

KANKAKEE COUNTY BOARD

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Kankakee, Illinois 60901

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July 12, 2016

Mr. Dave Navecky
Office of Environmental Analysis
Surface Transportation Board
Docket No. FD 35952
395 E Street SW
Washington, DC 20423-0001

Dear Mr. Navecky,

This letter serves as a submission of comments by the County Board of Kankakee County, Illinois, on behalf of its citizens, regarding the Great Lakes Basin Transportation (GLBT) railroad project, Docket No. FD 35952. For reasons outlined in this letter, as well as in the attached staff analysis, the County Board wishes to express its opposition to the proposal due to its impact on our citizens and environment and due to the lack of input in any planning process prior to the submission of the proposal.

The County has done its best to analyze and digest information put forth by STB, GLBT, and all interested parties that have commented on the scoping process. Most of the information and comments are relevant to any area of the three states impacted by the proposal.

However, out of the entire 278 mile proposed route, Kankakee County is in the unique position of trying to evaluate the impact of a proposed 15,000 acre "rail port" affecting primarily Sumner Township as well as portions of Manteno and Yellowhead Townships. This rail port feature was introduced with no advance warning, explanation or justification for size or anticipated operation, and no opportunity for analysis of regional impact or infrastructure needs. Commenting on such a massive feature of the proposal during the environmental review process is difficult without specifics. This, taken together with the basic railroad route proposal, has created a great deal of uncertainty for residents, landowners, local businesses, and other governmental units, and is enormously unfair on the part of GLBT.

In addition, our comment is that the entire process has not been carried out in a clear and transparent manner in such a way as to assure understanding of the purpose and need of the project, and whether the project can succeed on its merits.

The attached analysis by the Kankakee County Planning Department outlines particular concerns of our community. Many of these concerns are unique to Kankakee County, in particular the project's impact on the Kankakee River and Kankakee River State Park, as well as the lack of opportunity to evaluate compatibility with the Kankakee Area Transportation Study MPO Long Range Transportation Plan in advance of submission.

Part of the environmental review scoping process requests the submission of alternative proposals. Attached is such a proposal prepared by the Kankakee County Planning Department that utilizes existing rail infrastructure across northern Illinois, Indiana, and Iowa.

In summary, the Kankakee County Board, by a unanimous vote today (23-0) at its regularly scheduled meeting is reflecting the consensus of our community by directing the submission of this letter (with attachments) in opposition to the proposed GLBT project. Thank you for the opportunity.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Bossert', with a long, sweeping horizontal line extending to the right.

Michael Bossert

Chairman, Kankakee County Board



County of Kankakee
Planning Department

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July 11, 2016

Mr. Dave Navecky
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

Dear Mr. Navecky,

This letter is regarding the Great Lakes Basin Transportation railroad project, Docket No. FD 35952, and concerns pertaining to Kankakee County, Illinois. Please note that these comments and concerns were developed by the Kankakee County Planning Department and therefore not necessarily representative of any official action taken by the Kankakee County Board. These comments are not intended to be interpreted as in favor of or in opposition to the project.

A newly constructed railroad will require new crossings with existing streets. The three Class I railroads and one short line railroad currently existing in Kankakee County have approximately 138 at-grade, public crossings. The proposed GLBT railroad would add approximately 28 at-grade crossings, a 20 percent increase. The combination of these proposed, new crossings and the proposed closures of roads in the vicinity of the rail port are a concern regarding traffic safety.

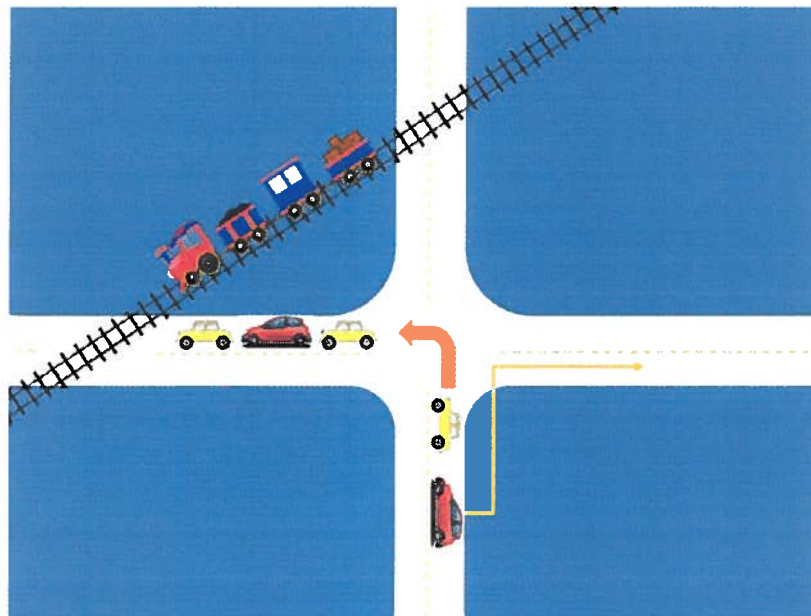
Equipment malfunctions, such as gates being lowered when no trains are approaching is a concern because if frequent enough, motorists may occasionally drive around the gates because no danger is perceived. This is a problem because if drivers become used to lowered gates and no approaching trains, they may begin to disregard the gates and safety warnings. It is also possible for vehicles to become stuck/trapped between the gates while attempting to bypass them.

Another traffic safety concern at at-grade crossings includes deterioration of the crossings for roadway traffic. As crossings deteriorate, drivers begin to drive slower over the tracks to the point of essentially having speed bumps because traffic slows down to 10 MPH or less. There has been a recent rise in concern regarding rear end crashes with stopped and slowing traffic along roadways in Kankakee County.

There has been some concern about private crossings needing safety devices just like any public crossings. A local emergency responder remembered a series of car versus train fatalities, about 25 years ago at unprotected, private crossings along an existing railroad in Kankakee County. As a result, all crossings along that railroad were given standard flashers and gates safety devices. This may be a safety concern that needs to be addressed for the proposed project.

Besides the immediate traffic safety concerns, the proposed route has some locations where the project has at-grade crossings that are close to street intersections. Maintaining an adequate distance could help ease congestion if traffic were to back up to the intersection when trains are passing through the area. Along rural roads, in a farming community such as Kankakee County, with short distances between roadway intersections and at-grade crossings, it may only take a combination one or two grain trucks and a couple passenger vehicles for traffic to be backed up to the intersection.

The illustration below shows a possible scenario of traffic backing up if an at-grade crossing is too close to an intersection.



Additional delays are a major concern for emergency responders and public transit and school bus transportation providers, particularly in the rail port area. With every road near the rail port being proposed to be closed, there are many effects that must be considered. Everyone currently using those roads will have to permanently detour around the closures, creating additional mileage costs that would need to be absorbed. This includes residents, emergency responders, public transit, school bus transportation providers, and farmers.

The change in road accessibility would require new routes to be created, which would have impacts for emergency responders and transportation providers. SHOW BUS

provides rural public transportation to residents outside the Kankakee Urbanized Area. Part of their service includes service contracts with social service agencies that have day programs that provide employment for individuals with disabilities. The newly created routes would also have to accommodate any possible delays due to trains passing through the area with only a few highways having grade separated crossings. Any potential delays may not be severe on whether children arrive at school on time or public transportation riders arrive at their destinations on time, but it could be significant for emergency services that respond to situations where seconds can make a difference. Due to the scale of the proposed road closures around the rail port, having at least one road, preferably more, to continue providing a means for traffic over the proposed rail yard would be a great benefit for these public services and the traveling public. With the existing railroads already passing through Kankakee County, delays are already a problem with the timeliness of regular road users. The additional proposed at-grade crossings will create more delays for new areas of the county.

In addition to the already proposed grade separated road crossings, there may be other roads that currently have high traffic volumes for the region, such as 9000N Road and 4000E Road. The proposed railroad crosses near the intersection of 9000N Road and 2250W Road. The Illinois Department of Transportation shows 2,500 annual average daily traffic (AADT) on the segment west of that intersection. This location would benefit from a grade separated crossing.

In the Kankakee Area Transportation Study Metropolitan Planning Organization's (KATS MPO) 2040 Long Range Transportation Plan, 4000E Road is included as an important future thoroughfare for an eastern bypass of the metropolitan planning area. The road is planned to provide a direct route from IL-17 northerly to the Kankakee/Will County Line. Due to the proposed closing of 5000E Road and Sycamore St (3000E Road) on either side of 4000E Road, it would seem GLBT would not want 4000E Road to be a through road. However, in the 2040 Long Range Transportation Plan, 4000E Road would be another key road that would greatly benefit from a future grade separated crossing. Please refer to the enclosed pages from the long range plan about the 4000E Road bypass.

The road closures in the vicinity of the proposed rail port could have significant impacts on the street network as existing traffic would be required to find new paths. Currently there are nearly 3,000 estimated vehicles per day that traverse north-south roads between 9000N Road and 12000N Road. The traffic data available from Illinois Department of Transportation indicates that many of those vehicles continue traveling on north-south roads into Will County from Kankakee County or vice-versa. This traffic would be distributed elsewhere on existing roads, likely increasing daily averages on 9000N Road and 12000N Road. These effects could as much as double the amount traffic on those two roads.

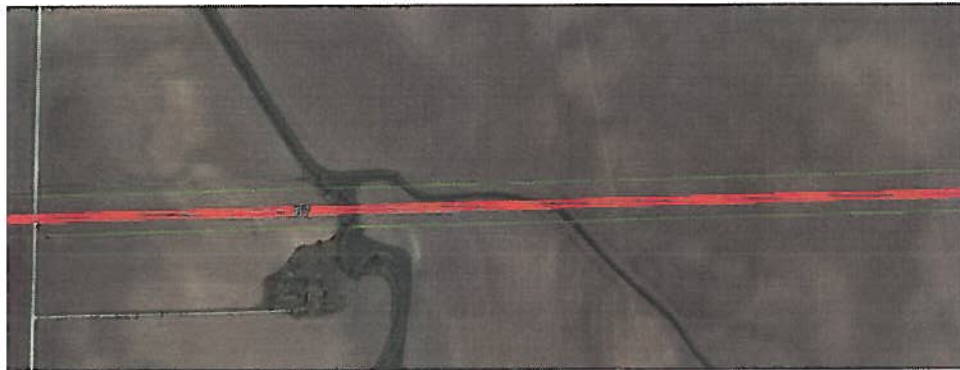
The existing through-traffic on 11000N Road and 10000N Road, although less than the north-south roads, would also have to find new routes. Traffic on IL-50 and IL-1 would also likely increase with a greater impact on IL-1. All of the increases in traffic would

have additional delays on emergency services, public transit providers, and school bus transportation providers. Enclosed is a map showing annual average daily traffic in the rail port area.

The road closures will create additional issues for the Kankakee County Highway Department particularly during winter storms. The current plow routes would be significantly affected and decrease the department's efficiency of keeping roads open and the timeliness of re-opening roads that must be closed.

Beyond the obvious crossings with streets, at this time there is an unknown amount of underground utility lines. Kankakee County has many underground pipelines traversing the county. Please be aware that this includes fourteen locations where the proposed route would cross underground pipelines.

In some locations the current proposed railroad crosses farm field drainage streams near a fork. Instead of traversing two streams, it may be better to align the project to a single stream. This could help reduce the number of bridges or culverts required to be installed and help minimize the effects on drainage.



In locations where the proposed route traverses farmable fields, particularly in a diagonal direction, there's an importance in determining how fields are being divided to ensure the amount of "cut off" land is still farmable. A small fragment of land may have access to be farmed, but it's also important to further consider that any potential inconveniences still make it worthwhile to farm.

Kankakee County is a rural community and a major concern is the amount of farmable land that would no longer be used for agriculture. The Kankakee County Farm Bureau estimates that 4.58 percent of the agricultural land in the county would no longer be used for that purpose. Their preliminary estimate with regard to economic output is \$68.9 million annually. The socioeconomic effects of changing land use could have drastic effects on the local economy.

There are numerous concerns about the proposed route going through the Kankakee River State Park. The current proposed route passes through the state park just east of 7000W Road (CR-20). According to the map of the state park, there is a horse

campground and water and restroom amenities (indicated by arrow “A” on the image below) inside the proposed 200 foot right-of-way. The proposed route also crosses two state park trails and just west of 7000W Road is a boat launch, which is also a popular place for fishing (indicated by arrow “B” on the image below) and may be affected by the additional noise. The state park also has historical significance to the region which includes archaeological sites. Needless to say, a new railroad through the state park would have momentous effects on the park’s current environment, including park visitors and wildlife.

According to a presentation by Harris Miller Miller & Hanson Inc., an environmental and transportation planning consulting firm, at a distance of fifty feet automobiles have an average noise volume of about 68 dBA at 45 MPH (the current posted speed limit on 7000W Road through the state park), which is the majority of traffic that uses Warner Bridge (7000W Road over the Kankakee River). It’s unclear what the typical train speed would be through this area, but rail cars are shown to have a volume of 76-78 dBA at 35 MPH (of course louder at greater speeds and quieter at lesser speeds). At that speed, rail cars would be approximately twice as loud as the existing vehicle traffic. Locomotives were shown to have a constant noise volume of 89 dBA, four times as loud as the existing vehicle traffic.



At this time the Kankakee County Planning Department is not aware of any information that describes the expected number of trains per day or the length of trains that would use the proposed railroad. Both the total daily number and the length of trains are important

in being able to determine the effects the trains would have on the region, in addition to the changes created by the proposed new construction.

In order to determine how many homes would be affected by the proposed railroad, a buffer analysis was performed for Kankakee County and each home viewed in 2015 aerial images was counted. Within the 200-foot proposed right-of-way there are nineteen (19) homes in the southern portion of Bill's Mobile Court, between Illinois State Route 50 and Sycamore Street, in northern Manteno, IL. Beyond the 200-foot proposed right-of-way there are sixty-seven (67) more homes within 0.1 miles. The next buffer at 0.25 miles adds another 108 homes and at 0.5 miles expands to 376 additional homes. Buffers were also placed at 0.75 miles and 1.0 mile with an additional 428 and 449 homes respectively.

A major concern for Kankakee County officials and residents is the sheer size of the area indicated as a rail port. There is much confusion and speculation over what activities and development is proposed to be included in that area. The large target area of 15,000 acres seems excessive. According to the Union Pacific Railroad, their Bailey Yard – the world's largest rail yard – is 2,850 acres. The proposed target area is 5.26 times larger than the Bailey Yard. Without more information about this area, it seems vastly oversized and unnecessary to be granted to the proposed project, particularly with minimal infrastructure currently in place. Within the 15,000 acre footprint, there are 271 homes (some included in the previous buffer analysis). There are also two small cemeteries in the rail port footprint and in unincorporated place of Whitaker.

The table below shows the number of homes within each buffer distance.

Buffer Distance	Number of Homes	Running Total of Homes
Within 200' right-of-way	19	19
0.1 miles	67	86
0.25 miles	108	194
0.50 miles	376	570
0.75 miles	428	998
1.00 miles	449	1,447
Within 15,000 ac. Rail Port	271 (120 outside of buffers)	1,567

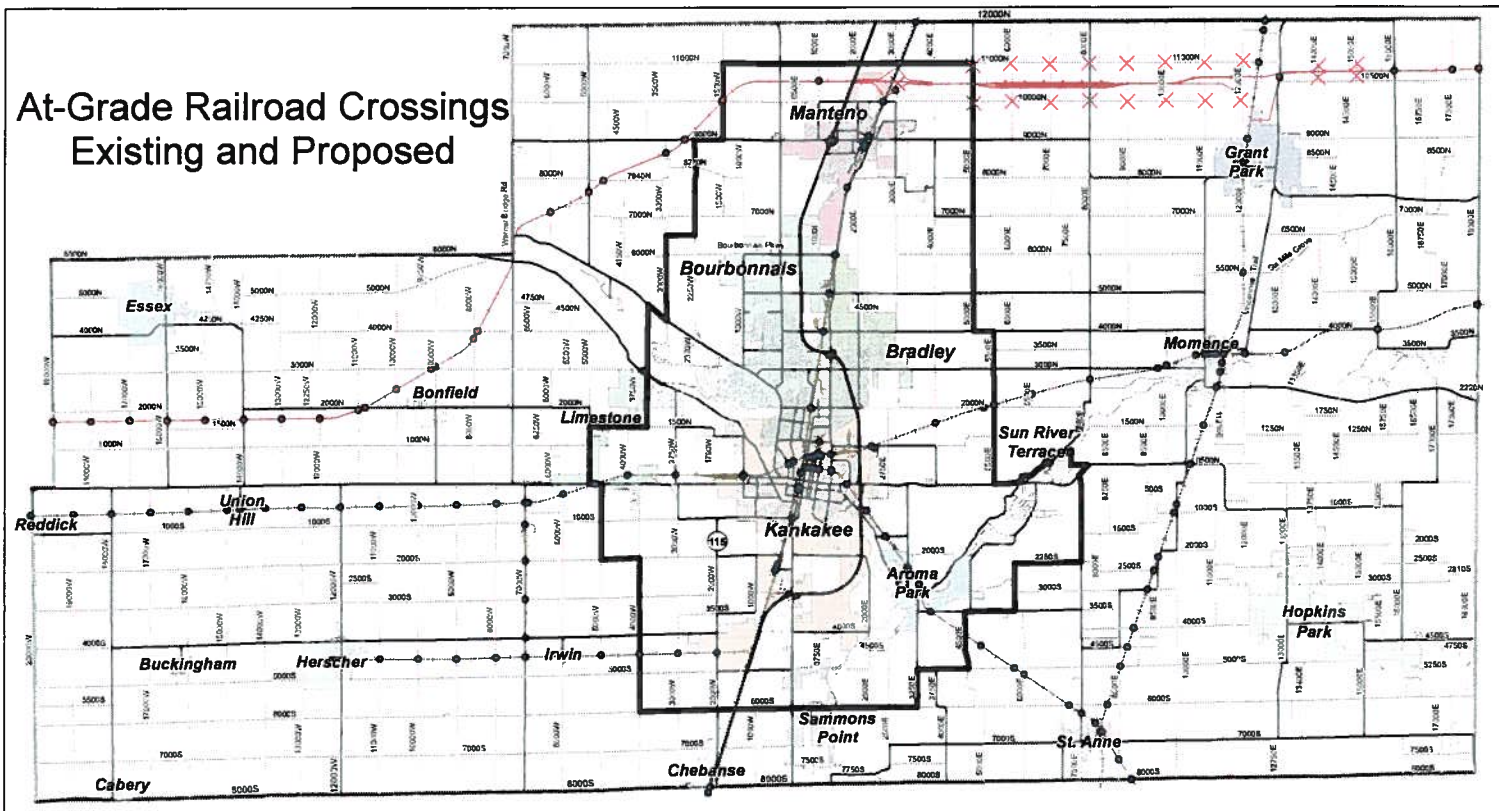
The CREATE program in the Chicago Metropolitan area is already addressing regional surface transportation congestion with good results, it seems more practical to reinvest in and expand existing infrastructure than new construction. Beyond the Chicago terminal, there are already Class I railroad networks. After reviewing the 2015 railroad map created by the Illinois Department of Transportation, there are already extensive rail networks that could be viable for railroad operators to bypass the Chicago terminal, in the same manner that GLBT proposes, using other existing railroads if they are interested. These potential regional bypass railroads include the Northern Suffolk Railroad, Iowa Interstate Railroad, Burlington Northern Santa Fe Railroad, and Elgin, Joliet & Eastern Railroad line, and the Union Pacific Railroad.

With the short amount of time that has been available to identify concerns and make comments about the proposed GLBT railroad, there are still many details that are unknown to the Kankakee County Planning Department. This makes it difficult to address all possible issues, particularly due to the scale of the project. Thank you for accepting these comments for the scoping phase. The Kankakee County Planning Department hopes they will be useful.

Sincerely,

Geoffrey Olson
Transportation Program Manager
Kankakee County Planning Dept.

At-Grade Railroad Crossings Existing and Proposed



Legend

- Existing At-Grade Crossings
- Proposed At-Grade Crossings



Number of At-Grade Crossings

Canadian National: 38
Kankakee, Beaverville, Southern: 26
Northern Suffolk: 50
Union Pacific: 24
Total: 138

Additional Proposed: 28

Map created by

Planning Dept.
Date: Jun. 24, 2016



Disclaimer: This map is for reference only. Data provided are derived from multiple sources with varying level of accuracy. Kankakee County disclaims all responsibility for the accuracy or completeness of the data shown herein.

Data Sources: Street Centerlines (2013) - Illinois Department of Transportation (2013); 2013 Crash Data - Illinois Department of Transportation Safety Portal (Crash Reports, Other data - ILDOT, Kankakee County

Annual Average Daily Traffic Surrounding the Proposed GLBT Rail Port

 Urbanized Area
 Municipalities
 1234 Annual Average Daily Traffic
 Proposed GLBI Railport and Right-of-Way
 MPA Boundary
 County Boundary
 Proposed Road Closure
 Miles
0 0.5 1 2



Map created by

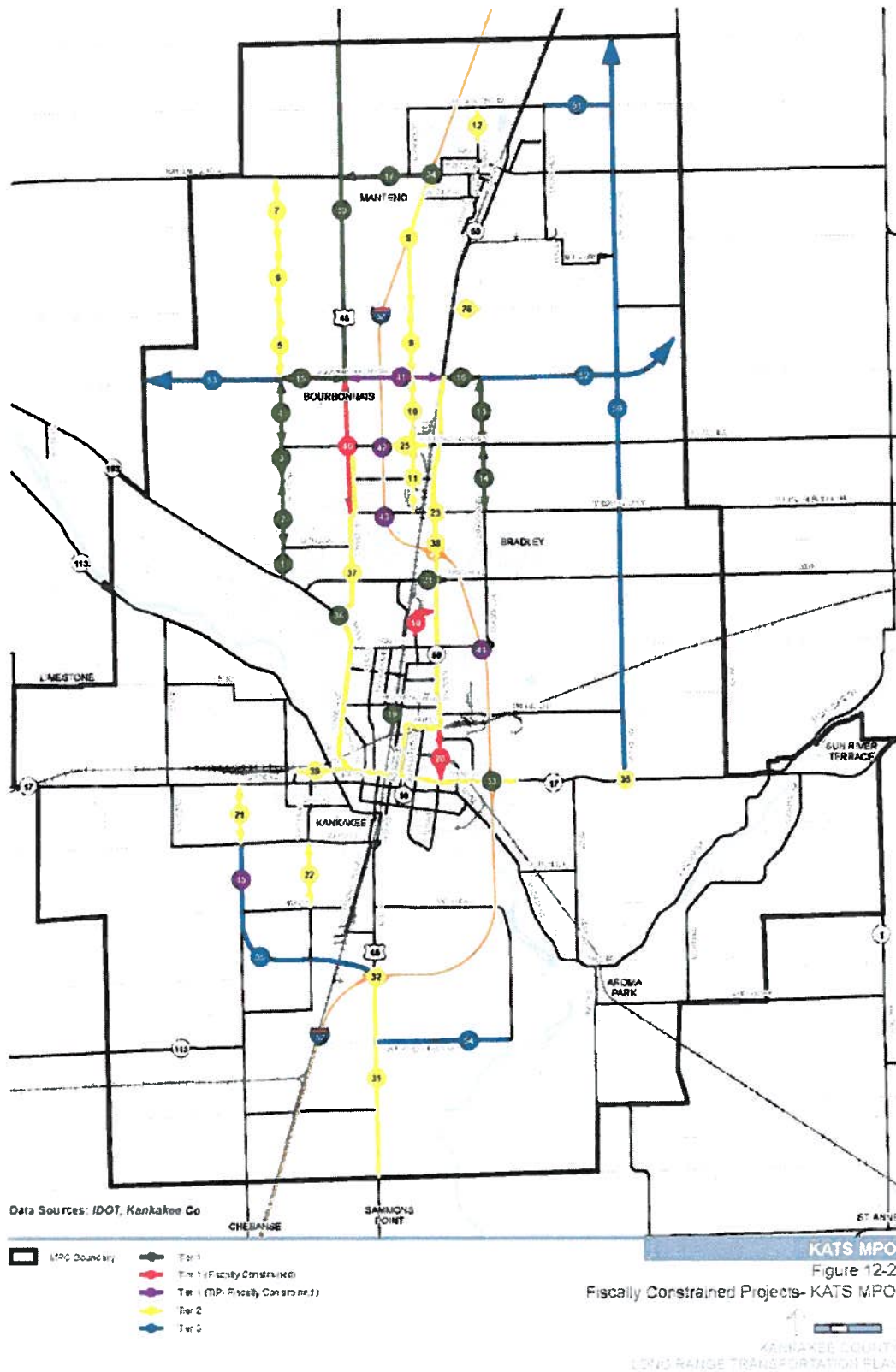
 Planning Dept.
 Date Jun. 27, 2016



Disclaimer: This map is for reference only.
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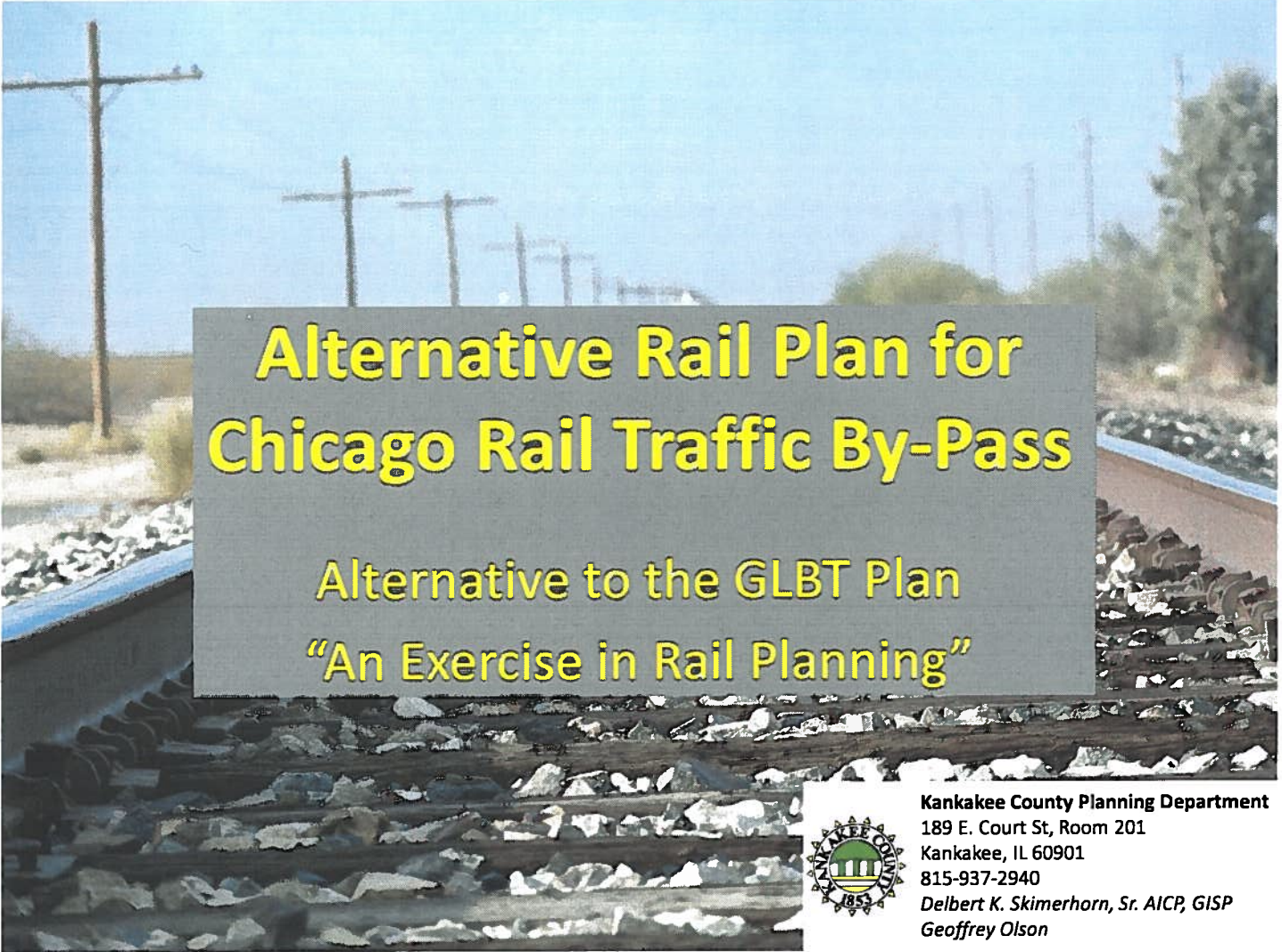
Data Sources: Street Centerlines (2014) - Illinois Department of Transportation (2014). Other data - ILDOT, Kane/DeKalb County

Figure 12-2: Tiered Projects – KATS MPO



Tier 3 Projects

ID No.	Roadway	Project Type	Starting Terminus	Ending Terminus	Current Conditions	Improvements	Improvement Length (In Miles)
50	Skyline Rd	Unsupported	IL-17	Manteno Rd	2 lane rural, township road, new north of E 10000N Rd	3 lane; concrete for heavy trucks; widen shoulders; drainage improvements; signals at major intersections	11.00
51	10000N Rd	Unsupported	4000E Rd	Sycamore Rd	2 lane rural, township road	3 lane; concrete for heavy trucks; shoulder-drainage improvements	1.00
52	Bourbonnais Pkwy	Unsupported	Cardinal Dr	Skyline Rd	2 lane rural, new from N 2000E to N 3000E, township road	4 lane; concrete for heavy trucks; shoulder-drainage improvements	3.50
53	Bourbonnais Pkwy	Unsupported	Career Center Rd	County Hwy 30/2250W Rd	2 lane rural, township road	4 lane; concrete for heavy trucks; shoulder-drainage improvements	2.00
54	Airport Road	Unsupported	US 45/52	River Rd	2 lane rural, township road	3 lane; shoulder-drainage improvements; turn lane onto Hwy 45/52	2.00
55	2000W	Unsupported	Jeffery St	US 45/52	New, township road	3 lane; concrete for heavy trucks; shoulder-drainage improvements	3.70



Alternative Rail Plan for Chicago Rail Traffic By-Pass

Alternative to the GLBT Plan
"An Exercise in Rail Planning"



Kankakee County Planning Department
189 E. Court St, Room 201
Kankakee, IL 60901
815-937-2940
Delbert K. Skimerhorn, Sr. AICP, GISP
Geoffrey Olson

EXERCISE GOALS

- Find a logical alternative route to GLBT's plan to build a railroad by-pass around the Chicago Region.
- Utilize existing rail and facilities as much as possible.
- Keep the route close to the Chicago Region.
- Allow for the ability to split cargo between Chicago and elsewhere.
- Displace or disrupt as few people, homes, businesses, land use patterns, roads, parks, and waterways, as possible.

ASSUMPTIONS

1. Plan assumes that there is a need for cargo trains to by-pass the Chicago region.
 - a. *We are basing this on information in GLBT's statement of purpose and need.*
2. It is assumed that railroads will cooperate with each other to use existing tracks and right-of-ways.
 - a. *None of the railroads mentioned have been contacted in any way.*
3. It is assumed that the new sections of railroad can be built.
 - a. *No engineering study or environmental assessment has been conducted on this project. No property owners have been contacted.*
4. It is presumed that the existing rail can handle the increased volume or that additional tracks can be placed in the existing right-of-way.
 - a. *Again no engineering study or environmental assessment has been conducted on this project.*

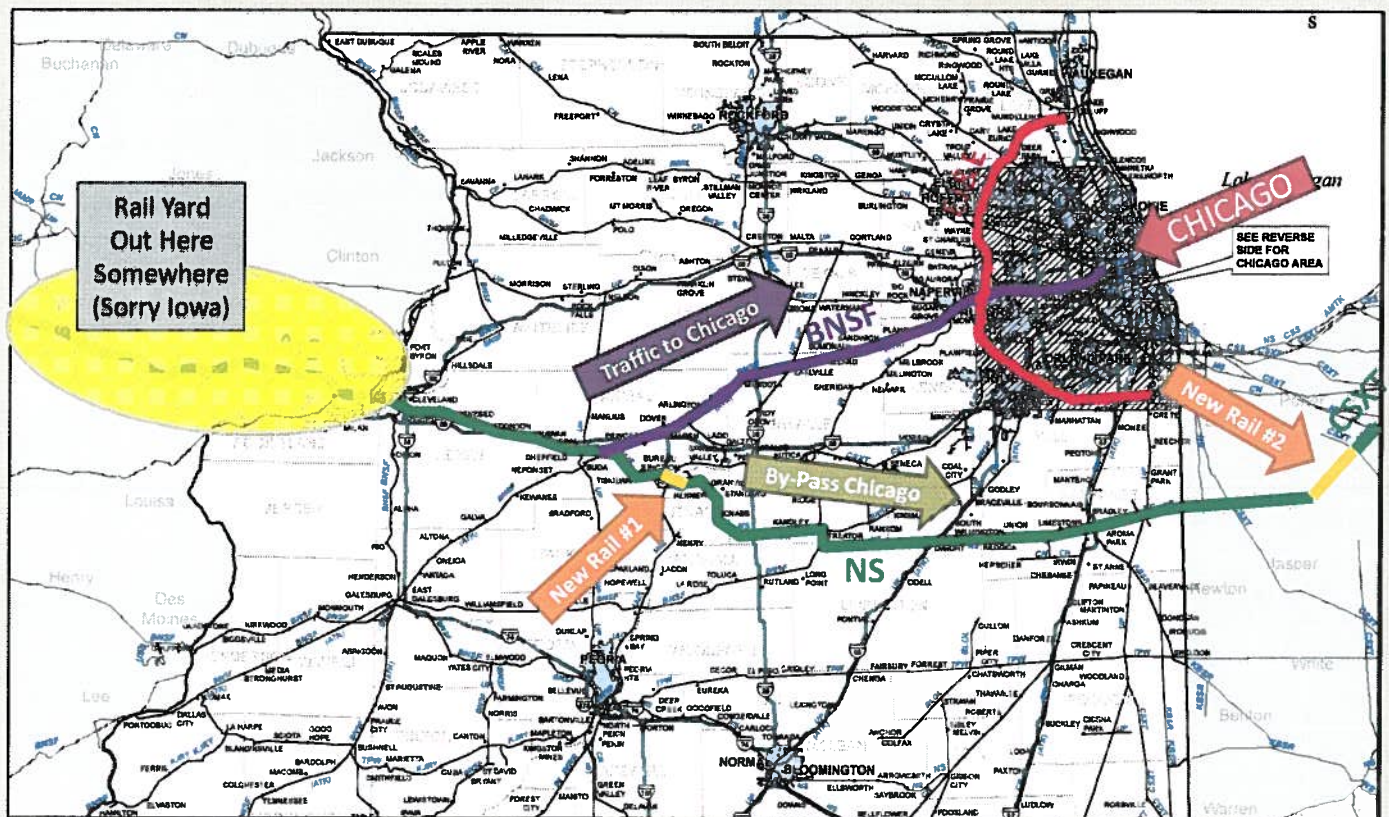


Features

- Allows the by-pass of the Chicago Metropolitan Area with the construction of less than 10 miles of new right-of-way/track.
- Cargo heading to Chicago can still get there via BNSF lines and the Chicago Rail network.
- Assumes a rail yard to separate cargo would be needed somewhere in Iowa or further west. Once separated cargo by-passing Chicago could use the NS and CSTX lines.
- Plan would require the cooperation of 4 existing railroads: IAIS, NS, BNSF, and CSXT.

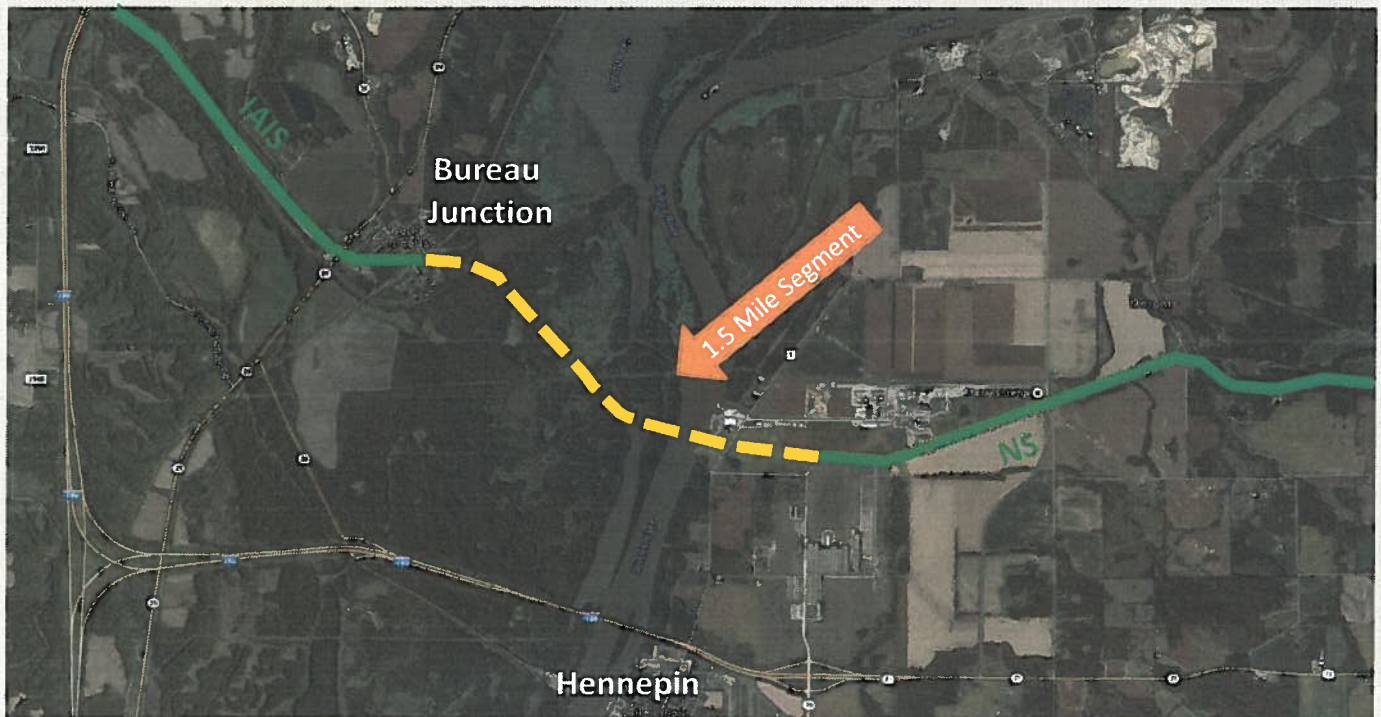


POSSIBLE ALTERNATIVE ROUTE



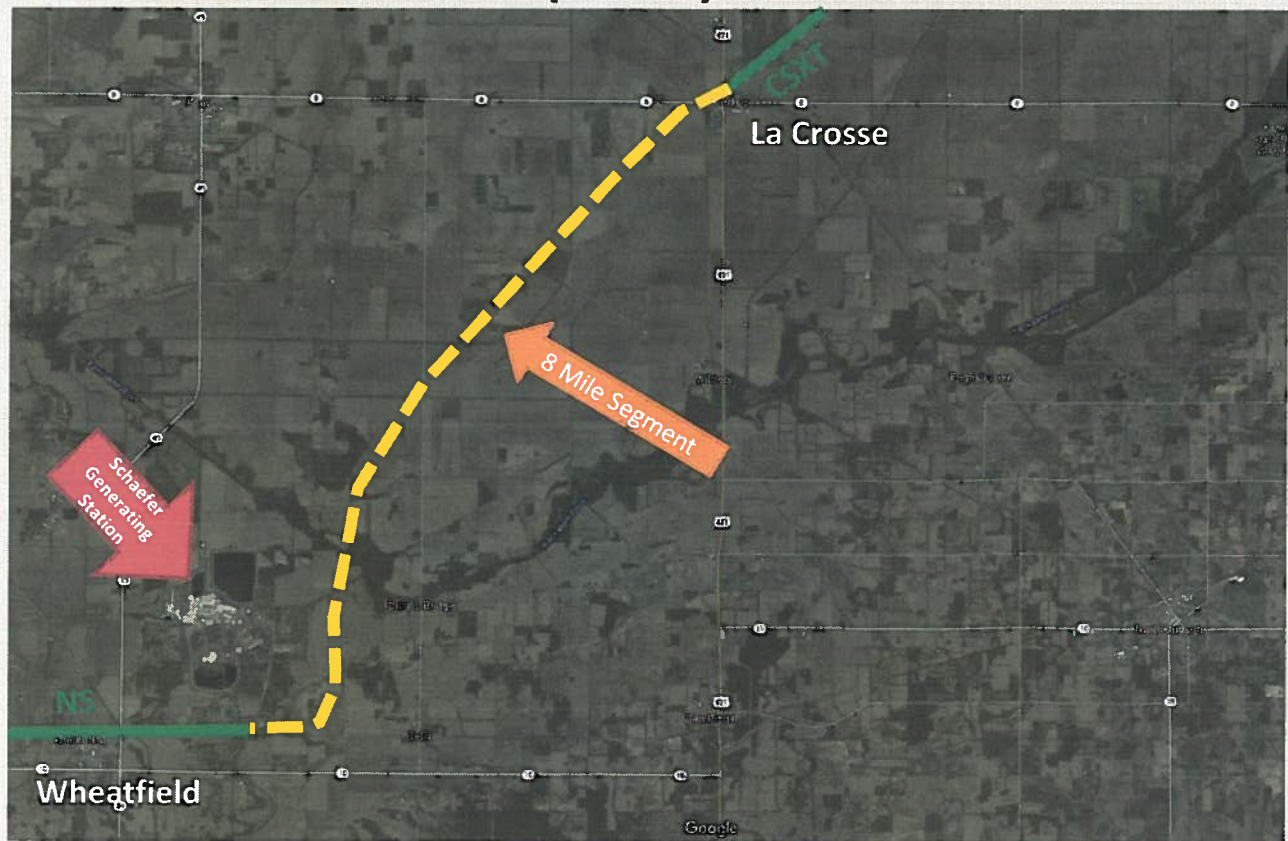
NEW RAIL #1

Bureau Junction to Hennepin (north)



NEW RAIL #2

Wheatfield (east) to La Crosse



Conclusion

- It appears that there are alternatives to the GLBT proposal which minimize the impacts to people, homes, businesses, land use patterns, roads, parks, and waterways while accomplishing the goal of moving freight through Chicago.
 - Keep in mind that this “Plan” was put together by two county planners with no prior railroad planning experience and without the aid of engineering or environmental studies in about two (2) hours. Imagine what could be designed by individuals that have actual experience in railroad design and planning.

