pending

Nature Preserve

- Land & Water Reserve

Acquisition Plan

- Public Properties

Trail Systems

- ~ Existing
- ~ Proposed
- ~ Road Route
- ~ Undeveloped

Hydrology

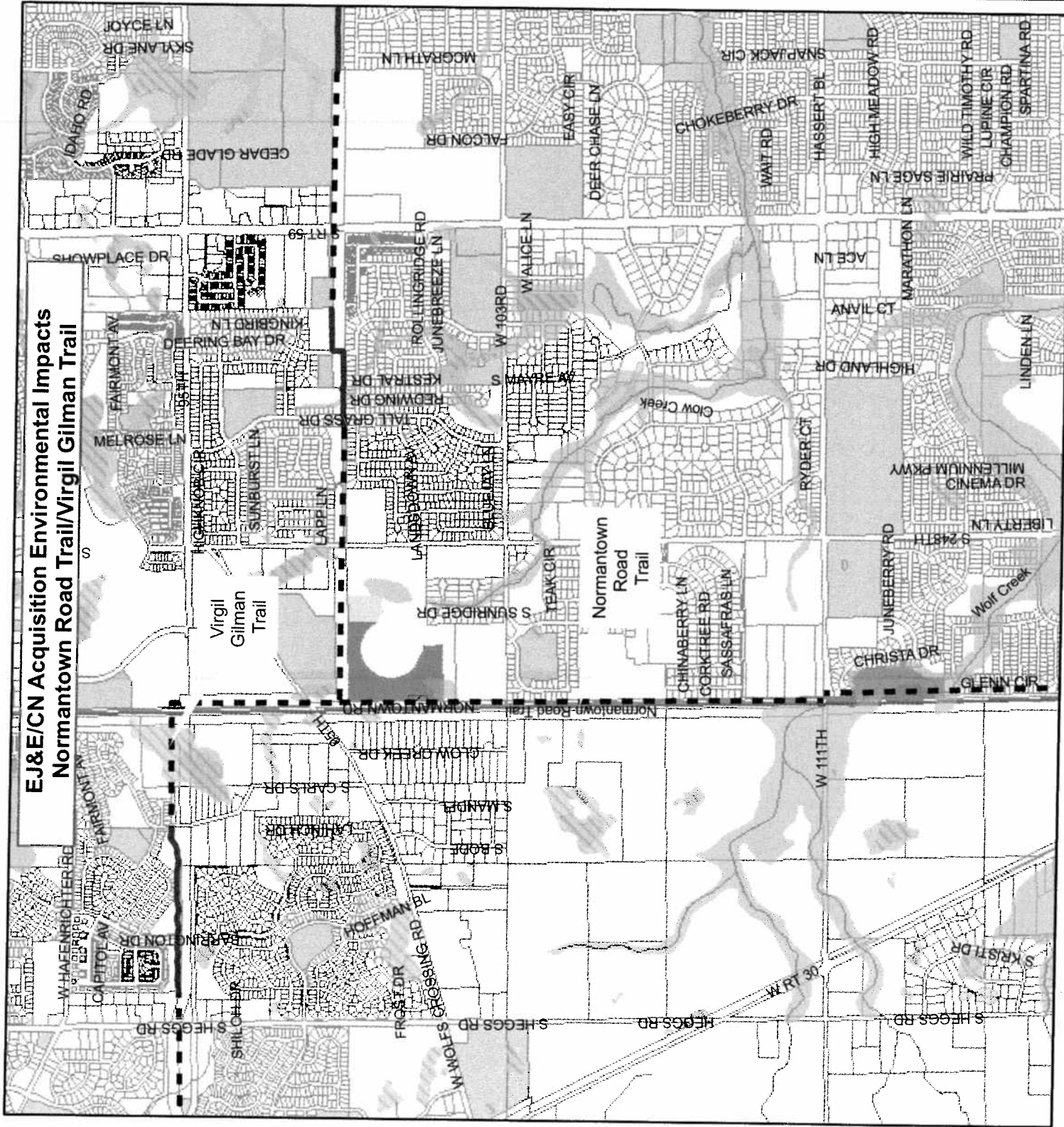
- ~ Rivers and Streams
- Wetlands
- Floodplain
- Bodies of water

Natural Resources

- Natural Remnants
- E_T_State
- will_inai_isp



EJ&E/CN Acquisition Environmental Impacts Normantown Road Trail/Virgil Gilman Trail



Railroad

- ~ EJ&E
- ~ CN
- ~ Unknown

Forest Preserves

- Owned
- Leased
- Easement
- Managed
- Pending

- Nature Preserve
- Land & Water Reserve

- Acquisition Plan
- Public Properties

Trail Systems

- Existing
- Proposed
- Road Route
- Undeveloped

Hydrology

- Rivers and Streams
- Wetlands
- Floodplain
- Bodies of water

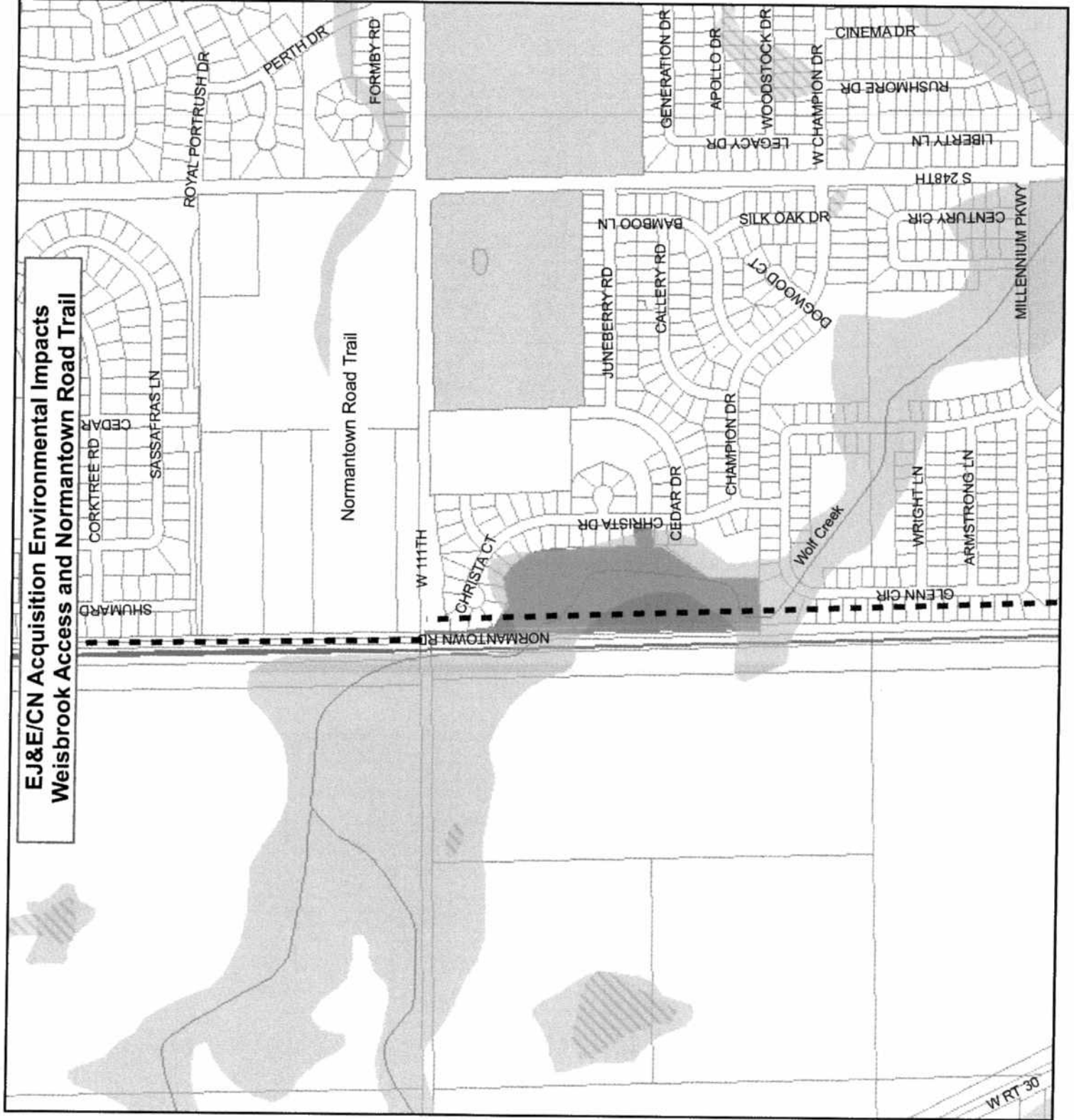
Natural Resources

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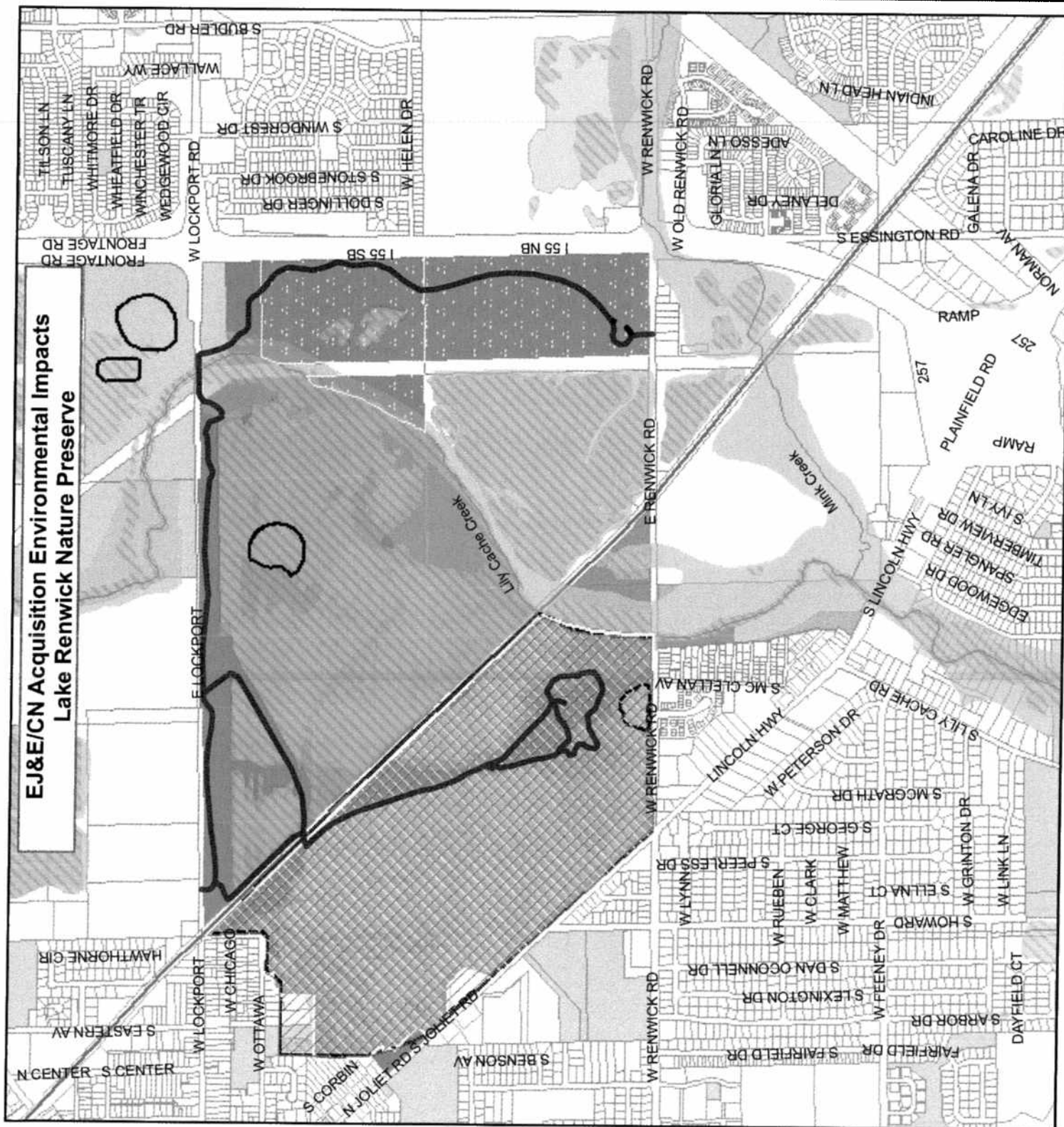


EJ&E/CN Acquisition Environmental Impacts Weisbrook Access and Normantown Road Trail

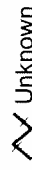
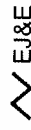
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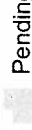
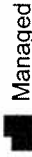
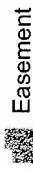
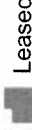
EJ&E/CN Acquisition Environmental Impacts Lake Renwick Nature Preserve



Railroad



Forest Preserves



Nature Preserve

Land & Water Reserve



Acquisition Plan

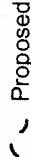


Public Properties

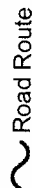
Trail Systems



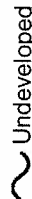
Existing



Proposed

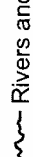


Road Route

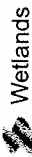


Undeveloped

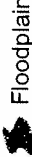
Hydrology



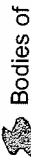
Rivers and Streams



Wetlands

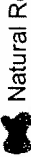


Floodplain

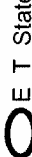


Bodies of water

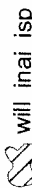
Natural Resources



Natural Remnants



E_T_State



will_inai_isp



EJ&E/CN Acquisition Environmental Impacts Joliet Historic Iron Works Site

Koppers Coke Oven Plant
County Landmark

National
Register Site

Railroad

- EJ&E
- CN
- Unknown

Forest Preserves

- Owned
- Leased
- Easement
- Managed
- Pending

- Nature Preserve
- Land & Water Reserve

- Acquisition Plan
- Public Properties

Trail Systems

- Existing
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Hydrology

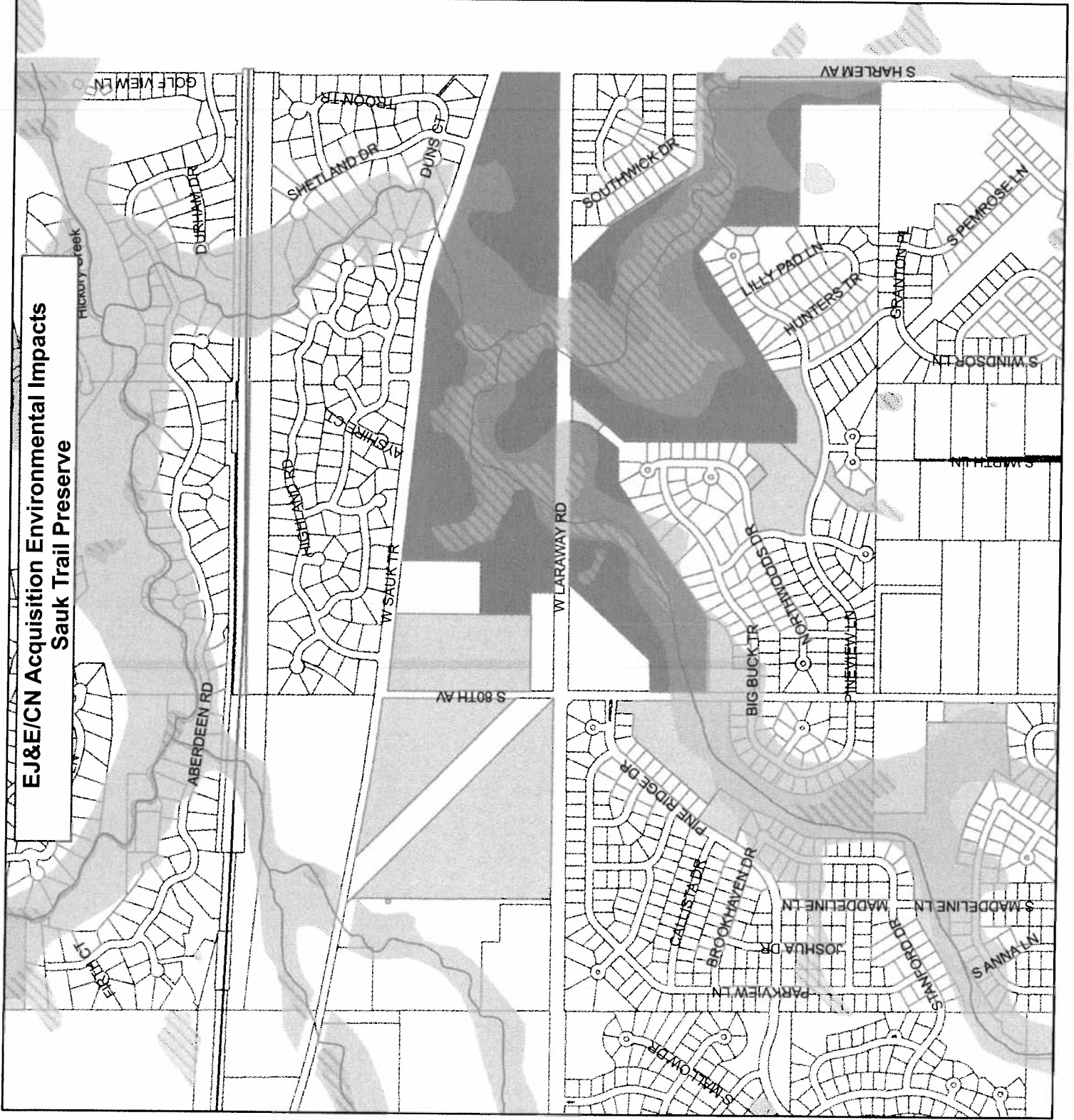
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EJ&E/CN Acquisition Environmental Impacts Sauk Trail Preserve



Railroad

- ~ EJ&E
- ~ CN
- ~ Unknown

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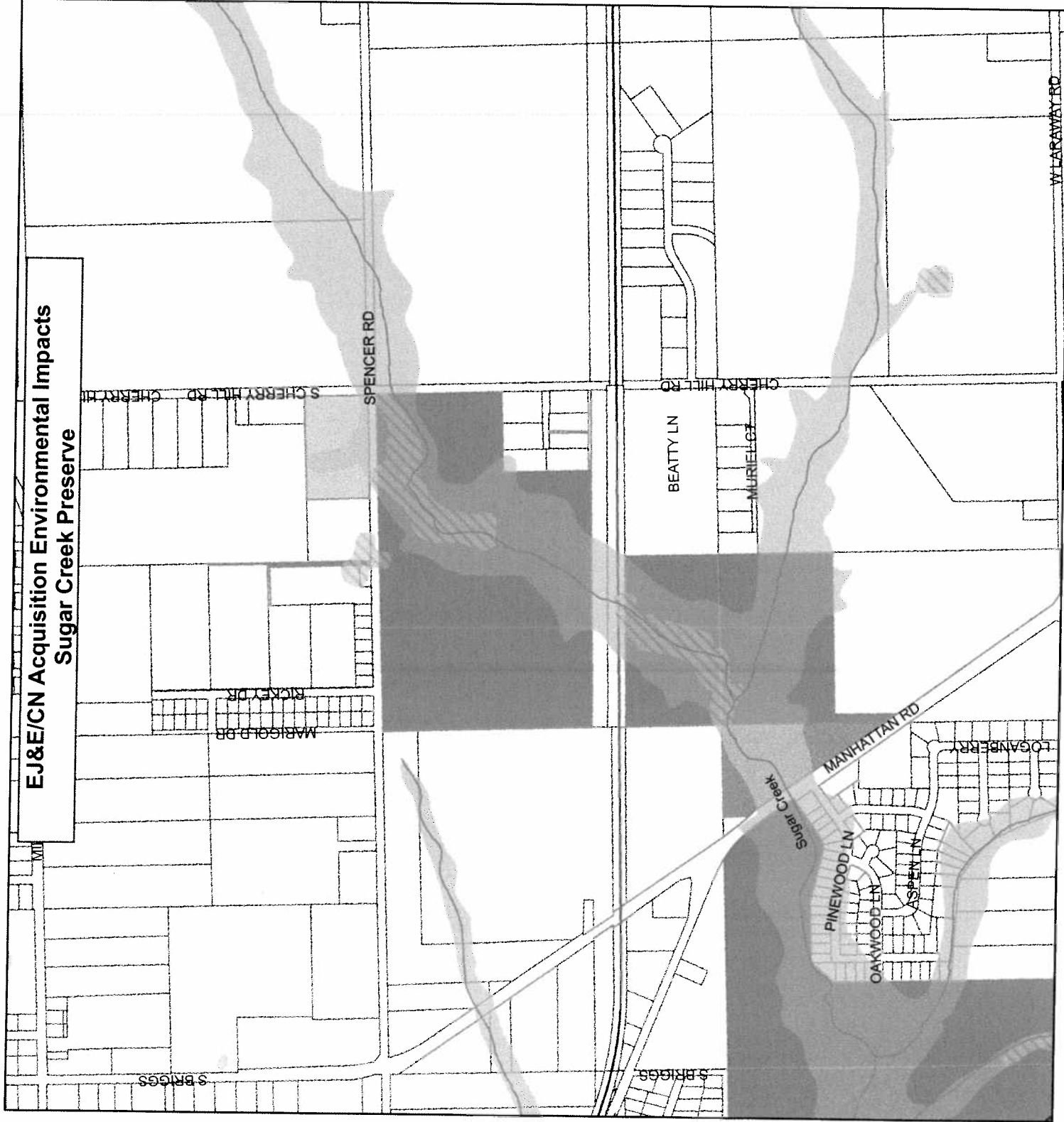
Hydrology

- Rivers and Streams
- Wetlands
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- Bodies of water

Natural Resources

- Natural Remnants
- e&t_species_pts
- E_T_State
- will_inai_isp

EJ&E/CN Acquisition Environmental Impacts Sugar Creek Preserve



Railroad

- EJ&E
- CN
- Unknown

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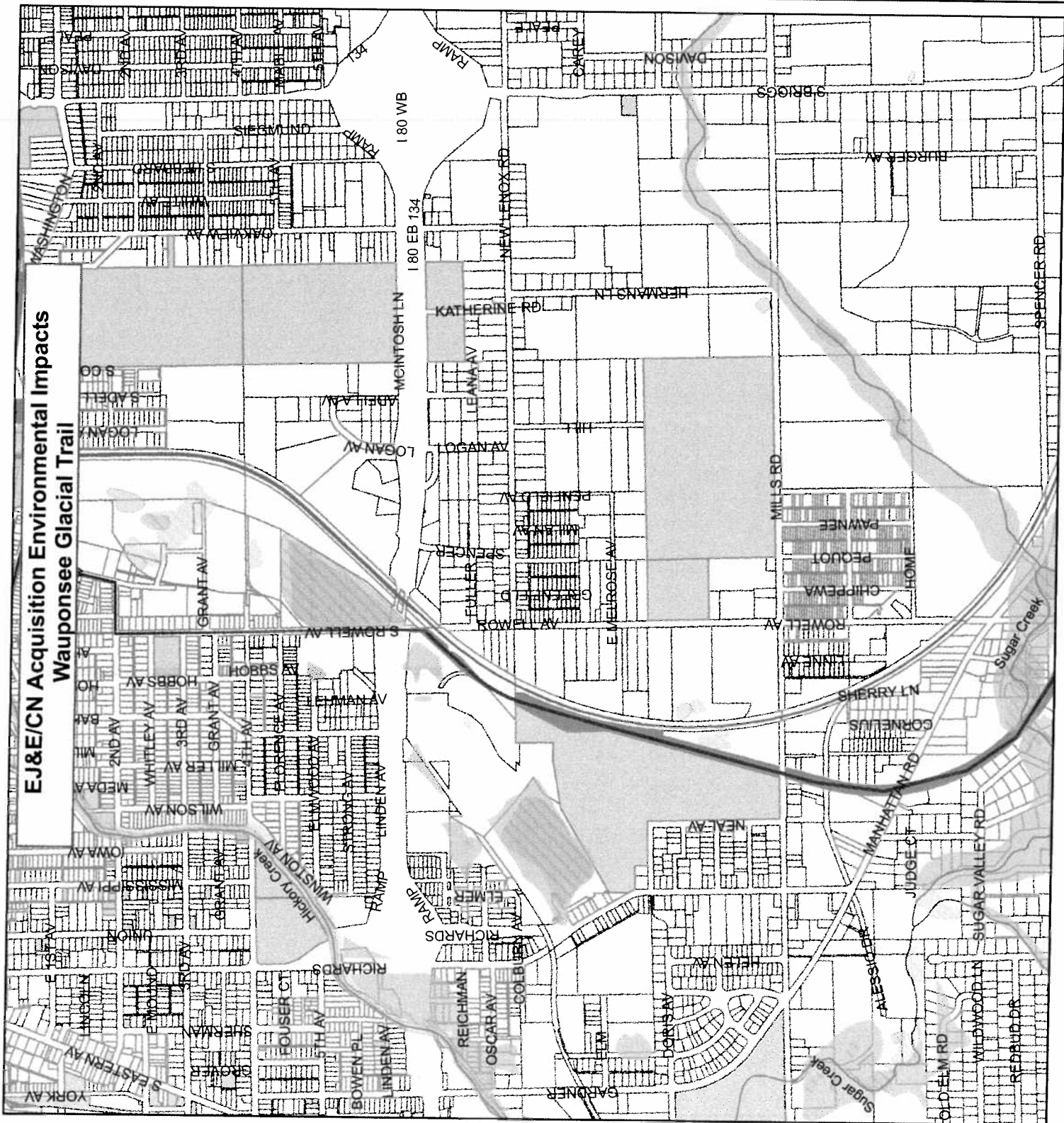
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- Floodplain
- Bodies of water

Natural Resources

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- e&t_species_pls
- E_T_State
- will_inai_isp



EJ&E/CN Acquisition Environmental Impacts Wauponsee Glacial Trail



Railroad

- ~ EJ&E
- ~ CN
- ~ Unknown

Forest Preserves

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EJ&E/CN Acquisition Environmental Impacts Lockport Prairie Nature Preserve

