

BEFORE THE
SURFACE TRANSPORTATION BOARD

THIS IS
PART 2 OF 2

FINANCE DOCKET NO. 35087
CANADIAN NATIONAL RAILWAY COMPANY AND
GRAND TRUNK CORPORATION

SEE EI-14342
FOR PART 1

-CONTROL-

EJ&E WEST COMPANY

NOTICE OF FILING OF WILL COUNTY'S
COMMENTS ON THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT

Please take notice that Will County Illinois has electronically filed its Comments on the Draft Environmental Impact Statement today, September 30, 2008, with the Surface Transportation Board.

Respectfully submitted,
WILL COUNTY, ILLINOIS

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Dated: September 30, 2008

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Recommended Improvements for Mitigation

The STB identified many of the crossings as “moderately affected”, but these figures are per 2015 projections. The adverse long term effects of increasing rail traffic by more than 4 times the existing conditions in some areas needs to be evaluated taking into account the following facts on Will County regarding population growth from 2000 to 2007:

- * Will County is 1st in population growth of all Illinois counties
- * Will County is the 31st fastest growing county in the US
- * Will County’s population increased by 171,395 (25%).

The current population of Will County is 673,586 residents. That number is expected to grow to 1,076,446 by the year 2030 which is a 60% increase.

Travel on the area roadways is expected to increase proportionally to the growth in population and employment. With increase rail traffic, the EJ&E rail line will become an impediment to vehicular travel through Will County. It is essential that grade separations be provided at strategic locations to allow egress for emergency services, schools, commuters and the movement of services and goods throughout Will County. In addition, since the number of trains will increase significantly and most areas are within close proximity to existing or planned residential development, physical improvements in accordance with the FRA’s rule on the observance of Quiet Zones must be constructed as the minimum improvement required to mitigation noise (horn blowing) and to insure that the crossings will be no less safe then they are today. Furthermore, sections of double tracking included with the Proposed Action will pose greater safety risks to vehicular traffic, cyclists and pedestrians since two-way train traffic may pass at the crossings. Improvements are needed at the crossings to reduce the risk of incidents. As part of the recommendations, 10 of the 38 crossings were recommended to be grade separated. Those decisions were based on travel demand, regional continuity, local routing, projected delay, and emergency response. Those locations are: 95th St./Wolf’s Crossing, 119th St./Ferguson, 143rd St., IL 126/Main St., Woodruff Rd., Washington St., Briggs St., Gougar Rd., Schoolhouse Rd., and Harlem Ave.

The following is a list of specific improvements recommended as mitigation if the Proposed Action is approved:

1. 87th Street (Local Jurisdiction)

87th Street is an existing 2-lane (24' wide) roadway with traffic projected to reach 1,470 ADT by the year 2015. This roadway will remain a low volume roadway. The rail crossing is in a predominantly residential area, with the exception of an industrial / business district located immediately to the southeast. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on the west side and a 3-lane section on the east side with railroad signalization improvements. These improvements would require approximately 530 lineal feet of roadway to be reconstructed and/or widened and resurfaced. 87th Street terminates in a T-intersection at Normantown Road, approximately 100 ft. east of the crossing. This intersection would be reconstructed as part of the proposed improvements, providing exclusive left-turn and right-turn lanes from 87th Street on to Normantown Road. The proposed roadway improvements would have minimal impact on adjacent properties. The estimated construction cost is approximately \$0.9 million. This segment of track has been designated by CN for upgrade from single- to double-track. This cost does not include land acquisition or engineering.

2. Hafenrichter Road (Local Jurisdiction)

Hafenrichter Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 4,800 ADT by the year 2015. The rail crossing is in a predominantly residential area, with the exception of an industrial/business district located immediately to the northeast. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on the each side with railroad signalization improvements. These improvements would require approximately 800 lineal feet of roadway to be reconstructed and/or widened and resurfaced. The intersection with each of two side roads (91st Street and Union Mill Drive) would also need to be widened and resurfaced as part of the proposed improvements. The proposed roadway improvements would have minimal impact on adjacent properties. This segment of track has been designated by CN for upgrade from single- to double-track. The estimated construction cost is approximately \$1.1 million. This cost does not include land acquisition or engineering.

3. 95th Street/Wolf's Crossing Road (Local Jurisdiction)

Wolf's Crossing is an existing 2-lane (24' wide) roadway with traffic projected to reach 17,740 ADT by the year 2015. This route has high growth potential serving area between Oswego and Naperville. A grade separated crossing is being proposed at this location, sized to

accommodate a future 5-lane cross-section, resulting in the reconstruction of approximately 2,400 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Portions of two side roads and one private drive would be reconstructed in order to accommodate the lowered roadway profile at their intersection with Wolf's Crossing. One of these side roads, Normantown Road, currently intersecting approximately 75 ft. east of the rail crossing, would also need to be realigned to provide adequate sight distance relative to the bridge through the proposed underpass. In order to address access issues to existing properties, a frontage road approximately 900 ft. in length would need to be constructed along the north side of Wolf's Crossing west of the rail line. Driveways for each of these four properties would also need to be reconstructed. To minimize right-of-way, retaining walls would be required, estimated at 39,700 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available. The proposed roadway improvements would have a significant impact on adjacent properties, limiting and/or altering access points and requiring substantial right-of-way acquisition. This segment of track has been designated by CN for upgrade from single- to double-track. The estimated construction cost for this crossing is approximately \$35.7 million. This cost does not include land acquisition or engineering.

4. 111th Street (Local Jurisdiction)

111th Street is an existing 2-lane (24' wide) roadway with traffic projected to reach 13,230 ADT and 16,400 by the year 2015 and 2030, respectively. The rail crossing is largely surrounded by agricultural properties, but is in an area that has experienced substantial residential development in recent years, as well as the construction of a middle school approximately a half-mile to the east. An at-grade crossing is proposed to remain at this location. To accommodate the future ADT we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on the each side with railroad signalization improvements. These improvements would require approximately 1,000 lineal feet of roadway to be reconstructed and/or widened and resurfaced. An existing side road, Normantown Road, currently intersecting approximately 75 ft. east of the rail crossing, would be converted to a right-in right-out access for the south leg, and access to the north leg would be terminated as that portion of roadway is no longer in use and dead-ends just north of the intersection. The proposed roadway improvements would have minimal impact on adjacent properties. This segment of track has been designated by CN for upgrade from single- to double-track. The estimated construction cost for this crossing is approximately \$1.2 million. This cost does not include land acquisition or engineering.

5. 119th Street / Ferguson (Local Jurisdiction)

119th Street is an existing 2-lane (24' wide) roadway with traffic projected to reach 11,750 ADT and 14,600 ADT by the years 2015 and 2030, respectively. There is a fire department and a high school located to the east of the crossing, approximately a quarter-mile and three-quarters of a mile away, respectively. Plainfield Fire Station #3 was recognized in the DEIS as being cut off from its service area when the nearby crossings are blocked. No other facility is within the coverage area that can respond timely to fire or medical emergencies. A grade separated crossing is being proposed at this location, sized to accommodate a future 5-lane cross-section, resulting in approximately 2,200 lineal feet of roadway to be reconstructed and/or widened and resurfaced. In addition to the double rail track, Normantown Road intersects 119th Street approximately 75 ft. east of the rail crossing and would also need to be grade separated, resulting in the need for a large bridge structure. In order to provide access from Normantown Road to the grade separated 119th Street, a new portion of roadway would need to be constructed connecting the two roads east of the crossing. A new private access drive would need to be constructed to provide access to the property located immediately southeast of the crossing, and the entrance to a private drive would need to be reconstructed near the west end of the improvements. To minimize right-of-way, retaining walls would be required, estimated at 30,100 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available. The proposed roadway improvements would have a significant impact on adjacent properties, limiting and/or altering access points and requiring substantial right-of-way acquisition for the new connecting roadway. This segment of track has been designated by CN for upgrade from single- to double-track. The estimated construction cost is approximately \$42.7 million. This cost does not include land acquisition or engineering.

6. 127th Street (Local Jurisdiction)

127th Street is an existing 3-lane (40' wide) roadway with traffic projected to reach 6,910 ADT by the year 2015. The rail crossing is surrounded by both residential and agricultural properties and is in an area that has experienced substantial residential development in recent years. There is a hospital located approximately a half-mile to the east of the crossing and U.S. Route 30 intersects approximately 150 ft. west of the crossing. An at-grade crossing is proposed to remain at this location. Given its close proximity to US 30, we are proposing a 4-lane curb and gutter section with a 12' barrier median on the each side with railroad signalization improvements. These improvements would require approximately 900 lineal feet of roadway to be reconstructed and/or

widened and resurfaced. The intersection with U.S. Route 30 would be widened and resurfaced as part of the proposed improvements in order to conform to the widened roadway, requiring traffic signal modifications. The proposed roadway improvements would have minimal impact on adjacent properties. This segment of track has been designated by CN for upgrade from single- to double-track. The estimated construction cost is approximately \$1.4 million. This cost does not include land acquisition or engineering.

7. 135th Street (Local Jurisdiction)

135th Street is an existing 3-lane (36' wide) roadway with traffic projected to reach 3,620 and 4,900 ADT by the years 2015 and 2030, respectively. The rail crossing is surrounded by both residential and industrial properties and is in an area that has experienced substantial residential development in recent years. There is an elementary school located approximately a quarter of a mile to the west of the crossing, a fire department located approximately a mile to the east and U.S. Route 30 intersects approximately 700 ft. west of the crossing. Due to the residential nature of the surrounding area, the Village of Plainfield prefers to have an at-grade crossing at this location. As part of their downtown comprehensive plan, Plainfield intends to designate 143rd Street as a truck route and provide a grade separation from the rail line at that location instead. Consequently, an improved at-grade crossing is being proposed at this location, with a 3-lane cross-section, medians and signalization, resulting in 900 lineal feet of the roadway to be reconstructed and/or widened. A new private access drive would need to be constructed to provide access to the property located immediately southwest of the crossing. The proposed roadway improvements would not have a significant impact on adjacent properties. This is an existing segment of double-track rail. The estimated construction cost is approximately \$1.1 million. This cost does not include land acquisition or engineering.

8. Van Dyke Road (Local Jurisdiction)

Van Dyke Road is an existing 2-lane (36' wide) divided roadway with bicycle lanes in each direction and vehicular traffic projected to reach 4,650 ADT by the year 2015. This segment of track has been designated by CN as remaining single-track. This crossing is adequate in its current state and no improvements are proposed at this location. Accordingly, there are no proposed costs associated with this crossing.

9. 143rd Street (Illinois Department of Transportation)

143rd Street is an existing 2-lane (24' wide) roadway with traffic projected to reach 16,090 ADT and 17,780 ADT by the years 2015 and 2030, respectively. There is a police department located approximately a quarter of a mile to the west of the crossing. This crossing is located in a predominantly industrial area, and the Village of Plainfield prefers to have a grade separated crossing at this location. As part of their downtown comprehensive plan, Plainfield intends to designate 143rd Street as a truck route and divert traffic away from Illinois Route 126 through the downtown corridor, thereby greatly increasing future traffic counts on 143rd Street. Will County has widened this roadway to three lanes and designed the pavement to handle increased truck traffic with the rerouting. Consequently, a grade separated crossing is being proposed at this location, sized to accommodate a future 5-lane cross-section, resulting in 2,400 lineal feet of the roadway to be reconstructed and/or widened and resurfaced. The intersection with Van Dyke Road would be reconstructed as part of the proposed improvements in order to accommodate the lowered roadway profile, requiring traffic signal modifications. Portions of two private drives would be reconstructed in order to address access issues to existing properties and accommodate the lowered roadway profile at their intersection with 143rd Street. To minimize right-of-way, retaining walls would be required, estimated at 33,010 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available. The proposed roadway improvements would have a significant impact on adjacent properties, limiting and/or altering access points and requiring substantial right-of-way acquisition. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$24.4 million. This cost does not include land acquisition or engineering.

10. Naperville-Plainfield Road (Local Jurisdiction)

Naperville-Plainfield Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 4,990 and 8,690 ADT by the years 2015 and 2030, respectively. The rail crossing is located within a business district near downtown Plainfield. There is a fire department located approximately a half-mile to the southwest of the crossing and a middle school located approximately a quarter of a mile to the east. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on the each side with railroad signalization improvements. These widening improvements would require approximately 1,400 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Naperville-Plainfield Road terminates in a T-

intersection at Illinois Route 59, approximately 400 ft. southwest of the crossing. A portion of the intersection with Illinois Route 59 would be reconstructed as part of the proposed improvements in order to conform to the widened roadway, requiring traffic signal modifications. The entrance to several private drives as well as multiple driveway aprons would need to be reconstructed to accommodate the wider roadway. The proposed roadway improvements would have a moderate impact on adjacent properties, limiting and/or altering access points and requiring some additional right-of-way. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$1.6 million. This cost does not include land acquisition or engineering.

11. IL Route 126/Main Street (Illinois Department of Transportation)

IL Route 126/Main Street is an existing 2-lane (30' wide) roadway with traffic projected to reach 23,390 ADT by the year 2015. The rail crossing is located within a business district near downtown Plainfield. There is a fire department located approximately a half-mile to the southwest of the crossing and a middle school located approximately a quarter of a mile to the east. Due to the high traffic volumes, projected queuing that will spill over into the IL 59 intersection, and regional connectivity to Interstate 55, a grade separated crossing is being proposed at this location, sized to accommodate a future 5-lane cross-section, resulting in the reconstruction of approximately 2,000 ft. of roadway. Portions of four side roads, several private access drives and multiple driveway aprons would need to be reconstructed in order to accommodate the lowered roadway profile at their intersection with Illinois Route 126. To minimize right-of-way, retaining walls would be required, estimated at 30,170 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available. The proposed roadway improvements would have a very significant impact on adjacent properties, limiting and/or altering access points and requiring substantial right-of-way acquisition. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$24.4 million. This cost does not include land acquisition or engineering.

12. Center Street (Local Jurisdiction)

Center Street is an existing 2-lane (20' wide) roadway with traffic projections unavailable due to the fact that this road was not modeled. The rail crossing is located adjacent to commercial / industrial properties fronting the rail line in an otherwise residential area near downtown Plainfield. There is a fire department located approximately a half-mile to the southwest of the crossing and a middle school located less than a quarter of a mile to the northeast. To accommodate the future ADT we

are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on the each side with railroad signalization improvements. These widening improvements would require approximately 900 lineal feet of roadway to be reconstructed and/or widened and resurfaced. The intersection with a side street, a private access drive and two driveway aprons would need to be widened and resurfaced to accommodate the wider roadway. The proposed roadway improvements would have a moderate impact on adjacent properties, limiting and/or altering access points and requiring some additional right-of-way. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$1.1 million. This cost does not include land acquisition or engineering.

13. Eastern Avenue (Local Jurisdiction)

Eastern Avenue is an existing 2-lane (24' wide) roadway with traffic projections unavailable due to the fact that this road was not modeled. The rail crossing is located adjacent to commercial / industrial properties fronting the rail line in an otherwise residential area near downtown Plainfield. There is a fire department located approximately a half-mile to the southwest of the crossing and a middle school located less than a quarter of a mile to the north. An improved at-grade crossing is being proposed at this location, with a 3-lane cross-section, medians and signalization, resulting in the reconstruction of approximately 1,200 ft. of roadway. The intersection with a side street and several driveway aprons would need to be reconstructed to accommodate the wider roadway. The proposed roadway improvements would have a moderate impact on adjacent properties, limiting and/or altering access points and requiring some additional right-of-way. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$1.4 million. This cost does not include land acquisition or engineering.

14. Lockport Road (Local Jurisdiction)

Lockport Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 11,710 ADT by the years 2015. The rail crossing is located at the eastern edge of a residential area near downtown Plainfield. There is a fire department located approximately three quarters of a mile to the west of the crossing and a middle school located approximately a half-mile to the northwest. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on the each side with railroad signalization improvements. These widening improvements would require approximately 1,200 lineal feet of roadway to be reconstructed and/or widened and resurfaced. West Chicago Street and several driveway aprons would need to be widened

and resurfaced to accommodate the wider roadway. The proposed roadway improvements would have a moderate impact on adjacent properties, limiting and/or altering access points and requiring some additional right-of-way. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$1.4 million. This cost does not include land acquisition or engineering.

15. Renwick Road (CH 36) (Will County)

Renwick Road (CH 36) is an existing 2-lane roadway with traffic projected to reach 11,360 and 13,820 ADT by the year 2015 and 2030, respectively. The rail crossing is located in an undeveloped area with some industrial properties nearby. An at-grade crossing is proposed to remain at this location with signalization and a 4-quadrant gate. No roadway reconstruction is proposed at this location since this is an environmentally sensitive area abutting the Lake Renwick Heron Rookery Nature Preserve. This segment of track has been designated by CN as remaining single-track. The estimated construction cost is approximately \$0.5 million. This cost does not include land acquisition or engineering.

16. Essington Road/East Frontage Road (Local Jurisdiction)

Essington Road/East Frontage Road is an existing 3-lane (36' wide) roadway south of the tracks and an existing 3-lane (24' wide) roadway north of the tracks with traffic projections unavailable due to the fact that this road was not modeled. An at-grade crossing is proposed to remain at this location. A 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These improvements would require approximately 670 lineal feet of roadway to be resurfaced and railroad signalization improvements. Four private drives would require adjustments to the intersection due to widening improvements. There would be no right-of-way impacts. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.2 million. This cost does not include land acquisition or engineering.

17. Division Street (Local Jurisdiction)

Division Street is an existing 4-lane (42' wide) roadway with traffic projected to reach 6,190 and 8,800 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. A 4-lane curb and gutter section with a 12' barrier median on each side with railroad signalization improvements. These improvements would require approximately 940 lineal feet of roadway to be resurfaced and railroad signalization improvements. Hennepin Drive would require

adjustments to the intersection due to widening improvements. There would be no right-of-way impacts. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.4 million. This cost does not include land acquisition or engineering.

18. Gaylord Avenue (Local Jurisdiction)

Gaylord Avenue is an existing 2-lane (24' wide) roadway with traffic projected to reach 6,240 ADT by the year 2015. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 730 lineal feet of roadway to be reconstructed and/or widened and resurfaced. One private drive would need to be improved in order to accommodate the widened roadway. Chestnut Street would require adjustments to the intersection and Emlong Street would have to be revised to a right-in-right-out access due to the median added on Gaylord Avenue. This segment of track has been designated by CN as remaining single-track. There would be no right-of-way impacts. The estimated construction cost for this crossing is approximately \$0.9 million. This cost does not include land acquisition or engineering.

19. Oakland Street (Local Jurisdiction)

Oakland Street is an existing 2-lane (28' wide) roadway with traffic projections unavailable due to the fact that this road was not modeled. An at-grade crossing is proposed to remain at this location. To improve safety and due to the close proximity to the bus barn on Sak Drive, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 760 lineal feet of roadway to be reconstructed and/or widened and resurfaced. There would be no right-of-way impacts. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$0.9 million. This cost does not include land acquisition or engineering.

20. Woodruff Road (Local Jurisdiction)

Woodruff Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 8,070 by the year 2015. The improvement area consists of a residential area and beyond the area is some mixed commercial use. Due to the excessive hours of road blockage due to train activity with the nearby east Joliet Yard, a grade separated crossing is being proposed at this location with the bridge length proposed to

accommodate a future 5-lane section. It has been identified that this crossing would see a substantial increase in the number of vehicles delayed due to the increase of freight rail volume. The grade separation would require approximately 1,920 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Two private drives need to be improved in order to accommodate the lowered profile. One access road needs to be constructed in order to accommodate the lowered profile to get access to the ComEd lift station. It is also proposed that N. Hacker be revised to a cul-de-sac near the Woodruff intersection. Minor profile revision would be needed to North Valley Avenue and Harrison Avenue. To minimize right-of-way impacts, retaining walls would be required, estimated at 26,120 sq. ft. The proposed roadway improvements would have a significant impact on adjacent properties, limiting and/or altering access points and requiring substantial right-of-way acquisition. This segment of track has been designated by CN as remaining double-track. The estimated construction cost for this crossing is approximately \$33.3 million. This cost does not include land acquisition or engineering.

21. Washington Street (Local Jurisdiction)

Washington Street is an existing 3-lane (36' wide) roadway with traffic projected to reach 8,140 and 11,150 ADT by the year 2015 and 2030, respectively. This area is located in a mixed zoning area which consists of industrial and a residential area. A grade separated crossing (over the rail) is being proposed at this location with the bridge length proposed for the current section. It has been identified that this crossing would see a substantial increase in the number of vehicles delayed and the potential of pedestrian accident increased due to the increase of freight rail volume. Washington Street would have to go over the rail due to the close proximity to Hickory Creek. The grade separation would require approximately 2,050 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Eight private drives need to be improved in order to accommodate the raised profile. Four access roads need to be improved in order to accommodate the raised profile to get access to Logan and Adella Avenue. To minimize right-of-way impacts, retaining walls would be required, estimated at 37,050 sq. ft. The proposed roadway improvements would have a significant impact on adjacent properties, limiting and/or altering access points and requiring substantial right-of-way acquisition. This segment of track has been designated by CN as remaining double-track. The estimated construction cost for this crossing is approximately \$28.7 million. This cost does not include land acquisition or engineering.

22. Rowell Street (N) (Local Jurisdiction)

Rowell Street (N) is an existing 2-lane (24' wide) roadway with traffic projected to reach 1,817 and 2,150 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. These improvements would require approximately 175 lineal feet of roadway to be resurfaced and railroad signalization improvements. There would be no right-of-way impacts. The estimated construction cost for this crossing is approximately \$0.5 million. This cost does not include land acquisition or engineering. This segment of track has been designated by CN as remaining double-track. If widening was to be performed to this roadway, the Interstate 80 bridge would have to be evaluated in order to see if there was adequate separation to the piers and/or abutments.

23. Mills Road (CH 51) (Will County)

Mills Road (CH 51) is an existing 2-lane (36' wide) roadway with traffic projected to reach 3,660 and 5,810 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 810 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Eight private drives would need to be improved in order to accommodate the widened roadway. Three of these drives would affect the left turning movements onto Mills Road. There would be no right-of-way impacts. This segment of track has been designated by CN as remaining double-track. The estimated construction cost for this crossing is approximately \$1.1 million. This cost does not include land acquisition or engineering.

24. Rowell Street (S) (Local Jurisdiction)

Rowell Street (S) is an existing 2-lane (24' wide) roadway with traffic projected to reach 2,900 and 3,600 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 710 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Two private drives would need to be improved in order to accommodate the widened roadway. There would be no right-of-way impacts. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$0.9 million. This cost does not include land acquisition or engineering.

25. West Spencer Road (Local Jurisdiction)

West Spencer Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 1,440 ADT by the year 2015. An at-grade crossing is proposed to remain at this location. These improvements would require approximately 720 lineal feet of roadway to be resurfaced and railroad signalization improvements. There would be no right-of-way impacts. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$0.8 million. This cost does not include land acquisition or engineering. The City of Joliet may want to change this crossing and terminate West Spencer at a cul-de-sac on each side of the current crossing,

26. Briggs Street (CH 54) (Will County)

Briggs Street is an existing 3-lane (48' wide) roadway with traffic projected to reach 11,730 and 13,670 ADT by the year 2015 and 2030, respectively. A grade separated crossing is being proposed at this location with the bridge length proposed for a future 5-lane section to accommodate future ADT. This roadway has been identified as a major collector route for the County. This crossing would help serve as a major north-south corridor and help increase the mobility for East Joliet Fire Department, the Will County Sheriff's Department, Will County Highway Maintenance facility and direct access to Interstate 80. The grade separation would require approximately 1,650 lineal feet of roadway to be reconstructed and/or widened and resurfaced and traffic signal modernization to U.S. Route 52 and Briggs Street. Five private drives need to be improved in order to accommodate the lowered profile.

Two access roads need to be improved in order to accommodate the lowered profile. To minimize right-of-way impacts, retaining walls would be required, estimated at 28,420 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available, though some right-of-way acquisition will be required in order to construct the frontage roads. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$26.3 million. This cost does not include land acquisition or engineering.

27. Cherry Hill Road (Local Jurisdiction)

Cherry Hill Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 2,300 and 4,300 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements

would require approximately 930 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Three private drives would need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.1 million. This cost does not include land acquisition or engineering.

28. Gougar Road (CH 52) (Will County)

Gougar Road (CH 52) is an existing 2-lane (24' wide) roadway with traffic projected to reach 13,440 and 20,380 ADT by the year 2015 and 2030, respectively. This roadway has been identified as a major collector route for the County who has recently issued a Freeway Order for this route. A grade separated crossing is being proposed at this location with the bridge length proposed for a future 5-lane section to accommodate future ADT and to alleviate traffic that would otherwise be diverted to nearby crossings that are residential in nature with no continuity. This crossing would help serve as a major north-south roadway and increase mobility for the Will County Highway Department, adjacent emergency response vehicles, and also the high school. The grade separation would require approximately 1,780 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Five private drives need to be improved in order to accommodate the lowered profile. To minimize right-of-way impacts, retaining walls would be required, estimated at 32,400 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available, though some right-of-way acquisition will be required in order to construct the frontage roads. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$23.1 million. This cost does not include land acquisition or engineering.

29. Nelson Road (Local Jurisdiction)

Nelson Road is an existing 2-lane (24' and 36' wide north and south, respectively) roadway with traffic projected to reach 2,860 and 5,640 ADT, by the year 2015 and 2030 respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 760 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Andrea Drive and one private drive would need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future

phases. New Lenox Fire Department located approximate 500 feet from this location which presents an emergency response issue when needed to go North on Nelson road. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$0.9 million. This cost does not include land acquisition or engineering.

30. Cedar Road (CH 4) (Will County)

Cedar Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 11,620 and 23,270 ADT by the year 2015 and 2030, respectively. Due to a creek which parallels the railroad, an at-grade crossing is proposed to remain at this location. The option of a grade separation with the roadway over was considered but not pursued since crossings are proposed at Gougar Road to the west and Schoolhouse Road to the east. If separations are not constructed at either of the two aforementioned locations, the Cedar Road location would be reconsidered. As part of the present recommendation, to accommodate the future ADT, we are proposing a 4-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 1,520 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Edison Drive would need to be improved in order to accommodate the widened roadway. A bridge crossing the Jackson Branch Creek would need to be widened to accommodate the widening improvements. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$2.5 million. This cost does not include land acquisition or engineering.

31. South Spencer Road (Local Jurisdiction)

South Spencer Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 2,550 and 5,050 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 980 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Four private drives would need to be improved in order to accommodate the widened roadway. The ADT at this crossing is relatively low but increase in train traffic could adversely affect the 3 elementary schools located southwest of the proposed crossing and a public water facility, which is within 2,200 lineal

feet. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.2 million. This cost does not include land acquisition or engineering.

32. Schoolhouse Road (Local Jurisdiction)

Schoolhouse Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 11,300 ADT by the year and rising to 21,000 ADT per the CMAP model by 2030. Due to its traffic carrying capacity and its strategic location along the east/west EJ&R line, a grade separated crossing is being proposed at this location. This roadway accommodates a high amount of truck traffic and the roadway is adjacent to a bus barn which services 3 elementary schools and a high school in New Lenox. A bridge to support a future 5-lane section is recommended to accommodate future ADT and the mobility of the area. The grade separation would require approximately 2,420 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Howell Drive, a roadway just south of Old Plank Drive, 2 frontage roads, and five private drives need to be improved in order to accommodate the lowered profile. To minimize right-of-way impacts, retaining walls would be required, estimated at 36,380 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available, though some right-of-way acquisition will be required in order to construct the frontage roads. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$23.5 million. This cost does not include land acquisition or engineering.

33. 116th Street/Owens Road (Local Jurisdiction)

116th Street/Owens Road is an existing 2-lane (30' wide) roadway with traffic projected to reach 870 and 2,650 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 760 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Two private drives would need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.2 million. This cost does not include land acquisition or engineering.

34. Wolf Road (Local Jurisdiction)

Wolf Road is an existing 2-lane (36' wide) roadway with traffic projected to reach 12,300 ADT by the year 2015. This roadway is a major collector adjacent to residential subdivisions in the Village of New Lenox and the Village of Frankfort. An at-grade crossing is proposed to remain at this location. To accommodate the future ADT we are proposing a 5-lane curb and gutter section on each side with railroad signalization improvements. These widening improvements would require approximately 940 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Two private drives would need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining double-track. The estimated construction cost for this crossing is approximately \$1.7 million. This cost does not include land acquisition or engineering.

35. Center Road (Local Jurisdiction)

Center Road is an existing 2-lane (24' wide) roadway with traffic projected to reach 10,800 and 13,500 ADT by the year 2015 and 2030, respectively. A grade separation was considered for this crossing with the high amount of truck traffic and 2030 ADT, but due to South LaGrange road being a grade separation and only 1 mile from the Center road crossing it was determined an at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These widening improvements would require approximately 860 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Sangmeister Road would need to be modified to a right-in-right-out access only and six private drives need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining double-track. The estimated construction cost for this crossing is approximately \$1.1 million. This cost does not include land acquisition or engineering.

36. Sauk Trail (Local Jurisdiction)

Sauk Trail is an existing 2-lane (20' wide) roadway with traffic projected to reach 4,620 and 8,070 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad

signalization improvements. These widening improvements would require approximately 1,540 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Three private drives need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.7 million. This cost does not include land acquisition or engineering.

37. Pfeiffer Road/88th Street (Local Jurisdiction)

Pfeiffer Road/88th Street is an existing 2-lane (24' wide) roadway with traffic projected to reach 10,170 and 12,570 ADT by the year 2015 and 2030, respectively. An at-grade crossing is proposed to remain at this location. To improve safety, we are proposing a 2-lane curb and gutter section with a 12' barrier median and 9' wide striped shoulders on each side with railroad signalization improvements. These improvements would require approximately 1,080 lineal feet of roadway to be reconstructed and/or widened and resurfaced. Three private drives need to be improved in order to accommodate the widened roadway. Right-of-way impacts would be minimal if any at all and would have to be further analyzed in future phases. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is approximately \$1.2 million. This cost does not include land acquisition or engineering.

38. Harlem Avenue (Cook County)

Harlem Avenue is an existing 2-lane (24' wide) roadway with traffic projected to reach 12,570 and 22,200 ADT by the year 2015 and 2030, respectively. The proposed roadway improvements are adjacent to residential to the west and farm land to the east. Due to the volume of traffic, a grade separated crossing is being proposed at this location with the bridge length proposed for a future 5-lane section to accommodate the 2030 projection. This roadway anchors the eastern boundary of Will county and Cook county and provides a major north-south route to U.S. Route 30 and Interstates 80 and 57 via U.S. Route 30. The grade separation would require approximately 2,300 lineal feet of roadway to be resurfaced, reconstructed, and/or rehabilitated. Aberdeen Road and two private drives need to be improved in order to accommodate the lowered profile. To minimize right-of-way impacts, retaining walls would be required, estimated at 35,760 sq. ft. The use of retaining walls could possibly be reduced if adjacent properties are determined to be available. This segment of track has been designated by CN as remaining single-track. The estimated construction cost for this crossing is

approximately \$25.3 million. This cost does not include land acquisition or engineering.

Right-of-Way Impacts

The level of impact is subjective based on the changes of access and the ability to reinstate that access. Assessments of damages to the remainder or additional acquisition to accommodate construction staging were not considered unless they were apparently known.

The level of impact is subjective based on the changes of access and the ability to reinstate that access. Further analysis in future phases will help determine the ultimate impact of the mitigated improvements as described above. Assessments of damages to the remainder or additional acquisition to accommodate construction staging were not considered unless they were apparently known, in which then they were described within the section above.

Section 4.0 - Conclusion

The DEIS fails to fully disclose the impacts to the natural and human environment. The Proposed Action has a disproportional level of impacts on Will County and that issue is ignored based on the presumption that there will be overall regional benefits; however, those benefits may be short-lived as excess rail capacity on the existing CN line may be filled.

Proposed Action has significant impacts on the residents and businesses in Will County. Travel will be hampered by train disruptions which are estimated to be far more severe than predicted. The resultant impact will be increased fuel usage to highway users and delays in travel that have both a cost implication regarding lost productivity and a social impact regarding the degradation on one's quality of life.

The DEIS leaves the bulk of the mitigation for the public to fund for the sole benefit of a private business. The DEIS states that there are "15 Highway/Rail Crossings in the Study Area that require mitigation due to the effects under the proposed action" and provide other options of mitigation under consideration. The cost to Will County will \$319.5 million based on independent estimates. SEA recommended that the board mandate CN only 5% to 50% of the costs of the crossings, which presents the question of who will fund the remaining. In an August 5th Congressional field hearing on this transaction, IDOT and the ICC stated that Illinois is in not in a position to fund any needed grade crossing mitigation that would result from an approved transaction. This non-participation in funding would put financial strain on the County and communities, if they were to assume responsibility for the mitigation. With the increased efficiency claimed by the CN, a savings will be realized and the business will be more profitable. A large percentage of those proceeds should be put back into the public infrastructure to make the County "whole". Although travel may be affected on localized level, improvements to facilitate regional travel needs to be implemented to have a zero net effect and provide local rerouting options. The grade separations recommended in this report provide for regional travel, local connectivity and emergency response; and should be part of the mitigation of the Proposed Action.

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September 30, 2008

Ms. Phillis Johnson-Ball
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

***Re: Will County Comments On Draft Environmental Impact
Statement Issued in STB Finance Docket 35087***

Dear Ms. Johnson-Ball:

We represent Will County Illinois ("Will County"), an intervenor in STB Finance Dkt. 35087. Enclosed please find two reports that were prepared for Will County that comment upon the Draft Environmental Impact Statement ("DEIS") prepared by the Surface Transportation Board ("STB") and HDR Engineering, Inc. ("HDR") and issued July 25, 2008. (The STB and HDR are collectively referred to as the "Preparers"). One of the enclosed reports is entitled *EJ&E/CN Railroad Draft Environmental Impact Review for Will County* and was prepared by the SEC Group, Inc. The other report is entitled *Report for Will County On The Draft Environmental Impact Statement From The Surface Transportation Board on the Canadian National's EJ&E Proposed* (STB Financial Docket 35087). This report was prepared by Dr. Fred Millar.

Will County adopts and incorporates by reference both enclosed reports as its comments on the DEIS. In addition, Will County also submits the supplemental comments below, which both summarize and amplify upon the comments contained in the enclosed reports.

Will County is the county immediately south of Chicago whose current population is approximately 673,586. Will County has added more than 171,000 residents since the 2000 census. In other words, in seven years its population has grown by 34%. Will County is soon expected to grow to over 1 million residents. The application pending before the STB in essence requests approval by the STB of the purchase by the Canadian National Railway Company ("CN") of virtually all of the assets of the Elgin Joliet and Eastern Railway Company ("EJ&E"). The EJ&E mainline runs more than 90 miles through Will County and effectively bisects the County. The EJ&E also operates over 16 miles of branch lines in Will County. If approved, the proposal would entail a more than 400% increase in rail traffic and more than 700% increase in hazardous material transportation through one half of this fast growing metropolitan county, and

similar increases in the other half. The environmental, human and health safety consequences would be enormous.

For the reasons set forth below, Will County believes that the DEIS is woefully inadequate and that the STB should issue a new draft in accordance with the applicable CEQ regulations. See 40 C.F.R. §1502.9(a). In addition, Will County requests that HDR be prohibited from further work on the DEIS or the Final Environmental Impact Statement ("FEIS") until such time as:

- (1) the STB explains how HDR was selected, so that the parties can be assured that the selection followed the Council on Environmental Quality provisions governing third-party contractors who prepare environmental impact statements; and
- (2) STB has obtained from HDR and made public information sufficient to demonstrate that HDR's judgment and work is not clouded by a conflict of interest.

I. GENERAL STANDARDS GOVERNING NEPA ANALYSIS

An agency analyzing the environmental consequences of a prepared transaction in accordance with the National Environmental Policy Act ("NEPA") is required to take a "hard look" at the environmental consequences of the proposed action. *Kleppe v. Sierra Club*, 427 U.S. 390, 410, n. 21, 96 S.Ct. 2718, 2730 n. 21, 49 L. Ed. 2d 576 (1976). NEPA and the implementing Council on Environmental Quality regulations require an agency to analyze reasonable alternatives to the proposed action to avoid or minimize environmental harm. 40 C.F.R. §1502.1. Mitigation options to eliminate or reduce environmental impacts must be addressed. 40 C.F.R. §1502.16(f)-(h). The lead agency is charged with the duty to "ensure the professional integrity, including scientific integrity, of the discussion and analyses in environmental impact statements." *Id.* at §1502-24.

The analysis prepared by HDR, perhaps with some STB oversight, falls well short of these basic EIS standards. Environmental impacts were consciously and intentionally understated through the Preparers' refusal to use projected traffic data routinely used and relied upon for metropolitan planning purposes. Reasonable alternatives were not evaluated. Indirect impacts on adjacent roadways were ignored. Increased exposure of minority communities to toxic chemicals was masked or ignored. Assumptions were made instead of conducting the requisite surveys. No meaningful, specific mitigation was explored or identified. It appears that instead of a "hard look" at environmental impacts of the proposed acquisition, every effort was made to minimize or understate the environmental impacts of the proposed transaction. No meaningful effort was made to evaluate or quantify the cost to mitigate the environmental impacts and harm of the proposed transaction.

This is not a good job, and it is not what is expected or required under NEPA and its implementing regulations. Some of the more glaring defects are discussed below.

II. THE FAILURE TO EVALUATE OR PROPOSE ANY MEANINGFUL MITIGATION IS A FATAL FLAW THAT REQUIRES ISSUANCE OF A NEW DRAFT EIS

The CEQ regulations implementing NEPA require a full scientific and analytic analysis of the means to mitigate adverse environmental impacts. 40 C.F.R. §1502.16. The CEQ has described the scope of mitigation analysis required by NEPA as follows:

The mitigation measures discussed in an EIS must cover the range of impacts of the proposal. The measures must include such things as design alternatives that would decrease pollution emissions, construction impacts, esthetic intrusion, as well as relocation assistance, possible land use controls that could be enacted and other possible efforts. Mitigation measures must be considered even for impacts that by themselves would not be considered "significant."

* * *

All relevant, reasonable mitigation measure that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies, and thus would not be committed as part of the RODs of these agencies. Sections 1502.16(h), 1505.2(c). This will serve to [46 FR 18032] alert agencies or officials who can implement these extra measures, and will encourage them to do so. Because the EIS is the most comprehensive environmental document, it is an ideal vehicle in which to lay out not only the full range of environmental impacts but also the full spectrum of appropriate mitigation.

Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations ("Forty Questions"), 46 Fed. Reg. 18026, 18031-32 (Council on Environmental Quality 1981).

The DEIS identifies environmental consequences likely to result from the proposed transaction, but it fails to identify any specific meaningful mitigation measures required to address these impacts beyond those voluntarily proposed by the CN. Instead, the Preparers of the DEIS at best identify a general laundry list of mitigation options that are not tailored to specific situations, invite the parties to identify the appropriate mitigation in their comments, and suggest that the Preparers will then pick and choose among the parties' recommended mitigation measures in the Final EIS. See, e.g., DEIS at 6-19.

The procedure suggested by the Preparers violates the Council on Environmental Quality regulations implementing NEPA, which the STB and all other federal agencies are bound to follow. See 40 C.F.R. §1500.3. As noted above, the environmental impact statement must include a meaningful analysis of all relevant, reasonable mitigation measures, whether or not they are within the jurisdiction of the lead agency. The requirements that are applicable in final environmental impact statements are equally applicable to draft environmental impact statements:

The draft [environmental impact] statement must fulfill and satisfy to the fullest extent possible the requirements established for final statements in Section 102(20)(C) of the Act. If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.

40 C.F.R. §1502.9(a).

The DEIS is so inadequate with respect to its mitigation analysis that it precludes meaningful analysis. For example, with the tremendous increase in train traffic at Will County's 38 public at grade crossing, there are very significant public safety, emergency sources and traffic impact consequences. There is no specific mitigation recommended in the DEIS for any of those crossings. Will County's consultant, the SEC Group, has calculated that \$319.5 million is required in public improvements to protect traffic safety at the identified crossings. Whether that is the right number, or it is more or less, there most assuredly is going to be a safety and environmental impact when one increases rail traffic in a populous metropolitan county by over 400% and hazardous materials transport by more than 700%. There are no specific mitigation measures identified in the DEIS to address any given crossing. Instead, the STB provided a generalized laundry list of eight general mitigation options, one of which was closing the crossing. The DEIS mitigation discussion concerning at-grade rail crossings is simply devoid of meaningful analysis.

Moreover, two fire stations, Plainfield Fire Station No. 3 and Joliet Fire Station No. 8, are going to be unable to effectively serve communities in their district on the other side of the EJ&E/CN tracks due to the increased train traffic. The obvious solution is to build a fire station on the other side of the tracks, yet the DEIS never mentions this required mitigation.

The CEQ regulations require the Preparers to submit a meaningful evaluation of mitigation options. The failure of the Preparers to identify, analyze, or recommend specific mitigation measures fails to comply with the CEQ regulations and defeats the purpose of issuing a draft EIS, for which the parties have an opportunity to comment and have their comments analyzed and addressed in the final EIS. Pursuant to 40 C.F.R. §1502.9(a), the failure to include specific analysis of mitigation options requires that the STB prepare a new DEIS that contains a meaningful analysis of specific mitigation options. Moreover, Will Count believes that for the reasons discussed below, there are other sections of the DEIS that also require revision and resubmission in draft form.

III. EXAMPLES OF SOME OF THE OTHER MORE GLARING DEFICIENCIES

Examples of some of the more glaring deficiencies in the DEIS are set forth below. The enclosed reports identify numerous other deficiencies.

A. Traffic Impacts And Delays Are Consciously And Intentionally Understood

The CEQ regulations implementing NEPA require that the environmental information

developed for the EIS "must be of a high quality. Accurate scientific analysis, expert agency comments and public security are essential to implementing NEPA." 40 C.F.R. §1500.1. The DEIS Preparers consciously and intentionally understated the traffic impacts and delays that would result from the proposed transaction because they chose to use vehicular traffic projections for 2015 instead of 2030.

The six county Chicago metropolitan area, including Will County, is an air quality non-attainment area. That means that a Metropolitan Planning Organization must adopt a metropolitan transportation plan that adheres to an air quality budget. The backbone of that planning process is a Regional Transportation Plan that includes approved projects based upon projections of vehicular traffic 20 years or more into the future. Those traffic projections, which are deemed sufficiently reliable and foreseeable that every governmental unit and planning organization in the Chicago metropolitan area uses them, were rejected by the Preparers in favor of 2015 traffic projection or, in other words, projection of traffic growth only six years into the future. In a fast growing metropolitan county like Will County, the Preparers' refusal to use respected and accepted traffic projections 20 years into the future in favor of a six year projected traffic data dramatically understates the vehicular traffic impacted, the related traffic delays and air quality impacts and, therefore, the required mitigation.

In addition, the DEIS fails to account for two major areas of rail traffic delay in its assessment of how fast rail traffic will move through Will County. The Des Plaines River lift span is a single track bridge that opens for river traffic on average of 17 times per day. The projected increase in cars handled in the East Joliet Yard, where the number of cars handled is expected to double in an area that already has severe train speed impediments, is almost certain to slow passing trains. No meaningful consideration of these impediments is provided in the DEIS.

The combination of understated vehicular traffic projections and slower rail speeds than projected virtually ensures that the vehicular delays will be significantly greater in Will County than is projected in the DEIS.

B. Reasonable Alternatives Were Not Considered

The CEQ regulations implementing NEPA provide that the alternatives analysis is the heart of the environmental impact statement. 40 C.F.R. §1502.14. Those regulations require the Preparers to "[r]igorously and objectively evaluate all reasonable alternatives." *Id.* §15502.14(a). As explained in the response to Question 2A in the CEQ's 40 Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations:

In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is capable itself of carrying out a particular alternative. Reasonable alternatives include those that are practicable or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

46 Fed Reg. at 18027. The deficiencies in the DEIS' alternatives analysis include, but are not limited to, the following :

- ◆ The DEIS did not consider the option of shifting only a portion of the traffic from existing CN lines to the EJ&E lines.
- ◆ The DEIS did not evaluate alternative locations for double track sections.
- ◆ The DEIS rejected a ByPass Route as an alternate because of "more environmental impacts," but no information or analysis is provided to support this conclusion.

C. Indirect And Cumulative Reports

The DEIS is required to identify all indirect and cumulative effects that are known or reasonably foreseeable. 40 C.F.R. §1508.8(b). As explained more extensively in the enclosed SEC Group report, the Preparers' analysis of indirect and cumulative impacts is deficient because they ignored accepted and reasonably foreseeable projected increases in population and traffic; they failed to evaluate the local character of projected land use; and they did an inadequate job of evaluating the impact of this transaction on Metra's proposed STAR Line and the related environmental consequences and costs if Metra is required to build a new track within or outside the EJ&E right of way.

D. The Hazardous Materials Increase Is Not Addressed In Any Meaningful Manner

As discussed on page 8 of the SEC Group's report, carloads of hazardous materials are projected to grow from 17,000 to 145,000 carloads per year, which is higher than on any existing CN line. The increase reduces the interval between hazardous materials releases by a factor of 15 to 20.

Hazardous materials, whether released accidentally or pursuant to a terrorist attack, pose a huge risk to populous metropolitan areas like Will County. The DEIS focuses almost exclusively upon the training of local officials to deal with a release of hazardous materials.

As discussed in Professor Millar's enclosed report, the risk of a terrorist attack on a metropolitan area utilizing rail freight transportation of toxic materials is a risk deserving of evaluation. Furthermore, the release of toxic hazardous materials in a populous urban area like Will County, intentional or not, poses a potentially disastrous risk.

The failure of DEIS to address that risk in a meaningful way, and to evaluate possible mitigation such as utilizing other routes for hazardous materials transportation is unacceptable and a fatal flaw in the DEIS.

E. The Failure To Recognize And Address The Disproportionate Impact On Minority And Low Income Populations Violates The Environmental Justice Review

Requirement

As reflected in the enclosed SEC Group report, minority and low income populations will be subjected to disproportionate impacts in terms of exposure to trains transporting hazardous materials; air quality in the form of higher levels of the mobile air toxin acrolein at the Ogden, Washington and Woodruff intersections; and disproportionate land value impacts. All of these facts should have been addressed and mitigation discussed, which was not done.

F. Biological Resources And Air Quality

As reflected on pages 10 to 12 of the SEC Group Report, the biological resource impact analysis is woefully inadequate. Virtually no field or survey work has been done, two major designated Illinois Nature Preserves that are near the EJ&E are not even mentioned although impacts appear likely, and one cannot tell from the report whether federal endangered species will or will not be impacted, as the analysis is inadequate and the DEIS contains conflicting information.

The same sloppy work pervades the DEIS' air quality analysis. For example, as reflected on page 12 of the enclosed SEC Group report, standard risk assessment protocols for evaluation of total exposure to carcinogenic pollutants was not followed and, therefore, the risk exposure analysis for the listed carcinogenic chemicals is inadequate and untrustworthy.

G. The Preparers' Cost-Benefit Analysis Is One Sided

Section 1502.23 of the CEQ regulations provides in relevant part:

If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences.

40 C.F.R. §1502.23. The one sided nature of the Preparers' analysis is reflected by the fact that they report that the proposed acquisition will generate \$14.3 million in annual operation benefits for the CN. However, there is no corresponding calculation of the resultant costs to the public.

The SEC Group has calculated that, among others, it will cost approximately \$319.5 million for grade crossing improvements to maintain and protect public safety if the proposed transaction is approved, and it will generate an additional \$3.2 million in annual delay costs. See SEC Group Report at 10. The STB can and should develop an unbiased calculation of the private and public costs and benefits in a draft EIS in accordance with 40 C.F.R. §1502.23.

IV. CONFLICT OF INTEREST ISSUES

In the list of preparers, included in the DEIS, there were 55 preparers listed that are either HDR employees or HDR subconsultants, and only four STB employees listed. HDR clearly had the principal role in writing the DEIS.

The handful of deficiencies previously listed in this letter are only a small number of the deficiencies in the DEIS that are identified in the SEC Group report. A large number of analyses issues also lacked any meaningful analysis, lacked the necessary fieldwork and research necessary to arrive at a reasoned analysis, or understated environmental impacts due to the analysis methodology selected. Will County is concerned that the deficiencies could be the product of trying to produce a DEIS quickly to meet the CN's timetable rather than taking the time to do the job correctly.

The CEQ regulations implementing NEPA contemplate the use of third party contractors, such as HDR, to prepare environmental impact statements. See 40 C.F.R. §1506.5(c). The applicable regulations require that the third party contractor be selected by the lead or cooperating agencies "to avoid any conflict of interest." *Id.* The CEQ's NEPA guidance contemplates that the selection will be made based upon a written "solicitation of a field of candidates under the agency's direction." Forty Questions, 46 Fed. Reg. at 18031. The CN's Application filed in this proceeding indicates on page 33 that the "CN has obtained the approval of the Board's Section on Environmental Analysis ("EA") for the retention of HDR Engineering, Inc. ("HDR") as a third-party environmental consultant to prepare any environmental documentation (EA or EIS) that may be required." CN-2 at 33.

CN's statement suggests that there was no selection procedure as contemplated by the CEQ, and that the STB simply rubber stamped the CN's selected third party consultant. To assure the parties that was not the case, please identify the selection procedures utilized by STB to select HDR, the published or unpublished selection criteria utilized, and the names and identities of the other candidates who were contacted and considered.

The CEQ regulations also mandate that "contractors shall execute a disclosure statement prepared by the lead agency . . . specifying that they have no financial or other interest in the outcome of the project." 40 C.F.R. §1506.5(c). The CEQ has explained what is intended by the required disclosure:

Section 1506.5(c), which specifies that a consulting firm preparing an EIS must execute a disclosure statement, does not define "financial or other interest in the outcome of the project." The Council interprets this term broadly to cover any known benefits other than general enhancement of professional representation.

40 Questions, 46 Fed. Reg. at 18031.

The purpose of the conflict of interest disclosure requirements is to ensure the "objectivity and integrity of the NEPA." See *Associations Working For Aurora's Residential Environment v. Colorado Department of Transportation*, 153 F.3d 1122, 1129 (10th Cir. 1998); *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 202 (D.C. Cir. 1991). Given the defects in the DEIS, Will County submits that it is incumbent upon STB to disclose to all parties the disclosure statement it obtained from HDR. Furthermore, to ensure that HDR does not have an actual conflict, STB should submit in writing and publish HDR's answers by the following questions:

- (1) Does HDR have an agreement or a commitment from CN that HDR will be retained to work on the integration of the EJ&E operating assets into the CN system if the CN's application is approved?
- (2) Has HDR discussed with CN the possible provision of services by HDR with respect to the EJ&E operating assets if the CN's application is approved? If so, please describe the content of those discussions.
- (3) For each of the last five calendar years, please describe the amount of money that HDR has been paid for services rendered to the CN, its parent corporation, affiliates or subsidiaries.

Until the STB has answers to those questions and has evaluated whether HDR has a conflict of interest, HDR and its subconsultants should not be permitted to work on this project.

CONCLUSION

Will County appreciates the opportunity to comment on the DEIS. Hopefully, the STB will agree with the wisdom of publishing a supplemental DEIS for comment before proceeding with preparation of the final EIS and will address the potential conflict of interest issues raised above.

Sincerely,

HINSHAW & CULBERTSON LLP



Edward R. Gower
egower@hinshawlaw.com

ERG:rs
Encl.

Copy, w/enclosure to: Paul Cunningham, Esq.
Eric L. Hirschhorn, Esq.
Kevin Sheys, Esq.

EJ&E/CN RR DEIS STUDY SUMMARY OF COST FOR WILL COUNTY

#	STREET	JURISDICTION	LOCAL JURISDICTION	PROPOSED ACTION	PROJECTED 2030 ADT	PROJECTED 2015 ADT	CALCULATED IMPEDED SPEED	COST PER LOCATION
1	87th St	LOCAL	Wheatland Township	2-Lane At Grade	1,350	1,470	N/A	\$ 902,031
2	Hafenrichter Rd	LOCAL	City of Aurora	2-Lane At Grade	3,750	4,800	31	\$ 1,081,719
3	95th/Wolf's Crossing	LOCAL	Wheatland Township	5-Lane Grade Separation	12,300	17,740	29	\$ 35,715,816
4	111th St	LOCAL	Wheatland Township	2-Lane At Grade	16,400	13,230	29	\$ 1,229,063
5	119th St/Ferguson	LOCAL	Village of Plainfield	5-Lane Grade Separation	14,600	11,750	27	\$ 42,744,162
6	127th St	LOCAL	Village of Plainfield	2-Lane At Grade	1,650	6,910	21	\$ 1,408,750
7	135th St	LOCAL	Village of Plainfield	2-Lane At Grade	4,900	3,620	23	\$ 1,081,719
8	Van Dyke Rd	LOCAL	Village of Plainfield	None Needed	1,210	4,650	31	\$ -
9	143rd St	LOCAL	Village of Plainfield	5-Lane Grade Separation	17,780	16,090	33	\$ 24,439,239
10	Naperville-Plainfield Rd	LOCAL	Village of Plainfield	2-Lane At Grade	8,690	4,990	35	\$ 1,618,050
11	IL RT 126/Main St	IDOT	Village of Plainfield	5-Lane Grade Separation	17,170	23,390	35	\$ 24,439,215
12	Center St	LOCAL	Village of Plainfield	2-Lane At Grade	N/A	N/A	35	\$ 1,081,719
13	Eastern Ave	LOCAL	Village of Plainfield	2-Lane At Grade	N/A	N/A	35	\$ 1,376,406
14	Lockport Rd	LOCAL	Village of Plainfield	2-Lane At Grade	9,730	11,710	35	\$ 1,376,406
15	Renwick Rd (CH 36)	WILL	Village of Plainfield	4-Quad Gate	13,820	11,360	35	\$ 462,000
16	Essington Rd/East Frontage Rd	LOCAL	Plainfield Township	2-Lane At Grade	N/A	N/A	33	\$ 934,375
17	Division St	LOCAL	City of Joliet	5-Lane W/Median At Grade	8,800	6,190	27	\$ 1,376,406
18	Gaylord Rd	LOCAL	City of Crest Hill	2-Lane At Grade	6,240	6,240	21	\$ 934,375
19	Oakland Ave	LOCAL	City of Crest Hill	2-Lane At Grade	N/A	N/A	N/A	\$ 934,375
20	Woodruff Rd	LOCAL	City of Joliet	5-Lane Grade Separation	2,430	8,070	10	\$ 33,334,530
21	Washington St	LOCAL	City of Joliet	3-Lane Overhead Grade Separation	11,150	8,140	10	\$ 28,731,012
22	Rowell Ave. (N)	LOCAL	City of Joliet	At Grade Int. Impv. W/New Gates	1,546	2,150	9	\$ 492,344
23	Mills Rd (CH 51)	WILL		2-Lane At Grade	5,810	3,660	18	\$ 1,081,719
24	Rowell Ave (S)	LOCAL	City of Joliet	2-Lane At Grade	3,600	2,900	24	\$ 934,375
25	West Spencer Rd	LOCAL	City of Joliet	At Grade Gate work or Close Rd.	830	1,440	N/A	\$ 787,031
26	Briggs St (CH 54)	WILL		5-Lane Grade Separation	13,670	11,730	26	\$ 26,301,537
27	Cherry Hill Rd	LOCAL	Village of New Lenox	2-Lane At Grade	4,300	2,300	N/A	\$ 1,081,719
28	Gougar Rd (CH 52)	WILL	Village of New Lenox	5-Lane Grade Separation	20,380	13,440	26	\$ 23,096,370
29	Nelson Rd	LOCAL	Village of New Lenox	2-Lane At Grade	5,640	2,860	30	\$ 934,375
30	Cedar Rd (CH 4)	WILL	Village of New Lenox	5-Lane W/Median At Grade	23,270	11,620	30	\$ 2,544,375
31	South Spencer Rd	LOCAL	Village of New Lenox	2-Lane At Grade	5,050	2,550	30	\$ 1,229,063
32	Schoolhouse Rd	LOCAL	Village of New Lenox	5-Lane Grade Separation	9,260	11,310	30	\$ 23,519,364
33	116TH/Owens Rd	LOCAL	Village of Frankfort	2-Lane At Grade	2,650	870	N/A	\$ 1,229,063
34	Wolf Rd	LOCAL	Village of Frankfort	5-Lane At Grade	12,200	12,300	24	\$ 1,743,750
35	Center Rd	LOCAL	Village of Frankfort	2-Lane At Grade	13,500	10,800	26	\$ 1,081,719
36	Sauk Trail	LOCAL	Village of Frankfort	2-Lane At Grade	8,070	4,620	30	\$ 1,671,094
37	Pfeiffer Rd/88th	LOCAL	Village of Frankfort	2-Lane At Grade	8,330	10,170	30	\$ 1,229,063
38	Harlem Ave	COOK	Village of Frankfort	5-Lane W/Median Grade Separation	22,200	12,570	40	\$ 25,306,170

TOTAL COST	\$ 319,464,496
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EJ&EN RR DEIS STUDY SUMMARY OF GENERAL INFORMATION FOR WILL COUNTY

Notes: \$319,454,496

1. Data from <http://www.gettingaroundindetroit.com/IDT.asp?d=7&asid=2>
2. Blank ADT indicates FRA/ICC case machines IDOT call. Blank VR indicates ICC data
3. Municipal data is not seasonally adjusted and in some cases is projected, for more information visit the columns M, N, and O.
4. Chicago Metropolitan Agency for Planning (CMAP) Travel Demand Model, based off of information visit the columns M, N, and O.
5. For projection without vehicle volume P, for previous forecasts utilize column R.
6. Will County 2030 Transportation Plan, Travel Demand Model, provided by CH2M Hill
7. Municipal Transportation Master Plan concurred by CMAP
8. Provided by Will County 9-1-1

TRAIN BLOCKAGES PER DEIS AVERAGE TRAIN SPEEDS

Street	Train Length (Feet)		Trains Per Day, N		Train Speed, V (mph)		Blocked Time Per Train (Minutes)		Blocked Time Per 24 Hour (Minutes)	
	No-Action	Proposed Action	No-Action	Proposed Action	No-Action	Proposed Action	No-Action	Proposed Action	No-Action	Proposed Action
Hafenrichter Road	3881	6203	15.7	39.5	32	38	1.88	2.35	29.5	93.0
Wolf's Crossing Road	3881	6203	15.7	39.5	31	37	1.92	2.41	30.2	95.0
111th Street	3881	6203	15.7	39.5	31	37	1.92	2.41	30.2	95.0
Ferguson Road/ 119th Street	3881	6203	15.7	39.5	30	36	1.97	2.46	30.9	97.1
127th Street	3881	6203	15.7	39.5	29	33	2.02	2.64	31.7	104.1
135th Street	3398	5842	15.7	39.5	29	34	1.83	2.45	28.8	96.9
Van Dyke Road	3398	5842	18.5	42.3	32	38	1.71	2.25	31.6	95.0
143rd Street	3398	5842	18.5	42.3	33	39	1.67	2.20	30.9	93.2
Plainfield- Naperville Road	3398	5842	18.5	42.3	34	40	1.64	2.16	30.3	91.4
Main Street	3398	5842	18.5	42.3	34	40	1.64	2.16	30.3	91.4
Center Street	3398	5842	18.5	42.3	34	40	1.64	2.16	30.3	91.4
Eastern Avenue	3398	5842	18.5	42.3	34	40	1.64	2.16	30.3	91.4
Lockport Road	3398	5842	18.5	42.3	34	40	1.64	2.16	30.3	91.4
Renwick Road	3398	5842	18.5	42.3	35	40	1.60	2.16	29.7	91.4
East Frontage Road/ Essington	3398	5842	18.5	42.3	33	39	1.67	2.20	30.9	93.2
Division Street	3398	5842	18.5	42.3	31	36	1.75	2.34	32.3	99.2
Gaylord Road	3398	5842	18.5	42.3	28	33	1.88	2.51	34.8	106.2
Oakland Avenue	3398	5842	18.5	42.3	NOT MODELED					
Woodruff Road	2742	5552	18.5	42.3	9	10	3.96	6.81	73.3	288.0
Washington Street	3795	6684	6.4	28.3	9	10	5.29	8.10	33.9	229.1
South Rowell Avenue	3795	6684	6.4	28.3	19	17	2.77	4.97	17.7	140.6
Mills Road	3795	6684	6.4	28.3	27	30	2.10	3.03	13.4	85.8
South Rowell Avenue	3795	6684	6.4	28.3	29	33	1.99	2.80	12.7	79.3
Spencer Road	3795	6684	6.4	28.3	NOT MODELED					
Briggs Street	3795	6684	6.4	28.3	31	34	1.89	2.73	12.1	77.4
Cherry Hill Road	3795	6684	6.4	28.3	NOT MODELED					
South Gougar Road	3795	6684	6.4	28.3	28	34	2.04	2.73	13.1	77.4
Nelson Road	3795	6684	6.4	28.3	31	36	1.89	2.61	12.1	73.9
Cedar Road	3795	6684	6.4	28.3	30	36	1.94	2.61	12.4	73.9
Spencer Road	3795	6684	6.4	28.3	31	36	1.89	2.61	12.1	73.9
School House Road	3795	6684	6.4	28.3	31	36	1.89	2.61	12.1	73.9
Owens Road	3795	6684	6.4	28.3	NOT MODELED					
Wolf Road	3795	6684	6.4	28.3	28	33	2.04	2.80	13.1	79.3
Center Road	3795	6684	6.4	28.3	29	34	1.99	2.73	12.7	77.4
Old Sauk Trail	3795	6684	6.4	28.3	32	36	1.85	2.61	11.8	73.9
Pfeiffer Road/ 88th Avenue	3795	6684	6.4	28.3	32	36	1.85	2.61	11.8	73.9
Harlem Avenue	3795	6684	6.4	28.3	35	41	1.73	2.35	11.1	66.6

IMPEDED SPEED CALCULATION

Street	Track Speed Per Occupancy Calculation	Average Train Speed per DEIS	Calculated Impeded Speed
Hafenrichter Road	45	38	31
Wolf's Crossing Road	45	37	29
111th Street	45	37	29
Ferguson Road/ 119th Street	45	36	27
127th Street	45	33	21
135th Street	45	34	23
Van Dyke Road	45	38	31
143rd Street	45	39	33
Plainfield-Naperville Road	45	40	35
Main Street	45	40	35
Center Street	45	40	35
Eastern Avenue	45	40	35
Lockport Road	45	40	35
Renwick Road	45	40	35
East Frontage Road/ Essington	45	39	33
Division Street	45	36	27
Gaylord Road	45	33	21
Oakland Avenue	25	NOT MODELED	
Woodruff Road	10	10	10
Washington Street	10	10	10
South Rowell Avenue	25	17	9
Mills Road	42	30	18
South Rowell Avenue	42	33	24
Spencer Road	42	NOT MODELED	
Briggs Street	42	34	26
Cherry Hill Road	42	NOT MODELED	
South Gougar Road	42	34	26
Nelson Road	42	36	30
Cedar Road	42	36	30
Spencer Road	42	36	30
School House Road	42	36	30
Owens Road	42	NOT MODELED	
Wolf Road	42	33	24
Center Road	42	34	26
Old Sauk Trail	42	36	30
Pfeiffer Road/ 88th Avenue	42	36	30
Harlem Avenue	42	41	40

TRAIN BLOCKAGES USING IMPEDED TRAIN SPEEDS

Street	Train Length (Feet)		Trains Per Day, N		Train Speed, V (mph)		Blocked Time Per Train (Minutes)		Blocked Time Per 24 Hour (Minutes)	
	No-Action	Proposed Action	No-Action	Proposed Action	No-Action	Proposed Action	No-Action	Proposed Action	No-Action	Proposed Action
Hafenrichter Road	3881	6203	15.7	39.5	32	31	1.88	2.77	29.5	109.6
Wolf's Crossing Road	3881	6203	15.7	39.5	31	29	1.92	2.93	30.2	115.8
111th Street	3881	6203	15.7	39.5	31	29	1.92	2.93	30.2	115.8
Ferguson Road/ 119th Street	3881	6203	15.7	39.5	30	27	1.97	3.11	30.9	122.9
127th Street	3881	6203	15.7	39.5	29	21	2.02	3.86	31.7	152.3
135th Street	3398	5842	15.7	39.5	29	23	1.83	3.39	28.8	133.8
Van Dyke Road	3398	5842	18.5	42.3	32	31	1.71	2.64	31.6	111.7
143rd Street	3398	5842	18.5	42.3	33	33	1.67	2.51	30.9	106.2
Plainfield- Naperville Road	3398	5842	18.5	42.3	34	35	1.64	2.40	30.3	101.4
Main Street	3398	5842	18.5	42.3	34	35	1.64	2.40	30.3	101.4
Center Street	3398	5842	18.5	42.3	34	35	1.64	2.40	30.3	101.4
Eastern Avenue	3398	5842	18.5	42.3	34	35	1.64	2.40	30.3	101.4
Lockport Road	3398	5842	18.5	42.3	34	35	1.64	2.40	30.3	101.4
Renwick Road	3398	5842	18.5	42.3	35	35	1.60	2.40	29.7	101.4
East Frontage Road/ Essington	3398	5842	18.5	42.3	33	33	1.67	2.51	30.9	106.2
Division Street	3398	5842	18.5	42.3	31	27	1.75	2.96	32.3	125.2
Gaylord Road	3398	5842	18.5	42.3	28	21	1.88	3.66	34.8	154.9
Oakland Avenue	3398	5842	18.5	42.3	NOT MODELED					
Woodruff Road	2742	5552	18.5	42.3	9	10	3.96	6.81	73.3	288.0
Washington Street	3795	6684	6.4	28.3	9	10	5.29	8.10	33.9	229.1
South Rowell Avenue	3795	6684	6.4	28.3	19	9	2.77	8.94	17.7	253.0
Mills Road	3795	6684	6.4	28.3	27	18	2.10	4.72	13.4	133.6
South Rowell Avenue	3795	6684	6.4	28.3	29	24	1.99	3.66	12.7	103.7
Spencer Road	3795	6684	6.4	28.3	NOT MODELED					
Briggs Street	3795	6684	6.4	28.3	31	26	1.89	3.42	12.1	96.8
Cherry Hill Road	3795	6684	6.4	28.3	NOT MODELED					
South Gougar Road	3795	6684	6.4	28.3	28	26	2.04	3.42	13.1	96.8
Nelson Road	3795	6684	6.4	28.3	31	30	1.89	3.03	12.1	85.8
Cedar Road	3795	6684	6.4	28.3	30	30	1.94	3.03	12.4	85.8
Spencer Road	3795	6684	6.4	28.3	31	30	1.89	3.03	12.1	85.8
School House Road	3795	6684	6.4	28.3	31	30	1.89	3.03	12.1	85.8
Owens Road	3795	6684	6.4	28.3	NOT MODELED					
Wolf Road	3795	6684	6.4	28.3	28	24	2.04	3.66	13.1	103.7
Center Road	3795	6684	6.4	28.3	29	26	1.99	3.42	12.7	96.8
Old Sauk Trail	3795	6684	6.4	28.3	32	30	1.85	3.03	11.8	85.8
Pfeiffer Road/ 88th Avenue	3795	6684	6.4	28.3	32	30	1.85	3.03	11.8	85.8
Harlem Avenue	3795	6684	6.4	28.3	35	40	1.73	2.40	11.1	67.9

SUMMARY TRAIN BLOCKAGES

Street	Blocked Time Per Train (Minutes)			Blocked Time Per 24 Hour (Minutes)			Blocked Time Per Hour (Minutes)		
	No-Action	Proposed Action Average Speed	Proposed Action Impeded Speed	No-Action	Proposed Action Average Speed	Proposed Action Impeded Speed	No-Action	Proposed Action Average Speed	Proposed Action Impeded Speed
Hafenrichter Road	1.88	2.35	2.77	29.5	93.0	109.6	1.2	3.9	4.6
Wolf's Crossing Road	1.92	2.41	2.93	30.2	95.0	115.8	1.3	4.0	4.8
111th Street	1.92	2.41	2.93	30.2	95.0	115.8	1.3	4.0	4.8
Ferguson Road/ 119th Street	1.97	2.46	3.11	30.9	97.1	122.9	1.3	4.0	5.1
127th Street	2.02	2.64	3.86	31.7	104.1	152.3	1.3	4.3	6.3
135th Street	1.83	2.45	3.39	28.8	96.9	133.8	1.2	4.0	5.6
Van Dyke Road	1.71	2.25	2.64	31.6	95.0	111.7	1.3	4.0	4.7
143rd Street	1.67	2.20	2.51	30.9	93.2	106.2	1.3	3.9	4.4
Plainfield-Naperville Road	1.64	2.16	2.40	30.3	91.4	101.4	1.3	3.8	4.2
Main Street	1.64	2.16	2.40	30.3	91.4	101.4	1.3	3.8	4.2
Center Street	1.64	2.16	2.40	30.3	91.4	101.4	1.3	3.8	4.2
Eastern Avenue	1.64	2.16	2.40	30.3	91.4	101.4	1.3	3.8	4.2
Lockport Road	1.64	2.16	2.40	30.3	91.4	101.4	1.3	3.8	4.2
Renwick Road	1.60	2.16	2.40	29.7	91.4	101.4	1.2	3.8	4.2
East Frontage Road/ Essington	1.67	2.20	2.51	30.9	93.2	106.2	1.3	3.9	4.4
Division Street	1.75	2.34	2.96	32.3	99.2	125.2	1.3	4.1	5.2
Gaylord Road	1.88	2.51	3.66	34.8	106.2	154.9	1.5	4.4	6.5
Oakland Avenue	NOT MODELED			NOT MODELED			NOT MODELED		
Woodruff Road	3.96	6.81	6.81	73.3	288.0	288.0	3.1	12.0	12.0
Washington Street	5.29	8.10	8.10	33.9	229.1	229.1	1.4	9.5	9.5
South Rowell Avenue	2.77	4.97	8.94	17.7	140.6	253.0	0.7	5.9	10.5
Mills Road	2.10	3.03	4.72	13.4	85.8	133.6	0.6	3.6	5.6
South Rowell Avenue	1.99	2.80	3.66	12.7	79.3	103.7	0.5	3.3	4.3
Spencer Road	NOT MODELED			NOT MODELED			NOT MODELED		
Briggs Street	1.89	2.73	3.42	12.1	77.4	96.8	0.5	3.2	4.0
Cherry Hill Road	NOT MODELED			NOT MODELED			NOT MODELED		
South Gougar Road	2.04	2.73	3.42	13.1	77.4	96.8	0.5	3.2	4.0
Nelson Road	1.89	2.61	3.03	12.1	73.9	85.8	0.5	3.1	3.6
Cedar Road	1.94	2.61	3.03	12.4	73.9	85.8	0.5	3.1	3.6
Spencer Road	1.89	2.61	3.03	12.1	73.9	85.8	0.5	3.1	3.6
School House Road	1.89	2.61	3.03	12.1	73.9	85.8	0.5	3.1	3.6
Owens Road	NOT MODELED			NOT MODELED			NOT MODELED		
Wolf Road	2.04	2.80	3.66	13.1	79.3	103.7	0.5	3.3	4.3
Center Road	1.99	2.73	3.42	12.7	77.4	96.8	0.5	3.2	4.0
Old Sauk Trail	1.85	2.61	3.03	11.8	73.9	85.8	0.5	3.1	3.6
Pfeiffer Road/ 88th Avenue	1.85	2.61	3.03	11.8	73.9	85.8	0.5	3.1	3.6
Harlem Avenue	1.73	2.35	2.40	11.1	66.6	67.9	0.5	2.8	2.8

SUMMARY TRAIN BLOCKAGES

DEIS vs Calculated Impeded Speed

Street	Blocked Time Per 24 Hour (Minutes)			Difference Between DEIS Blocked Time and Calculated Blocked Time (Minutes)	Total Blocked Time Percentage			Difference Between DEIS Total Blocked Time Percentage and Calculated Impeded Total Blocked Time Percentage
	No-Action	DEIS Proposed Action Average Speed	Calculated Proposed Action Impeded Speed		No-Action	DEIS Proposed Action Average Speed	Calculated Proposed Action Impeded Speed	
Hafenrichter Road	29.5	93.0	109.6	16.6	2.0%	6.5%	7.6%	1.2%
Wolf's Crossing Road	30.2	95.0	115.8	20.8	2.1%	6.6%	8.0%	1.4%
111th Street	30.2	95.0	115.8	20.8	2.1%	6.6%	8.0%	1.4%
Ferguson Road/ 119th Street	30.9	97.1	122.9	25.8	2.1%	6.7%	8.5%	1.8%
127th Street	31.7	104.1	152.3	48.2	2.2%	7.2%	10.6%	3.3%
135th Street	28.8	96.9	133.8	36.9	2.0%	6.7%	9.3%	2.6%
Van Dyke Road	31.6	95.0	111.7	16.7	2.2%	6.6%	7.8%	1.2%
143rd Street	30.9	93.2	106.2	13.0	2.1%	6.5%	7.4%	0.9%
Plainfield-Naperville Road	30.3	91.4	101.4	10.0	2.1%	6.3%	7.0%	0.7%
Main Street	30.3	91.4	101.4	10.0	2.1%	6.3%	7.0%	0.7%
Center Street	30.3	91.4	101.4	10.0	2.1%	6.3%	7.0%	0.7%
Eastern Avenue	30.3	91.4	101.4	10.0	2.1%	6.3%	7.0%	0.7%
Lockport Road	30.3	91.4	101.4	10.0	2.1%	6.3%	7.0%	0.7%
Renwick Road	29.7	91.4	101.4	10.0	2.1%	6.3%	7.0%	0.7%
East Frontage Road/ Essington	30.9	93.2	106.2	13.0	2.1%	6.5%	7.4%	0.9%
Division Street	32.3	99.2	125.2	26.0	2.2%	6.9%	8.7%	1.8%
Gaylord Road	34.8	106.2	154.9	48.7	2.4%	7.4%	10.8%	3.4%
Oakland Avenue	NOT MODELED				NOT MODELED			
Woodruff Road	73.3	288.0	288.0	0.0	5.1%	20.0%	20.0%	0.0%
Washington Street	33.9	229.1	229.1	0.0	2.4%	15.9%	15.9%	0.0%
South Rowell Avenue	17.7	140.6	253.0	112.4	1.2%	9.8%	17.6%	7.8%
Mills Road	13.4	85.8	133.6	47.8	0.9%	6.0%	9.3%	3.3%
South Rowell Avenue	12.7	79.3	103.7	24.4	0.9%	5.5%	7.2%	1.7%
Spencer Road	NOT MODELED				NOT MODELED			
Briggs Street	12.1	77.4	96.8	19.4	0.8%	5.4%	6.7%	1.3%
Cherry Hill Road	NOT MODELED				NOT MODELED			
South Gougar Road	13.1	77.4	96.8	19.4	0.9%	5.4%	6.7%	1.3%
Nelson Road	12.1	73.9	85.8	11.9	0.8%	5.1%	6.0%	0.8%
Cedar Road	12.4	73.9	85.8	11.9	0.9%	5.1%	6.0%	0.8%
Spencer Road	12.1	73.9	85.8	11.9	0.8%	5.1%	6.0%	0.8%
School House Road	12.1	73.9	85.8	11.9	0.8%	5.1%	6.0%	0.8%
Owens Road	NOT MODELED				NOT MODELED			
Wolf Road	13.1	79.3	103.7	24.4	0.9%	5.5%	7.2%	1.7%
Center Road	12.7	77.4	96.8	19.4	0.9%	5.4%	6.7%	1.3%
Old Sauk Trail	11.8	73.9	85.8	11.9	0.8%	5.1%	6.0%	0.8%
Pfeiffer Road/ 88th Avenue	11.8	73.9	85.8	11.9	0.8%	5.1%	6.0%	0.8%
Harlem Avenue	11.1	66.6	67.9	1.3	0.8%	4.6%	4.7%	0.1%

EJE PUBLIC AT-GRADE RAIL CROSSINGS IN WILL COUNTY

EJE PUBLIC AT-GRADE RAIL CROSSINGS IN WILL COUNTY

EJE PUBLIC AT-GRADE RAIL CROSSINGS IN WILL COUNTY

- EJE PUBLIC AT-GRADE RAIL CROSSINGS IN WILL COUNTY

Model Run 1 - Traffic Diversion Estimates (95th Wolf Crossing & Harlem Ave Closed)

Weighted Average:

- Travel Modeling GC 09 18 08.xls

Model Run 2 - Traffic Diversion Estimates (119th Street and Wolf Rd Closed)

Weighted Average:

- Travel Modeling GC 09_18_08.xls

EJE PUBLIC AT-GRADE RAIL CROSSINGS IN WILL COUNTY

EJE PUBLIC AT-GRADE RAIL CROSSINGS IN WILL COUNTY

Notes:

- Notes:

Model Run 4 - Traffic Diversion Estimates (143rd Street and Gougar Closed)

Weighted Average:

Data from <http://www.nettinganumcillinois.com/default.asp?n=aaat>

- Blank, IDOT, and MNDOT website data matched IDOT data. Blank "R" indicates ICC data was not available.
8. Municipal data were provided for all counties except Cook County. For more information, see the Chicago Metropolitan Area Forecasting Model (CMAFM) Travel Demand Model.
9. The projection methodology includes county-level forecasts for the entire study area. For projections by geographic unit smaller than county level, please refer to the appendix B.
10. Will County 2030 Transportation Plan, Travel Demand Model, provided by CH2M Hill
11. Municipal Transportation Master Plan concurred by CMAP
12. Numbers by Will County 9-1-1
13. Numbers Based on Will County Model Growth with IDOT Base Traffic
14. Numbers Based on Will County Model (Weighted Average Growth at ElJ&E Rail Crossings) with IDOT Base Traffic
15. Numbers Based on Will County Model Growth with Will County Base Traffic

Summary of 95th/Wolf's Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	87th St	Mainline	1.1%	TWS-2	TWS-2
LOCAL	Hafenrichter Rd	Mainline	0.2%	TWS-2	TWS-2
LOCAL	111th St	Mainline	37.8%	TWS-4	TWS-4
LOCAL	119th St/Ferguson	Mainline	8.5%	TWS-2	TWS-4
LOCAL	127th St	Mainline	0.3%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of 119th Street/Ferguson Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	95th/Wolf's Crossing	Mainline	6.0%	TWS-4	TWS-4
LOCAL	111th St	Mainline	37.5%	TWS-4	TWS-4
LOCAL	127th St	Mainline	9.3%	TWS-2	TWS-4
LOCAL	135th St	Mainline	0.8%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of 135th Street Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	119th St/Ferguson	Mainline	4.9%	TWS-2	TWS-2
LOCAL	127th St	Mainline	32.0%	TWS-2	TWS-4
LOCAL	Van Dyke Rd	Mainline	-20.2%	TWS-2	TWS-2
LOCAL	143rd St	Mainline	39.4%	TWS-4	TWS-4
LOCAL	Naperville-Plainfield Rd	Mainline	0.6%	TWS-2	TWS-2
IDOT	IL RT 126/Main St	Mainline	8.6%	TWS-4	TWS-4

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of 143rd Street Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	127th St	Mainline	0.9%	TWS-2	TWS-2
LOCAL	135th St	Mainline	53.9%	TWS-2	TWS-2
LOCAL	Van Dyke Rd	Mainline	4.2%	TWS-2	TWS-2
LOCAL	Naperville-Plainfield Rd	Mainline	2.3%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of Illinois Route 126 Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	143rd St	Mainline	12.4%	TWS-4	TWS-4
LOCAL	Naperville-Plainfield Rd	Mainline	40.6%	TWS-2	TWS-2
LOCAL	Lockport Rd	Mainline	1.5%	TWS-2	TWS-2
WILL	Renwick Rd (CH 36)	Mainline	5.0%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of Briggs Street Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	Rowell St (S)	Mainline	9.0%	TWS-2	TWS-2
LOCAL	West Spencer Rd	Mainline	0.8%	TWS-2	TWS-2
LOCAL	Cherry Hill Rd	Mainline	20.4%	TWS-2	TWS-2
WILL	Gougar Rd (CH 52)	Mainline	7.4%	TWS-4	TWS-4
LOCAL	Nelson Rd	Mainline	4.1%	TWS-2	TWS-2
WILL	Cedar Rd (CH 4)	Mainline	3.3%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of Gougar Road Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
WILL	Briggs St(CH 54)	Mainline	5.5%	TWS-2	TWS-4
LOCAL	Cherry Hill Rd	Mainline	29.4%	TWS-2	TWS-2
LOCAL	Nelson Rd	Mainline	42.7%	TWS-2	TWS-2
WILL	Cedar Rd (CH 4)	Mainline	3.8%	TWS-2	TWS-2
LOCAL	South Spencer Rd	Mainline	0.9%	TWS-2	TWS-2
LOCAL	Schoolhouse Rd	Mainline	1.3%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of Schoolhouse Road Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
WILL	Gougar Rd (CH 52)	Mainline	2.6%	TWS-4	TWS-4
LOCAL	Nelson Rd	Mainline	4.8%	TWS-2	TWS-2
WILL	Cedar Rd (CH 4)	Mainline	8.7%	TWS-2	TWS-2
LOCAL	South Spencer Rd	Mainline	39.7%	TWS-2	TWS-2
LOCAL	116TH/Owens Rd	Mainline	3.7%	TWS-2	TWS-2
LOCAL	Wolf Rd	Mainline	15.1%	TWS-2	TWS-4
LOCAL	Center Rd	Mainline	1.7%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of Wolf Road Crossing Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
WILL	Cedar Rd (CH 4)	Mainline	3.2%	TWS-2	TWS-2
LOCAL	Schoolhouse Rd	Mainline	25.2%	TWS-2	TWS-4
LOCAL	116TH/Owens Rd	Mainline	24.4%	TWS-2	TWS-2
LOCAL	Center Rd	Mainline	5.0%	TWS-2	TWS-2
LOCAL	Sauk Trail	Mainline	1.6%	TWS-2	TWS-2
LOCAL	Pfeiffer Rd/88th	Mainline	1.7%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

Summary of Harlem Impedance Effects

Jurisdiction	Street Name	Branch	Percentage of Diverted Traffic	Required Infrastructure Based on 2015 Traffic without Diverted Traffic	Required Infrastructure Based on 2015 Traffic with Diverted Traffic
LOCAL	Wolf Rd	Mainline	3.0%	TWS-2	TWS-4
LOCAL	Center Rd	Mainline	-0.7%	TWS-2	TWS-2
LOCAL	Sauk Trail	Mainline	0.9%	TWS-2	TWS-2
LOCAL	Pfeiffer Rd/88th	Mainline	16.8%	TWS-2	TWS-2

Notes: Infrastructure Requirements based on IDOT BDE Figure 48-6A

TWS-2: Two Way Street 2 Lanes

TWS-4: Two Way Street 4 Lanes

TWS-6: Two Way Street 6 Lanes

INFLUENCED SCHOOLS WITHIN LIMITS OF WILL COUNTY AND EJ&E RAIL CROSSINGS											
STREET	Schools Within 2 Mile Radius (Bus)			Schools Within 1.5 Mile Radius (Cyclists)			Schools Within 1 Mile Radius (Walkers)				
	College	High School	Middle School	Elementary	College	High School	Middle School	Elementary	High School	Middle School	Elementary
1 87th St	0	0	0	4	0	0	0	2	0	0	1
2 Hafenrichter Rd	0	1	2	6	0	0	0	4	0	0	2
3 95th/Wolf's Crossing	0	1	3	8	0	0	2	5	0	0	2
4 111th St	0	1	3	3	0	1	2	0	0	1	0
5 119th St/Ferguson	0	1	2	1	0	1	2	0	1	1	0
6 127th St	0	2	2	2	0	1	1	2	1	1	1
7 135th St	0	2	1	3	0	1	1	2	0	0	2
8 Van Dyke Rd	0	3	2	4	0	0	1	4	0	0	1
9 143rd St	0	3	3	5	0	0	1	4	0	1	0
10 Naperville-Plainfield Rd	0	2	3	5	0	2	3	2	2	1	1
11 IL RT 126/Main St	0	2	5	5	0	2	3	2	2	1	1
12 Center St	0	2	2	4	0	2	3	2	2	1	1
13 Eastern Ave	0	2	4	4	0	2	2	3	2	1	1
14 Lockport Rd	0	2	4	3	0	2	2	3	2	2	2
15 Renwick Rd (CH 36)	0	2	4	3	0	0	2	2	0	1	2
16 Essington Rd/East Frontage Rd	0	0	3	4	0	0	2	2	0	1	0
17 Division St	0	0	2	5	0	0	1	2	0	1	1
18 Gaylord	0	1	1	5	0	0	1	4	0	1	1
19 Oakland St	0	2	4	6	0	1	1	4	0	1	2
20 Woodruff Rd	2	2	8	9	0	0	5	4	0	0	3
21 Washington St	1	3	8	9	1	3	5	8	1	1	5
22 Rowell St (N)	1	4	9	8	0	2	3	6	1	1	2
23 Mills Rd (CH 51)	1	3	4	6	0	1	2	3	1	2	3
24 Rowell St (S)	0	3	5	5	0	1	2	3	1	1	1
25 West Spencer Rd	0	1	5	5	0	1	1	1	1	1	1
26 Briggs St (CH 54)	0	2	3	2	0	0	1	0	0	1	0
27 Cherry Hill Rd	0	1	1	2	0	1	1	0	0	1	0
28 Gougar Rd (CH 52)	0	2	2	4	0	1	1	0	1	0	0
29 Nelson Rd	0	4	2	9	0	2	1	2	1	0	0
30 Cedar Rd (CH 4)	0	3	2	10	0	2	2	6	1	0	2
31 South Spencer Rd	0	3	2	6	0	1	1	6	0	1	5
32 Schoolhouse Rd	0	1	2	6	0	1	1	4	0	0	3
33 116TH/Owens Rd	0	1	1	1	0	0	1	1	0	1	0
34 Wolf Rd	0	1	1	1	0	1	1	1	0	1	1
35 Center Rd	0	2	0	2	0	2	0	2	1	0	0
36 Sauk Trail	0	2	0	3	0	0	0	2	0	0	1
37 Pfeiffer Rd/88th	0	2	0	3	0	0	0	2	0	0	1
38 Harlem Ave	0	0	1	3	0	0	1	2	0	0	1

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1

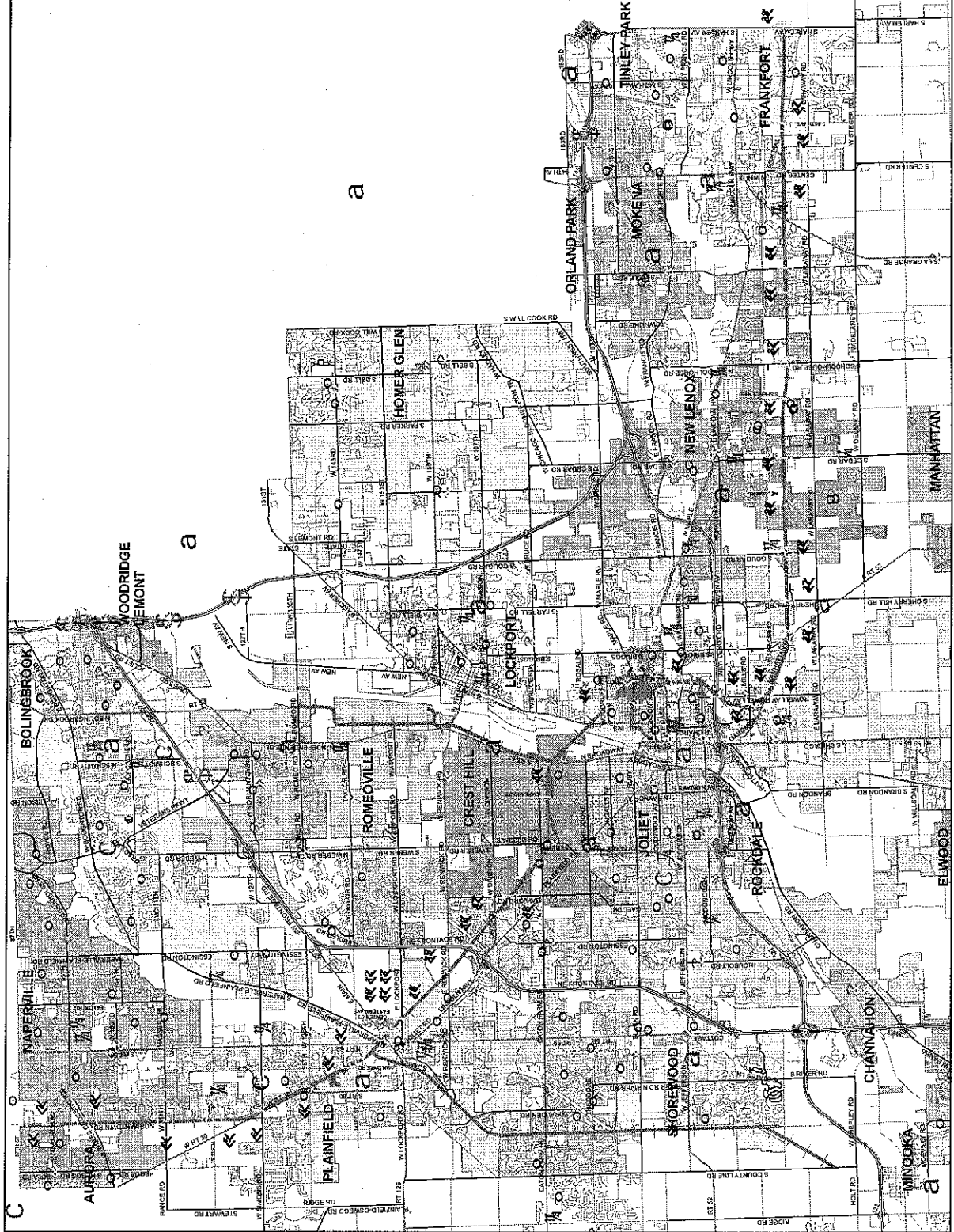
Legend

-  EJ&E Railroad
-  At Grade Crossings
-  Grade Separation Crossings
-  Elementary School
-  Middle School
-  High School
-  College
-  Hospital
-  Fire Station
-  Police Station

2 1 0 2 Miles

WILL COUNTY HIGHWAY DEPARTMENT
EJ&E Exhibit
Overall

SCALE: 1 inch equals 2 miles
DATE: 09/11/2008
DRAWN BY: MJF
CHECKED BY:



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Legend

Grade Separation Crossings

At Grade Crossings

Existing Grade Separation

Elementary School

Middle School

High School

College

Hospital

Fire Station

Police Station

CITY OF AURORA

CITY OF NAPERVILLE

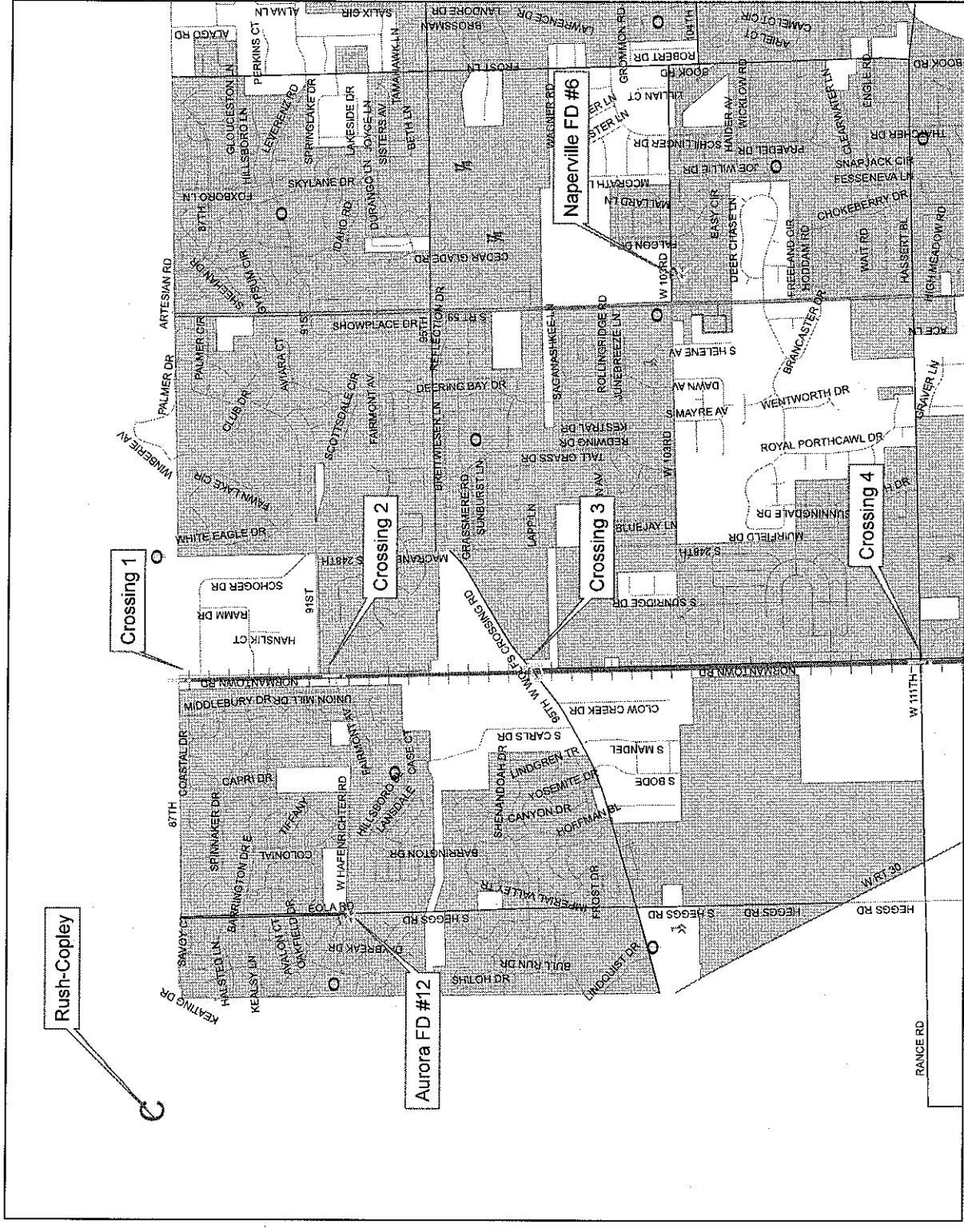
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WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit

Crossings 1, 2, 3 & 4

SCALE: 1 inch equals 0.4 milles
DATE: 09/11/2008
DRAWN BY: BJB
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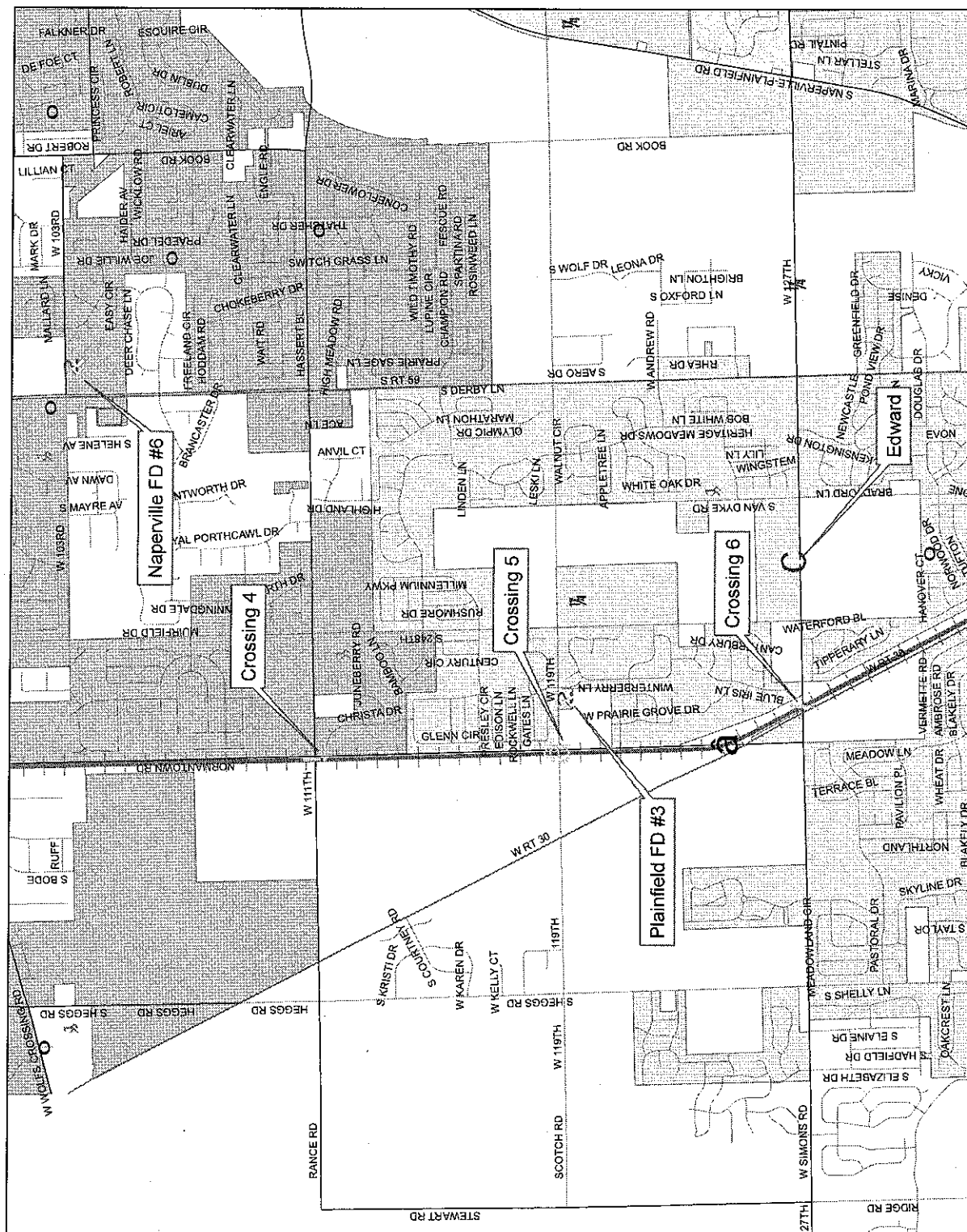
Legend

- | EJ&E Railroad | | | |
|---|----------------------------|---|-----------|
|  | Existing Grade Separation | | |
|  | At Grade Crossings | | |
|  | Grade Separation Crossings | | |
|  | Elementary School | | |
|  | Middle School | | |
|  | High School | | |
|  | College | | |
|  | Hospital | | |
|  | Fire Station | | |
|  | Police Station | | |
|  | CITY OF AURORA | | |
|  | CITY OF NAPERVILLE | | |
|  | VILLAGE OF PLAINFIELD | | |
| 0.4 | 0.2 | 0 | 0.4 Miles |

WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit
Crossings 4, 5 & 6

SCALE: 1 inch equals 0.4 miles
DATE: 09/12/2008
DRAWN BY: BJB
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Legend



J&E Railroad

Existing Grade Separation

At Grade Crossings

Grade Separation Crossings

Elementary School

Middle School

High School

College

Hospital

Fire Station

Police Station

VILLAGE OF PLAINFIELD

VILLAGE OF ROMEVILLE

VILLAGE BOLINGBROOK

0.4 Miles 0.2 0

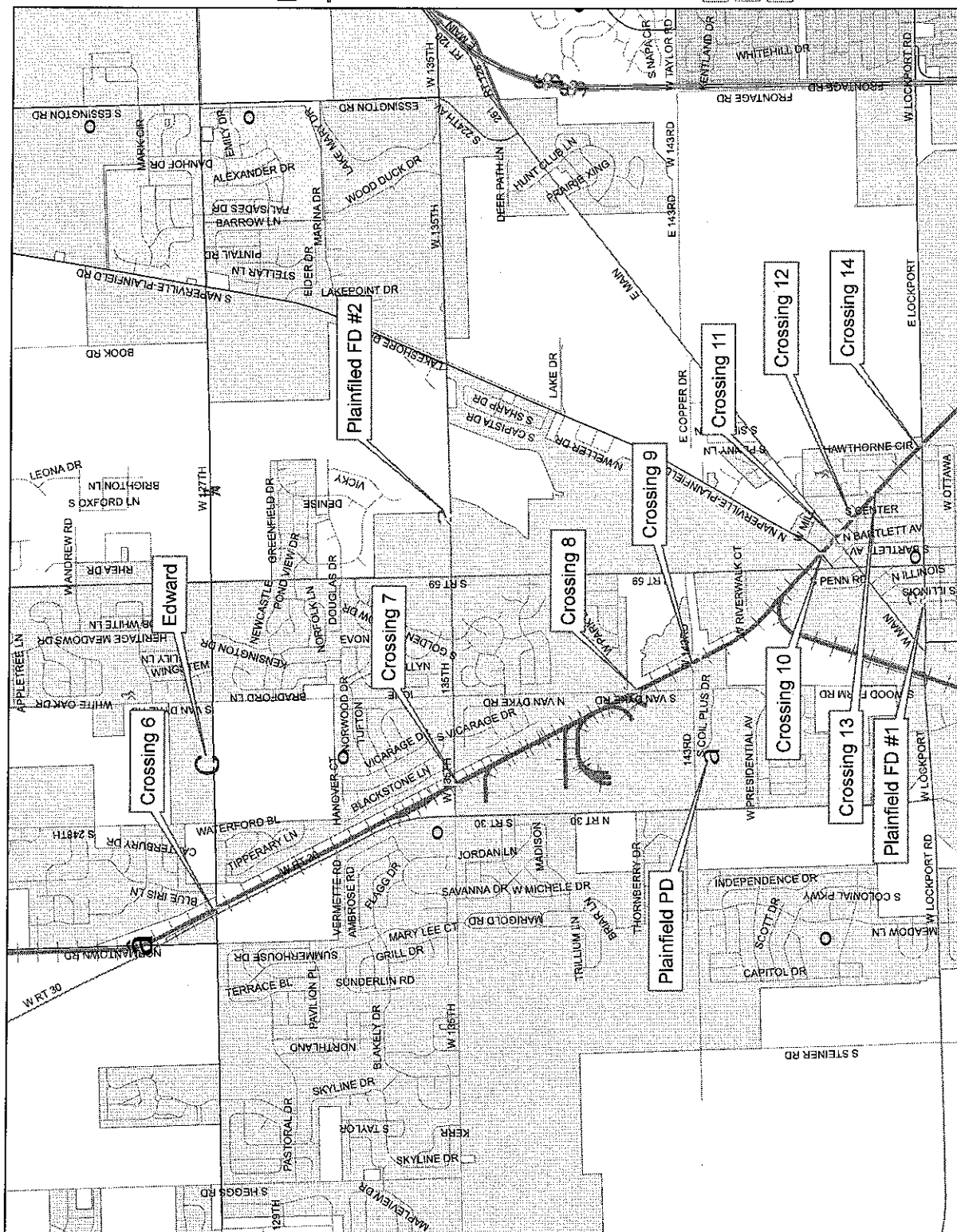
WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit

Crossings 6 - 14

SCALE: 1 inch equals 0.4 miles DRAWN BY: BJB

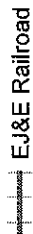
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Legend



EJ&E Railroad

Existing Grade Separation

At Grade Crossings

Grade Separation Crossings

Elementary School

Middle School

High School

College

C Hospital

Fire Station

a Police Station

VILLAGE OF PLAINFIELD

VILLAGE OF ROMEVILLE

CITY OF CREST HILL

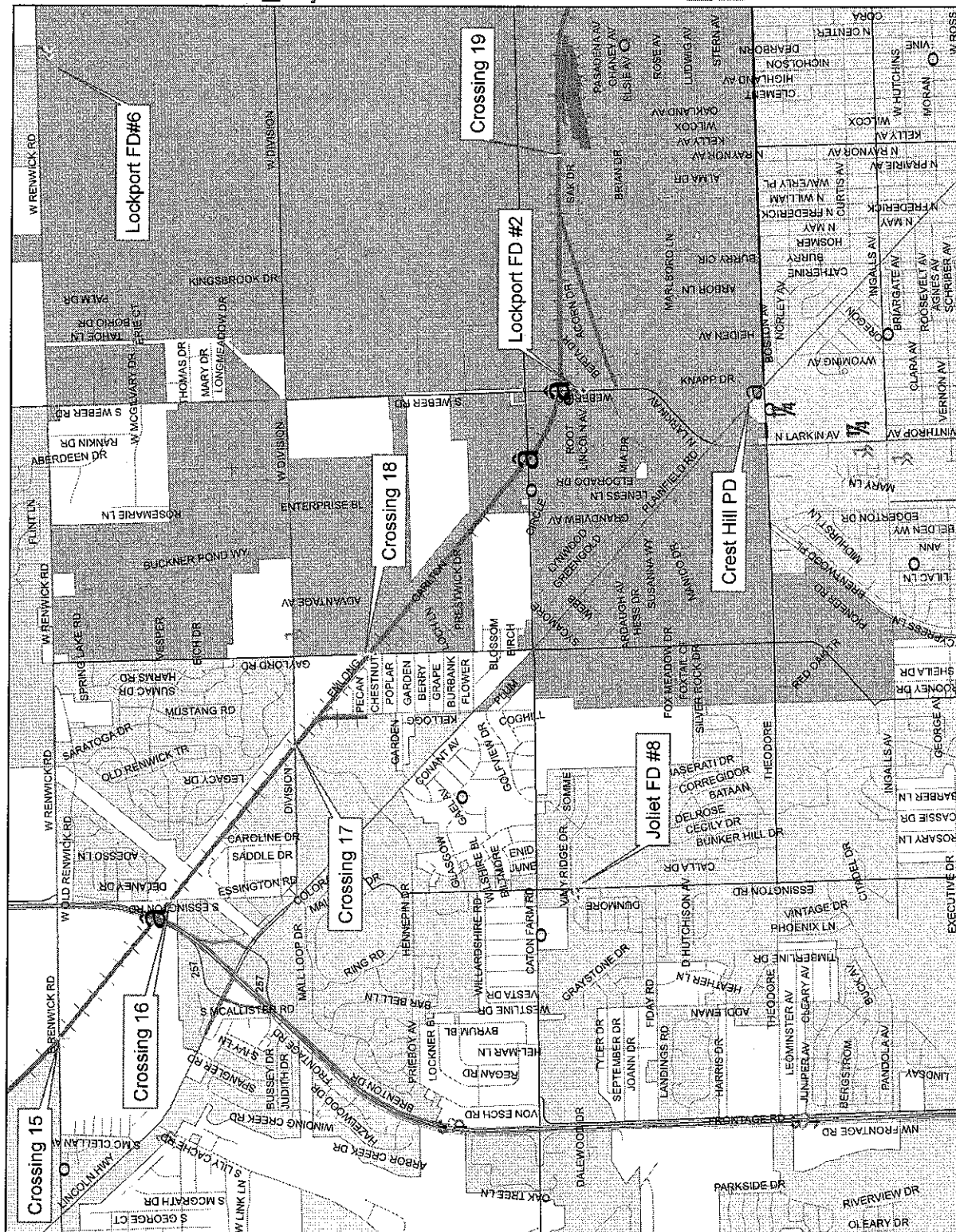
CITY OF JOLIET

	0.4	0.2	0	0.4 Miles
0.4				
0.2				
0				

WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit
Crossings 15 - 19

SCALE: 1 Inch equals 0.4 miles DRAWN BY: BJB
DATE: 09/12/2008 CHECKED BY:



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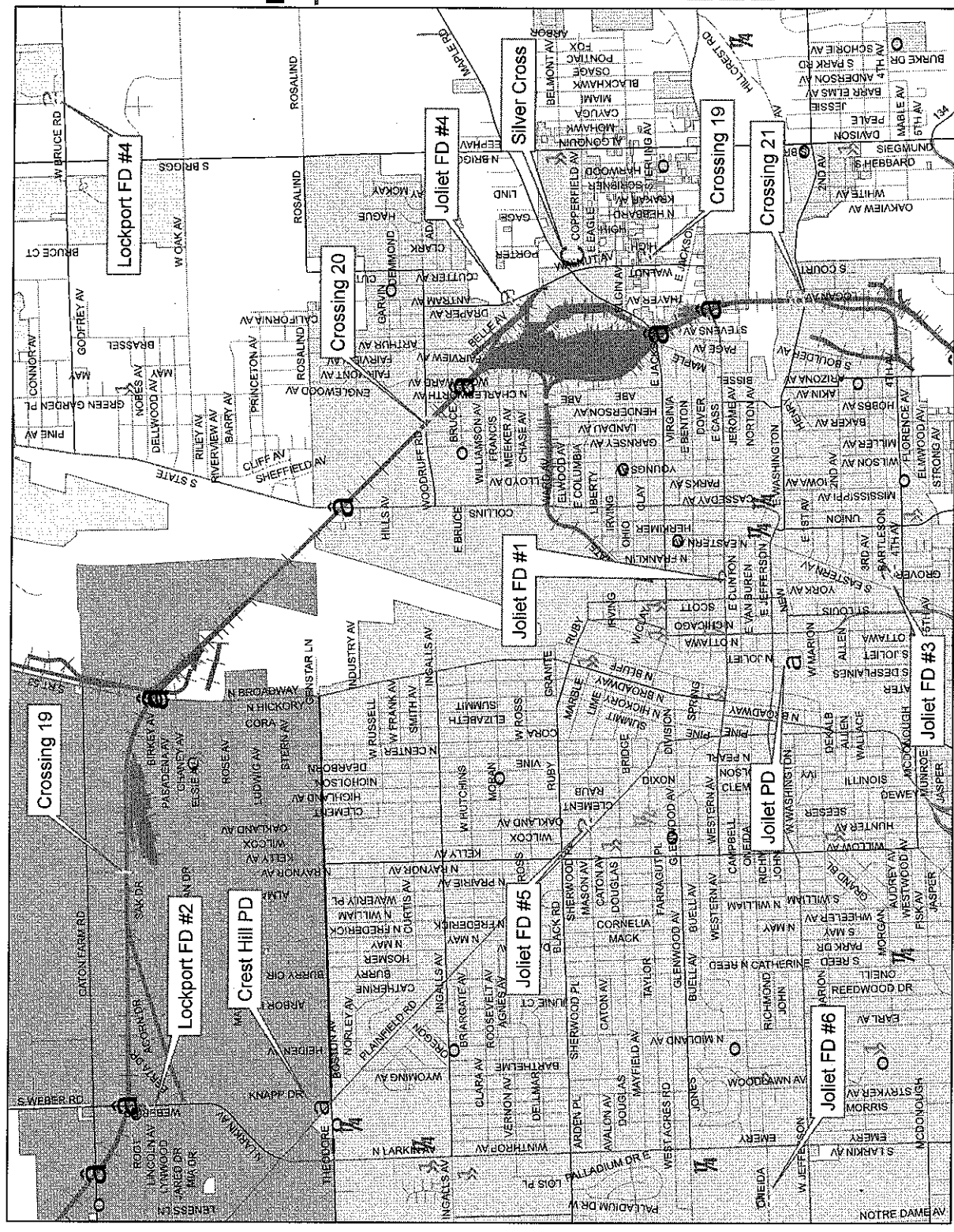
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Legend

- EJ&E Railroad
- Existing Grade Separation
- At Grade Crossings
- Grade Separation Crossings
- Elementary School
- Middle School
- High School
- College
- Hospital
- Fire Station
- Police Station
- CITY OF LOCKPORT
- CITY OF CREST HILL
- CITY OF JOLIET

0.4 0.2 0 0.4 Miles

WILL COUNTY HIGHWAY DEPARTMENT
EJ&E Exhibit
Crossings 19 - 21
 SCALE: 1 inch equals 0.4 miles
 DATE: 06/12/2008
 DRAWN BY: BJB
 CHECKED BY:



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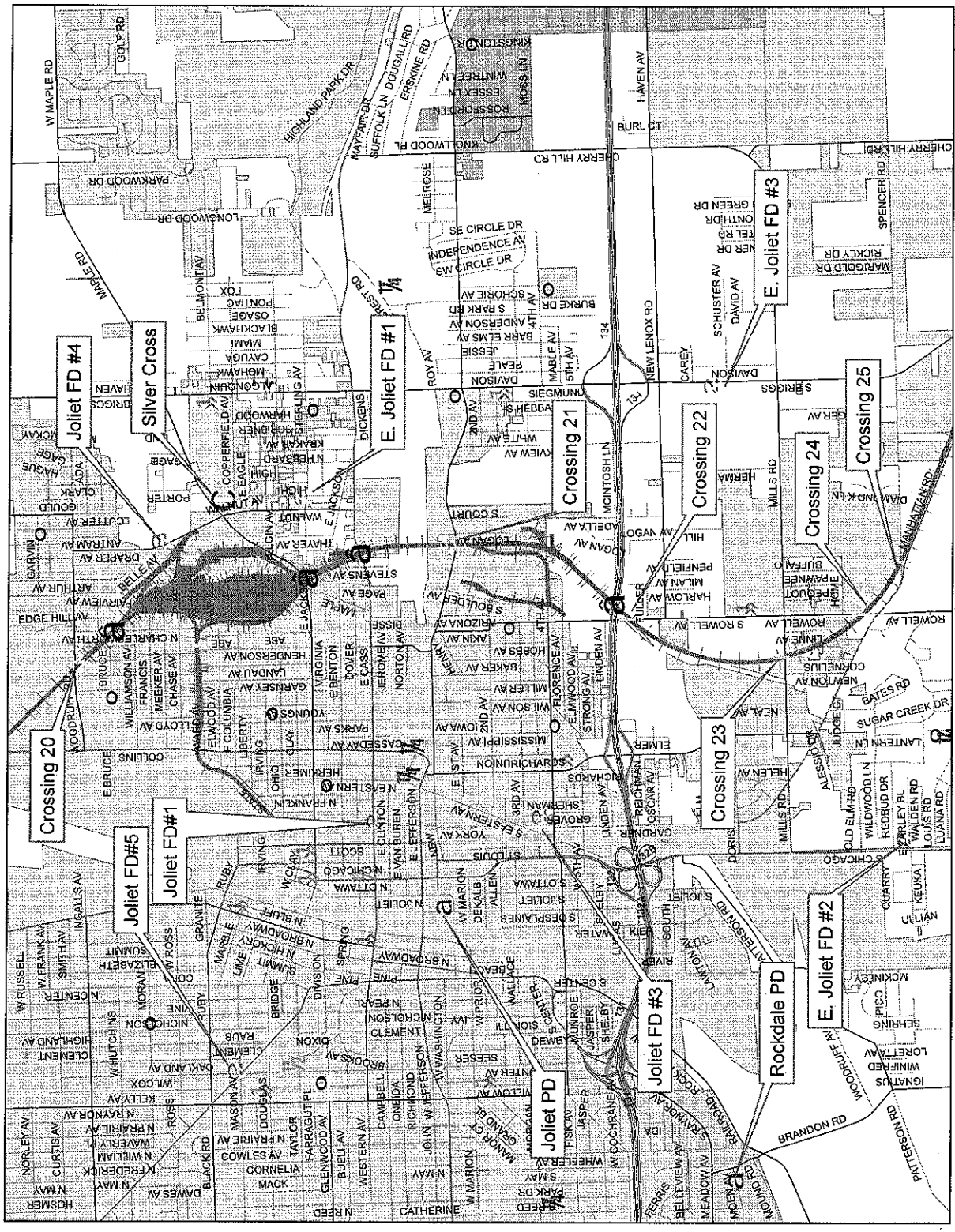
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Legend

-  EJ&E Railroad
-  Existing Grade Separation
-  At Grade Crossings
-  Grade Separation Crossings
-  Elementary School
-  Middle School
-  High School
-  College
-  Hospital
-  Fire Station
-  Police Station
-  VILLAGE OF ROCKDALE
-  VILLAGE NEW LENOX
-  CITY OF JOLIET

0.4 0.2 0 0.4 Miles

WILL COUNTY HIGHWAY DEPARTMENT
EJ&E Exhibit
Crossings 20 - 25
SCALE: 1 inch equals 0.4 miles
DATE: 09/12/2008
DRAWN BY: BJB
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Legend

-  EJ&E Railroad
-  Existing Grade Separation
-  Grade Separation Crossings
-  At Grade Crossings
-  Elementary School
-  Middle School
-  High School
-  College
-  Hospital
-  Fire Station
-  Police Station
-  VILLAGE NEW LENOX
-  CITY OF JOLIET

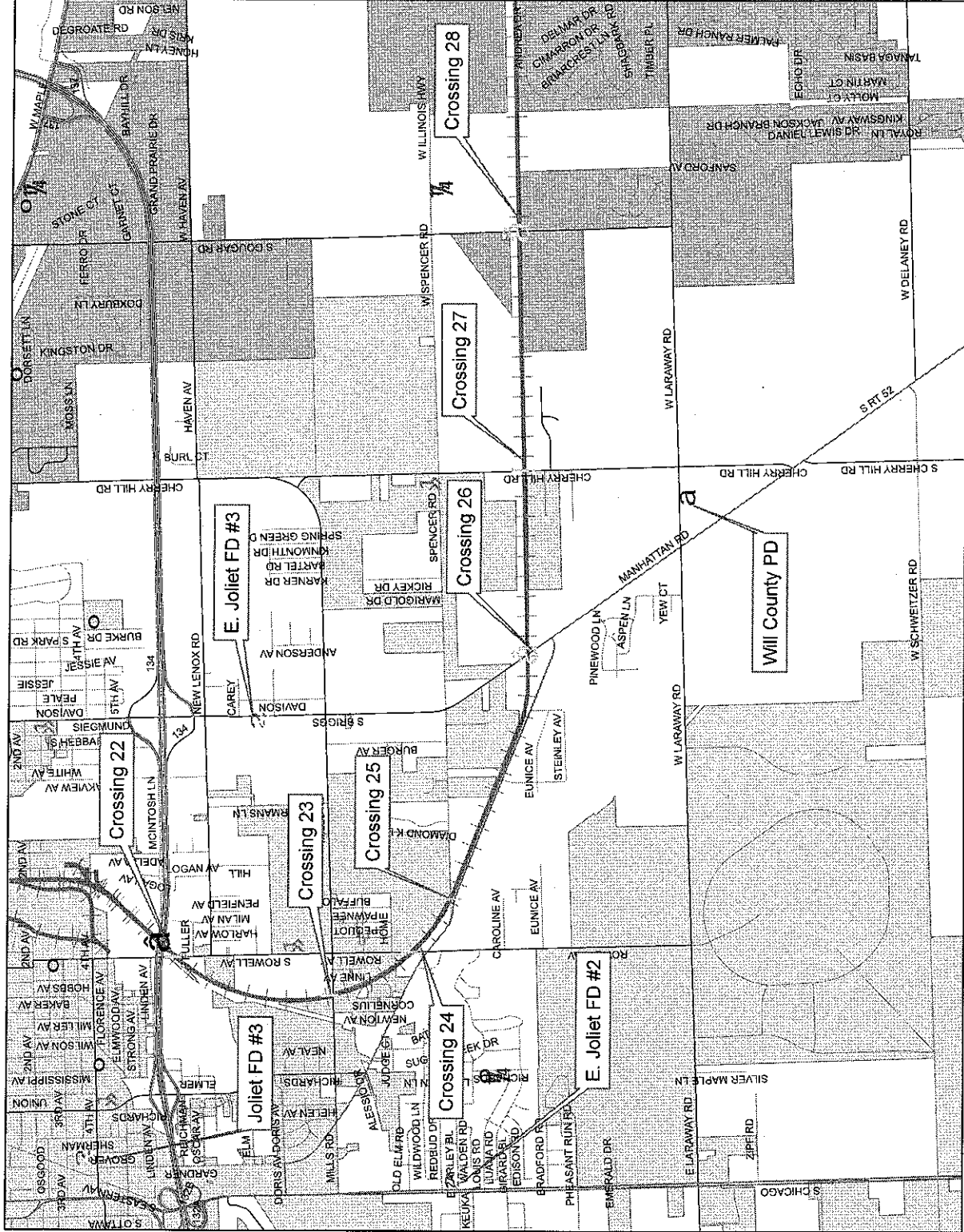
0.4 0.2 0 0.4 Miles

WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit

Crossings 22 - 28

SCALE: 1 inch equals 0.4 miles DRAWN BY: BUB
 DATE: 09/22/2008 CHECKED BY:



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Legend

- | | |
|---|----------------------------|
| â | Existing Grade Separation |
| â | EU&E Railroad |
| â | Grade Separation Crossings |
| â | At Grade Crossings |
| â | Elementary School |
| â | Middle School |
| â | High School |
| â | College |
| â | Hospital |
| â | Fire Station |
| â | Police Station |

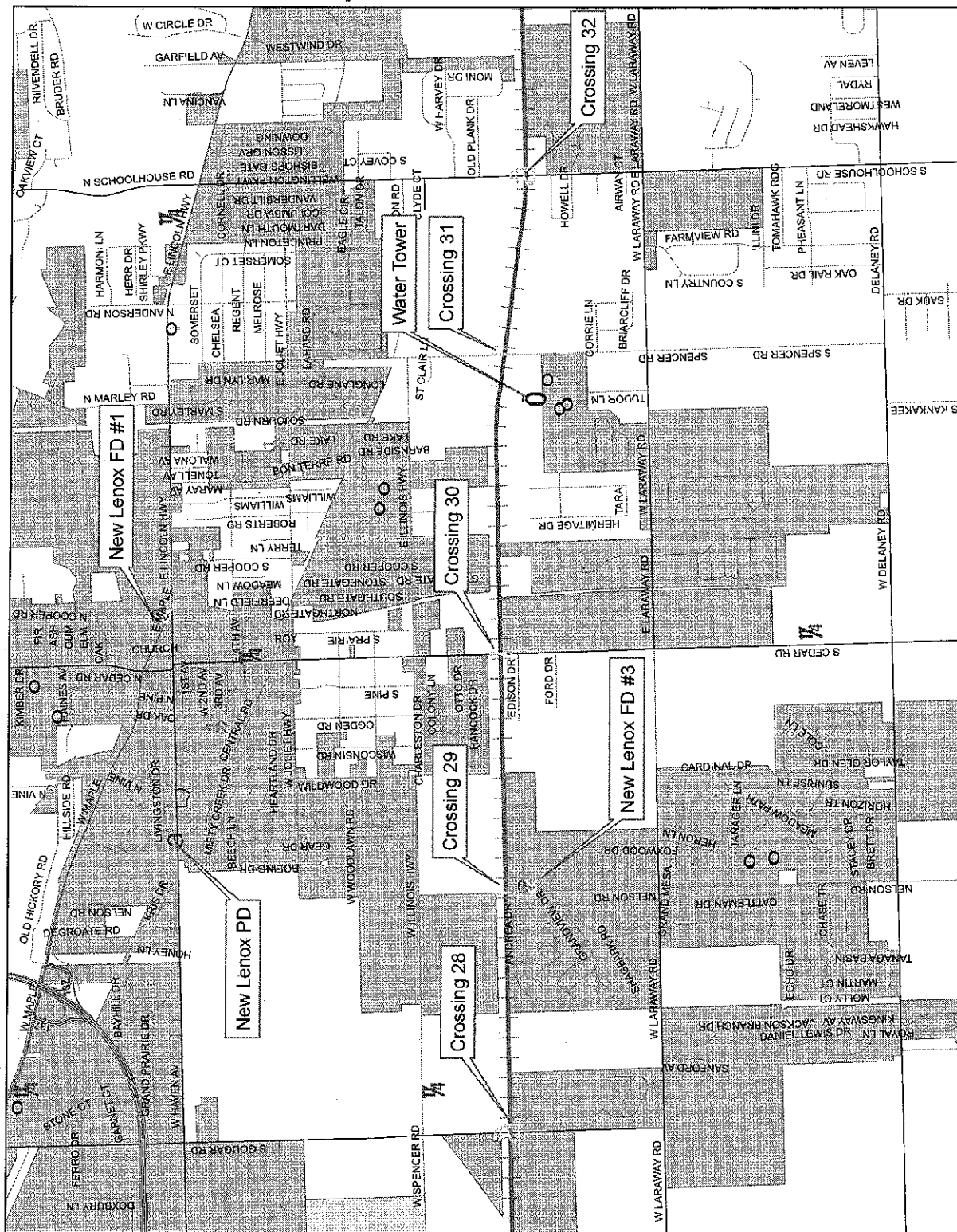
VILLAGE NEW LENOX
VILLAGE OF MOKENA
CITY OF JOLIET



WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit
Crossings 28 - 32

SCALE: 1 inch equals 0.4 miles
DATE: 09/12/2008
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Legend

-  EJ&E Railroad
-  Existing Grade Separation
-  At Grade Crossings
-  Grade Separation Crossings
-  Elementary School
-  Middle School
-  High School
-  College
-  Hospital
-  Fire Station
-  Police Station
-  VILLAGE OF NEW LENOX
-  VILLAGE OF MOKENA
-  VILLAGE OF FRANKFORT

0.4 0.2 0 0.4 Miles

WILL COUNTY HIGHWAY DEPARTMENT

EJ&E Exhibit

Crossings 32 - 35

SCALE: 1 inch equals 0.4 miles
 DATE: 09/12/2008
 DRAWN BY: BJB
 CHECKED BY:

