

# CITY OF EDGERTON



City of Edgerton, Kansas  
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Mr. Joshua Marx  
U.S. Army Corps of Engineers  
Kansas City Regulatory Office  
700 Federal Building  
601 E. 12<sup>th</sup> Street  
Kansas City, MO 64106-2896

9/20/2007

Mr. Marx:

The City of Edgerton received public notice from the Kansas City Regulatory Office of the U.S. Army Corps of Engineers in regards to the consideration of granting a Section 401 Water Quality Certification and a Section 404 Clean Water Act Certification for the Gardner Intermodal Facility proposed by the BNSF Railway Company. This letter contains the City's comments for your consideration.

Because the site will be located about a mile and a half northeast of Edgerton, the City feels that there are issues and concerns that need to be addressed by the applicant prior to the issuance of the permits. Some of these concerns are directly related to the proximity of the City to the proposed location of the facility and others are cumulatively or secondarily related to the overall effects of the intermodal facility on Edgerton and the surrounding area.

These comments document the issues and concerns as the City of Edgerton views them. Although many are negative in nature, the City supports the efforts of the applicant to locate the proposed facility at the proposed site. We encourage the applicant to actively engage in developing solutions to these concerns to make this a quality development that will enhance the quality of life for residents of the proximate area both now and in the future. The City of Edgerton appreciates your review and consideration of these issues.

Sincerely,

Frances M. Cross  
Mayor

## COMMENTS

1. The intermodal facility will produce an increase in train traffic which means that the at-grade crossings at 199<sup>th</sup> Street, Nelson Street and 207<sup>th</sup> Street may be blocked for several minutes at a time. With an increase in this traffic, these intersections will be blocked more frequently than they are now.
2. The intermodal trains will be approximately 8,000 or more feet in length and currently block the at-grade crossings of 199<sup>th</sup> Street, Nelson Street and 207<sup>th</sup> Street at the same time. This can make it difficult for people wanting to access the City from Interstate 35 or vice versa due to all entrances from the east side of town being blocked.
3. Intermodal trains having to idle or slow down to enter or exit the intermodal facility will have a detrimental impact on all automobile traffic wanting to access Interstate 35 from Edgerton or vice versa. The at-grade crossings at Nelson Street and 207<sup>th</sup> Street may be blocked for extended periods of time and more frequently than they are currently blocked.
4. Johnson County Fire District #1 provides fire protection for the City of Edgerton. Trains that block the at-grade crossings prevent the department from accessing the east part of the City in a timely manner during an emergency. If the tracks are blocked during an emergency call, the department must call the City of Gardner to provide an emergency response. The City of Gardner is approximately six miles to the northeast of Edgerton via Interstate 35. This obviously delays an emergency response.
5. The City of Edgerton is working with developers to complete a 585-home subdivision on the east side of the tracks, south of the current urban development. Any emergency calls from this subdivision, once completed, may require a response from Gardner if the tracks are blocked during an emergency. Johnson County Fire District #1 does not have plans to construct a fire station on the east side of the rail tracks now or in the near future to accommodate this issue.
6. The Johnson County Sheriff's Department provides law enforcement services to the City of Edgerton with their main City offices located on the west side of the tracks. During a blockage of the tracks, patrol officers are not able to access the east side of the tracks until train traffic has left. In the event the tracks are blocked for an extended period of time, a delayed response from another unit would have to come from somewhere else to access the scene.
7. The at-grade crossing of 199<sup>th</sup> Street is currently unsafe and hazardous due to its relative location to an elevated rise with no view of on-coming traffic from the east. An increase in truck traffic on US-56 will make this intersection even more dangerous.
8. Truck traffic through Edgerton on US-56 will increase making it difficult for this business corridor to thrive at it currently does without addressing safety and ingress/egress issues.
9. Truck traffic may cut through Edgerton to access Interstate 35, especially while a new interchange on I-35 is constructed. This will add more heavy traffic to our street network, which will further wear down this infrastructure at a faster rate than originally planned and increase the City's maintenance cost.
10. There may be conflicts between the increase in truck traffic and school traffic in the morning and early evenings. School buses will be picking up and dropping off students and young, inexperienced drivers will be driving to and from school. This could create unsafe conditions for traffic on US-56 during the school season, especially at peak travel times.

- 11.** Truck traffic may use Edgerton as a cut-through to avoid the weight station between Gardner and Olathe. This will increase the numbers of trucks that will be using the road system, which will affect maintenance costs and planning.
- 12.** Increased idling or slower trains will have an impact on the air quality within the City of Edgerton and the surrounding area that includes the Johnson County Parks and Recreation District's Mildale Farm and Big Bull Creek Park.
- 13.** Increased trains will produce more noise pollution. Currently there are four at-grade crossings near the City that require trains to sound their horns prior to entering the crossing zone. With more trains, this will mean more horns being sounded with shorter intervals between them. Presently, trains operate at any period of time during each twenty-four hour timeframe, seven days a week.
- 14.** Larger diesel trucks produce more noise than typical automobiles. This noise will affect Edgerton due to a large quantity of truck traffic using US-56 and other Edgerton roads to access their points of destination. The business corridor may become less customer-friendly due to increases in noise, air pollution and truck traffic producing issues for Edgerton businesses located along this corridor.
- 15.** Storm runoff could affect the water quality of the watershed, which includes Hillsdale Lake. The City of Edgerton has water rights with the lake and would be pulling water resources from it for citizens and businesses.
- 16.** Water and air quality could decrease if any direct or indirect hazardous materials from the facility, trains, trucks or freight are allowed to contaminate the environment.