



MANTENO COMMUNITY FIRE PROTECTION DISTRICT

May 23, 2017

Mr. Ken Blodgett
Surface Transportation Board
DOCKET No.: FD **35952** - Great Lakes Basin Transportation Corp, LLC Project
395 E. Street SW
Washington, DC 20423-0001

Honorable Ann D. Begeman, Acting Chairman
United States Surface Transportation Board
DOCKET No.: FD **35952** - Great Lakes Basin Transportation Corp, LLC Project
395 E. Street SW
Washington, DC 20423-0001

Dear Mr. Blodgett & Ms. Begeman,

The Manteno Community Fire Protection District (District) Board of Trustees (Board), serves the Village of Manteno, and the Townships of Manteno, Rockville and Sumner in Illinois. We are responsible for a population of 12,500 and provide service & protection for a 96 square mile area. The Board has concerns which should be addressed in the Environmental Impact Statement for the Great Lakes Basin Transportation, Inc. project. As we seek to improve the quality of life daily in our community, the overriding concern of the Board involves the safety of our citizens of and those traveling through our District as well as District's First Responders and those First Responders providing aid to the District.

Our concerns and the questions we seek answers to are as follows:

1. The proposed rail line will create at grade crossings and stub numerous roads that will impede our emergent response to our residents, especially in the western half of our District. As fire doubles every 17 seconds, spending minutes waiting at a crossing or re-routing due to a limited number of crossings available is costly in lost property value and possibly in lives. With multiple tracks proposed, the possibility for one lengthy train to cross and then another several minutes later will create long delays. A large amount of truck & passenger traffic occurs on this two-lane road. A crossing will greatly increase the risk of travel on this road. In addition, we have great concern for the safety



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of our young drivers as the risk of accidents will increase by the proposed rail line, especially if the wait times are extended. An overpass is needed at West 9000N. Rd. to decrease this risk.

2. With the District literally divided by the proposed rail line for a length of 15 miles, we will need additional equipment, firefighter/paramedics and a fire station just to maintain the level of service that we currently provide. And with the construction of the rail line, as well as associated projects, the call volume will increase. Is it fair that the residents & businesses must pay more to keep the service level they enjoy at their current property tax rate? Where will the additional funds to maintain current service levels come from?

3. And with the mention of private road crossings in the proposal, will these be gated with flashers and bells? The risk of motor vehicle into train accidents will rise without crossing protection as evidenced by past history with the Illinois Central (CN) crossings that were originally unprotected in the rural areas of our county and neighboring counties. Many of these crossing accidents at unprotected sites involved young drivers.

4. With a project that seeks for 16000 acres of land, detailed project information is needed so that we may adequately plan for the risks that we will be tasked with mitigating. We can't adequately protect our community, nor our emergency responders if we can't identify the risks through planning & preparation. And without project information, we are unable to perform this very important task. With growth; training, equipment acquisitions & personnel must have a funding mechanism and without the project information, this planning task is also impossible. We need to be allowed access to more project information so that we can prepare and plan for the future growth provided by the project and ultimately our community!

5. In the new proposal, they mention they will have their own fire department. This is a good plan as they can mitigate the small issues and promote safety within their property, but they will not be large enough to fully satisfy the needs of a large scale event. GLBT states that they will support local first responders, but will they cover the costs for preparation, training, equipment and possible responses (mutual aid) or will these costs still be carried by the property owners of our fire district, as well as the neighboring districts.

6. If an oil refinery is placed in the Manteno rail port footprint, the risk of a situation like Lac-Megantic will be present and it will be situated near the Village of Manteno. We have a daily risk with the single line CN rail, but this increased risk is due to the



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increased volume of Bakken crude oil that will be transported to the oil refinery via rail. It's an exposure very similar to the one Lac-Megantic experienced with the increased shipments to the Irving Oil Refinery. How will these risks be addressed prior to construction of the rail line?

7. This proposed rail line is being touted as a bypass of hazardous materials. An analysis is needed to determine what will be transported and what we will need to mitigate the potential release or spill of these materials. We currently evaluate this risk on the CN rail line as we work with CN officials, review the hazardous goods that are transported and plan for those risks. We also receive training assistance from CN and have a good working relationship with them. With this proposed rail line, we will be exposed to risks that are unknown. We know what the response from the CN will entail and what resources they have available to mitigate an incident. What if the goods they are transporting are different from CN and we are not prepared to respond to them? The GLBT application states they "will train first responders to assure that shipments will be safe", but the application falls short of outlining the plan and explaining how the costs of the training will be covered. And the assurance of safety is in planning, preparation & prevention, not in the mitigation stage. At this stage, the incident we want to prevent has occurred. We don't want to be left guessing!

8. If a hazardous material incident occurs and a spill or cloud affects the community, we do not have the necessary resources to notify the community to either evacuate or shelter in place. The financial resources for this equipment is not available to our community nor our county (Kankakee) at this time. How would we secure the ability to obtain these resources?

9. The amount of land that the rail port proposal takes out of private use (agricultural and residential) will have a drastic effect on our real estate property tax base. What will be the revenue loss to our District and where will the funding to replace these funds come from? In addition, how will we fund our District with the expected revenue loss and expected increase in call volume? Should the residents & businesses of our community be shouldering this burden for the sole benefit of others! And will this concern will be exacerbated by falling EAV's (equalized assessment valuations) of property as a result of the proposed rail line?



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Lack of trust in a project can result when issues are ignored and requests are made by the project principles to keep important information hidden. If there is a lack of trust at the beginning, what can we expect further into the process of the project? Is the railroad the real project, or is it a tool for the advancement of other projects that don't have the federal legal standing of a railroad? Trust needs to be encouraged, developed, and maintained from the beginning and this has not yet been demonstrated!

Proposed projects should be able to demonstrate a benefit to all stakeholders. There are still many ambiguities in their proposed/revised plan. And as with all projects, there is the planning & preparation that must be thoroughly completed by all of us in order to properly meet the needs of our communities. We want to minimize the unintended consequences too! And with this project there are concerns we feel need to be addressed by the Surface Transportation Board in their Environmental Impact Statement. These concerns also need to be addressed by the GLBT too as the safety of our citizens, those traveling through our District; and for our District's First Responders who are providing aid to the community represent our highest priority.

Sincerely,

MANTENO COMMUNITY FIRE PROTECTION DISTRICT

Gerald Bengé
Trustee President

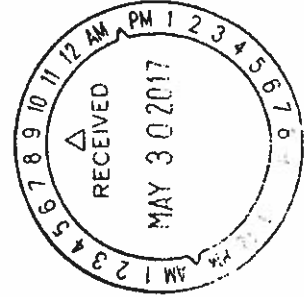


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13 South Walnut
Manteno, IL 60950-1432



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