



January 15, 2017

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Andrea Martin
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U.S. Department of Transportation
1200 New Jersey Avenue S.E.
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Re: Chicago-Milwaukee Intercity Passenger Rail Corridor Draft Environmental Assessment

Dear Mr. Rao, Mr. Ramos, and Ms. Martin:

The Village of Glenview is appreciative of the additional time to review the draft Chicago-Milwaukee Intercity Passenger Rail Program Environmental Assessment (EA). However, the additional time has reaffirmed our position that the EA is lacking the necessary data to accurately assess which, if any, of the proposed UPRR A-20 alternatives adequately address the concerns listed in our Notice of Objection dated December 15, 2016. The Village of Glenview continues to strongly object to the current project planning to add three roundtrip trains to Amtrak's Hiawatha service between Chicago and Milwaukee (Project) and **demands a complete Environmental Impact Statement (EIS)** on the Project.

The overall lack of operational and environmental impact data provided in the EA is troubling. With the transparent release of data as part of an EIS all parties can obtain an understanding of the need and benefits to the stakeholders (WisDOT, IDOT, Amtrak, Metra, Union Pacific, Canadian Pacific, FRA, the general public, and the impacted communities). Examples of missing data or analysis include:

- Insufficient analysis of the Project's purpose and need – most of the 14 daily trips on the Hiawatha line are severely underutilized which is highly inconsistent with a proposal to add capacity with more trains that would operate off-peak.
- Insufficient data to demonstrate the need to add the A-20 holding track to mitigate the impacts on the existing freight operations. The modeling and resulting delay data to freight operations that is triggering the A-20 holding track by the proposed additional off-peak Hiawatha trips needs to be provided.

- Operational data (number of trains per day, operating times, train length (current and projected), delay time at intersections, etc.) of the intersections south and north of A-20 is needed, as congestion in these areas are understood to be the primary cause of the freight traffic delays.
- Release of the operating agreements between the passenger and freight rail operators for the intersections impacting A-20 operations are also needed to understand how the intersections operate and the opportunities for improvement.
- The data on current operations along A-20 should be compared with projections of freight train travel assuming both poor and favorable economic conditions. There is no guarantee or regulation preventing the freight lines from increasing activities compared to the Project's proposed activity and the true potential impacts of the proposed A-20 holding track should be known.
- The EA provides no detailed data on air quality, noise, and other health and safety impacts for residents living adjacent to the proposed holding track.
- The EA provides no details on the increased delay of trains blocking West Lake Avenue, a major arterial to a High School and Hospital, due to trains slowing and speeding up to arrive or depart from the holding track.
- The benefit cost analysis from the Service Development Plan (SDP) for this Project is needed.

Further studies and an EIS are needed to rigorously explore and objectively evaluate the data and additional alternatives. Glenview believes it is possible to eliminate the proposed A-20 holding track from the Project and potentially decrease the existing operational inefficiencies associated with the A-20 intersection. The following alternatives and issues need additional study and discussion:

- New Amtrak locomotive and rail car technology exists and can be used to address the purpose and need listed in the Project EA – new rail cars would increase train capacity by more than 20%.
- A ridership study, rather than a 2014 survey, should be conducted to determine service needs. Common sense suggests increasing Hiawatha ridership with more service options during peak travel times, which minimally impacts freight operations, would be more effective than adding off-peak service options.
- Stakeholder service outcome agreements should be considered to ensure operations along the freight and passenger lines function optimally for all rail users of the regional system.
- Evaluate the use of universal crossovers on the Amtrak/Metra line north and south of A-20 to avoid trains standing near the intersection.
- Evaluate the use of two connecting tracks from the Union Pacific line to a location north of A-20 and connecting to both lines along the Amtrak/Metra tracks.
- Evaluate the installation of a third rail or sections of a third line along the Amtrak/Metra line to allow Amtrak and Metra to circumnavigate freight trains that may be temporarily standing/holding at the A-20 intersection.
- Coordination of the various stakeholders (WisDOT, IDOT, Amtrak, Metra, Union Pacific, Canadian Pacific, FRA, and the impacted communities) to determine how to best collectively achieve the stakeholder's short and long term goals.

Thank you for this opportunity to comment on the draft EA. If you have additional questions regarding this submission, please contact Interim Village Manager Don Owen at (847) 904-4478.

Sincerely,



James R. Patterson, Jr.
Village President

CC: US Senator Durbin
US Senator Duckworth
US Congresswoman Schakowsky
US Congressman Schneider
US Secretary of Transportation Foxx
Governor Rauner
State Senator Biss
State Senator Morrison
State Senator Silverstein
State Representative Fine
State Representative Nekritz
State Representative Gabel
State Representative D'Amico
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