



Salina Township Fire Protection District

144 S. East Avenue, P.O. Box 126 • Bonfield, IL 60913 • (815) 935-1411



June 1, 2017

Ken Blodgett

Surface Transportation Board

DOCKET No.: FD **35952** - Great Lakes Basin Transportation Corp, LLC Project 243681

395 E. Street SW

Washington, DC 20423-0001

Honorable Ann D. Begeman, Acting Chairman

United States Surface Transportation Board

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395 E. Street SW

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ENTERED
Office of Proceedings
June 2, 2017
Part of
Public Record

Dear Mr. Blodgett and Honorable Ms. Begeman,

The Salina Township Fire Protection District (District) Board of Trustees (Board), serving the Village of Bonfield, Illinois and the surrounding community, has concerns which should be addressed by the Surface Transportation Board regarding the Great Lakes Basin Transportation, Inc. application to construct and operate a rail line through our Fire Protection District. The overriding concern of the Board is whether the public convenience and necessity overrides the safety of the citizens of and those traveling through Salina Township as well as District First Responders and those First Responders providing aid to the District.

We have reviewed the application submitted by Great Lakes Basin Transportation, Inc. on May 1, 2017, but find our concerns outlined in our environmental scoping comments have not been sufficiently addressed. As such, we have restated and in some cases revised them below:

Safety

- With the stated objective of the proposed line, to avoid major population centers, we assume freight on the rail line and possibly the utility easement will include hazardous materials. An assessment of potential risks along with a mitigation strategy should be developed. It should include potential impacts on people, property and the environment should an incident occur.

- Development of the rail line and utility easement will add nine (9) At Grade Crossings and undetermined number of Private Road Crossings to our response area. This creates safety risk for people, property and the environment. Risk of an incident and an environmentally damaging release may come from trains and the utility easements, but they may also come from farm equipment or vehicle traffic involved in the incident. An analysis is needed to determine the probability of each type of incident and corresponding emergency response necessary including the number of personnel by skill level and equipment needs to properly handle the incident. It should be noted that Kankakee County does not have a Level 1 Trauma Center.
- Due to increased risks noted in the first two points above, there will be a need for increased training of first responders (fire, EMS, law enforcement). This will require an analysis of the type and level of training necessary. It also needs to be determined how the training would be conducted: online? locally held classes? locally conducted hands-on/practical training? Further, who will bear the cost of training? If travel is required, who covers the cost of travel, room and board?
- Related to training, will our personnel be compensated for attending or successfully completing training? Our District is a volunteer department. Our responders are paid \$1/year in order to meet workman's compensation requirements, regardless of the number of calls they respond to, how much training they attend or work they do for the District. All responders have other jobs, careers or are attending school. They give up their time to give back to the community and help their neighbor.
- We hope rail and/or utility related incidents will be low, but in the event of a significant incident (not including a potentially catastrophic event), neighboring departments in our county-wide MABAS (Mutual Aid Box Alarm System) and potentially regional resources will be called upon to assist. As such, an analysis will be required to determine the personnel, skill/training requirements for responding personnel, and equipment needs to properly handle likely incidents.
- Our District has no pressurized water supply (no fire hydrants). Our ability to fight a large fire or provide effective vapor disbursement is limited by water tender/tanker shuttle operations. Analysis is required to determine if additional equipment is necessary, if new fill sites need to be established and what will be required to develop new mutual aid box cards to address potential rail/utility incidents.
- The rail line/utility easement will cause disruption and delays to movement of emergency vehicles due to At Grade Road Crossings and potentially Private Road Crossings. This will include delays during normal operation as well as during construction and maintenance of the line, easement and all crossings.

We will require information from GLBT regarding the frequency of trains, duration of crossing blockage during passage of a trains or stopped on the tracks. How frequently can we expect trains to block crossings? How long will or can a train block a crossing?

- Based upon the information above, an analysis of response times is required for our District including:
 - Arrival at an incident opposite the tracks from our station
 - Response time for personnel to report to the station, since more than half of our Responders currently reside opposite the tracks from our station
 - Response times for each of our automatic and mutual aid fire protection districts/departments to determine potential impacts on their responses including times via normal and alternate routes.
 - Ability to successfully conduct rural water supply operations. Our District currently has one fill site, located near our station. An incident requiring water opposite the tracks will be impact water shuttle operation. Unacceptable shuttle operation may force development of additional fill sites.

Unacceptable response times may force us to consider new mutual and automatic aid agreements, new station construction, apparatus and equipment procurement, or hiring of permanent Responders.

- Introduction of the rail line and utility easement in our District will increase call volume. How much of an increase can we expect during construction? During normal operations? Based upon the increase in call volume and potential disruption and delays outlined above, our District will need to determine if we have enough first responders to properly and safely respond to increased number of calls?
- Similarly, increased call volume will impact our County-wide Emergency Dispatch Center - KanComm. An analysis will be needed to determine if KanComm can handle the increased volume or if additional resources and/or equipment will be necessary.
- The proposed rail line and utility easement, as currently mapped, passes close to a Kankakee County emergency communication tower located on 3000 N approximately 9250W (approximate MP 83.20). Any accident involving this facility will cripple emergency response to the entire western portion of Kankakee County as well as counties north and west of Kankakee County. Analysis is needed to ensure the integrity of our emergency communication system.

- The proposed rail line and utility easement, as currently mapped, passes within one (1) mile of a grade school housing 300+ pre-school through 2nd grade students. Analysis will be needed to determine potential risks. Plans and safety procedures will then need to be developed to address each of the risks.
- According to GLBT “Point of Interchange” document filed with the STB, all At Grade Road Crossing are to be equipped with road flashers and gates and bells. We expect these and any other safety devices available are put in place to minimize incidents.
- It would be expected that rail and utilities be required to share information with local authorities, including first responders as to the nature of contents passing through their jurisdiction in general and specifically in the event of unusual or particularly hazardous materials.
- Need to ensure railroad and utility companies have in place a comprehensive emergency response team for immediate consultation and deployment. Standards need to be set regarding the timely arrival of appropriate experts, resources and emergency equipment in the event of an incident.
- Also need to ensure the railroad has in place a comprehensive emergency response tool accessible by any smartphone, tablet or desktop PC with Internet access to provide first responders with exact contents of any rail car along with emergency response information and recommendations from protective action distances.
- Need for review of Federal and State Safety Agencies to ensure all safety related roles and responsibilities are in place to work with local safety agencies, including first responders during the planning, construction and on-going operation of the rail line, rail port and utility easement efforts. This would include:
 - Preparedness, response and recovery for all hazards
 - Coordination of planning and response with local officials including first responders as well as reimbursement of costs incurred to plan and respond
 - Coordination, equipping, training and dispatching response assessment teams
 - Processes and resources in place to oversee and conduct initial response, recovery and cleanup
 - Processes in place to review, assess, bill, collect and distribute fees and fines from responsible parties to first responders in the event of poor preparedness, poor response, safety violation, accident, incident or release

- Processes in place to reimburse first responders for costs incurred due to a safety violation, accident, incident or release.
- Periodic compliance reviews and audits of emergency plans and procedures.

Water Resources

- As mentioned previously, our District has no pressurized water supply (no fire hydrants). Our source of water for firefighting operations is surface and ground water. If a rail or utility event were to compromise our water supply with potentially flammable chemicals we would be left with no firefighting capabilities.

Land Use

- Most of our Fire Protection District volunteer's jobs/careers are related to the agricultural industry. Will the loss of an estimated 16,000 acres from agricultural production cause a loss of farm jobs and loss of current and/or potential volunteers to our District?
- If all drainage issues are not properly addressed, new wet areas could make areas of our District inaccessible by heavy firefighting/rescue equipment. Unfortunately, this will not be known until after construction and periods of heavy rain.

Navigation

- In February 2014, existing County Road 20/N7000 Road West bridge (Warner Bridge) across the Kankakee River was closed for several weeks due to ice jams. A study should be conducted to determine if the addition of the railroad bridge would increase the likelihood of bridge closure impacting emergency vehicle traffic and increasing response time to our District and from our District to our mutual aid Department/Districts.

Noise and Vibration

- Numerous existing commercial and residential structures in our District are old, and not built to withstand vibrations caused by rail traffic. Many of the structures are built on limestone/sandstone foundations which will rapidly deteriorate and pose a risk of collapse. Need mitigation analysis to determine which buildings may be impacted to determine risks to our citizens.

Socioeconomics

- The influx of temporary construction workers may increase the demand for emergency services without an increase in revenues. An analysis should be performed to determine the nature and extent of the increase and possible solution to providing the needed emergency services.

Cumulative Impacts

- Tax implications – It is unclear if current railroads and switching facilities in Kankakee County provide tax revenue to the local community. Analysis of the impact on current taxes needs to be performed to determine the net effect of this project on tax revenue for Fire Protection Districts and other units of government. Rail lines and rail port will require additional services, particularly emergency services from Fire Protection Districts. How will these services be funded? Examples of potential increases include increased operating cost such as:
 - Insurance costs
 - Facility development, operation and maintenance
 - Equipment procurement, operation, maintenance and replacement
 - Training
 - Recruitment and retention of first responders.
- What will be the impact on land values? Our annual budget is based on equalized assessment valuation (EAV) of property (property taxes). If this project results in declining EAV, our budget is reduced. Will the project result in a reduction in property values? If it does, how will the District make up for loss of revenue?

To date, activity surrounding Great Lakes Basin Transportation, Inc. proposal has been done without a lot of transparency. As such, they have done nothing to build our trust in their willingness to work with us to protect our citizens and first responders.

Sincerely,

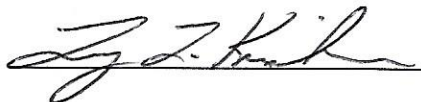


Larry L. Kirchner – Trustee President

Salina Township Fire Protection District

In accordance with the Surface Transportation Board Decision Docket No. FD 35952
Service Date – Late Release June 2, 2017, this document has been re-submitted
with the Certificate of Service to the Applicant.

I certify that I have this day served a copy of this document to the Applicant.

Signed:  Date: June 2, 2017

Larry L. Kirchner - Trustee