

Village of Plainfield's Analysis of the Possible Impact of the Proposed Acquisition of the Elgin Joliet and Eastern Railway (EJ&E) by Canadian National (CN)

The Village of Plainfield has examined the possible impacts of the proposed sale of the EJ&E to CN. As a community located on the rail line, the Village has significant concerns related to several areas of the proposed acquisition. This Analysis will present a summary of the areas of concern. **It is the Village's intent and request that the Surface Transportation Board (STB) consider these areas of concern when evaluating the Environmental Impact Study (EIS) that must be prepared as part of this transaction.**

In the fall of 2007, the Village became aware that CN announced plans to acquire the EJ&E Railway. CN would like to use the EJ&E railway as a "bypass" around the congested rail hub and rail lines of the inner ring Chicago suburbs. As a result of the proposed sale and resulting use of the rail line, CN estimates that rail traffic on the line will increase from approximately 16 trains per day to approximately 50 trains per day on the Village's section of the main rail line. This represents over a 300% increase in train traffic volume. These increases reflect today's activity and freight hauling demand as indicated by CN, and could increase as the demand for CN's rail hauling services increases. Additionally, more traffic could be generated in the event that CN would allow other carriers to utilize the line to allow them to bypass the congestion of the Chicago and near suburban yards.

The EJ&E runs through the middle of the Village and in effect separates the Village into two distinct sections. The historic "core" of Plainfield lies to the east and north of the tracks while the newer areas of the Village's development are located to the west and south of the main EJ&E line. The mainline railway enters the Village just north and east of the intersection of 119th Street and Route 30 and exits the Village just south and east of the Renwick Road/Lockport Street intersection, traversing a generally northwest to southeast route through the Village. Additionally, the Illinois River Branch Line also traverses the Village in a generally north to south alignment beginning at 143rd Street and exiting the Village just north of Caton Farm Road. Due to the significant amount of trackage and crossings located within the Village's borders, the proposed sale would have a significant impact on the Village of Plainfield and its residents' quality of life.

The Village currently has 17 crossings of the EJ&E within its borders. Sixteen (16) of the crossings are at-grade crossings with the EJ&E railway. Eleven crossings are on the mainline, three crossings are on the Illinois River Line, one crossing is grade separated (at Illinois Route 59) and two are private crossings. Of the Main Line public crossings identified, three crossings are the jurisdiction of the Illinois Department of transportation (IDOT). These crossings are the Route 59 crossing, the Route 126/Main Street crossing, and the Route 30/143rd Street crossing. Additionally, the Renwick Road crossing is under the jurisdiction of Will County. The US 30/Lockport Street crossing on the Illinois River line is also under the jurisdiction of IDOT. The Village has identified the 119th

Street corridor as a Strategic Regional Arterial route in its comprehensive Plan. This route contains the 119th Street crossing which is an at-grade crossing of the main line.

At-Grade Crossings of the EJ&E Line within Plainfield Village Limits

	STREET	BRANCH	ADT	YR
	119th Street	Mainline	3,950	2004
	127th Street	Mainline	4,650	2004
	135th Street	Mainline	8,500	2004
	Van Dyke Road	Mainline	5,000	2004
1	143rd Street	Mainline	4,300	2004
	Naperville-Plainfield Road	Mainline	3,300	2004
1	IL Route 126/Main Street	Mainline	16,500	2005
	Center Street	Mainline	1,150	1999
	Eastern Avenue	Mainline	2,800	2004
	Lockport/Airport road	Mainline	8,200	2004
2	Renwick Road (CH 36)	Mainline	9,300	2004
1	US 30/Lockport Street	Illinois River	24,400	2005
	Renwick Road	Illinois River	4,300	2004
	Drauden Road	Illinois River	5,200	2004

Does not include the 2 private crossings within the Village of Plainfield's borders

Does not include the Route 59 grade-separated crossing within Village limits

1 – Crossing under the jurisdiction of the Illinois Department of Transportation

2 – Crossing under the jurisdiction of Will County

Summary of Concerns Identified:

1. The projected increase of rail traffic would significantly increase delays at the Village's at grade rail crossings resulting in significant impacts on the Village's roadway transportation network.

The Village's unique location adjacent to Interstate 55 requires the Village to accommodate significant volumes of "cut through" traffic. Residents of adjacent communities utilize the Village's transportation network to access Chicago and near west suburban communities and job centers via I-55. The routes that this "cut through" traffic utilizes to access I-55 contain at-grade rail crossings. Therefore, the Village of Plainfield would be unduly impacted by increased train traffic blocking the access to I-55. Additionally, the air quality adjacent to the crossings would be impacted by increased exhaust fumes.

The EIS must evaluate the impacts of more traffic, longer trains, track speed, and other operational constraints of the rail network on the roadway transportation network. It is the Village's position that the road network traffic impact of the proposed sale is sufficient in and of itself for the STB to deny the sale of the EJ&E to CN. Alternatively, due consideration to requiring CN to fund grade separation of crossings and other operational conditions such as hours of rail operation, train speeds, train length, and the amount of time a train can block an at-grade crossing MUST be evaluated. Additionally, the environmental impact of idling cars waiting for trains to pass at-grade crossings must also be evaluated. This issue is CRITICAL to the Village of Plainfield.

2. Increased train horn noise would significantly impact the Village's sensitive noise and vibration receptors. Three such locations are identified within the Village's boundaries:
 - Walkers Grove Elementary School 24810 West 135th Street (just west of the 135th Street Crossing)
 - Indian Trail Middle School 1005 N. Eastern Ave (just north of the Eastern Ave Crossing)
 - Lakewood Nursing and Rehabilitation Center (north of the Eastern Ave crossing)
 - Village Hall 24401 West Lockport Street
 - The Lake Renwick Rookery owned by the Will County Forest Preserve District is also adjacent to the mainline tracks
3. Increased train horn noise would significantly impact the quality of life of Village residents who live proximate to the rail line. There are approximately 3,800 households within a one-half mile radius of the rail line within the village's borders. This equates to approximately 14,000 residents who live within one-half mile of the rail tracks. This represents approximately 38% of the village's population.

The EIS must evaluate the impacts of increased rail traffic on noise and vibration levels in and proximate to the mainline. Due consideration must be given to requiring CN to install noise and vibration mitigation measures as a condition of the sale. The Village of Plainfield has established a “Quiet Zone” within a substantial portion of its boundaries to combat the effects of noise and vibration of rail traffic and funded the necessary improvements. The STB must consider requiring CN to fund measures to further establish quiet zones within affected areas and/or to install noise mitigation measures, particularly adjacent to sensitive noise and vibration receptors. The Village of Plainfield views the noise and vibration impacts as sufficient grounds to deny the sale of the EJ&E rail line to CN.

4. The projections in CN’s application ignore the growth that the region is undergoing. Analysis of the impacts based on today’s populations and traffic volumes are not an accurate reflection of what the situation will be even 5 years from now. A longer timeframe for analysis is necessary to fully evaluate the impact from the proposed sale.

The Village’s population has increased from 9,040 in 1997 to approximately 36,000 as of the end of 2007. This represents a quadrupling of the Village’s population in a 10-year period. The Village is continuing to grow and approximately 20,000 acres of undeveloped property are located within its planning area. In 2007, Forbes Magazine reported the Village as the 5th fastest growing suburban community in the United States. Communities to the west of the Village that utilize the Village’s transportation network to access I-55 are undergoing similar periods of growth as the region transforms from a rural farming region to the far southwest suburban area of Chicago.

When the EJ&E was constructed, the area was a rural farming area (for the most part) and little impact was noticed as volumes of train traffic varied based on demand changes throughout the years. Obviously, that is no longer the case and changes in rail volume loads will have significant impact to hundreds of thousands of people who now live in the west suburban communities affected.

STB must evaluate a twenty year timeframe when projecting the impacts to the population and roadway networks in the affected communities. Conditions within the southwest suburban area (mainly Will and Kendall Counties) are changing so rapidly and so much growth is occurring that even 5-year projections are not adequate to determine an accurate impact of the sale on this area and region. Population levels and traffic counts will continue to increase in the affected communities and the impacts and concerns identified in this analysis will be magnified by the sheer volume of population growth within the area.

Further, STB should give due consideration to phasing of conditions of approval. For example, conditions and improvements could be identified as part of approval of the initial sale and further conditions and improvements could be identified as time passes or as rail volumes on the line increase. Phasing of improvements would allow CN to benefit immediately from the increased efficiencies of utilizing the EJ&E line and also require them to re-invest in the line as time passes and their cash flows from the sale are realized.

5. Effect on Emergency Services Delivery: The Village is bifurcated by the main rail line. Emergency services delivery is dependent upon timely access to the roadway network. Although the Village does not oversee fire and ambulance protection (an independent Fire Protection District provides these services) effective and efficient delivery of police, fire, ambulance services, and access to adequate health care facilities are cornerstones to good community planning and quality of life.

Currently, the Fire Protection District serving the Village does not have a facility located on the west side of the EJ&E mainline. Ground has been broken on the first such facility, but it is not yet operational. Additionally, the Village's Law Enforcement Center (Police Station) and Emergency Operations Center (EOC) are both located on the west side of the EJ&E mainline tracks. Western Will County regional dispatch center is also located within the Village's Law Enforcement Center. Access to these facilities is critical in an emergency situation.

In the event of a rail catastrophe, due to the configuration of these emergency services facilities, response times would be lengthened if one or more of the Village's at-grade crossings were blocked by a stopped train. This scenario is the best case scenario. It is possible that in the event of a multi-train disaster, one side of the community could be entirely isolated from the other side of the community. It is also possible that the Village could not effectively utilize its Emergency Operations Center in these scenarios.

The possibility of such a scenario increases with increased rail traffic volume, increased train speeds, an increased number of cars attached to each train and more sophisticated switching scenarios requiring more coordination. Additionally, the possibility for train/car accidents increases with these factors as well as the level of frustration that drivers feel while waiting for trains to pass at-grade crossings.

Additionally, CN has indicated that shipments of hazardous waste through the Village of Plainfield will increase as a result of the merger. The Village is concerned that we would have the equipment and training necessary to respond in the event of an accident or derailment on the line.

As stated earlier, the STB must give ample consideration to having CN fund grade separations for rail crossings on the line. This is a critical and crucial step toward mitigating and alleviating the affect of the proposed sale on the roadway traffic network. The effect of the proposed sale on the roadway network is a fatal flaw and measures to mitigate these impacts must be taken.

As a corollary, the EIS must address the impact of the transaction on the delivery of emergency services. Placement of facilities and the hardships created by additional traffic, longer trains, and greater track speeds must be considered in the analysis involving safety factors.

The STB must consider a condition requiring CN to fund the necessary equipment for all affected communities to be able to adequately and appropriately respond to a hazardous materials situation. Additionally, the STB must consider a condition to have CN provide ongoing emergency response training so that first responders are adequately trained to mitigate the effects of a hazardous materials incident.

6. In addition to providing emergency services, transportation networks are also of critical importance to other governmental agencies and bodies providing services to the Village and its residents. Plainfield Consolidated Community School District 202 is currently the fifth largest school district in the State of Illinois. With the continued growth expected for the Plainfield region, District 202 is projected to become the second largest school district in the state. District 202 is currently searching for sites within the Village limits to place a facility to house approximately 400 school buses it uses to transport students every day. Obviously, having adequate grade separations for rail crossings is essential to ensure the efficient and safe travel of the District's students every day.
7. The effect of the transaction on the future of the STAR Line (commuter rail line): The STAR line has been identified to be an outer loop providing commuter rail service from suburb to suburb within the Chicago area. Currently, a simple hub and spoke system exists in the Chicago area. Federal, State, and Regional leaders have identified the STAR Line as the next phase in the development of light commuter rail service in the Chicago region. Several studies have been conducted and the feasibility of such a line has been established. With the Village's ongoing commitment to the Cool Cities initiative to reduce greenhouse gas emissions and the growth outlined in the region mass transit opportunities including the STAR Line are critical.

CN has been unwilling to commit to allowing the STAR Line to proceed on its tracks after its proposed acquisition of the EJ&E. The EJ&E was willing to share its trackage with METRA to achieve the vision of the STAR commuter line. CN has been unwilling to make a similar commitment. CN has even stated that its core business is serving as a freight hauler. As such, its motivations are to maximize the amount of freight that it can move over its tracks. CN has stated

that it would consider allowing another party to construct a light rail line at the other party's expense, but has not committed to such a position. This line could then be utilized as the commuter rail line.

It is extremely unlikely that this scenario would provide a cost effective solution and opportunity to achieve the STAR Line. One of the reasons that the STAR Line was such an attractive option to area officials was that the EJ&E railway was willing to allow its tracks to serve as the STAR Line with minimal additional construction.

Based on the level of planning that has occurred with the STAR Line proposal, several communities have identified station sites along the line and affected planning and zoning changes to implement the vision. The City of Naperville acquired two sites for rail stations along the proposed STAR Line. In November of 2006, the Village of Plainfield expended approximately \$7.5 million to acquire 57 acres of land adjacent to the EJ&E rail line. It is the Village's vision to utilize this land for a train station, parking, and a transit oriented development opportunity within the Village.

If the STB is inclined to approve the sale of the EJ&E line, a condition MUST be imposed to require CN to allow the STAR Line to run on its tracks and to require CN to finance any additional construction necessary to allow for the operation of the commuter rail line on the EJ&E line.

8. The impact of the double tracking improvements contemplated within and proximate to the Village of Plainfield must be evaluated. Allowing double tracking and siding improvements to the line will result in multiple accelerations and decelerations of trains in and proximate to the double tracked zones.

When one train has to switch tracks and/or stop to allow another train to pass, lower train speeds result from the acceleration and deceleration process. This has the impact of longer times proceeding through at-grade rail crossings, thereby increasing delays encountered.

Double tracking zones have been proposed both within and adjacent to Village boundaries. This issue has greater importance and emphasis for the Village of Plainfield with the number of crossings (eleven (11)) that are located within Village boundaries.

The Village must again stress that the STB must give ample consideration to having CN fund grade separations for rail crossings on the line. This is a critical and crucial step toward mitigating and alleviating the affect of the proposed sale on the roadway traffic network. The affect on the roadway network is a fatal flaw in the proposed sale and measures to mitigate these impacts must be taken.

Additionally, the STB must place a higher priority on grade separations in double tracked areas or those areas where multiple accelerations and decelerations of train traffic will occur due to the more pronounced impacts that the acceleration and deceleration process has on at-grade rail crossings.

The STB must also evaluate whether double tracking is indeed appropriate in those areas for which it is proposed.

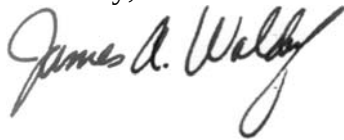
9. Antiquated Circuitry: Switching mechanisms on the mainline and the Illinois River Branch line are still manually operated. This results in lengthy delays on the roadway network as the train engineer stops to manually switch the track mechanism. Automated switching is available but to date EJ&E has been unwilling to invest in its system to upgrade the switches to mitigate this impact.

If the STB is inclined to approve the sale of the EJ&E line, a condition MUST be imposed to require CN to fund an upgrade to manual switching circuitry at all manual switching locations. By requiring such a condition, the STB would be putting measures in place to alleviate the significant roadway delays that occur from the switching activities.

The Village of Plainfield appreciates this opportunity to comment on the proposed scope of the EIS. The Village looks forward to receiving the draft copy of the EIS and providing comment to the STB as the process moves forward.

Thank you for your consideration.

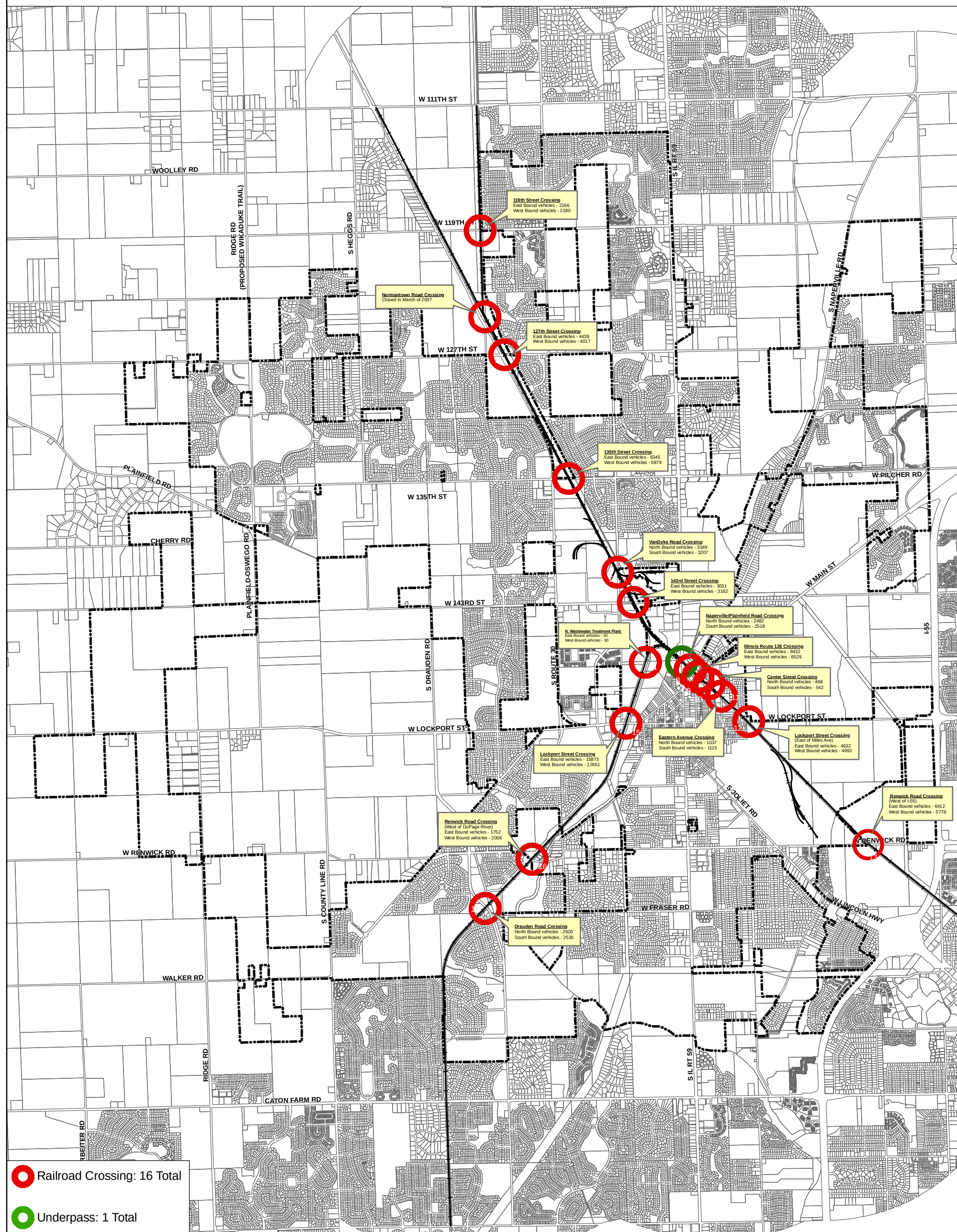
Cordially,

A handwritten signature in black ink, appearing to read "James A. Waldorf". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

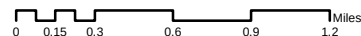
James A. Waldorf
Village President

Railroad Crossings, 2008

Village of Plainfield, IL

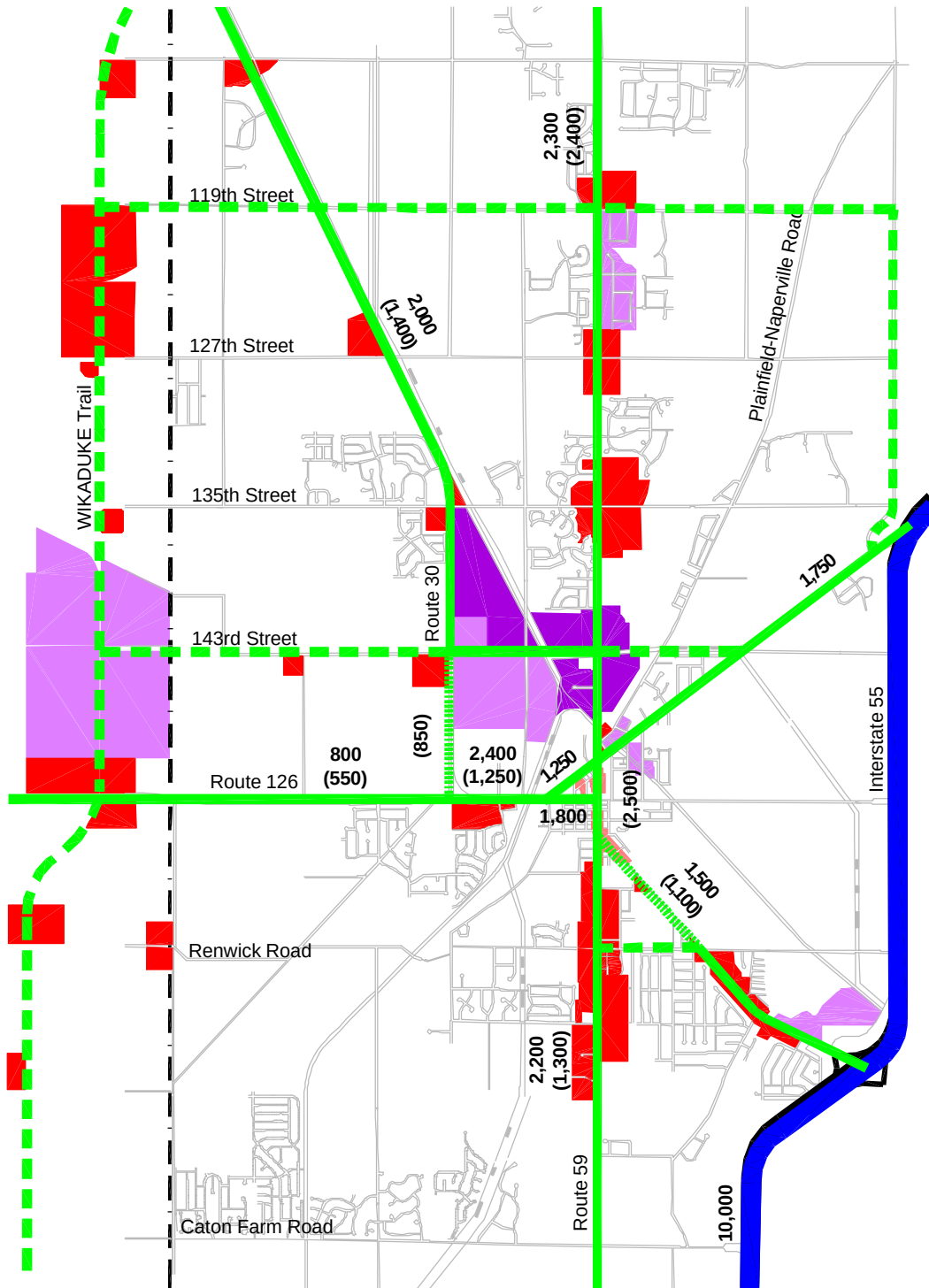


#1 Crosses 119 th St. West of Normantown Rd.	#10 Crosses Center St. East of Route 59
#2 Crosses Normantown Rd. North of Route 30	#11 Crosses Eastern Ave.
#3 Crosses 127 th St. East of Route 30	#12 Crosses Lockport St. East of Miles Ave.
#4 Crosses 135th St. East of Route 30	#13 Crosses Renwick Rd. West of I-55
#5 Crosses Van Dyke Rd. North of 143 rd St.	#14 N. Wastewater Treatment Plant
#6 Crosses 143 rd St. East of Van Dyke Rd.	#15 Crosses Lockport St. West of the DuPage River
#7 Crosses Over Route 59 (underpass)	#16 Crosses Renwick Rd. West of the DuPage River
#8 Crosses Naperville Rd. East of Route 59	#17 Crosses Drauden Rd. South of Van Dyke Rd.
#9 Crosses Illinois Route 126 East of Route 59	



Community Development Dept.
GIS Division
January 2008

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LEGEND

	CLASS I TRUCK ROUTE	(X,XXX)	1992 AVERAGE DAILY HEAVY COMMERCIAL TRAFFIC
	CLASS II TRUCK ROUTE	X,XXX	2000 AVERAGE DAILY HEAVY COMMERCIAL TRAFFIC
	EXISTING TRUCK ROUTE TO REMAIN		GENERAL COMMERCIAL LAND USE
	NEW DESIGNATED TRUCK ROUTE		TRANSITIONAL COMMERCIAL LAND USE
	DESIGNATED TRUCK ROUTE TO BE DECLASSIFIED		HEAVY INDUSTRIAL LAND USE
			LIGHT INDUSTRIAL LAND USE



May 20, 2002

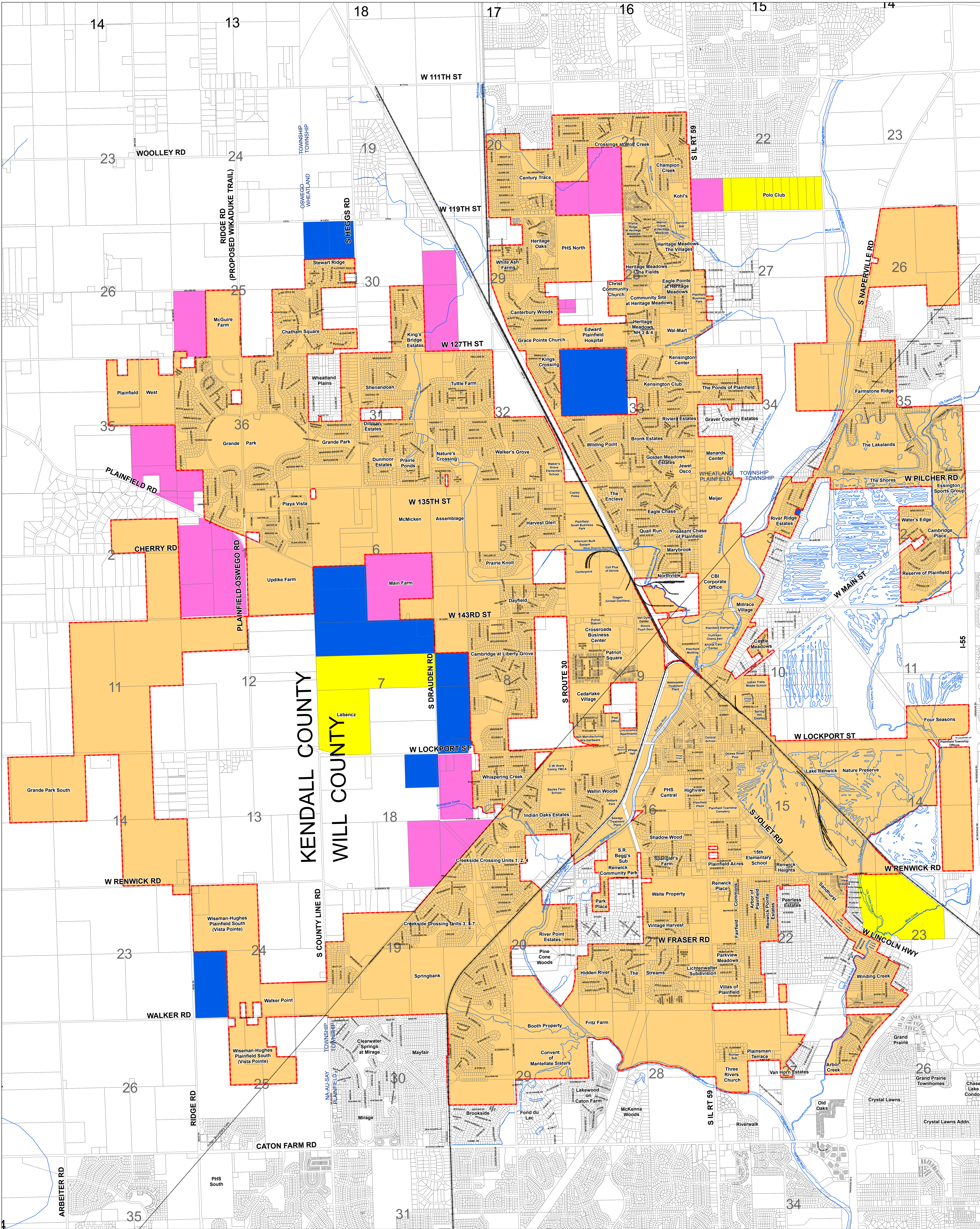


VILLAGE OF PLAINFIELD

Truck Routes Map

Village of Plainfield, Illinois

2008 Development Map



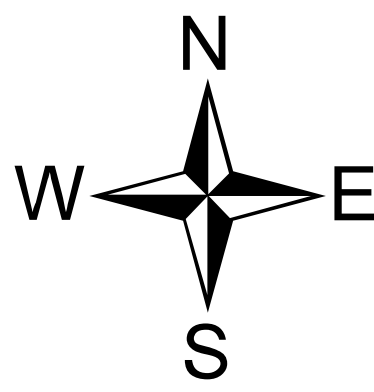
Development Status

- Current
- Pending Annexation
- Pre Annexation
- Proposed Annexation
- Unincorporated
- Village Boundary

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Community Development Department
GIS Division
January 25, 2008



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