



HOFFMAN ESTATES

OFFICE OF THE MAYOR

William D. McLeod
MAYOR

October 28, 2019

Soren G. Hall
Senior Project Manager
U.S. Army Corps of Engineers
Chicago District Regulatory Branch - East Section
231 South LaSalle Street, Suite 1500
Chicago, Illinois 60604

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

Dear Mr. Hall:

I would like to take this opportunity to provide comments and questions on the Wisconsin Central, Ltd.'s (CN) response of August 30, 2019 to the Army Corps of Engineers review letter. As the Army Corps of Engineers continues its review, I feel there are several points related to the Railroad's proposal which need clarification, additional analysis, and revision.

Locomotive engines currently idle for hours at a time near Shoe Factory Road, creating noise and vibration which are very disruptive to residents of the adjacent homes. This has been occurring for years, since the CN acquisition of the EJ&E was completed in 2009. The Village and local residents have informed the Railroad of this many times in the past. Following this outreach, there has been no change in this practice. The Railroad's proposal currently under review states the purpose of their project is at least in part to improve "fluidity," which in theory should eliminate idling. If approved for construction, the Railroad must not allow any locomotive engines operated to idle near the adjacent residential areas in the Village. We request that specific requirements and / or regulations to this effect be a condition of the permit, should it be approved. We also request that a process for reporting and addressing violations of these requirements or regulations be identified and communicated to residents and the Village.

The locations of the proposed crossovers were raised as concerns by adjacent residents. Trains moving through the existing and proposed crossovers create noise beyond that associated with trains moving on the continuous rail. The track crossovers should be moved to locations which are not adjacent to or near residential properties.

The Railroad proposal refers to the project's "...unavoidable loss of some trees..." due to the proposed construction on Railroad right of way. This existing vegetation provides visual screening between the adjacent residences and the railroad track, standing locomotives, and moving trains. The loss of this screening vegetation will be substantial and negatively impact the adjacent residences. The Railroad's response to the Army Corps of Engineers was that it is, "... committed to returning native trees and shrubs, where appropriate..." It is unclear what this statement actually means and it does not commit the Railroad to a specific replacement of this existing screening. The Railroad should be required to prepare a landscaping plan for review showing preservation of trees / growth where these can be saved, along with a plan for new plantings to replace materials which are removed.

Train volumes, length, and time of day have an effect on the noise impacts on the adjacent residential area. The Railroad provided information on estimated train volumes during daytime and nighttime hours, which they state was used for the noise analysis. The noise analysis memo included a table showing the existing and projected numbers of trains per hour in this subdivision of the system. We assume the "night time" hours of 10:00 p.m. to 7:00 a.m. represent the average hours corresponding to the northbound and southbound night hours in the table; therefore, the hours of 7:00 a.m. to 10:00 p.m. represent the daytime hours used in the noise analysis. Multiplying the number of hours per period by the trains per hour for each entry in the table yields an estimate of the existing and future daily train volumes (presumably an average). Performing these calculations gives a total train volume of 17.1 per day under existing conditions and 22.8 per day under future conditions. The most recent data we can access on train volumes was sent to the STB by the Railroad for 2015 and through November 2016. The average number of trains per day from these periods were 19.6 in 2015 and 18.1 in 2016 based on this available data. While volumes can vary from year to year and activity is dependent upon demand, among other factors, the estimate of "existing" numbers of trains per day in the noise analysis seems low. Including up to an additional 9 trains per day as cited in the Railroad's original permit application would yield train volumes greater than the "future" volumes used in the noise analysis. These inputs should be checked and verified, and the noise analysis should be redone to reflect the assumptions of train volumes used in the model. These critical input values must be resolved and the noise analysis updated to properly assess noise impacts.

The Railroad's response on page 3 of 23 discusses train forecasts. It notes its original proposal using data from the third quarter of 2018 projecting to the fourth quarter of 2020 estimated approximately 9 additional trains per day in the Leithton subdivision. Their letter then states a shorter-term forecast using more recent data reduced the additional trains to 4 to 5 per day. It is unclear why 2020 was used as an analysis year and why longer-term trends in volumes were not used. While it may be appropriate to consider short-term fluctuations in volume in some cases, these are not necessarily the best indicator to use for longer-range analyses. A more conservative approach to the noise analysis would be to use the higher volumes of additional trains in the original proposal to assess both noise and vibration.

Information on vibration analysis was requested in comments from the Army Corps of Engineers, but we feel the Railroad's response did not adequately address this question. The Railroad's response indicated that there are no regulations that apply, but it did not answer the direct question of what an updated analysis of vibration showed.

The Environmental Impact Statement for the Railroad's purchase of the EJ&E did not include analyses of extending the siding track south of Shoe Factory Road or providing a second mainline track, either as an extension of, or in addition to, the siding. To appropriately address this variation from the EIS, the environmental document should be updated and submitted for review to reflect this specific proposal.

The restrictive culvert south of Golf Road was not proposed to be improved, nor a second crossing culvert pipe added, due to the low benefit / cost ratio cited by the Railroad. The Village believes this is a necessary upgrade which should be required as part of the project. As the railroad will need a permit from IDOT for

the second bridge crossing Golf Road, coordination now with IDOT on the whole project scope is recommended. It is our observation that backups from the culvert can impact Golf Road and the State right of way so it is essential that IDOT be involved in a review of more than just the structure proposal.

Enclosed is a copy of a Village Board resolution opposing the Railroad's proposal in its current form for your records and use. An electronic copy was sent to you last week.

Thank you in advance for giving due consideration to these points as the Army Corps of Engineers continues its review and discussions with Wisconsin Central, Ltd. We appreciate your coordination with the Railroad on our prior correspondence and for these current issues. If I can answer any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "William D. McLeod". The signature is written in black ink and is positioned to the left of the typed name.

William D. McLeod
Village President

enclosure