

E1-1603  
7/26/05  
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Before the  
Surface Transportation Board

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Docket No. 34435



AMEREN ENERGY GENERATING COMPANY  
— CONSTRUCTION AND OPERATION EXEMPTION —  
IN COFFEEN AND WALSHVILLE, IL

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**NORFOLK SOUTHERN RAILWAY COMPANY'S  
COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT  
SERVED MAY 25, 2005**

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Surface Transportation Board

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On May 5, 2004, the Surface Transportation Board (“Board”) instituted a proceeding to review the petition, filed on February 5, 2004, by Ameren Energy Generating Company (“AEGC”), on behalf of itself and its newly created subsidiary, the Coffeen and Western Railroad Company (“CWRC” or “Coffeen”), for AEGC to construct, and for Coffeen to operate, an approximately 13-mile rail line between AEGC’s Coffeen Power Plant to connections with the Union Pacific Railroad Company (“UP”) and The Burlington Northern and Santa Fe Railway Company (“BNSF”) near Walshville, IL (this Finance Docket No. 34435 proceeding is hereinafter referred to as the “Build-out Proceeding”).

The Build-out Proceeding is associated with, but not formally related to, two other proceedings before the Board: (1) Finance Docket No. 34497, Coffeen and Western Railroad Company – Lease and Operation Exemption – Near Coffeen, Illinois, served May 10, 2004 (“Coffeen Notice of Exemption”); and (2) Finance Docket No. 34498, Ameren Corporation – Control Exemption – Coffeen and Western Railroad Company, served May 10, 2004 (“Common

Control Exemption”). The Build-out Proceeding also is associated with, but not formally related to, a proceeding before the Illinois Commerce Commission (“ICC”): Docket No. T04-0084, Coffeen and Western Railroad Company v. Montgomery County, IL, Petition for an Order authorizing the construction of at grade crossings in and around Coffeen, IL (“ICC Proceeding”).

Norfolk Southern Railway Company (“NSR”) submits these comments on the draft environmental assessment, served by the Board’s Section of Environmental Analysis on May 25, 2005 (“Draft EA”). NSR notes apparent inconsistencies in statements made by AEGC directly or by AEGC through its newly formed subsidiary, CWRC, in the various proceedings before the Board, the ICC and the Illinois Department of Transportation (“Ill. DOT”) that may undermine the facts upon which the Draft EA is based and upon which the Board’s Section of Environmental Analysis (“SEA”) has relied in its efforts to satisfy the Board’s obligations under the National Environmental Protection Act of 1969, 42 U.S.C. §§ 4321 to 4370f (“NEPA”).

## DISCUSSION

### A. Applicant entity

The following footnote appears in both the Executive Summary and the body of the Draft EA: “The rail line would be constructed and operated by the Coffeen and Western Railroad Company (CWRC), a wholly owned subsidiary of AEGC. For simplicity, this EA refers to AEGC, the applicant, in the balance of this document.” Draft EA, footnote 1 at ES-1 and Draft EA, footnote 4 at 1. This statement in the Draft EA, apparently based on representations made to

the Board by AEGC<sup>1</sup>, is inconsistent with the Board's prior decisions in this proceeding, other statements in the EA, and other statements made by AEGC, directly or through its newly formed subsidiary, CWRC, to Ill. DOT in permit applications.

The Board has issued two decisions in this proceeding not related to the availability of the Draft EA; one served on May 5, 2004 and one served on July 9, 2004. In each of these decisions, the Board clearly identified AEGC as the party seeking construction authority, and distinguished AEGC, as the party seeking authority to construct the rail line, from CWRC, as the operator of the rail line:

By petition filed on February 5, 2004, Ameren Energy Generating Company (AEGC), a wholly owned subsidiary of Ameren Corporation (Ameren), on behalf of itself and CWRC, its newly formed railroad subsidiary, sought an exemption under 49 U.S.C. 10502 from the prior approval requirements of 49 U.S.C. 10901 for AEGC to construct and CWRC to operate an approximately 13-mile rail line....

STB Finance Docket No. 34435, Ameren Energy Generating Co. – Construction and Operation Exemption – In Coffeen and Walshville, IL., served May 5, 2004, slip op. at 1; STB Finance Docket No. 34435, Ameren Energy Generating Co. – Construction and Operation Exemption – In Coffeen and Walshville, IL., served July 9, 2004, slip op. at 1.

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<sup>1</sup> In a November 3, 2003 letter to SEA, for example, AEGC sought a waiver of the six-month pre-filing notice requirement under 49 C.F.R. 1105.10(c) and informed SEA that it would seek on behalf of a new railroad subsidiary [CWRC] Board authority to construct the proposed Build-out Project. Letter to Victoria Rutson, Chief, SEA, dated November 3, 2003, from Sandra L. Brown, Troutman Sanders LLP. A year later, CWRC submitted to SEA and the third-party consultant retained to assist SEA “proposed voluntary mitigation measures for [CWRC’s] proposed rail construction project” that were developed by CWRC and would be implemented by CWRC if the Board were to approve the pending Build-out Proceeding petition. Among other items, CWRC agreed to limit maximum train speeds on the rail line. Memorandum to Jo Carole Dawkins, Dawkins Consulting and David Navecky, SEA, dated November 12, 2004, from Sandy Brown and Rebecca Roback, Troutman Sanders LLP (“November 12, 2004 Voluntary Mitigation Memorandum”).

Further, the Draft EA footnotes discussed above appear inconsistent with the discussion on page 9 of the Draft EA implying that there are no operations or maintenance activities contemplated by CWRC at all. The Draft EA clearly states at page 9 that either or both of UP and BNSF will perform the railroad operations over the line, and that neither AEGC nor CWRC will perform the maintenance: “AEGC would enter into a trackage rights agreement with UP and/or the BNSF to provide rail service over the proposed line. \* \* \* AEGC would select a contractor to perform all maintenance and inspections....” See also, Draft EA at 4 (“AEGC states that it expects to enter into a trackage rights agreement with UP and/or BNSF to provide rail service over the proposed rail line.”)<sup>2</sup>.

In its Petition to the ICC, however, CWRC seems to tell another story. CWRC bases its request before the ICC for railroad grade crossing approvals on the fact that: (1) the STB will authorize the construction; (2) the authorization will be for CWRC to construct the rail line; (3) CWRC will conduct the railroad operations; and (4) CWRC will maintain the railroad property. In ICC Docket No. T04-0084, Petition filed December 14, 2004, at 2, 3 and 4 (emphasis added) (attached as Exhibit A), CWRC states as follows:

Subject to the environmental review process, the STB will authorize the construction of the [proposed Route A]. \* \* \* CWRC will be a Class III common carrier and will provide service to other shippers as requested. \* \* \* This configuration and number of trains would enable CWRC to move approximately 3.4 million tons of coal to the Coffeen Power Plant per year. For the foreseeable future, CWRC does not anticipate exceeding 300 loaded trains per year.... \* \* \* The track and grade crossings will be constructed and maintained by and at the expense of Petitioner [CWRC].

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<sup>2</sup> In response to a question from SEA’s third-party consultant, CWRC represented that it expects to enter into trackage rights agreement with UP and/or the BNSF to provide rail service over the line. Memorandum to Jo Carole Dawkins, Dawkins Consulting, dated August 9, 2004, from Sandra L. Brown and Rebecca Roback, Troutman Sanders LLP (“August 9, 2004 Memorandum”), at 11.

Although CWRC also makes the statement that “While CWRC may decide in the future to contract with another carrier to provide service on the new line, CWRC would still remain a common carrier and hold “residual common carrier” authority even in that event,” CWRC failed to submit to the ICC any operational data to the ICC for UP or BNSF operations over the line.

Id.

This is not the only factual inconsistency as to the identity of the party or parties that will construct the rail line, operate and maintain a new railroad if all necessary regulatory approval is obtained. It is Ameren Energy Fuels & Services (“AFS”), not CWRC, that is identified as the party seeking to “construct, operate and maintain a railroad grade crossing on Illinois Route 127” in an April 19, 2005 Illinois DOT utility permit. See April 28, 2005 Permit 6-29222 Approval Letter with April 19, 2005 Illinois DOT utility permit request (attached hereto as Exhibit B) (“ILL DOT Proceeding”). AFS is a subsidiary of Ameren Corporation; it is not even a subsidiary of AEGC or CWRC (CWRC is a subsidiary of AEGC, which is a subsidiary of Ameren Corporation). In fact, AFS is the shipper’s representative acting on Ameren Corporation’s behalf to “evaluate the fuel and transportation resources available for each plant in order to maximize the flexibility and competitiveness of each [of Ameren Corporation’s] plant.” Petition for an Exemption from 49 U.S.C. § 10901 to Construct and Operate a Rail Line between Coffeen and Walshville, Illinois,” filed February 5, 2004, at 5.

Further, while represented in the ILL DOT Proceeding as the entity responsible for construction, operation and maintenance of the grade crossing, AFS is not identified as such or even mentioned in the Draft EA. Rather, SEA relies, for purposes of the Draft EA, upon representations by AEGC that CWRC will be responsible for the construction and operation of the proposed rail line, and that: 1) AEGC, or perhaps CWRC as its wholly owned subsidiary

(see footnote 1 of page ES-8 of the Draft EA), will be responsible for implementing a set of voluntary mitigation measures and any additional environmental mitigation measures recommended by SEA to address the environmental impacts of the proposed rail construction and operation project<sup>3</sup>; 2) either UP or BNSF will operate over the line; and 3) a contractor will maintain the line. By contrast, the ICC relies, for the purpose of its petition by CWRC, on representations that CWRC will construct, operate and maintain the line.

The factual information provided in the AFS permit is not consistent with the factual information presented in either the petition filed by AEGC before the Board in the Build-out Proceeding or the petition filed by CWRC before the ICC in the ICC Proceeding, nor is the factual information presented in those two proceedings consistent. The relevant regulatory bodies, in fulfilling their respective statutory obligations, and interested parties must be able to rely upon the information provided by applicants.

The issue of what entity is seeking authority to construct and what entity will operate the rail line is significant for determining environmental responsibility and for other corporate responsibility reasons, as AEGC, CWRC and AFS are apparently companies different in nature and with different types of legal powers. This is not a case of a distinction without a meaningful difference. Before the ICC, CWRC claims to be a common carrier that will build and operate the line, and is using that status to seek ICC authority for railroad grade crossings. Before the Ill. DOT, AFS claims to be the party that would build, operate and maintain the railroad crossings.

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<sup>3</sup> For example, CWRC represented to SEA and its third-party consultant that CWRC, and not some other entity, would consult with Ill. DOT and various county and local commissioners concerning grade crossings issues. August 9, 2004 Memorandum, at 5. Indeed, CWRC stated that it had re-aligned the track at the crossing with Highway 127 in order to address potential crossing safety issues. November 12, 2004 Voluntary Mitigation Memorandum, at 2. As noted above, however, it was AFS, a non-carrier shipper representative, that actually sought and obtained the permit from Ill. DOT to construct, operate and maintain the Highway 127 grade crossing, not CWRC. See, Exhibit B.

If, in fact, it is AEGC requesting the authority to construct, and if there is no intention for CWRC to perform any railroad operations, then those facts raise questions as to whether the Board's authority and the ICC's authority are properly being invoked and, as a corollary, how as a legal matter the environmental mitigation obligations imposed by the Board in connection with the construction and operation of a rail line are to be satisfied.

Moreover, the purpose of the existence of CWRC is now in question. It has been over a year since CWRC was to have become a carrier by means of a lease of 1,000 feet of track from AEGC. NSR has previously raised the question (unanswered) as to whether this 1,000 feet of track is within the confines of the AEGC facility (thus making the claim that it would serve any shipper on the leased line rather inconsequential). There is substantial question whether it is or ever intended to perform any railroad operations. In the ICC Proceeding, NSR raised the questions (unanswered) as to whether and when CWRC actually signed any lease that allegedly gives rise to its status as a carrier. Notwithstanding all of the inconsistencies and unanswered questions, CWRC is claiming its common carrier authority from the Board as the basis for its authority to petition for grade crossings before the ICC.

It is important for the Board, consulting federal, state and local agencies and the public to have a clear understanding of the obligation by and intent of an applicant to mitigate the environmental impacts of a project requiring regulatory approval. In this instance, SEA has taken certain representations made to it by AEGC and relied upon such in conducting its assessment of the environmental impacts of the proposed rail construction and operation project. If the Board's environmental process is to have meaning, as it must under NEPA, there must be

sufficient transparency for all interested parties to see and understand the intentions of the applicant, and a consistent set of facts presented before all agencies as to the proposal being made and evaluated. NSR believes that the process as implemented to date in this matter reveals fundamental flaws in the information relied upon by the regulators. In order to rectify these flaws and misconceptions, SEA and the Board should direct AEGC, CWRC and AFS to refile the pending petition so that the relevant regulatory agencies and interested parties can determine what the proposal is, and what environmental impacts will need to be addressed and by whom.

B. “Build” alternatives assessment

The Draft EA suffers from a second significant flaw. The Draft EA considers only one true alternative to the “no action” alternative required to be assessed in compliance with NEPA. That “build” alternative is referred to as “Route A” in the Draft EA. While the environmental impacts of “Route B” were evaluated and included in the Draft EA based on construction and operation information provided by AEGC, Route B is not in fact a plausible alternative of sufficient weight to be considered a build alternative for EA evaluation purposes.

NEPA requires an agency to consider the reasonable alternatives to the agency action proposed, and the Board’s environmental rules expressly require an applicant to describe “any reasonable alternatives to the proposed action” for purposes of the Board’s environmental review of a proposed action that requires an applicant to submit an environmental report to the Board. 49 CFR §1105.7(e)(1). Route B is not a “reasonable” option under any relevant criteria because it is premised upon an underlying set of contingencies that are not remotely likely to occur and are wholly beyond the ability of AEGC to make happen. Indeed, Route B could never be

developed without NSR voluntarily selling, leasing or otherwise allowing AEGC to use its Sorrento to Coffeen track, “which would be required for Route B to be feasible.” Draft EA at 4. See also, Draft EA at 10. As AEGC is very aware, NSR has categorically stated to AEGC that it has no intention of permitting AEGC or CWRC rights over its line. Moreover, there is absolutely no legal obligation by NSR to do so. Indeed, NSR is developing additional shipper business over the line in question and has no interest in selling, leasing or otherwise altering control of operations over the line.

Thus AEGC has submitted for consideration by the STB as an alternative “build” route subject to environmental review a route – Route B – that has no meaningful possibility of being realized. As such, it cannot be held out by AEGC as a plausible build alternative relevant to the STB’s consideration of the environmental impacts of the proposed action, and SEA’s work to verify and evaluate the environmental impacts of Route B – as well as the project review conducted by the numerous other federal, state and local agencies with whom SEA has consulted – are, unfortunately, for naught. Instead, SEA is left with a Draft EA that has considered the environmental impacts of only the one build option for which AEGC has provided sufficient information in its submittals to the STB to undergo environmental evaluation in an EA. No other “reasonable” build alternatives are compared in the Draft EA.

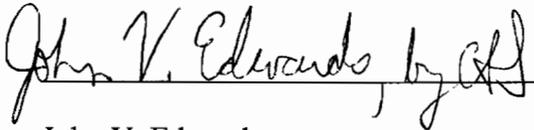
NSR is not arguing that every option considered as an alternative to the preferred route be one that would be implemented as an alternative to the preferred route – only that such options considered for the purpose of NEPA evaluation be possible. Route B is not and AEGC knows that. The purpose of NEPA is not carried out when a build alternative described by an applicant and then relied upon by the agency tasked with conducting a NEPA-compliant environmental

review of reasonable alternatives is as illusory as is Route B.

However, as indicated in the Draft EA, AEGC apparently briefly considered another rail construction option to provide it with a new rail line into its plant. Draft EA, at page 11. "Route C" was dismissed by AEGC from more rigorous environmental evaluation and was not even mentioned as a possible alternative in AEGC's February 5, 2004 Petition for Exemption filed with the Board. The Draft EA offers only AEGC's conclusory reasons for not undertaking a more intensive environmental analysis of Route C, in particular a more detailed comparison of the similarities and differences in the environmental impacts of Route A versus Route C. It may be the case that Route C is not the preferred construction alternative for a variety of reasons and that an evaluation of Route C (or other alternative routes, if relevant) as detailed as that undertaken for Route B is not necessary to complete the NEPA review of the proposed action, but as matters stand the Board and interested parties, including local communities, do not have

the benefit of more than one build option to consider, and no build alternative with which to compare Route A in any meaningful way.

Respectfully submitted,



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Dated: June 30, 2005

CERTIFICATE OF SERVICE

I certify that on June 30, 2005, a true copy of "Norfolk Southern Railway Company's Comments on the Draft Environmental Assessment served May 25, 2005," including all attachments, was served by overnight courier upon the following:

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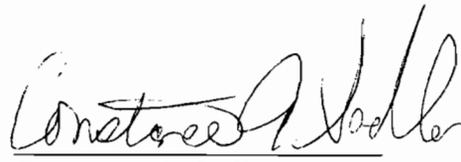
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# **EXHIBIT A**

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

**COFFEEN AND WESTERN RAILROAD  
COMPANY,**

**Petitioner,**

v.

**MONTGOMERY COUNTY, ILLINOIS,**

**Respondent.**

**Docket No.** \_\_\_\_\_

**Petition for an Order authorizing the  
construction of at grade crossings in and  
around Coffeen, Illinois.**

**PETITION**

The Coffeen and Western Railroad Company ("CWRC" or "Petitioner"), an affiliate of Ameren Corporation ("Ameren"), hereby requests that the Illinois Commerce Commission (the "Commission") issue an Order authorizing it to construct and maintain certain railroad grade crossings in and around Coffeen, Illinois, as further described herein. Exhibit B to this Petition sets forth a complete listing of crossings for which approval is sought. In support of its petition, CWRC states as follows:

1. Petitioner is an Illinois corporation with its principal place of business in St. Louis, Missouri, and is authorized to transact business in the state of Illinois and holds common carrier authority from the Surface Transportation Board ("STB"). Petitioner is a wholly-owned subsidiary of Ameren, which is the parent of four Illinois public utilities: Central Illinois Public Service Company, Central Illinois Light Company, Union Electric Company and Illinois Power Company. Ameren is also the parent of Ameren Energy Generating Company ("AEGC"), which owns and operates the coal-fired Coffeen Power Plant in the vicinity of Coffeen, Illinois.

2. AEGC filed a petition with the STB on February 5, 2004, on behalf of CWRC, for common carrier authority to construct and operate a proposed new rail line. The proceeding at the STB is captioned "STB FD No. 34435, Ameren Energy Generating Co.- Construction and Operation - In Coffeen and Walshville, Illinois." In the STB petition, Petitioner requested the STB to authorize the proposed Route A, an approximately 13 mile rail line. Subject to the environmental review, the STB will authorize the construction of the route. The route is shown in Exhibit A attached hereto and by this reference made a part of this Petition (the "Coffeen build-out").

3. Currently, the sole rail transportation provider to the Coffeen Power Plant is the Norfolk Southern Railway ("Norfolk Southern"). In order for Norfolk Southern to get to the Coffeen Power Plant, Norfolk Southern runs over Burlington Northern Santa Fe Railway ("Burlington Northern") trackage rights from Litchfield, Illinois to Sorento, Illinois where Norfolk Southern begins operating on its own track again for the last 12 miles to the Coffeen Power Plant. The 12 mile Norfolk Southern track between Sorento and Coffeen is an island of Norfolk Southern track because Norfolk Southern has previously abandoned the other sections of the track to the east and west of the island section. Norfolk Southern does not serve any other shippers on the island track.

4. AEGC's desire to lower fuel costs for customers by maximizing the fuel and transportation options at its plants, led to AEGC's investigation of alternative rail service options that would provide more flexibility by increasing transportation competition via the Coffeen build-out.

5. Route A is an approximately 13 mile rail line in an east/west direction from the Coffeen Power Plant to a connection with the Union Pacific Railroad ("Union Pacific") and a

separate connection to the Burlington Northern both in the vicinity of Walshville, Illinois. Route A would cross 11 public roadways and 3 private crossings. The location of each of these proposed crossings is listed in Exhibit B attached hereto and by this reference made a part of this Petition. Each of the public crossings for Route A is also illustrated in Exhibit C attached hereto and by this reference made a part of this Petition. All of the proposed crossings for Route A are located in Montgomery County. The public crossings for Route A include: CR 400-N. 4<sup>th</sup> Ave.; CR 1375-Arrow Trail; CR 1275-Buckeye Trail; CR 1025-Pheasant Trail; CR 900; CR650/10-Long Bridge Trail; CR 350-Loew Ave.; CR 625-Old Brushy Road; CR 300-N. 3<sup>rd</sup> Ave.; and CR 425-Elm Trail. As shown in Exhibit B, the average daily traffic count ("ADT") for the crossings on Route A range between approximately 25 ADT to less than 500 ADT, except the proposed crossing at Illinois Route 127/CR 1125 which has an ADT of 2,500 vehicles. Petitioner has voluntarily agreed to install flasher/gates at Route 127.

6. Petitioner requests that the Commission approve the Route A crossings consistent with the requested authority from the STB.

7. The Coffeen Power Plant currently receives approximately 3.0 million tons of coal per year. CWRC expects to use train configurations of 115 cars and move approximately 257 loaded trains per year or an average of 0.704 loaded trains per day (or less than two trains a day on average of loaded and empty trains). This configuration and number of trains would enable CWRC to move approximately 3.4 million tons of coal to the Coffeen Power Plant per year. For the foreseeable future, CWRC does not anticipate exceeding 300 loaded trains per year or an average of 0.8219 loaded trains per day (or less than two trains a day on average of loaded and empty trains). No request has been made to Petitioner to move other traffic or commodities over the line.

8. The Coffeen build-out is an essential project to ensure the maximum fuel flexibility and economically competitive status of the Coffeen Power Plant. As described above, this project will allow AEGC to use multiple transportation providers. The Coffeen build-out will thus result in more and lower cost options for fuel, increase plant reliability and ultimately reduce the plant's total cost of operations. All of these factors are important to keep the Coffeen Power Plant competitive and viable in the future.

9. The track and grade crossings will be constructed and maintained by and at the expense of Petitioner. The installation of the proposed warning device at each proposed crossing is consistent with public safety. The cost of constructing the flashing light signals and gates or crossbucks as applicable will be borne by Petitioner. Petitioner will bear the cost of maintaining the warning devices following installation. Petitioner is not requesting the allocation of public funds.

WHEREFORE, Petitioner respectfully requests that the Commission set the aforesaid matter for public hearing and, enter an order granting and authorizing the construction and installation of grade crossings at the locations for Route A; determine that the proposed warning devices at each listed grade crossing location are sufficient and adequate to protect the traveling public with respect to the newly constructed at-grade crossings and grant such other and further relief as the Commission deems necessary and appropriate.

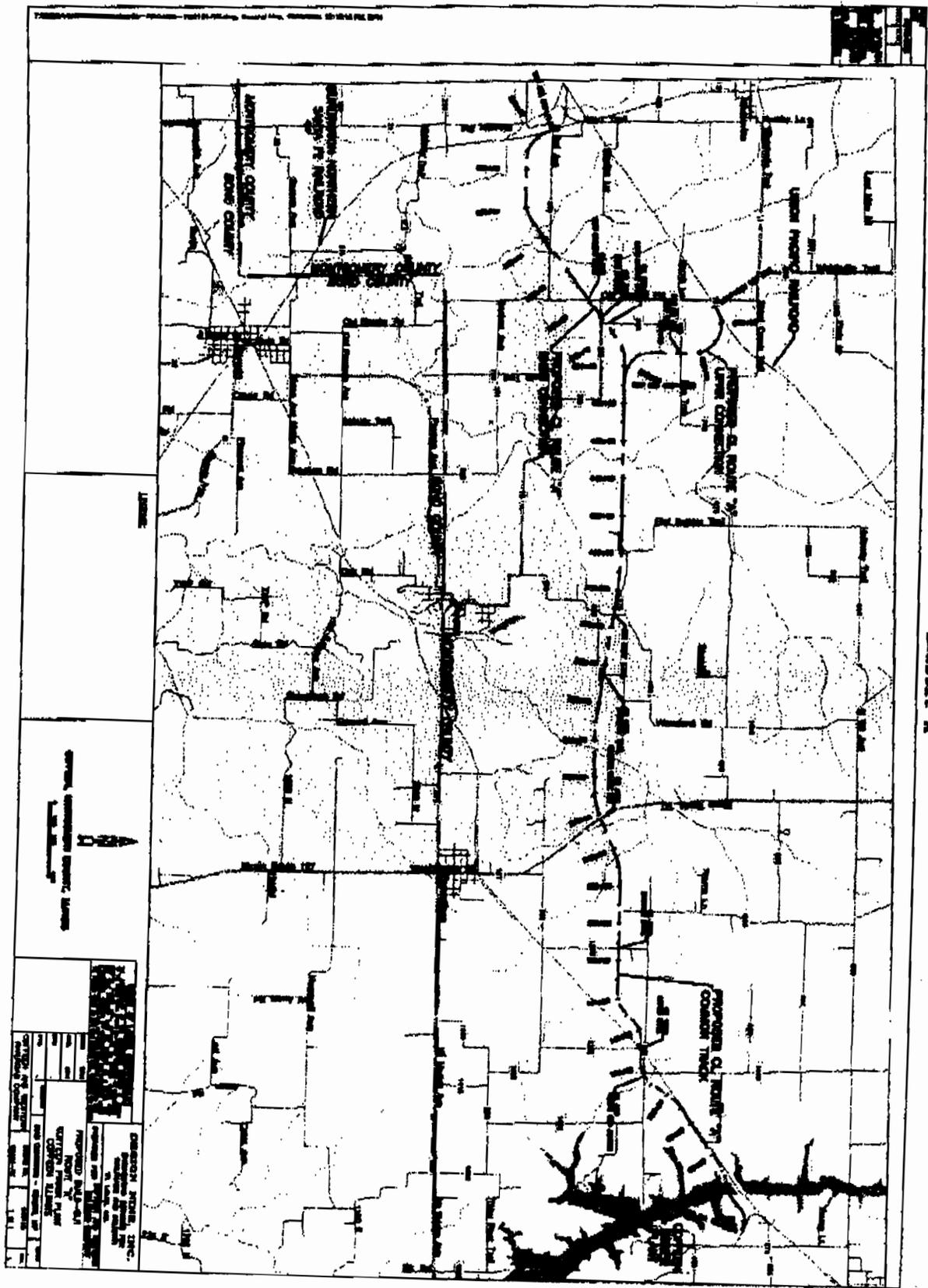
**COFFEEN AND WESTERN RAILROAD  
COMPANY**

By: \_\_\_\_\_

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**EXHIBIT A**  
**Map of Route A and Route B**  
**[See Attached]**



Docket No.

Exhibit A

**EXHIBIT B**

**Proposed Railroad Grade Crossings**

**ROUTE A**

Road- all within Montgomery County	Type	Station Number	Crossing Method	Safety Device	ADT
Brackett	Private	ECS 67+00	At Grade	Crossbucks	N/A
CR 400 - N. 4 <sup>th</sup> Ave.	Public	ECS 115+37	At Grade	Crossbucks	150
CR 1375 - Arrow Trail	Public	ECS 130+74	At Grade	Crossbucks	25
CR 1275 - Buckeye Trail	Public	ECS 187+36	At Grade	Crossbucks	75
Ill Rte 127, CR 1125	Public	ECS 257+47	At Grade	Flashers/Gates	2500
CR 1025 - Pheasant Trail	Public	ECS 334+96	At Grade	Crossbucks	N/A
Fox Hunt Trail	Public	ECS 366+88	At Grade	Crossbucks	<175*
Laughlin Lane	Private	ECS 401+65	Grade Separated <sup>1</sup>	N/A	N/A
CR 650/10 - Long Bridge Trail	Public	ECS 525+32 BN**	At Grade	Crossbucks	<500*
CR 350 - Loew Ave	Public	ECS 529+75 BN**	At Grade	Crossbucks	450
CR 625 Old Brushy Road	Public	ECS 541+46 BN**	At Grade	Crossbucks	325
CR 300 - N. 3 <sup>rd</sup> Ave.	Public	ECS 575+25 BN**	Grade Separated <sup>2</sup>	N/A	100
Weiss	Private	ECS 581+25 BN**	At Grade	Crossbucks	N/A
CR 425 - Elm Trail	Public	ECS 529+90 UP**	At Grade	Crossbucks	<500*

\* ADT volumes are not published for these roads. Instead, the number shown reflects the highest ADT volume of surrounding roads.

\*\* The "BN" or "UP" designation next to certain station numbers indicates whether the location is for the BN or UP connection portion of Route A as applicable.

<sup>1</sup> This crossing is proposed as a grade separated crossing in order to accommodate the area topography.

<sup>2</sup> This crossing is proposed as a grade separated crossing in order to accommodate the crossing of Lake Fork Creek.

**EXHIBIT C**  
**Route A Crossings**  
**[See Attached]**



















STATE OF MISSOURI     )  
                                  )  
CITY OF ST. LOUIS     )

**VERIFICATION**

Thomas Byrne, being duly sworn on oath, deposes and states that he the attorney for the Coffeen and Western Railroad Company; that he is duly authorized by said railroad company to sign, verify and file the foregoing Petition; that he has knowledge of the matters set forth in said Petition and that the same are true and correct.

Thomas M. Byrne

Subscribed and sworn to before me this  
14<sup>th</sup> day of December, 2004.

Carolyn J. Woodstock

Notary Public

**CAROLYN J. WOODSTOCK**  
Notary Public - Notary Seal  
**STATE OF MISSOURI**  
Franklin County  
My Commission Expires May 19, 2008

## **PROOF OF SERVICE**

Christopher W. Flynn, attorney, being first duly sworn on oath, certifies that on December 14, 2004, he caused to be served, a true and correct copy of PETITION upon all parties of record by depositing same in the U.S. Mail depository located at 77 W. Wacker Drive, Chicago, Illinois, certified-return receipt requested, postage prepaid, addressed to:

**Illinois Department of Transportation**

**Montgomery County**



# **EXHIBIT B**



# Illinois Department of Transportation

Division of Highways / District 6  
126 East Ash Street / Springfield, Illinois / 62704-4792  
Telephone 217/782-7301

April 28, 2005

Ameren Energy Fuels & Services  
MC 611  
1901 Chouteau Avenue  
St. Louis, Missouri 63103

RE: Permit 6-29222 Approval Letter

Dear Sir:

Enclosed are two approved copies of Utility Permit, District Serial No. 6-29222.

One copy of the Permit should be retained for your records while the other copy shall be available at the jobsite whenever construction is taking place.

You may proceed with the work in accordance with the terms and provisions of the Permit.

Also enclosed please find two self-addressed post cards, the "Start of Work" card needs to be mailed 72 hours prior to the start of work, and the "Completion of Work" card after the work is completed.

Sincerely,

Christine M. Reed, P.E.  
Deputy Director of Highways  
Region Four Engineer

By:   
Louis J. Haasis, P.E. *KTT*  
District Operations Engineer

LJH:KT:djc  
Enclosure



Illinois Department of Transportation

UTILITY PERMIT

PHONE NUMBER:

Public Improvement  Yes  No
IDOT Permit No. 6-29222
Utility Reference No.

I (We) Ameren Energy Fuels & Services MC 611, 1901 Chouteau Avenue
Name of Applicant Mailing Address
St. Louis, Missouri 63103
City State & Zip

hereinafter termed the Permittee, request permission and authority to occupy, and to do certain work herein described on, the right-of-way of the State highway known as FAP 42, Section 105.106. (W. RS-1) & 105 (R-BR) from to in Montgomery County. The work is described in detail below and/or on the attached sketch or plans.

The work location is on FAP 42- IL 127 approximately 3,540 feet north of Township Road 300 in Montgomery County.

Whereas, Ameren Energy, hereinafter termed the Petitioner, are hereby granted permission and authority to locate, construct, operate and maintain a railroad grade crossing on Illinois Route 127, Montgomery County, located at Railroad Station 257+47 in Section 13, Township 7 North, Range 4 West in accordance with the attached plans, which are made a part of this permit.

This permit covers the operation and presence of specified equipment, material or facility on the right-of-way that may be related to the authorized work. A copy must be present when crews or equipment occupy highway right-of way.

This permit is subject to conditions and restrictions of Part 530 of Title 92 of the Illinois Administrative Code, Accommodation of Utilities on Right-of-Way of the Illinois State Highway System. The removal, relocation or modification of facilities permitted to occupy the right-of-way is governed by Section 9-113 of the Illinois Highway Code, as amended by Public Act 92-0470. The Permittee agrees to comply with the requirements of these laws and with all terms and conditions established by this permit. This permit is subject to revocation by the Department on violation of the terms and conditions governing its use.

Signature of Agent for Permittee: Glennon P. Hof, Date: 4/19/05

Name of Permittee (Print or Type): GLENNON P. HOF

Mailing Address: P.O. Box 66149, MC 611

City: ST. LOUIS, State: MO, Zip: 63166-6149

This Permit is not in effect until signed by Petitioner and approved by District Engineer.

The work authorized by this permit shall be completed within 988 days (by 12/31/07) after the date of approval by the Department otherwise the permit will be considered null and void.

Public Improvement Projects only: The anticipated letting date is

This permit allowing occupancy and work on state right-of-way is approved. The Utility Coordination Council established by the Department in the area covered by this permit is District 6/Region 4

Signature: Christine M. Beard, Date: 4/28/05
Department of Transportation KTT

This permit is subject to the conditions and restrictions **established in accordance with the Illinois Highway Code and Part 530 of Title 92 of the Illinois Administrative Code** including but not limited to the following:

- (1) The applicant represents all parties in interest and shall furnish material, do all work, pay all costs and shall in a reasonable length of time restore the damaged portions of the highway to a condition similar or equal to that existing before the commencement of the described work, including any landscape restoration necessary. (See Section 530.250 of Title 92 ).
- (2) The proposed work shall be located and construction to the satisfaction of the District Engineer or his duly authorized representative. No revisions or additions shall be made to the proposed work on the right-of-way without the written permission of the District Engineer or his duly authorized representative (See Section 530.200 of Title 92). **In certain circumstances the Department may require that the construction plans and/or the as-built documents be sealed by an Illinois Registered Professional Engineer. Typical of such projects would be petroleum or gas pipelines.**
- (3) The applicant shall at all times conduct the work in such a manner as to minimize hazards to vehicular and pedestrian traffic. All signs, barricades, flaggers, etc., required for traffic control shall be furnished by the applicant. (See Section 530.240 of Title 92).
- (4) The applicant must ascertain the presence of Highway Authority Agreements established in accordance with 35 Ill. Admin. Code Section 742.1020 in the path of its proposed installation and take precautions to protect its workers, human health and the environment in those areas. (See Section 530.240 of Title 92). Where contamination is encountered through excavation in the ROW, it should be managed offsite and IDOT's generator number for the appropriate county may be used.
- (5) The applicant shall not trim, cut or in any way disturb any trees or shrubbery along the highway without the approval of the District Engineer or his duly authorized representative. (See Section 530.600 of Title 92).
- (6) **The facilities authorized to occupy the right-of-way by this permit are subject to removal, relocation or modification by the permittee at no expense to the State on notice given by the Department in accordance with Section 9-113 of the Illinois Highway Code, as amended. Participation by the permittee in the UTILITY Coordination Council identified on page one of this permit is required as a condition of this permit. Permittee shall cooperate with the Department with the scheduling of any removal, relocation or modification deemed necessary for highway or highway safety purposes, and, if Utility Coordination Council participation is required by this permit, with the activities of the council identified on the first page of this permit. (See Section 9-113 of the Illinois Highway Code.) Use of and compliance with current IDOT Traffic Control Standards will be required.**
- (7) If the applicant and the District cannot agree either on whether the permit should be issued or on what conditions would be appropriate, the applicant may, within 30 days of the issuance of written notice of the District's position, appeal the District's determination to the Chief of the Department's Central Bureau of Operations. (See Section 530.900 of Title 92).
- (8) **The permittee agrees to fully comply with the following legal obligations in advance of entering and while upon any Right-of-way within the Illinois State Highway System.**
  - a) ***Only a permit issued by the Department under this Part will satisfy the "written consent" requirement of Section 9-113 of the Illinois Highway Code (the Code).***
  - b) ***A permit from the Department grants a license only to undertake certain activities in accordance with this Part on a State right-of-way, and does not create a property right or grant authority to the permittee to impinge on the rights of others who may have an interest in the right-of-way. Such others might include an owner of an underlying fee simple interest if the right-of-way is owned as an easement or dedication of right of way, an owner of an easement, or another permittee.***
  - c) ***It shall be the responsibility of the permittee to ascertain the presence and location of existing above-ground or underground facilities on the highway right-of-way to be occupied by their proposed facilities. The Department will***

make its permit records available to a permittee for the purpose of identifying possible facilities. When notified of an excavation or when requested by the Department, a permittee shall locate, physically mark, and indicate the depth of its underground facilities within 48 hours excluding weekends and holidays.

- d) The permittee shall avoid conflicts with any existing underground or above-ground facilities on or near the highway right-of-way. Both the Department and J.U.L.I.E. are to be contacted for assistance during the application process.
- e) The permittee shall comply with all other applicable laws relating to the placement of utility lines.
- f) The issuance of a utility permit by the Department does not excuse the permittee from complying with any existing statutes, local regulations or requirements of other Department (e.g., oversized and overweight vehicles) or the requirements of other State agencies including, but not limited to, the following:

Illinois Commerce Commission  
Illinois Department of Agriculture  
Illinois Department of Natural Resources  
Illinois Department of Mines and Minerals  
Illinois Environmental Protection Agency  
Illinois Historic Preservation Agency

- g) Rights of abutting and underlying property owners are protected by common law and Sections 9-113 and 9-127 of the Code. The permittee will address these rights prior to initiating activities on State right-of-way. The Department will not be a party in any negotiations between the utility and abutting property owners.
- h) In no case shall the permit give or be construed to give an entity any easement, leasehold or other property interest of any kind in, upon, under, above or along the State highway right-of-way.
- i) Each person responsible for a utility, in place on the effective date of this Part, on a State highway right-of-way shall notify the Department in writing, if that facility does not comply with this Part. The Department shall treat such a notice as a request for a variance under Section 530.130. Until informed that a variance will not be granted, a person responsible for a pre-existing utility will not be in violation of this Part. The failure to provide such notice constitutes a violation of this Part and of the utility accommodation permit (if any) and would justify the imposition of the sanctions set forth in Section 530.810.

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Work to be coordinated with Department Representatives:

Kim Tribbet

Phone 217/782-7745

Phone ( )

Utility Contact Person: \_\_\_\_\_

Phone ( )

Work to be done by:

Contractor: \_\_\_\_\_

Daytime Phone: ( )

Emergency Phone: ( )

Traffic control operation:

Number of lane closures: \_\_\_\_\_

Time of closures: \_\_\_\_\_

Any deviation of alignment for the proposed railroad grade crossing requires permission from the District permit office. Upon completion of the project, the petitioner shall submit a set of as-built plans.

**All work authorized by this permit shall be constructed and maintained without expense to the State of Illinois.**

**The proposed railroad grade crossing shall be constructed and maintained to match the existing profile of Illinois Route 127.**

**The proposed crossing shall be Star Track II HD pre-cast concrete or approved equal installed in accordance with the manufacturer's recommendations.**

**A full-depth saw cut shall be made on Illinois Route 127 prior to removing the pavement for the Star Track II Installation. The pavement removal limits shall be 10-feet each side of the track centerline. The material placed in the trench outside the limits of the concrete crossing shall be according to the attached mixture chart. The Permittee shall replace all highway pavement markings that become obliterated by the crossing installation.**

**The Permittee shall be responsible for furnishing the required railroad flaggers for all future work on Illinois Route 127 by the Department at this railroad crossing, at no cost to the State.**

**Utility poles, manholes, handholes, fire hydrants or any other obstruction shall not be placed in the ditch flowline of any state highway. Facilities shall be placed outside the clear zone area.**

**All pipe, conduit, wire, poles, cross arms, or other materials distributed along the highway prior to installation shall be placed as remote as practicable from the edge of the pavement in a manner to minimize its being a hazard to errant vehicles or an obstacle to highway maintenance. If material is to be stored on highway right-of-way for more than 2-weeks prior to installation, approval must be obtained from the Department.**

**Any tree trimming, tree removal, or root disturbance required for the installation of utility facilities covered by this permit, shall not be considered normal maintenance operations. Tree trimming, tree removal, and/or root disturbance shall require the application for, and issuance of, a separate permit. This permit shall be submitted for approval to the District Landscape Architect, Bureau of Operations 217/785-5305.**

**The applicant shall have on hand the proposed roadway construction plans for this project. The placement of the facilities shall be constructed so as not to be in conflict with the proposed roadway construction project. Any adjustment or relocation of the new or existing facilities within the state's right-of-way or access control shall be at the applicant's expense.**

**The applicant must notify this office 48 hours prior to the start of any work on State right-of-way.**

**This permit is valid only for those facilities located upon State right-of-way and precludes installation upon non-State right-of-way without acquisition of any required and/or necessary easements.**

**All appurtenances located on State right-of-way attached to said facilities shall be the responsibility of the Applicant.**

**It must be understood that everyone working on this project shall indemnify and save harmless the State of Illinois, its officers, and employees, from all suits, actions or damages received or sustained by any person or property on account of or in consequence of any action of omission, neglect, or misconduct, by your organization or anyone working with your organization.**

**The Applicant shall require his Contractor (or Contractors) to perform his (or their) work in accordance with the "Standard Specifications for Road and Bridge Construction," adopted January 1, 2002, and the "Supplemental Specifications" in effect on the date of construction. All material incorporated into the project shall be obtained from a Department approved source and shall be in accordance with Section 1000 of said "Specifications."**

**Work is not allowed to be started on this project until the permit has been approved by this Department. This permit is required to be available at the jobsite at all times for inspection by a duty authorized representative of the Department of Transportation of the Illinois State Police.**

**Upon completion of all construction or maintenance work on state highway right-of-way, the Contractor and/or the Applicant shall remove all excess material and restore all turf and terrain to the satisfaction of the Department.**

127  
G.P.A.  
1/14/05

**Such clean-up and repair may consist of backfilling, regrading, reseeding, resodding, or any other requirements to restore the right-of-way to a condition equivalent to that which existed prior to the commencement of the project.**

**No deviations to the work specified in this permit will be allowed without approval from this office. If the applicant deviates without approval, the facility may be required to be relocated off of State right-of-way at the applicant's expense.**

**The Applicant shall stay a minimum of 0.61m (2-feet) away from all sign poles (wooden or steel) and at no time is the Applicant or his Contractor to remove and replace any signs without the approval of this office.**

**The Applicant or his Contractor (or Contractors) shall control and protect all vehicular and pedestrian traffic by use of signs, barricades, flagmen, lights, watchmen and by any other means as required in the "Manual on Uniform Traffic Control Devices for Streets and Highways" during the progress of the work as described within this permit. However, additional protection must be provided when special complexities and hazards arise.**

**Ground-mounted appurtenances to electric power or communication lines shall be located within 0.305m (1-foot) of the right-of-way line or as near as practicable. Ground-mounted appurtenances, when permitted on state highway right-of-ways, shall be provided with a vegetation free area expanding 0.305m (1-foot) in width beyond the appurtenances in all directions.**

**Overhead power and communication lines crossing conventional highways shall cross at or as near to a 90° angle as practicable. Vertical line clearance over the roadway shall be a minimum of 6.10m (20-feet) with additional clearances as required by General Order No. 160 Revised of the Illinois Commerce Commission for higher voltage lines.**

**No overhead flood light fixtures, advertising signs, or signs of any kind, shall be placed on/or overhang the state right-of-way.**

**The roadway shall be maintained by the petitioner in a safe and sightly manner and to the satisfaction of the Director of Highways or his duly authorized agent.**

**Traffic on the highway shall be protected by the use of signs, barricades, lights and flagmen as may be required during progress of the work in accordance with the current State of Illinois Manual of Uniform Traffic Control Devices for Highway Construction and Maintenance Operations and the attached Traffic Control Standard(s).**

**The centerline of all poles, anchors, fixtures, and appurtenances shall be located not more than one foot from the highway right-of-way line except as shown on the attached sketch.**

**Layout and construction shall be as shown on the attached sketch which is a part of this permit.**

**The crossing under the pavement shall be at least 30 inches below the flow line of the original or existing cross section of the roadway whichever is lower.**

**The disturbed area shall be seeded with the specified mixture at the following ratio: Three pounds of Kentucky Bluegrass or Kentucky 31 or Alta Fescue, two pounds of Perennial Ryegrass. The rate of application shall be five pounds per 1000 square feet. All flat areas shall be mulched with straw. Areas with slopes of 3:1 and greater shall be covered with an erosion control fabric. The area shall be continuously reseeded until a sound turf is established.**

**Construction shall be in accordance with provisions of the National Electric Safety Code and Illinois Commerce Commission's rules entitled, "Construction of Electric Power and Communication Lines" (83 Ill. Adm. Code 305).**

**Following completion of the construction on the highway right-of-way, all broken concrete or any other waste dirt or materials shall be removed from the highway and the remaining grassed areas prepared for seeding.**

**At all times during construction, the permittee shall be responsible for maintaining the highway surface in a safe and sightly manner. Any mud or debris which might be tracked or spilled onto the highway surface shall be immediately removed.**

**Before digging on state right-of-way, call toll free 800-892-0123 to the "Joint Utility Locating and Information for Excavators." They will advise you if there are any utilities in the area.**

**All construction methods and materials shall comply with the applicable provisions of the State of Illinois "Standard Specifications for Road and Bridge Construction" adopted January 1, 2002.**

Date:  
 Contract No.  
 County:  
 Route:  
 Section:

### MIXTURE REQUIREMENTS

The following mixture requirements are applicable for this project:

Location(s):	
Mixture Use(s):	Bituminous Surface
PG:	PG 64-22
RAP %: (Max)**	15%
Design Air Voids:	4.0% @ N Design = 50
Mixture Composition: (Gradation Mixture)	IL 9.5 or 12.5
Friction Aggregate:	M-X C

Location(s):	
Mixture Use(s):	Bituminous Binder
PG:	PG 64-22
RAP %: (Max)**	20%
Design Air Voids:	4.0% @ N Design = 50
Mixture Composition: (Gradation Mixture)	IL 19.0
Friction Aggregate:	N/A

Location(s):	
Mixture Use(s):	
PG:	
RAP %: (Max)**	
Design Air Voids:	
Mixture Composition: (Gradation Mixture)	
Friction Aggregate:	

Location(s):	
Mixture Use(s):	
PG:	
RAP %: (Max)**	
Design Air Voids:	
Mixture Composition: (Gradation Mixture)	
Friction Aggregate:	

District Permit No. 6-29222

Traffic Control for this permit shall be governed by Section 530.240 of the "Accommodation of Utilities on Right-of-way of the Illinois State Highway System", the Standard Specifications for Road and Bridge Construction adopted January 1, 2002, the latest Supplemental Specifications and Recurring Special Provisions, and the latest edition of the "Manual on Uniform Traffic Control Devices for Streets and Highways", Traffic Control Standards contained in the permit, and any additional reference to Traffic Control contained in the permit.

Per Article 702.01 of the Standard Specifications add the following: "All devices and combinations of devices shall meet the requirements of the National Cooperative Highway Research Program (NCHRP) Report 350 for their respective categories".

Special attention is called to Articles 701.04, 702.01, 704.01 and 1084.02 of the Standard Specifications for Road and Bridge Construction. These articles address the following.

#### **701.04 Flaggers and Flagger Certification**

Whenever flaggers are used to close traffic lanes, they shall be certified by an agency approved by the Department.

Flaggers shall have the appropriate spacing with proper communications as per the attached Traffic Control Standards and Standard Specification.

#### **FLAGGER VESTS (BDE) Effective: April 1, 2003**

"The flagger shall be stationed to the satisfaction of the Engineer and be equipped with a fluorescent orange, fluorescent yellow/green or a combination of fluorescent orange and fluorescent yellow/green vest meeting the requirements of the American National Standards Institute Specification ANSI/ISEA 107-1999 for Conspicuity Class 2 garments and approved flogger traffic control signs conforming to Standard 702001 and Article 702.05(e)".

Nighttime Flagging. The Flagger station shall be lit by additional overhead lighting other than streetlights. The flagger shall be equipped with a fluorescent orange or fluorescent orange and fluorescent yellow/green garment meeting the requirements of the American National Standards Institute specification ANSI/ISEA 107-1999 for Conspicuity Class 2 garments.

#### **PERSONAL PROTECTIVE EQUIPMENT (BDE) Effective: JULY 1, 2004**

All personnel, excluding flaggers, working outside of a vehicle (car or truck) within 7.6 m (25ft) of pavement open to traffic shall wear a fluorescent orange, fluorescent yellow/green or a combination of fluorescent orange and fluorescent yellow/green vest meeting the requirements of the American National Standards Institute specification ANSI/ISEA 107-1999 for Conspicuity Class 2 garments. Other types of garments may be substituted for the vest as long as the garments have manufacturers tags identifying them as meeting the ANSI Class 2 requirement.

## **702.01 Channeling Devices**

Channeling devices shall be spaced as per the attached Traffic Control Standards and Standard Specifications.

Devices shall be clean and have the proper sheeting.

Cones will not be used for nighttime traffic channelization unless they have the proper reflectivity. No lane closures without flagger protection.

Flashing lights are to be used for hazardous conditions. Steady burning lights are to be used for traffic guidance.

## **1084.02 Fluorescent Orange Signing**

All advance warning signs shall be fluorescent orange.

The Stop/Slow paddles shall be octagon in shape and the "Slow" side shall be fluorescent orange in color.

## **WORK ZONE TRAFFIC CONTROL DEVICES (BDE)**

Effective: January 1, 2003

Revised: April 2, 2004

Add the following to Article 702.01 of the Standard Specifications:

"All devices and combinations of devices shall meet the requirements of the National Cooperative Highway Research Program (NCHRP) Report 350 for their respective categories. The categories are as follows:

Category 1 includes small, lightweight, channelizing and delineating devices that have been in common use for many years and are known to be crashworthy by crash testing of similar devices or years of demonstrable safe performance. These include cones, tubular markers, flexible delineators and plastic drums with no attachments. Category 1 devices shall be crash tested and accepted or may be self-certified by the manufacturer.

Category 2 includes devices that are not expected to produce significant vehicular velocity change but may otherwise be hazardous. These include drums and vertical panels with lights, barricades and portable sign supports. Category 2 devices shall be crash tested and accepted for Test Level 3.

Category 3 includes devices that are expected to cause significant velocity changes or other potentially harmful reactions to impacting vehicles. These include crash cushions, truck mounted attenuators and other devices not meeting the definitions of Category 1 or 2. Category 3 devices shall be crash tested and accepted for Test Level 3.

Category 4 includes portable or trailer-mounted devices such as arrow boards, changeable message signs, temporary traffic signals and area lighting supports. Currently, there is no

implementation date set for this category and it is exempt from the NCHRP 350 compliance requirement.

The Contractor shall provide a manufacturer's self-certification letter for each Category 1 device and an FHWA acceptance letter for each Category 2 and Category 3 device used on the contract. The letters shall state the device meets the NCHRP 350 requirements for its respective category and test level, and shall include a detail drawing of the device."

Delete the third, fourth and fifth paragraphs of Article 702.03(b) of the Standard Specifications.

Delete the third sentence of the first paragraph of Article 702.03(c) of the Standard Specifications.

Revise the first sentence of the first paragraph of Article 702.03(e) of the Standard Specifications to read:

"Drums shall be nonmetallic and have alternating reflectorized Type AA or Type AP fluorescent orange and reflectorized white horizontal, circumferential stripes."

Add the following to Article 702.03 of the Standard Specifications:

"(h) Vertical Barricades. Vertical barricades may be used in lieu of cones, drums or Type II barricades to channelize traffic."

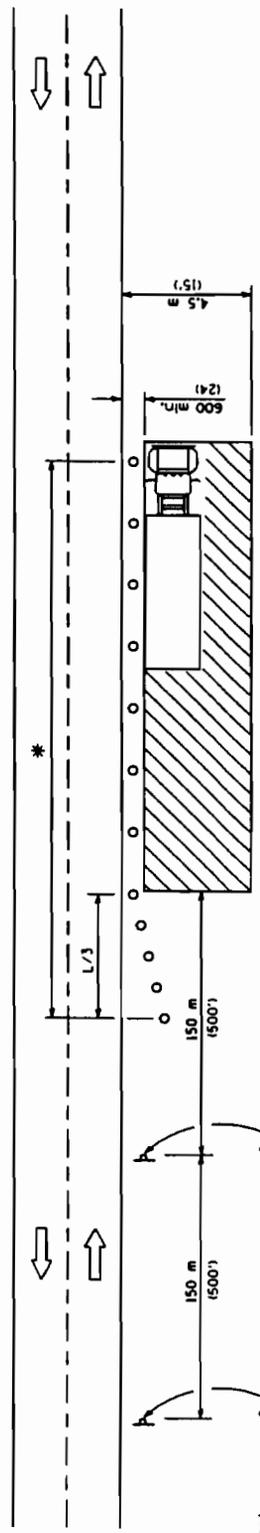
Delete the fourth paragraph of Article 702.05(a) of the Standard Specifications.

Revise the sixth paragraph of Article 702.05(a) of the Standard Specifications to read:

"When the work operations exceed four days, all signs shall be post mounted unless the signs are located on the pavement or define a moving or intermittent operation. When approved by the Engineer, a temporary sign stand may be used to support a sign at 1.2 m (5 ft) minimum where posts are impractical. Longitudinal dimensions shown on the plans for the placement of signs may be increased up to 30 m (100 ft) to avoid obstacles, hazards or to improve sight distance, when approved by the Engineer. "ROAD CONSTRUCTION AHEAD" signs will also be required on side roads located within the limits of the mainline "ROAD CONSTRUCTION AHEAD" signs."

Delete all references to "Type 1A barricades" and "wing barricades" throughout Section 702 of the Standard Specifications.

See <http://www.dot.il.gov/desenv/hwyspecs.html> for the highway standards, special provisions, and specifications.



**GENERAL NOTES**

This Standard is used where at all times any vehicles, equipment, worker or their activities will encroach in the area from 4.5 m (15') to the edge of pavement, except where activities will result in a dropoff greater than 75 mm (3") within 600 mm (24") of pavement.

If the operation is 4.5 m (15') or more off the pavement edge, no signing or cones are required; unless the 4.5 m (15') clear zone is required for the 4.5 m (15') clear zone in one hour.

\* When working within 600 mm (24") of the pavement edge, cones, drums or barricades shall be placed at 8 m (25') centers for L/3 distance, 15 m (50') centers through remainder of work area.

Shoulder tapers should have a minimum length of L/3.

Where L is:

**SPEED LIMIT** FORMULAS

TO km/h (40 mph) or less:  $L = \frac{W \cdot S}{150}$  (English)  $L = \frac{W \cdot S}{2}$  (Metric)

80 km/h (45 mph) or greater:  $L = 0.65(W \cdot S)$  (English)  $L = W \cdot S$  (Metric)

W = width of offset in meters (feet).

S = Normal posted speed in km/h (mph).

All dimensions are in millimeters (inches) unless otherwise shown.

**SYMBOLS**

- Work area
- Sign
- Cone, drum or barricade

**TYPICAL APPLICATIONS**

- Utility operations
- Curvey extensions
- Side slope changes
- Drainage installation and maintenance
- Ballast, material, and equipment
- Landscaping operations
- Shoulder repair
- Sign installation and maintenance

For contract construction projects

W20-1(0)-4B

For maintenance and utility projects

W21-4(0)-4B

W21-1a(0)-4B OR

W21-111(0)-4B

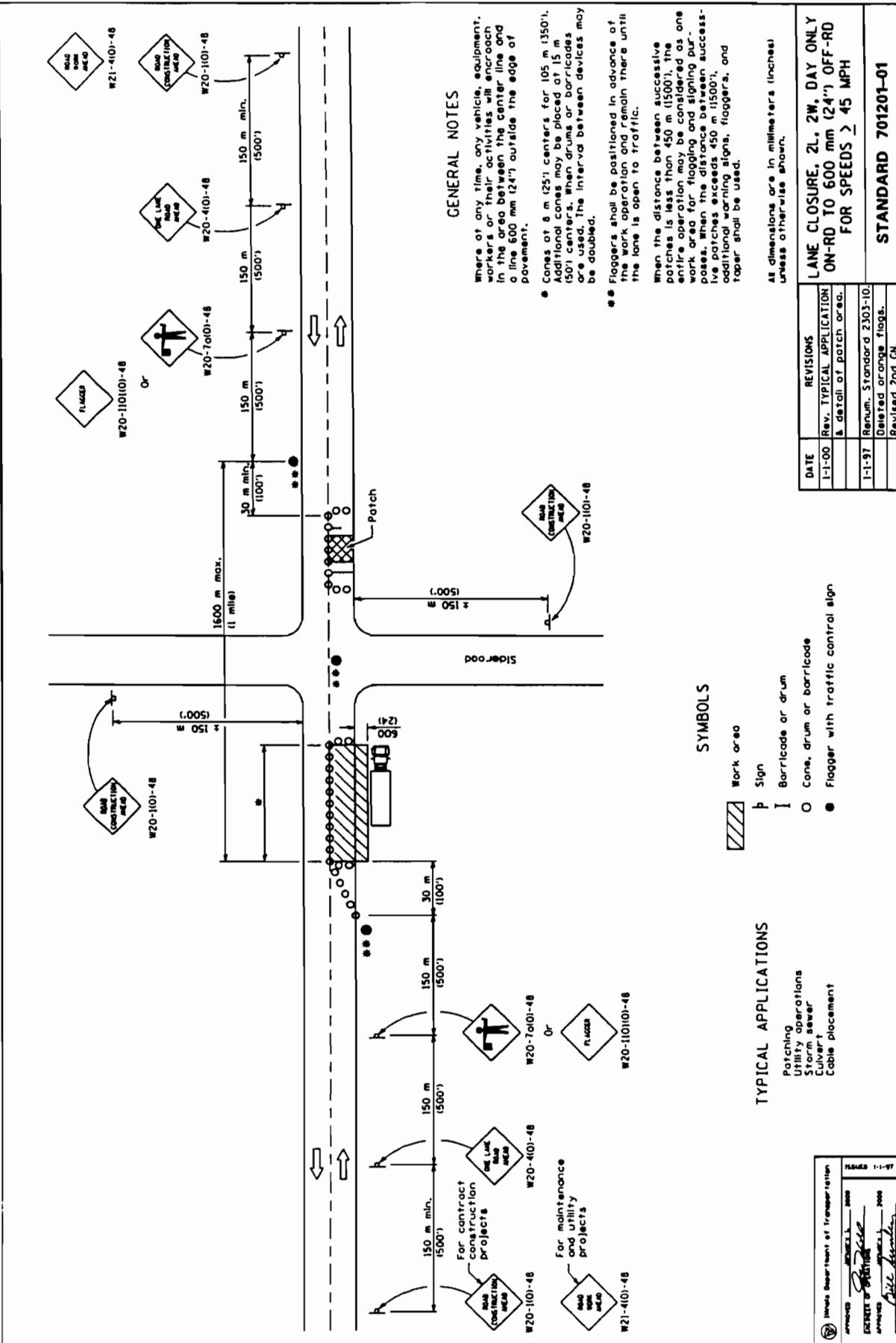
Illinois Department of Transportation  
 APPROVED: [Signature] 1998  
 DESIGNED BY: [Signature] 1998  
 DRAWN BY: [Signature] 1998  
 CHECKED BY: [Signature] 1998

DATE	REVISIONS
1-1-98	Rev. 1st GEN. NOTE.
	Rev. (24") to (24") in 3rd GEN. NOTE.
1-1-97	Revised Standard 2302-9.

**OFF-RD OPERATIONS 2L, 2W**  
**4.5 m (15') TO PAVEMENT EDGE**  
**FOR SPEEDS ≥ 45 MPH**

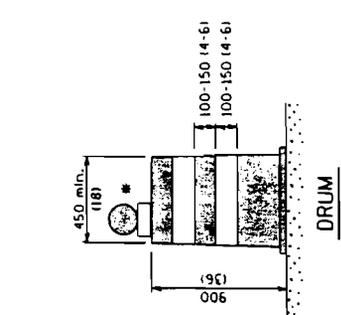
**STANDARD 701006-01**

6-29222

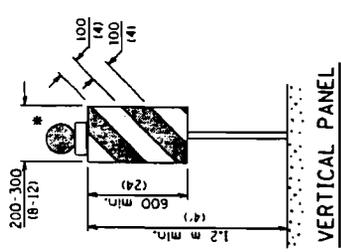


6-29222

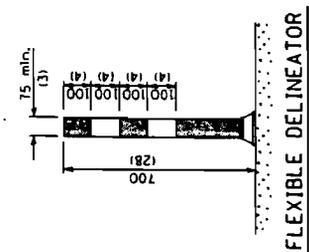
Missouri Department of Transportation  
 APPROVED: [Signature] 1-1-97  
 DESIGNED BY: [Signature] 1-1-97



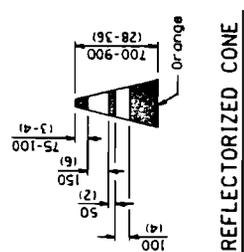
DRUM



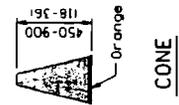
VERTICAL PANEL  
POST MOUNTED



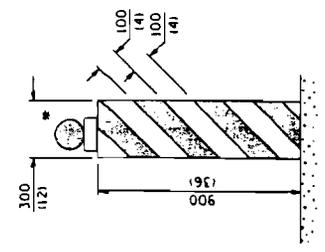
FLEXIBLE DELINEATOR



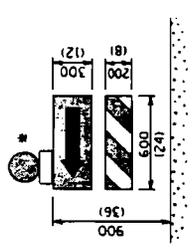
REFLECTORIZED CONE



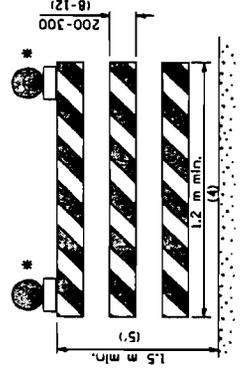
CONE



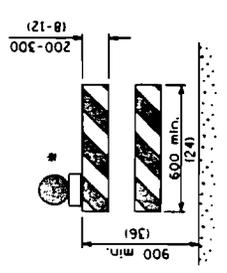
VERTICAL BARRICADE



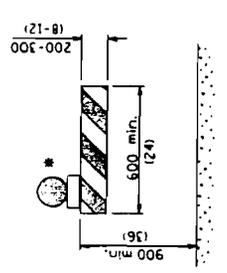
DIRECTION INDICATOR  
BARRICADE



TYPE III BARRICADE



TYPE II BARRICADE



TYPE I BARRICADE

GENERAL NOTES

All heights shown shall be measured above the pavement surface.  
All dimensions are in millimeters (inches) unless otherwise shown.

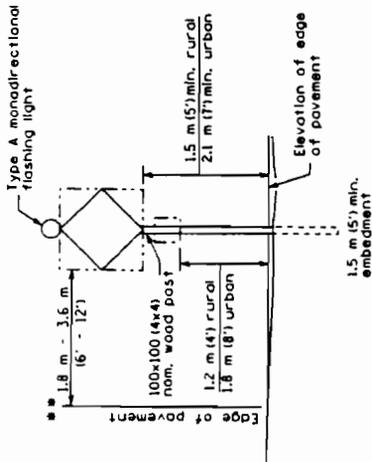
\* Warning lights (if required)

DATE	REVISIONS
1-1-05	Added note to work limit signing and re-added Type I barricade.
4-1-04	Removed Type I barricade and constr. speed limit sign.

TRAFFIC CONTROL DEVICES	
(Sheet 1 of 3)	
STANDARD 702001-05	

Illinois Department of Transportation APPROVED: [Signature] JUNE 2, 2005 CHIEF OF BUREAU APPROVED: [Signature] JUNE 2, 2005 CHIEF OF FIELD AND TRAFFIC CONTROL	ISSUED: 1-1-05
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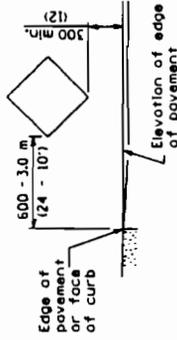
6-29222



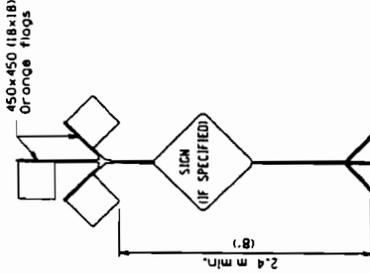
**POST MOUNTED SIGNS**

•• When curb or paved shoulder are present this dimension shall be 600 (24) to the face of curb or 1.8 m (6') to the outside edge of the paved shoulder.

**SIGNS ON TEMPORARY SUPPORTS**



**HIGH LEVEL WARNING DEVICE**



ROAD CONSTRUCTION NEXT X MILES  
G20-110)-6036

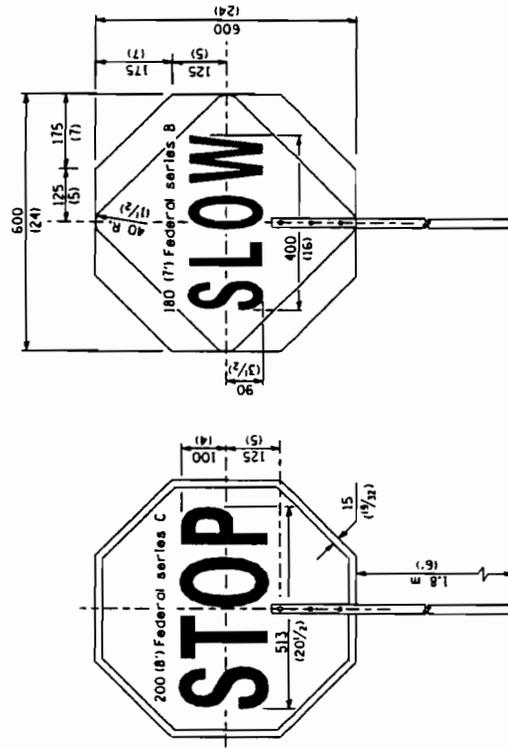
END CONSTRUCTION  
G20-2010)-6024

This signing is required for all projects 3200 m (2 miles) or more in length. ROAD CONSTRUCTION NEXT X MILES sign shall be placed 150 m (500') in advance of project limits.

END CONSTRUCTION sign shall be erected at the end of the job unless another job is within 3200 m (2 miles).

Dual sign displays shall be utilized on multi-lane highways.

**WORK LIMIT SIGNING**



FRONT SIDE

REVERSE SIDE

**FLAGGER TRAFFIC CONTROL SIGN**

All dimensions are in millimeters (inches) unless otherwise shown.

Ministry Department of Transportation

APPROVES: [Signature] 2008  
 CHECKED BY: [Signature]  
 APPROVED: [Signature] 2008  
 CHECKED BY: [Signature]

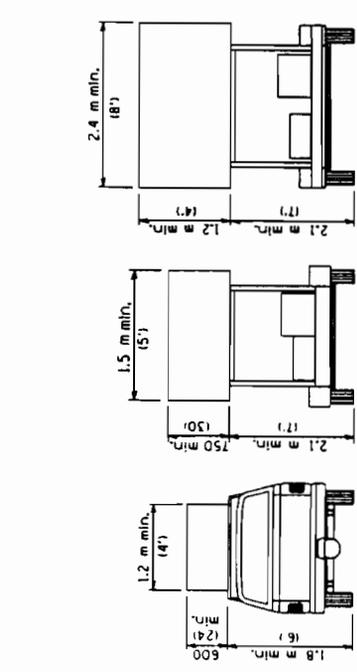
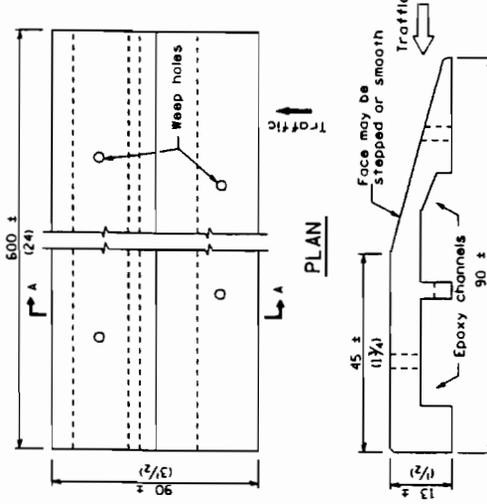
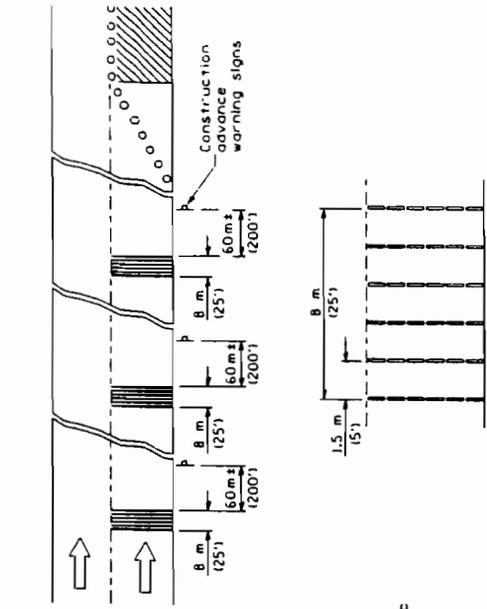
ISSUED: 1-1-97

**TRAFFIC CONTROL DEVICES**

(Sheet 2 of 3)

**STANDARD 702001-05**

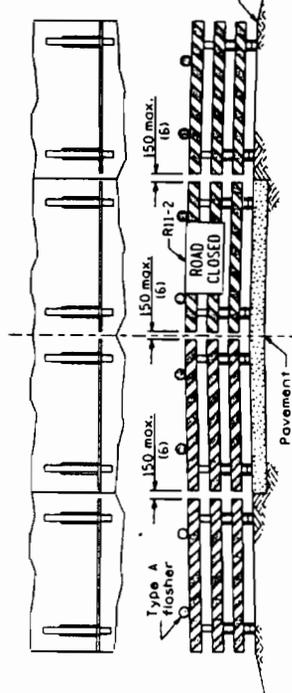
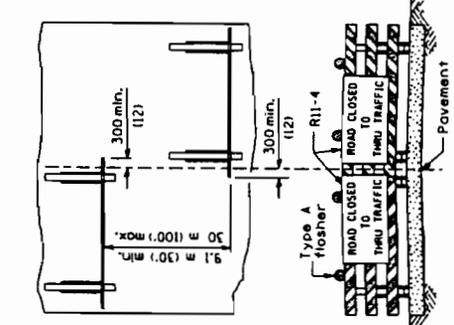
6-29222



TYPICAL INSTALLATION

TEMPORARY RUMBLE STRIPS

SECTION A-A



ROAD CLOSED TO ALL TRAFFIC  
 ReflectORIZED striping may be omitted on the back side of the barricades. If a Type III barricade with an attached sign panel which meets NCHRP 350 is not available, the sign may be mounted on an NCHRP 350 temporary sign support directly in front of the barricade.

ROAD CLOSED TO THRU TRAFFIC  
 ReflectORIZED striping shall appear on both sides of the barricades. If a Type III barricade with an attached sign panel which meets NCHRP 350 is not available, the signs may be mounted on NCHRP 350 temporary sign supports directly in front of the barricade.

TYPICAL APPLICATIONS OF TYPE III BARRICADES CLOSING A ROAD

Illinois Department of Transportation  
 APPROVED: [Signature] DATE: 11/1/97  
 CHECKED BY: [Signature]  
 DESIGNED BY: [Signature]  
 DRAWN BY: [Signature]

TRAFFIC CONTROL DEVICES  
 STANDARD 702001-05  
 (Sheet 3 of 3)

All dimensions are in millimeters (inches) unless otherwise shown.

6-29222