

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
December 9, 2016
Part of
Public Record

STB Docket FD 36075

**THE ILLINOIS STATE TOLL HIGHWAY AUTHORITY – PETITION FOR
DECLARATORY ORDER**

**LIMITED REPLY STATEMENT OF THE
SOO LINE RAILROAD COMPANY
d/b/a CANADIAN PACIFIC**

Soo Line Railroad Company d/b/a Canadian Pacific (“CP”)¹ submits this limited reply in opposition to the procedural schedule sought in The Illinois State Toll Highway Authority’s (the “Tollway”) Petition for a Declaratory Order (the “Petition”) filed November 23, 2016. CP reserves its rights to file a substantive opposition to the Petition.

I. Introduction

The Petition seeks a declaration by the Surface Transportation Board (the “Board” or the “STB”) that the Tollway’s takings of numerous portions of CP’s active right-of-way in Chicago in order to build several bridges on and in CP’s right of way would not unreasonably interfere with rail transportation and therefore would not be subject to federal preemption. The proposed takings involve, however, critical and irreplaceable CP rail operating property in Chicago, the fragile and already congested heart of the North American rail network. Not only that, to build these bridges would require shutting down CP’s mainline track repeatedly for up to 14 hours

¹ Canadian Pacific (CP) is a trade name under which Canadian Pacific Railway Company’s United States subsidiaries, Soo Line Railroad Company, Dakota, Minnesota and Eastern Railroad Corporation, and Delaware and Hudson Railway Company, Inc. operate. Bensenville Yard and the tracks referred to herein are owned and operated by Soo Line Railroad Company.

over an extended period, which would be enormously disruptive to interstate rail operations and would jeopardize the fluidity of an already stretched-to-the-limit Chicago rail network.

The proposed takings consist of temporary takings of 6.613 acres of CP's right of way during the Tollway's estimated five (5) years of construction and 2.85 acres of permanent takings for bridge piers and decks. The takings would substantially impair CP's ability to use its right of way to meet both short-term and long-term future capacity demand. Importantly, when completed, the Tollway would be locked into an alignment through CP's Bensenville Yard, thus jeopardizing CP's operations at arguably the most important rail yard in its network and a major rail yard in the greater Chicago Terminal. While such takings would be bad enough if the Tollway had no other options, other options that would not burden interstate rail transportation do exist, but the Tollway refuses to consider them.

The Tollway's proposed procedural schedule is based on tactical considerations, not on a valid good cause justification. Ostensibly, the Tollway seeks a fast-track schedule for its Petition, but, in reality, the only proposed fast-track deadline is December 13 for CP's reply, which is far too short for CP to respond adequately to the Tollway's nearly 900-page filing, and effectively precludes any chance for limited discovery which CP submits would aid the Board's decision making, given the substantial implications of the Tollway's proposed takings on CP's operations, the national rail network and the Chicago metropolitan area. After that extremely fast initial deadline, the Tollway's proposed procedural schedule takes a leisurely turn, proposing that the general public have until mid-February to file comments, further suggesting that the Tollway's request for expedited consideration is tactical and not based on any valid need for expedited resolution. Accordingly, CP believes that it would be in all stakeholders' interest that the Board,

should it initiate a proceeding, adopt a reasonable schedule that allows for the development of a more robust and complete record.

Not only does the Tollway want to “rush” through a Board decision, but it also wants the Board to cabin its decision to an overly narrow question related to building these bridges, and completely disregard the fact that these proposed takings would lock the Tollway into an alignment through CP’s Bensenville Yard. If the Tollway completes this phase of the construction, it will have built facilities that virtually abut the front and back gates of the Bensenville Yard, yet without any connection between them. It cannot be gainsaid that once these facilities are in place, the story would not end there. Rather, allowing these facilities to be constructed would place enormous pressure on CP, as well as the STB and Congress, to allow the Tollway to connect the dots, as it were.

Completion of the Tollway would require temporary and permanent takings of substantial portions of CP’s rail yard, disrupting current yard operations and depriving CP of precious rail operating property needed to meet the growing demand for rail service. CP believes that the Board must not isolate the proposed bridge building as a stand-alone and complete project (as the Tollway proposes), but, instead, properly consider them as components of a broader project, and address the inevitable implications of the Tollway’s insistence on constructing a Tollway in and across a major freight rail yard. Viewed in this light, the Petition necessarily puts federal preemption and the impact on Bensenville Yard at issue. Accordingly, CP seeks clarification from the Board whether it will address the project as a whole in this proceeding. If not, CP may file a declaratory order petition asking for such a ruling.

II. Background

On November 23, 2016, the Tollway filed a voluminous Petition seeking a declaration that the takings of several portions of CP's active right-of-way in Chicago to build bridges on and in the right of way would not unduly interfere with rail transportation and therefore should not be subject to federal preemption.

A. The Proposed Takings Would Harm CP Rail Operations and Set the Tollway on a Collision Course with a Major Rail Yard

The Petition concerns one stage of the Elgin-O'Hare Western Access ("EOWA") Project, a multi-stage tollway construction project to build an east-west tollway that approaches O'Hare International Airport ("O'Hare" or the "Airport") from the west (the "Western Access Tollway") and a north-south tollway that would connect I-90 north of O'Hare to I-294 south of O'Hare via the Airport's western perimeter (the "Western Bypass"). See Tollway's proposed right of way map attached hereto as Exhibit A. The two sections would connect at the Airport via four bridges over York Road, CP's mainline track, and Union Pacific's ("UP") parallel mainline track. Each bridge would be supported by a pier built in CP's right of way (the "Western Interchange"). A fifth bridge over CP's mainline would provide access to future development on the western side of the Airport. It too would be supported by a pier built in CP's right of way. As part of the construction of the Western Interchange, the Tollway would construct a section of the southern leg of the Western Bypass to Irving Park Road just north of CP's Bensenville Yard. Construction is estimated to last five years (Petition, at p. 20) during which time the Tollway would occupy 6.613 acres of CP's right of way for staging and construction activities and would shut down rail operations on the CP and/or UP main lines an estimated 31 times. Several of the outages would last for 14 hours. *Id.*, at Ex. A, p. 24.

The Tollway has already commenced construction on the portion of the Tollway immediately south of the Yard. In the next construction phase, the Tollway plans to construct the southern leg of the Western Bypass across and through the Yard to complete the Western Bypass. The Tollway intends to tunnel under METRA's main lines before emerging above ground within the Yard (where the turntable and other facilities are currently located). See detailed map of the proposed route through Bensenville Yard attached hereto as Exhibit B. The roadway would then shift to the east running next to CP's tracks over land currently occupied by CP's transload facility, all within the bounds of the Yard. The Tollway also intends to build a new secondary road, Taft Road which would bisect the Yard at its midpoint and would occupy land currently used by CP for its mechanical shop and related facilities. These plans would require the Tollway to acquire 36.43 acres of Bensenville Yard and for CP to undertake a substantial reconfiguration of the Yard within the remaining Yard property. In addition to inevitable disruption during years-long construction, the Tollway's plans would permanently deprive CP of the use of property critical to CP's ability to meet future capacity needs, and would significantly constrain CP's ability to reconfigure the Yard in the future to address changes in the industry. The Tollway intends to build through the Yard notwithstanding the fact that CP has repeatedly advised the Tollway that constructing through Bensenville Yard, arguably CP's most important real estate in its rail network and a critical component of the national rail network, is not a viable option.

B. Bensenville Yard is Crucial to CP's and the National Rail Network

With six Class I railroads meeting and interchanging approximately 25% of all U.S. rail freight there, Chicago is the heart of the North American rail network. CP's Bensenville Yard, which sits immediately south of O'Hare, is one of the largest rail yards in the greater Chicago Terminal. It is also CP's only rail yard in the Chicago Terminal and one of CP's busiest.

Bensenville Yard operates 24/7, 365 days a year, includes 119 tracks, an intermodal terminal, a bulk goods transfer facility, a mechanical shop, a locomotive turntable, and various other facilities. Several million tons of freight pass through Bensenville Yard each year. The mainline through the Yard is owned by METRA which operates 58 commuter trains through the Yard each weekday, adding an extra challenge and capacity constraint to Yard operations.

Yard fluidity is crucial to the health of CP's network and the freight rail network as a whole. Congestion has been an ongoing problem, and despite efforts by the industry to ease the problem, Chicago remains fragile. Even a small disruption to operations at a major Chicago rail yard can have significant consequences that quickly cascade throughout the network. The fragility was on display during the winter of 2013-14 when severe winter weather combined with a bumper crop to produce gridlock in Chicago that disrupted rail service across North America. Recovery was a long and difficult process lasting well into the year.

C. CP's Right of Way is No Ordinary Rail Right of Way

In addition to Bensenville Yard, CP owns the mainline and right of way running parallel to the western perimeter of O'Hare. CP's 100-foot rail right of way and its mainline extend from the western end of the Yard 1.8 miles to the junction with UP at Bryn Mawr Junction (the "Right of Way"). The Right of Way is bounded by York Road on the west and UP's mainline on the east. From Bryn Mawr Junction north, CP operates over the UP's mainline via trackage rights as CP does not own mainline beyond that point. The Right of Way and the Yard are virtually the only rail operating properties that CP owns and controls in Chicago. Given the near impossibility of acquiring additional property for rail operations in the area, these properties are crucial to CP's ability to meet future demand. The proximity to the Yard makes the Right of Way particularly valuable to CP and irreplaceable. With freight volumes expected to increase

substantially -- by some estimates, to double -- over the next 25 years², CP reasonably expects that it will eventually utilize every square inch of these properties.

As will be further detailed in CP's substantive reply, CP is considering several potential improvements for the Right of Way north of the Yard. These include adding staging tracks, inspection tracks, and various transfer facilities. If the Tollway were to take CP's property rights in its right of way, CP's ability to utilize this operating property would be foreclosed in whole or in part. For example, the encroachment of the bridge piers in CP's Right of Way would restrict the number of staging and/or inspection tracks that could be safely constructed, operated and maintained. The presence of the bridge piers and bridge decks overhead may limit or foreclose other options due to height restrictions and/or safety concerns. Further, the Tollway estimates that construction of the Western Interchange will take five years. Until construction is completed, CP's ability to add tracks or make other improvements on its Right of Way would be foreclosed entirely.

During construction, CP's operations on the mainline would be subject to significant disruptions. The Tollway currently estimates that there would be 31 mainline outages including 19 CP track outages. Some outages will last up to 14 hours. As the Tollway observes, however, CP's use of the mainline coming north from Bensenville is already constrained by METRA, particularly during morning and evening rush hour. Thus, CP's operating window in and out of Bensenville is already narrow. Narrowing it further would be enormously disruptive. Given the fragility of the Chicago network, the impact of such disruption could be far reaching.

² See <http://www.isasce.org/wp-content/uploads/2014/04/2014-Illinois-Rail-Final-Report.pdf>

D. The Tollway Refuses to Consider Options That Would Not Burden Interstate Rail Transportation

The Tollway has other alignment options that avoid Bensenville Yard and much of the Western Interchange which it inexplicably refuses to consider. The Tollway's refusal is mystifying as there has never been an agreement between CP and the Tollway to a routing through its rail properties.³ In fact, since discussions between CP and the Tollway commenced, the Tollway has been aware of CP's concerns regarding the impact on operations and on the ability to meet future capacity. These concerns are alluded to in the Tier 2 Environmental Impact Statement (EIS) which references "numerous concerns and conditions" identified by CP including its mindfulness of "the ability to expand in the future" and "maintaining full operation of the yard...during the construction of the proposed roadway."⁴ The Tollway has never satisfied CP management's concerns with respect to an alignment either over the Right of Way or through Bensenville Yard. CP has repeatedly advised the Tollway that its property is not for sale and recommended that the Tollway pursue other alignment options. The Tollway's obstinacy in refusing to do so appears to be based on parochial interests, pitting undisclosed local interests against the clear national interest in maintaining a healthy and sound rail freight network.

III. The Board Should Consider the Impact of the Whole Project on Interstate Rail Transportation

The Tollway's Petition asks the Board to consider only the direct impact of constructing the Western Interchange on CP's freight operations. It asks the Board to disregard the next phase of this multi-phase construction project which calls for construction of the Western Bypass

³ Periodically, the Tollway discussed with CP proposed alignments through the Yard. Those discussions were subject to the caveat that CP's participation was not an agreement to the proposed alignments.

⁴ Elgin O'Hare-West Bypass Study: Tier Two Final Environmental Impact Statement, § 3.4.2 available at <http://apps.dot.illinois.gov/fileexplorer/?search=environment\Elgin-Ohare%20Final%20EIS>.

through Bensenville Yard. According to the Tollway, the construction of the Western Interchange has independent value, namely providing western access to Airport property in order to access future development including the future Western Terminal called for in the 2001 O'Hare Modernization Program. Currently, however, there is no Western Terminal or other facilities and there are no plans to build a Western Terminal anytime soon. In fact, the most recent modernization plan, which was announced by the City of Chicago on July 15, 2016, includes no plans to build a Western Terminal.⁵ Moreover, only one of the five bridges provides Airport access. The other four bridges provide exit and egress from the southern and northern legs of the Western Bypass. Thus, the Tollway's emphasis on the western airport access as an independent justification for moving forward with the construction of the Western Interchange is highly suspect, and appears to be pretext.

The more important issue, which the Tollway wants the Board to disregard, is that the construction of the Western Interchange commits the Western Bypass to an alignment through Bensenville Yard. Indeed, in this construction phase, the Tollway plans to build the bridges and the Western Bypass from I-90 south virtually to the Yard's northwest property line. It is currently building from I-294 north to the Yard's southwest property line, and has acquired multiple properties, demolished buildings and brought in thousands of tons of soil along the Yard's southern property line that will be necessary to complete the Western Bypass through the Yard. Notwithstanding the Tollway's representations that it might not ever complete the Western Bypass, its current plan is to do so, and there is no rational basis to believe that the Tollway will not pursue that plan. At the very least, it is reasonably foreseeable that the Tollway will seek to complete the Western Bypass through the Yard.

⁵ See <https://www.cityofchicago.org/content/dam/city/depts/mayor/Press%20Room/Press%20Releases/2016/July/7.15.16Terminal5Expansion.pdf>

Stopping construction at the front and back gates of Bensenville Yard is not plausible. Rather, the very completion of this construction will put considerable political pressure on CP to cede sections of the Yard, on this Board to allow the Tollway to take the property necessary to complete the connection, and/or on legislators to fashion a legislative solution. The alternative -- the Tollway builds the Western Interchange but is unable to complete construction through the Yard -- means it will have wasted millions, if not billions, of dollars building sections of the Western Bypass that serve little or no purpose and are unlikely to generate the toll revenue on which the Project is premised. Thus, the Tollway will attempt to complete construction through the Yard, at enormous cost to CP and its customers, to the rail network, railroad industry, and to the national economy. As a result, the Board should consider the current proposal to be steps in a larger project and address the project as a whole now. Such consideration would be consistent with the Rail Transportation Policy (“RTP”) established by Congress. The RTP directs the Board to “promote a safe and efficient rail transportation system” and “ensure the development and continuation of a sound rail transportation system with effective competition among rail carriers and with other modes, to meet the needs of the public and the national defense.” 49 U.S.C.A. § 10101(3),(4).

IV. The Board Should Allow CP to Conduct Limited Discovery

CP believes that the proposed takings are clearly preempted under well-established precedent. *See e.g., Tri-City Railroad Company—Petition for Declaratory Order*, FD 35915 (STB served Sep. 14, 2016). Nevertheless, given the importance of this proceeding, CP believes that it would be appropriate and helpful to the Board to have before it a more robust and complete record. To that end, CP seeks discovery on a limited number of topics. Those limited topics include the following:

1. Discovery of the Tollway's Alternative Alignment Options

Missing from the Tollway's Petition is any compelling reason why the Tollway *needs* the property at issue, beyond the general statement that "the Tollway is now committed to this project, and delays at this point will cost the public millions of dollars." (Petition, at p. 4.) Indeed, CP has been advising the State of Illinois⁶ since 2009, before it even sought EIS approval for the new highway, that it had not approved of the project. Nevertheless, for the past seven years the Tollway has pushed forward with an ill-advised alignment which requires multiple crossings of CP's right of way and ultimately runs directly through Bensenville Yard, impacting rail operations at each point. It is difficult to understand why the Tollway would insist on its current alignment and seek to disrupt rail transportation through the region, when it could simply exercise its powers of condemnation to route the new highway around CP's facilities. To date, the Tollway has not shared any explanation. CP believes that alternate alignments exist and would better serve the goals of constructing the new highway, likely at a lower overall cost including the Tollway's purported delay costs, considering the substantial expense the Tollway seeks to undertake to build through Bensenville Yard (including tunneling *under* METRA's main lines before emerging above ground within the Yard). CP seeks discovery into the Tollway's underlying studies, data, and plans, and any reasons why an alternate alignment would not be more feasible and avoid affecting regional rail operations.

2. Discovery of the Basis of the Tollway's Expert's Opinions.

The Tollway retained R.L. Banks & Associates to undertake a study of their claims on the effects their taking may have on CP's rail operations. These studies, taken over the past six months, lead the Tollway's expert to form opinions and offer analysis of CP's rail operations at

⁶ The Tollway's EOWA project, and preliminary discussions on the project, originated with the Illinois Department of Transportation before the project was converted to a toll highway and transferred to the Tollway.

the subject area; however, those studies and the opinions presented were ostensibly made from outside observation, represent but a limited snapshot, did not utilize CP's own extensive experience in running its own railroad, did not account for CP's future plans for its rail corridor, and likely relied on a number of unfounded and undisclosed assumptions in reaching their conclusions. CP seeks to discover the bases for these opinions and explore their veracity and reliability.

3. Discovery of the Tollway's Plans for the Development toward Bensenville Yard.

The Tollway claims that construction of the planned Western Bypass to Irving Park Road, at the northern boundary of CP's Bensenville Yard, has value independent of whether it completes the southern leg of the Western Bypass through Bensenville Yard. Based on this claim, the Tollway argues that the Board should not consider the impact on the Yard. CP believes that there is no factual support for the construction of a standalone terminus at Irving Park Road, and the real goal of obtaining permission to construct the overpasses needed for such route is to force its way through Bensenville Yard, a design that the Tollway will have locked itself into by constructing the requested overpasses. CP seeks discovery into the Tollway's underlying studies, data, and plans that support the Tollway's claims.

V. The Board Should Adopt a Reasonable Procedural Schedule

The Tollway seeks expedited consideration due to alleged concern about possible delay to its current contracting and construction schedule. However, this puts the cart before the horse because Board approval should be the first step, not a retroactive rubber stamp on the Tollway's plan. The Tollway's purported "need" for expedited consideration is thus self-inflicted and self-serving. The importance of this proceeding to all stakeholders supports a more deliberate approach that affords CP, and others, adequate and reasonable time to respond to the Tollway's voluminous filing.

Notably, until filing the Petition, the Tollway vigorously and thus far successfully resisted efforts by CP to obtain clarity as to the legal rights and obligations of the parties with respect to the proposed alignment. CP filed a federal court action in November 2015 seeking a declaratory order that efforts to take rail property for the entire project via state regulatory power are preempted by the federal transportation scheme. But, there, as it is attempting to do before the Board, the Tollway sought to have the proposed takings of the Right of Way for the construction of the Western Interchange considered separately from the proposed taking of property in CP's Bensenville Yard. Yet, as shown above, treating each of these separately as an independent, stand-alone project, rather than together as a single, integrated project, is implausible both economically and operationally. Further, the alleged sudden need for a rushed Board decision results entirely from the Tollway's choice not to seek an earlier ruling despite the fact that the Tollway has long been aware of CP's position. Besides seeking a federal district court declaratory order in November 2015 regarding federal preemption, CP unequivocally rejected the Tollway's offer to acquire the Right of Way property on April 22, 2016. Yet, the Tollway waited seven (7) months, until November 23, 2016, the eve of the Thanksgiving holiday, to file its Petition at the STB seeking expedited consideration.

The Tollway's proposed procedural schedule further illustrates the self-serving nature of the Tollway's request for expedited action. While the Tollway proposes that CP's reply to its nearly 900-page filing which includes previously undisclosed expert technical reports, be due by December 13, 2016, it proposes that the public have nearly three months, until Sunday, February 12, 2017, to file comments.

The implications of this proceeding for the Tollway, CP and the rail network go far beyond the temporary disruptions and risks associated with unsubstantiated construction delays

and costs. They go to whether CP can operate effectively and efficiently in Chicago to meet growing demand, and what potential effects the inevitable takings in the Bensenville Yard will have on operation of the national rail network. Under these circumstances, it is particularly important that CP be afforded adequate time to prepare and file its substantive reply demonstrating its serious concerns. Not providing adequate time for CP's reply will also deprive the Board of the benefit of a robust and complete record. Accordingly, if the Board decides to initiate a declaratory order proceeding, CP requests that the Board adopt the following procedural schedule which provides an opportunity for CP to conduct discovery as well as adequate time to formulate its reply:

Day 1 – Board initiates proceeding; discovery begins

Day 120 – Discovery Ends

Day 150 – CP's Substantive Reply/Public Comment Due

In the event that the Board declines to allow discovery and is inclined to expedite proceedings, CP proposes that its substantive reply and any public comments be due on February 23, 2017, i.e., three months from the filing of the Petition.

Except as expressly admitted herein CP denies the allegations in the Petition.

CONCLUSION

For the reasons stated above, CP requests that, if the Board initiates a declaratory order proceeding, the Board establish a procedural schedule that provides for the development of a full and complete record and provides a reasonable and adequate time for CP to file its substantive reply. Further, CP asks that the Board clarify that the scope of the proceeding will address federal preemption in the context of the Tollway's project as a whole.

Dated: December 9, 2016

Respectfully submitted,

Jeffrey J. Ellis
Chief Legal Officer
CANADIAN PACIFIC
7550 Ogden Dale Road SE
Calgary, AB T2C 4X9
403-660-1479

Charles W. Webster
Senior Counsel
CANADIAN PACIFIC
11306 Franklin Avenue
Franklin Park, Illinois 60131
630-860-4161

/s/ David F. Rifkind
David F. Rifkind
STINSON LEONARD STREET LLP
1775 Pennsylvania Avenue, NW, Suite 800
Washington, D.C. 20006
202-969-4218
202-572-9994 Fax
david.rifkind@stinson.com

Richard T. Sikes, Jr.
Kevin W. Baldwin
DALEY MOHAN GROBLE, P.C.
55 West Monroe Street, Suite 1600
Chicago, Illinois 60603-5001
312-422-9999
313-422-5370 Fax

Attorneys for Soo Line Railroad Company

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2016, I served the foregoing Limited Reply Statement of the Soo Line Railroad Company d/b/a Canadian Pacific by first class mail, postage-prepaid, on the following:

The Illinois State Toll Highway Authority
Lisa Madigan
Attorney General of the State of Illinois

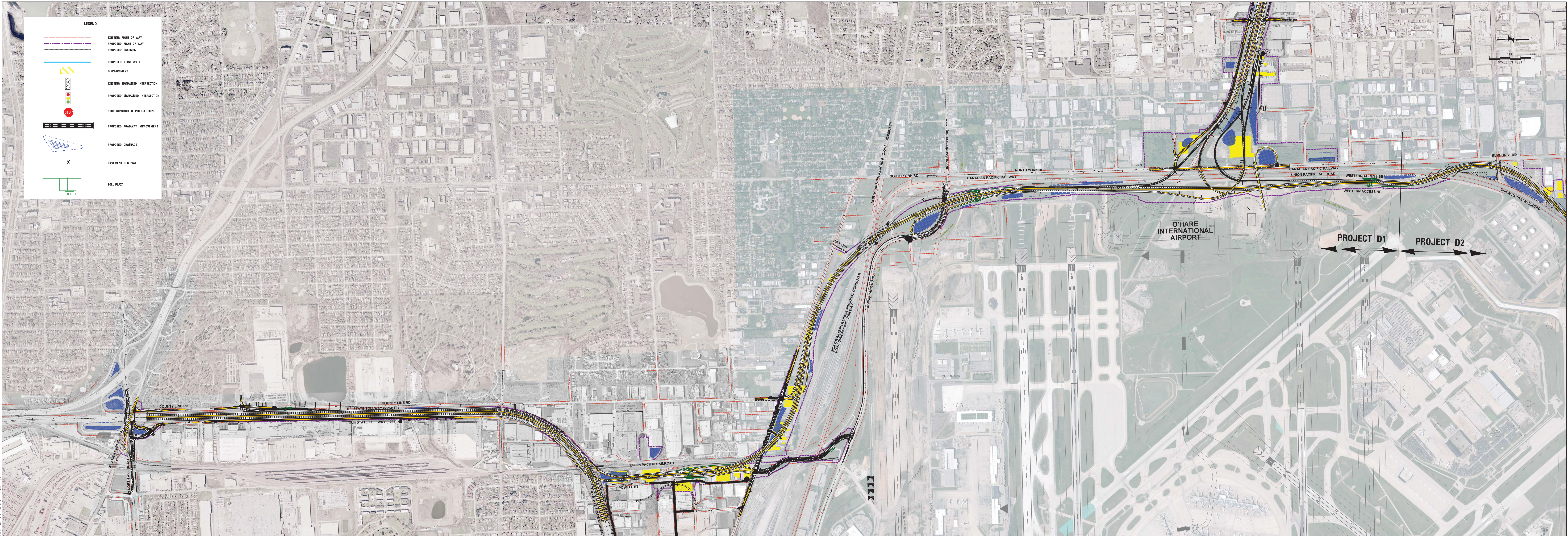
and by electronic mail and first class mail postage-prepaid on the following:

David A. Goldberg
Assistant Attorney General
General Counsel
Illinois State Toll Highway Authority
2700 Ogden Avenue
Downers Grove, IL 60515
(630) 241-6800
Dgoldberg@getipass.com

/s/ David F. Rifkind

David F. Rifkind

EXHIBIT A



FILE NAME: EOWA-DIEMR-P01-011-CDP1.mxd

EOWA PROJECT CONCEPT DESIGN
WESTERN ACCESS AND
I-294 AT ILLINOIS ROUTE 64

PREPARED BY:
CH2MHILL.

TOTAL SHEETS	SHEET NO.
6	5

EXHIBIT B



Elgin O'Hare
Western Access

LEGEND

- Project Footprint
- County Boundary
- Canadian Pacific Soo Line
- Land Acquisition Type
 - Fee Simple
 - Permanent Easement
 - Temporary Easement

IL 390/I-490 Interchange Parcels

Area A	Acquisition Type (Acres)			
Tollway ID	Fee	Permanent Easement	Temporary Easement	Grand Total
WA-2D-12-191.P	0.00	1.74	2.53	4.27
WA-2D-12-195.P	0.00	1.24	0.68	1.92
Grand Total	0.00	2.98	3.21	6.19

Yard Parcels

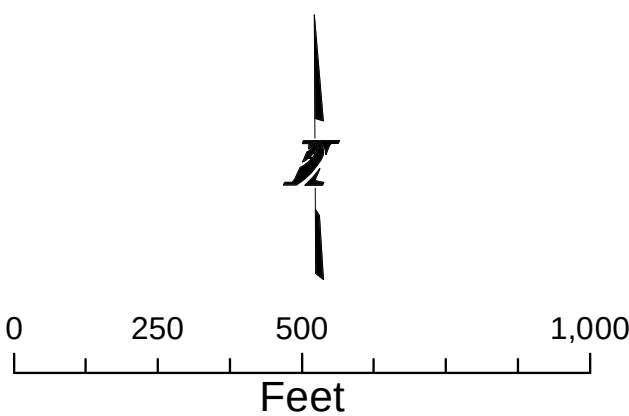
Area B	Acquisition Type (Acres)			
Tollway ID	Fee	Permanent Easement	Temporary Easement	Grand Total
WA-1D-12-046	16.91	2.08	1.72	20.71
WA-1D-12-066	2.22	1.33	2.71	6.26
Grand Total	19.13	3.41	4.43	26.97

Spur Track Parcels

Area C	Acquisition Type (Acres)			
Tollway ID	Fee	Permanent Easement	Temporary Easement	Grand Total
WA-1D-12-004	0.59	0.00	0.00	0.59
WA-1D-12-009	1.74	0.00	0.94	2.68
Grand Total	2.33	0.00	0.94	3.27

SUMMARY

	Acquisition Type Acres)			
Area	Fee	Permanent Easement	Temporary Easement	Grand Total
IL 390/I-490 Interchange				
Parcels	0.00	2.98	3.21	6.19
Yard Parcels	19.13	3.41	4.43	26.97
Spur Track				
Parcels	2.33	0.00	0.94	3.27
Grand Total	21.46	6.39	8.58	36.43



Basis for
IL Tollway Appraisal
September 24, 2015

