



HOFFMAN ESTATES

OFFICE OF THE MAYOR

William D. McLeod
MAYOR

April 12, 2019

Mr. Soren G. Hall
U.S. Army Corps of Engineers
Chicago District, Regulatory Branch
Attn: LRC-2018-00651, Mr. Soren Hall
231 South LaSalle Street
Suite 1500
Chicago, IL 60604-1457

Subject: USACE IP Application LRC-2018-00651
Wisconsin Central Ltd. Railroad

Dear Mr. Hall:

Staff at the Village of Hoffman Estates have reviewed the Public Notice for the above-referenced permit. The Village of Hoffman Estates met with representatives of CN Railroad on Monday, March 18, 2019, to discuss several areas of concern. The Railroad provided the Army Corps application package and plans for Village which were also made available for public review at Village Hall.

We have heard concerns from residents about the impacts from the potential increase in train traffic and associated noise, vibration, and safety issues associated with the addition of the proposed second mainline track south of Shoe Factory Road. There are also technical concerns in this area which the railroad and its design engineers need to fully investigate and consider. Flooding and drainage problems have been documented in the neighborhoods to the west of the railroad property, as have floodplain and creek issues. Given the cursory level of information provided to residents with the notice letter, it is unclear what physical changes are proposed and what impacts to the areas listed under evaluation factors might be. Representatives of the railroad have met with Village staff to discuss some technical and procedural issues; however, I am concerned that not enough time has been available to evaluate the plans, for the railroad to share more information with residents, and to provide comprehensive comments before the revised April 15, 2019 deadline for the public notice.

For these reasons, on behalf of the Village, I offer the following comments and requests to the Army Corps of Engineers regarding this permit application.

1. As requested in my March 6, 2019 letter to you, a public hearing needs to be held for the Army Corps and the railroad to receive direct input from the public. The impacts of the proposed action are of great concern to the neighborhoods adjacent to the railroad property.

The Village shares these concerns. I believe the Army Corps should encourage CN to hold a public hearing for residents to learn more about the proposed project and to provide opportunity for input.

2. While the effective FEMA Flood Insurance Rate Map (FIRM) for the project area is dated August 2008, there is more current information that represents the best technical data available for the area. 2010 Detailed Watershed Plan developed by MWRD and an ongoing FEMA map revision completed by the Illinois State Water Survey should be utilized for addressing impacts to floodplain and floodway. The project proposes considerable fill within the limits of floodway and the Special Flood Hazard Area according to the draft FIRM. Construction permitting should consider this information as regulatory to ensure that adverse impacts do not occur to the adjacent properties.
3. The draft FIRM indicates significant floodway within the proposed project. Based on this information floodway permitting with IDNR-OWR should be required.
4. The Village has observed the Poplar Creek Railroad Tributary (from approximately Shoe Factory Road to approximately 1500 feet south) has overtopped and encroached onto the neighboring residential properties due to an obstruction in the creek on the railroad property. We request the proposed project remove obstructions within the railroad property and improve drainage conditions by eliminating creek overtopping into the residential properties for the 100 year event. Rainfall data from the Frequency Distributions of Heavy Precipitation in Illinois: Updated Bulletin 70 (March 2019) should be utilized.
5. The MWRD 2010 Detailed Watershed Plan included a recommendation to increase the size of a restrictive culvert under the existing railroad tracks just south of IL 58 (Golf Rd). We request that this recommended improvement be required within the scope of the proposed track extension.
6. The Village maintains a sanitary sewer within an easement on the railroad property, with two crossings of the railroad tracks. We request further detail on the impact to the Village's sanitary sewer, specifically access to maintenance.

We also have the following questions and comments:

I. Railroad Operations

- a. Will the proposed second mainline track be used by trains waiting to proceed north or south of the second mainline extension? The intention stated in CN's permit application is "...to allow for uninterrupted flow of freight traffic by allowing northbound and southbound trains to pass freely without stopping and/or slowing down." (USACE Individual Permit (IP) Application LRC-2018-00651, p.1/5) Locomotives currently idle in this area, mostly north of Shoe Factory Road on the siding track for long periods of time. We are very concerned that the additional track will allow the Railroad to expand this practice which has a significant and detrimental impact on both the natural and built environments. We seek assurance from the Railroad that the tracks in the area south of Shoe Factory Road will not be used for parking, storing, or staging trains if the second mainline track is constructed.

- b. What is the expected number of trains per day on average? Our understanding is that this section sees about 20 trains per day. The forecasted additional 9 trains daily by 2020 represents an increase of nearly 50%. What is the expected train volume beyond 2020? How will the expected daily traffic change if this second mainline track extension is completed? Will addressing other regional capacity bottlenecks in the future lead to further increases in traffic?
- c. How will the second mainline track affect the expected delays at the Shoe Factory Road grade crossing? What analysis has been done?
- d. The STB decision on the acquisition was based on a single track in this area, as existed prior to the CN acquisition of the EJ&E. The single track constrained daily train volumes in this section. The STB decision process included the preparation of an EIS. With the addition of the second mainline track closer to sensitive areas of wetlands and homes, will the environmental analyses conducted as part of the STB process be redone or updated? We believe that the combination of the reduced distance from the existing residences to the proposed second mainline track and the increased train volumes necessitates new analyses of noise, vibration, and impacts to the natural environment. If the permit is approved and the railroad proceeds toward construction, we feel that mitigation for noise and vibration impacts must be provided by the Railroad.
- e. What are the railroad's plans to add second mainline track to the north and south of this particular section?
- f. How often will trains pass through the turnouts just south of Shoe Factory Road? At what speed will trains move through the crossover? Knowing this information will help understand the degree to which noise from trains moving through the crossover will be an issue.

II. Construction

- a. Will the railroad replace any of the existing trees between the mainline track and existing residences that are removed due to construction activities? The typical sections notes call for only topsoil, seeding, and erosion control in areas where vegetation is removed. Residents have already expressed concerns about the removal of some or all of the trees between the existing track and their residences. The existing trees provide visual screening of the mainline track. We understand that the depth of the trees is not and would not be sufficient for noise reduction. However visual screening is important to provide some level of separation between the tracks and the homes. To mitigate the negative impact to the natural environment and habitat from vegetation removal, as well as to help screen adjacent homes, we feel that substantial replanting of trees is necessary in areas proposed to be disturbed by the proposed project which are adjacent to homes.
- b. The siding track north of Shoe Factory Road is to the west of the mainline track. The ACOE permit information prepared by CN identified greater wetland impacts if the second mainline track was located to the east of the mainline track. Were engineering features such as retaining walls considered as a means to reduce wetland impacts to the east? The USACE IP Application notes that "...construction

on the east side [ed: of the existing mainline track] would likely result in greater impacts to natural resources....” (ibid, p.2/5) We do not feel that higher cost should be a factor for the permit review, although we understand that it is a consideration for the railroad. The analysis of impacts needs to consider the proximity of homes to the west of the existing single track and how these properties and residents would be negatively impacted by more trains using the proposed track closer to the homes.

- c. Can the proposed crossover at the south end of the existing siding be moved south to be adjacent to Cannon Crossings Park? Several residents have expressed concerns regarding noise caused by trains passing over the turnout at the south end of the existing siding.
- d. Grading work off railroad property is shown on the plans generally between stations 1673 and 1682. What coordination has occurred with these property owners and what is the status of securing agreements to do work on these properties?
- e. There is a fence along the east side of the Park District property which will be affected by the proposed grading. However the fence does not appear on the plan and profile sheets or in the cross sections. This feature needs to be considered and coordinated with the Park District.
- f. What is status of review and/or coordination with the Illinois Department of Transportation (IDOT) for the proposed bridge over IL Route 58 (Golf Road)?

III. Environmental Concerns

- a. The Village is concerned with the impacts of the proposed second mainline track on the water resources, threatened or endangered wildlife, and the natural and built environment adjacent to the proposed track. What are the results of the IDNR, IEPA, and USFWS reviews of the impacts of the project? Will IEPA conduct a review for Individual Section 404 Water Quality Certification?

Thank you for your consideration of these requests. The magnitude of the work that is being proposed by the railroad demands adequate time for public review and input. If you have questions, please feel free to contact me.

Sincerely,



William D. McLeod

Village President

- c: David Woodruff, CN Assistant Vice President & Head of Public and Government Affairs
Larry Lloyd, CN Manager, State and Local Government Affairs - US Network
The Honorable Dick Durbin
The Honorable Tammy Duckworth
The Honorable Raja Krishnamoorthi
- bc: Hoffman Estates Village Board