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STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

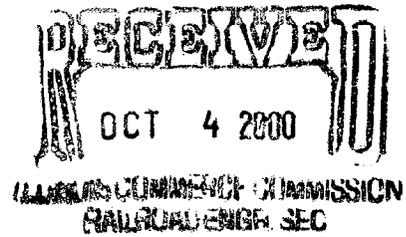
CITY OF LAKE FOREST, ILLINOIS)

VS.)

UNION PACIFIC RAILROAD COMPANY)

Petition for an Order of the Illinois Commerce
Commission pertaining to the existing grade
crossing of Old Elm Road with the tracks of the
Union Pacific Railroad Company in the City of
Lake Forest, Illinois, directing the installation of
automatic protective pedestrian crossing gates,
and a grade crossing pad.)

NO. 700-0099



PETITION

TO THE ILLINOIS COMMERCE COMMISSION:

Petitioner, City of Lake Forest, Lake County, Illinois, by Anne Conzelman Linn,
one of its attorneys, and respectfully represents to the Commission that:

1. Respondent, Union Pacific Railroad Company, in the operation of its facilities has a certain main line track running in a general north and south direction through petitioning City.
2. Old Elm Road, maintained by Petitioner, extends generally east and west through the City of Lake Forest, crossing U. S. Highway 41, and crossing the Respondent Union Pacific Railway's main line track. The location of the crossing of Old Elm Road and the Union Pacific Railway is at US DOT Inventory #176822Y, mile post 26.85, as shown on the plat designated as Petitioner's Exhibit A, which is attached hereto and made of part of this Petition.
3. This crossing is approximately 200 feet west of U. S. Highway 41 and

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approximately 60 west of the Skokie Valley Bike Trail. It is adjacent to Northcroft Park, which is a popular City park that generates pedestrian and bicycle traffic from residential areas both east and west of Highway 41.

4. In addition, there is a pedestrian walkway running parallel on the south side of Old Elm Road west from Highway 41 to the Skokie Valley Bike Trail only. The Petitioner plans to extend this southern sidewalk on the west side of Highway 41 continuing west of the bike trail, which will cross the Respondent Union Pacific Railroad's railroad line at this location. This sidewalk will connect with an existing pedestrian and bicycle path system in Northcroft Park. There is in addition a sidewalk on the north side of Old Elm Road which already crosses the railroad line, but there are no pedestrian crossing gates on either the north or south sides of Old Elm Road at this location.

5. Railroad traffic on the Union Pacific Railroad in this location is of heavy volume and consists of 22 regularly scheduled freight train movements per day.

6. By reason of the volume of railroad traffic combining with the pedestrian and bicycle traffic travelling to and from Northcroft Park and the Skokie Valley Bike Trail and the number of bicyclists who continue west to Waukegan Road, said crossing warrants the installation of automatic protective pedestrian crossing gates and a grade crossing pad on the south side to connect the existing pedestrian sidewalk with the sidewalk extension which will be constructed west of Respondent Union Pacific Railroad's tracks.

7. The installation of automatic protective pedestrian crossing gates and a grade crossing pad at this location is necessary in the interests of public safety, as recent school redistricting will require children to cross the railroad tracks en route to school.

8. Petitioner City of Lake Forest will be responsible for the costs associated with this project, but cannot install, own or maintain the gates and/or grade crossing pad, as they will be located on property owned and controlled by the Respondent Union Pacific Railroad, completely outside the control and responsibility of Petitioner.

WHEREFORE, Petitioner prays that the Commission will set the aforesaid matter for hearing with notice to the Parties hereto, and after such hearing enter an Order:

A. Directing the Respondent, Union Pacific Railroad Company, to install and therefore own, maintain and operate a system of automatic protective pedestrian crossing gates and grade crossing pad conforming with the provisions of the Commission's regulations as set forth in the Illinois Administrative Code, at the said crossing.

B. Providing for such other and further relief as the Commission may deem appropriate.

DATED at Lake Forest, Illinois, this 2nd day of October, 2000.

CITY OF LAKE FOREST
BY:



One of its Attorneys

Anne Conzelman Linn
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(847) 662-1316

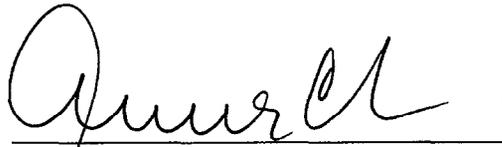
PROOF OF SERVICE

STATE OF ILLINOIS)
) SS.
COUNTY OF LAKE)

I, Anne Conzelman Linn, an attorney, hereby certify that I have served copies of the foregoing petition to the following, by depositing copies thereof in the United States Mail at Waukegan, Illinois, this 2nd day of October, 2000.

Union Pacific Railroad Company
301 West Lake Street
North Lake, IL 60164

Union Pacific Railroad Company
101 North Wacker Drive, Ste. 1910
Chicago, IL 60606



Anne Conzelman Linn
Attorney, City of Lake Forest

