



The Village of
Glenview

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November 15, 2016

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U.S. Department of Transportation
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Washington, DC 20590

Re: Chicago-Milwaukee Intercity Passenger Rail Corridor Draft Environmental Assessment

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

The Village of Glenview has long supported our regional passenger rail system, and it is clear that our community benefits greatly from the Metra and Amtrak service. However, Glenview strongly objects to the current project planning to add three roundtrip trains to Amtrak's Hiawatha service between Chicago and Milwaukee (Project).

On October 6, 2016, the draft Chicago-Milwaukee Intercity Passenger Rail Program Environmental Assessment (EA) was distributed by your agencies for public review. On October 16, 2016, the Village of Glenview Board of Trustees passed Resolution 16-163 opposing and protesting the findings of the EA stating that significant impacts would result from the proposed project and there was insufficient evidence to justify a Finding of No Significant Impact (FONSI). On November 2, 2016, hundreds of local residents and business owners attended the EA public meeting and submitted comments opposing the Project.

The Village of Glenview hereby transmits its formal **Notice of Objection** to the draft EA and **demands a complete Environmental Impact Statement (EIS)** on the Project based on the following issues that are more fully explained in the attached Notice:

- Disregard for the existing, long-term rail service plans – this plan is in conflict with U.S. Department of Transportation and Midwest Regional Rail Initiative plans.

- Lack of available data to assess the Project's environmental impacts – this project is proposing adding what is viewed as a small freight yard (the A-20 holding track) next to several residential neighborhoods and commercial businesses, which is a major change to the existing conditions; there is no data provided regarding the numerous environmental impacts that should be studied.
- 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 more trains.

Operating at less than 40% of Hiawatha's capacity, Glenview does not believe Amtrak needs to add three additional round trips between Chicago and Milwaukee at this time. Amtrak is **strongly encouraged to add additional passenger cars to the few trains that are at peak capacity.** Assuming this is implemented, Amtrak could cancel this proposed short-term project and **commence planning on the published long-term solution of separating passenger and freight rail traffic** in our region.

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

Sincerely,



James R. Patterson, Jr.
Village President

Encl

CC: US Senator Durbin
US Senator-elect Duckworth
US Congresswoman Schakowsky
US Congressman-elect 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
Illinois Secretary of Transportation Blankenhorn

Chicago-Milwaukee Intercity Passenger Rail Corridor Environmental Assessment



NOTICE OF OBJECTION

NOVEMBER 15, 2016

*Prepared by:
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EXECUTIVE SUMMARY

Notice of Objection

PROJECT INFORMATION

The Village of Glenview (the “Village”) is a home rule municipality in accordance with the Constitution of the State of Illinois of 1970. The Village has reviewed the draft Chicago-Milwaukee Intercity Passenger Rail Corridor Environmental Assessment (the “EA”), the long-range passenger rail service goals, and plan recommendations for mitigating freight system congestion in the region. The Wisconsin Department of Transportation, the Illinois Department of Transportation, the Federal Railroad Administration, and Amtrak (collectively the “Agencies”) authored the EA, which is an evaluation of the infrastructure identified to support the proposed expansion of Amtrak’s *Hiawatha* service from seven daily roundtrips to ten daily roundtrips (the “Project”).

“A-20” is a key rail junction located south of Techny Road in Northbrook, where a proposed freight holding track is proposed which crosses the Willow Road bridge and Shermer Road bridge (site of several previous train derailments including the most recent derailment in 2012 that resulted in fatalities and a two-year closure of Shermer Road) and terminates north of West Lake Avenue, all located in the Village. As such, the proposed new siding (holding) facilities, in addition to other infrastructure associated with the Project would be located within the Village and will directly impact the quality of life and the environment of the adjacent property owners.

GLENVIEW RESOLUTION OBJECTING TO PROJECT

On October 16, 2016, the Glenview Village Board concluded the EA does not present clear and convincing evidence for the need to expand the Hiawatha Service as proposed in the Project, does not fully satisfy the long range purpose of the Project, and would have an adverse impact on the character of the adjacent residential neighborhoods and on the public health, safety, and welfare of Glenview residents. Resolution 16-163 (see Appendix) opposes and protests the findings of the EA, such that significant impacts would result from the proposed Project due to the EA lacking the necessary evidence for consideration of a Finding of No Significant Impact (“FONSI”). The Village is also submitting this detailed report as a formal objection to the Project and the recommendations carried forward in the EA.

EXECUTIVE SUMMARY

EA DEFICIENCIES

The numerous deficiencies of the EA include a disregard for the Project's long-term goals, a lack of available data to truly assess the Project's environmental impacts and its effects on the public, and the insufficient analysis of the Project's identified Purpose and Need.

- Several supporting documents for this EA, including the data in the unpublished Service Development Plan ("SDP") which should have identified the freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts, were not available during the public comment period.
- The EA does not consider long-term plans consistent with the Midwest Regional Rail Service (MWRRS) or the Village of Glenview's long-term plans.
- The EA does not address important environmental impacts of a proposed freight holding track or additional Hiawatha service using older passenger rail locomotives and passenger rail cars, not designed for higher speed service (110 MPH) as identified in long-term plans.
- The EA is simply a short-term fix which cannot be confirmed as necessary based on available data.

ACTIONS NEEDED TO REMEDY EA DEFICIENCIES

Given this report outlines the Village's formal objections to the EA, while concurrently recommending how relief from the comments may be achieved, the following actions by the Agencies should occur:

- Determination that a FONSI cannot be concluded as the Project has reached a threshold of significance due to the deficiencies outlined in this report and other such submitted comments on the EA;
- Cease this EA process;
- The Project should be modified to include new passenger rail cars of sufficient capacity, a reservation system, and more efficient engines to address any quantifiable short-term needs; and,
- An Environmental Impact Statement ("EIS") should be undertaken with a focus on alternatives separating freight and passenger rail service to achieve the Hiawatha's long-term goal of 17 round trips.

KEY ENVIRONMENTAL ASSESSMENT OBJECTIONS

Long-Term Vision | Environmental Impacts | Insufficient Need

DISREGARD FOR PROJECT'S LONG-TERM GOALS

The EA recommendation is in conflict with U.S. Department of Transportation's Vision for High Speed Rail in America (April 2009, see Appendix). U.S. DOT's plan endorsed the development of regional high-speed corridor services with operating speeds up to 90–110 mph and 110–150 mph respectively, on shared and dedicated track in corridors of 100–500 miles. Similarly, the Midwest Regional Rail Initiative (MWRRI), which was collectively crafted by nine Midwestern states including Wisconsin and Illinois, identified significant improvements in regional passenger rail service. In 2004, the MWRRI put forth an implementation plan for Hiawatha service concepts to support 17 round trips per day operating at 110-mph. The EA is inconsistent with the vision and planning of the MWRRI and does not support its long term goals. **The EA proposes 79 mile an hour service which is not consistent with the MWRRI plan and is not competitive with current transportation alternatives.**

A detailed MWRRI line capacity analysis conducted in 1998 recommends a preferred alternative for this corridor, which proposed to split the freight and passenger traffic at Truesdell (North of Rondout). This route alternative would have accomplished an important function of ***separating freight and passenger services in dense corridors*** south of Truesdell, and also the separation of passenger rail service (Amtrak) from commuter service (Metra). This separation is essential to avoid conflicts during peak service times, which appears to be the basis for all the recommended infrastructure modifications included in the EA. The EA does not address the need for passenger and freight train separation in dense corridors and an alternative that would fully separate freight from passenger trains all the way to Milwaukee should be considered. **The EA does not provide a service model to understand how the perpetuation of these conflicts impacts long-term operations of the EA recommendations.**

LACK OF AVAILABLE DATA TO ASSESS THE PROJECT'S ENVIRONMENTAL IMPACTS

No SDP was made available therefore there is no basis to identify how many additional freight trains would need to be accommodated in the proposed Glenview holding track. No information is available to understand how long these trains will be held in the siding, if the proposed siding is of sufficient length to hold the trains or if the access to the holding track will cause traffic delays at the West Lake Avenue at-grade crossing. Asking for public comment without this

KEY ENVIRONMENTAL ASSESSMENT OBJECTIONS

data being included within the EA document violates the public's trust in the National Environmental Policy Act (NEPA) process and is insufficient.

The EA assumes that there is no severe environmental impact associated with the proposed service expansion. A-20 Alternatives 1 and 2 would have negative environmental impacts on the Village and neither option has been adequately analyzed, nor sufficiently documented by the EA. No mitigation measures have been proposed, yet both alternatives encroach closer to existing residential neighbors, and each would include tracks on an elevated embankment that could require up to 20 foot tall retaining walls to support the track infrastructure. Additionally, both sets of crossovers are near residences, include no background details on their impacts, nor on alternate locations that might be consistent with the Purpose of the Project, yet more limiting in their impacts.

Since no SDP was made available there is no basis for identifying how many freight trains would need to be accommodated on the proposed A-20 holding track. Without this information it is impossible to determine the impacts on adjacent residents of the resulting diesel emissions, noise, and vibration associated with holding trains or the impacts associated with the proposed construction project needed to add the siding track. As such, **there is insufficient information to reach any conclusion on the environment impacts of the Project and a detailed EIS is required to understand the full impacts and potential mitigation measures.**

INSUFFICIENT ANALYSIS OF THE PROJECT'S PURPOSE AND NEED

The Amtrak.com website recently posted the following service alert, effective November 22-27, 2016 which states: *"to better accommodate the increased number of travelers expected during the busy Thanksgiving holiday period, reservations will be required on the Hiawatha Service trains from Tuesday November 22 through Sunday, November 27, 2016. In addition, we are adding cars to provide more seating for our customers on these dates."* This statement illustrates that more cars and a reservation system can be deployed to meet peak travel periods, yet the EA summarily dismisses this option. The Amtrak Fact Sheet for fiscal year 2015, for the State of Wisconsin, cites that "additional Hiawatha frequencies would likely be phased in one-at-a-time in coming years". A phased approach to add new service one-at-a-time clearly speaks to the lack of urgency for this service expansion. Amtrak's selective use of a reservation system would effectively enable peak passenger volumes to be accommodated immediately by other existing under-utilized train starts.

The EA does not address newly purchased 149 seat passenger rail cars which would effectively double the capacity of the existing service in this corridor with no additional train starts required.

KEY ENVIRONMENTAL ASSESSMENT OBJECTIONS

Mating higher speed locomotives and higher speed/capacity passenger rail cars would meet the goals of the original MWRRI and would improve financial performance and investment in the Hiawatha Service. Passenger rate routes which support 110 mph service typically produce a 20-30% improvement in transit time over as 79 mph service. The EA only estimated a 2 minute time savings associated with a 90 mph option, but did not consider investing in rail equipment that could take full advantage of a higher speed limit. **The economically sensible solution is to improve train speed, increase capacity on existing trips, and better manage the schedule frequency, but without a detailed SDP the appropriate economic analysis and subsequent impacts cannot be completed.**

Without an operating plan for passenger trains, the operating costs of adding three additional trains, and the operating subsidies required to support the new service cannot be determined.

- No information was provided to verify on-time performance of the Milwaukee District North Line or the impacts of the proposed improvements on commuter trains (additional trains and siding expansion). Without this information, the Village cannot accept the premise that Metra service has been mitigated.
- No information on the number of freight speed increases was included in the report, nor data on the impacts of the proposed use of the holding track. Due to slow speeds leaving and approaching the holding track, the Village would experience significant additional vehicle delays at the existing grade crossings at West Lake Avenue.

The Village has serious opposition to EA recommendations that confuse short-term possibilities with long-term rail system solutions. The Village concludes that there is no urgency for short term action, since the train capacity currently being provided in the Chicago-Milwaukee corridor is adequate and other cost effective and currently available alternatives to introduce more efficient engines and passenger cars exist.

Environmental Assessment Overview

CURSORY REVIEW PROCESS

The EA developed its alternatives for adding three more Amtrak trains in the Chicago-Milwaukee rail corridor by following a three-step process:

- I. First, it offers a cursory screening of alternatives for passenger service that narrows the focus of the study to only the existing Amtrak route. Without any supporting analysis, the EA argues that none of the existing rail stations can be changed because this would “eliminate important intermodal connections at existing mid-corridor stations,” even if other alternatives could be demonstrated to produce better results.
- II. Next, the EA develops a cursory screening of speed options, assessing only the possibility for raising a portion of the route from 79-mph to 90-mph (Service Alternative B), but not considering 110-mph options (which are being implemented on two other corridors in the Midwest). The EA asserts that 110-mph service would not work “*because an increase in speed would not alleviate demand for the service*”– claiming that since raising the speed would make the service more popular and attract a higher ridership, the alternative should be screened. This screening of the higher speed options cannot be supported by any kind of a rational analysis. This fundamental flaw of the EA screening methodology has led to the selection of the wrong option for future development of the passenger rail service.
- III. Finally, the EA turns its attention to the capacity needs of the freight railroads (Union Pacific and Canadian Pacific) that would arise from the consequence of adding more passenger trains to the corridor during off-peak travel times. At this third level of alternative screening, the EA identified track switching modifications and six “Design Alternatives”, which it called A-20 Alternative 1 through A-20 Alternative 6, a majority of which directly impact the Village.
 - Numerous locations on the siding track and along the Metra/Amtrak line within the Village have been identified for proposed switches and universal crossovers with accompanying signals. The Glenview Universal Crossover is proposed at Dewes Street along the Metra/Amtrak line in downtown Glenview, and the other crossover is proposed near West Lake Avenue.
 - A-20 Alternatives 3 through 6 were removed from the analysis through application of a cursory screening methodology, which did not result from a systematic analysis of the environmental impacts of each alternative. The screening approach used in the EA is not based on a rigorous analytical approach, and therefore is fundamentally flawed as it does not meet the minimum required NEPA standards.
 - A-20 Alternatives 1 and 2 would each develop new rail infrastructure, and fundamentally change the character of train operations in the Village, if carried forward as listed in the EA.
 - Alternative 1 - the construction of an 11,000 foot holding track for rail freight on the west side of the A-20.
 - Alternative 2 - a 10,000 foot holding track for rail freight which would be located on a section of the existing westerly main line track. The existing northbound track would be used for southbound traffic and a new northbound track would be constructed on the east side of the A-20, with the mainline tracks swinging around the west holding track to the east.

Village's Long Term Vision

OVERVIEW

Long-term planning and the fiscally prudent implementation of such plans have been a part of the Village's operations for the past 30 years. The most major economic development investment decisions made by the Village have been predicated on the benefits associated with their proximity to train stations. The Village is keenly interested in long term growth of a viable Higher Speed Passenger rail system and a commuter rail network to realize return on economic investments. The assumption of 110 mph service for the passenger rail network is a core economic assumption for the Village's long range vision.

DOWNTOWN STATION

Downtown Glenview evolved as a rail stop in the late 1800's and the train station became the Village's center of activity. For the past 20 years, the Village has been focused on revitalization of downtown with an emphasis on adding density and transit oriented development within walking distance of the downtown train station. Recent Village economic development actions have included support for both a new 45,000 square foot Heinen's grocery store and the Midtown square mixed-use development with 127 residential units and ground floor retail.

THE GLEN OF NORTH GLENVIEW STATION

The Village created a Tax Increment Finance ("TIF") district to fund the redevelopment of the Glenview Naval Air Station ("Glen"), which at the time was Illinois' largest TIF. The 1200 acre redevelopment was made possible through a 1995 Economic Development Conveyance application to the United States Navy that ultimately resulted in an award winning new urbanist development that generated over a billion dollars of investment. A key design component of the Master Plan and Design Guidelines for the Glen was the addition of another train station along the existing Amtrak/Milwaukee North line Metra tracks. The new station was created to accommodate the needs of a 470,000 square foot Glen Town Center mixed-use shopping district with 181 apartments and 151 townhomes, the adjoining 121 unit compact residential neighborhood, numerous adjacent employment centers, and an abundance of commuter parking to enable increased commuter ridership, all within a convenient 15 minute walk.

The Village recently submitted a TIGER grant to significantly improve the multi-modal aspects of the downtown, which will include bicycle enhancements, a new commuter parking lot, and

LONG-TERM VISION

improvements to the North Glen train station to accommodate the relocation of the existing downtown Glenview Amtrak Hiawatha stop which creates vehicular congestion due to downed gates on Glenview Road when the train is in the downtown station. Enhancement of ridership connectivity is part of the EA assessment requirement. These enhancements were not included. Glenview requests that the cost of these enhancements should be included in the EA assessment.

GLENVIEW COMPREHENSIVE PLAN

The Village is in the final stages of adopting an updated Glenview Comprehensive Plan (the “Comprehensive Plan”), a draft of which has been reviewed by the Glenview Comprehensive Plan Committee and the Glenview Plan Commission which during the review process conducted five public hearings. The Comprehensive Plan is scheduled to be reviewed by the Glenview Village Board of Trustees on December 6, 2016 with anticipated adoption of the document in February 2017. Consistent with the continued support for major economic investment within the Village, the Comprehensive Plan includes goals such as the following:

- Continue to support the implementation of the Downtown Revitalization Plan, which includes a mix of uses near the downtown train station,
- Promote and improve convenience and connectivity in public transportation, and
- Develop opportunities for better mobility (automobiles, public transit, bicycles, and pedestrians) and context sensitive infrastructure design.

LONG-TERM VISION

EA Comments/Deficiencies

ADHERE TO LONG-TERM PLANS

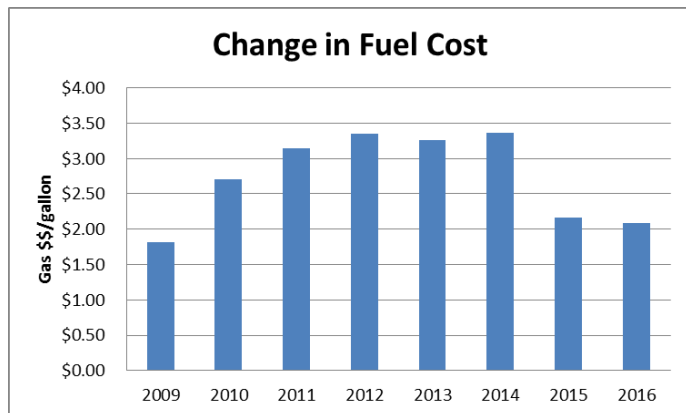
The EA is absent of fiscally responsible, big-picture approach and ignores long-term solutions to alleviate passenger and rail congestion issues for the entire region, instead focusing on short-term 'band-aids', such as Alternatives 1 and 2 to mitigate the Project impacts on freight rail. The EA does not support the vision for the Midwest Regional Rail System and the A-20 proposal is in conflict with Glenview's long range plans. The entire Chicagoland rail network lacks the fluidity necessary for the existing passenger and freight network, and significant investment is needed to realize the vision previously established to modernize interchanges that are choking the system and alleviate congestion with the separation of freight and passenger rail.

For the following reasons the Agencies should focus on implementing identified long-term rail plans that would negate the need to spend additional dollars on unnecessary short-term projects:

A. EA COMMENT/DEFICIENCY: UNACCOUNTED INDUSTRY TRENDS

The EA does not provide data to assess the most current industry trends and their impacts on the proposed Project.

- No capacity simulation information was provided to validate that the most current information was used or if the recommended alternatives fully mitigate the freight rail system against the impacts of future freight or passenger growth.
- Falling energy prices (see right, Source EIA.gov), along with new highway capacity explains the recent stagnation in rail passenger ridership growth. Although the rail ridership data provided in the EA shows ridership fluctuation, the EA analysis fails to reflect the impact of low cost energy (fuel) and a long term projection of energy costs.
- Industry wide trends for train lengths are approaching 15,000 feet long making the Design Alternatives inadequate prior to even being considered. The GOTO 2040 CMAP plan also identifies growing train lengths as a key factor in grade crossing delays (long trains blocking roadway crossings).



LONG-TERM VISION

- Alternatively, Canadian Pacific is running 15,000 foot to 18,000 foot trains southbound to Milwaukee and then separating these trains into smaller blocks to travel to Bensenville and Clearing yard, thereby limiting a need for a holding track in Glenview.
- With alternative fuel methods and less energy dependency, three coal fired plants in Wisconsin have transitioned to natural gas, limiting the need for coal trains moving through Glenview and through the Chicagoland rail system.

Requested Relief:

- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts.
- Projections of future freight and passenger operations which account for the reduction in coal cars, and the assumptions on longer train lengths vs shorter lengths in the urban areas.
- Analysis is needed on the impacts of gas prices on consumers using the Hiawatha service and the potential long-term erosion of ridership due to technological advancements in driverless automobiles.
- Analyze opportunities to separate passenger and freight corridors now to support future needs.

B. EA COMMENT/DEFICIENCY: CREATE SOLVES CONFLICTS, BUT THE EA CREATES THEM

The EA is silent about how this Project fits into the larger picture of the CREATE improvements which are aimed at improving freight and passenger system performance in Chicagoland.

- To ensure freight fluidity throughout the region, an integrated approach to capacity improvement is needed. Adding the A-20 holding track to park freight trains as proposed, only diminishes the congestion conflicts created by multiple classes of trains meeting and passing at intersections.
- Chicago CREATE (see Appendix) has 70 projects aimed at reducing rail congestion and improving freight fluidity. After completing 12 projects, with 14 under construction as of 2012, CREATE investments have resulted in a 28% reduction in freight delay and a 33% reduction in passenger delay compared to the system if no CREATE projects were built. This improvement in freight fluidity should demonstrate the need to invest in CREATE first to improve Chicago passenger and freight rail performance, instead of spending millions of dollars on the development of holding tracks associated with the Project.
- Since 2003, only half of the identified CREATE programs have been implemented, but once constructed their impacts on improving regional rail will be significant. Specific CREATE tower improvements at Rondout and Deval have not been scheduled, nor constructed to date and would substantially increase fluidity at rail intersections and likely negate the need for Alternatives 1 and 2.

LONG-TERM VISION

- Recent construction on the regional system as part of the CREATE program have resulted in delays and a modification of operations which have created false congestion measurements resulting in the supposed need for a holding track in Glenview (see Appendix).
- Canadian Pacific train service has been recently impacted by projects in the Bensenville area (see Appendix) as these CREATE projects have been completed, congestion has abated.

Requested Relief:

- Need to complete CREATE projects on a faster track than by the 2030 projection.
- Funding CREATE projects to keep trains moving should have a higher priority than the development of a side track to park trains.
- A detailed capacity projection is needed to determine whether the impacts of completed or proposed CREATE projects would negate the need for a holding track or other such infrastructure projects as identified in the EA.

C. EA COMMENT/DEFICIENCY: EA IGNORES LONG TERM PLANS

Currently the EA does not recognize Glenview's long term plans or the MWRRS plans which must operate as a system to support a seamless and fluid operating network. When segments of the system such as the Hiawatha service (Chicago to Milwaukee) under perform, asset management issues arise and compromise the fluidity of train meets and transfers in Chicagoland. Implementing short-term fixes will adversely impact other service corridors such as Chicago to Detroit and Chicago to St. Louis.

- The EA recommendation is inconsistent with the Wisconsin Rail Plan 2030 which references 110mph passenger rail service between Chicago and Milwaukee, and is also inconsistent with the Milwaukee-Twin Cities EIS.
- The Chicago-Milwaukee corridor is one of three Midwest High Speed Rail Priority Corridors which was planned to operate at 110 miles per hour. This speed is essential to provide a competitive alternative to highway travel, especially given that I-94 has been completed with improvements north of the Wisconsin border, at Mitchell Airport, and along the major downtown Milwaukee interchanges, in addition to the completion of the expanded Illinois Tollway Improvements on I-294. Chicago-Milwaukee service was prioritized by FRA as one of the first three corridors to be implemented as a 110-mph service, however Wisconsin proposed the Milwaukee-Madison extension to operate at this speed until a shovel-ready 110-mph project for Chicago-Milwaukee exists.
- Unfortunately, the EA summarily dismissed the kinds of long-term solutions that are needed to truly address the purpose and need of the Project and provide enough

LONG-TERM VISION

capacity to allow the rail system to be expanded north of Milwaukee to regional destinations in Wisconsin and Minnesota.

- When Amtrak operates at 79 mph or less it receives state subsidies. This poses a long term financial burden on the states. The EA recommends 79 mph service for the three new train starts which is in conflict with long term Midwest passenger rail planning efforts and locks Illinois and Wisconsin into unnecessary operating subsidies. When Amtrak services under-perform speed expectations, communities which support passenger rail access, are compromised in their ability to raise capital for local development.

Requested Relief:

- Based only on the cursory analysis developed in the EA, this Project is in conflict with the long term plans of local and state agencies and also conflicts with the recommendations of previous rail planning studies. An EIS is needed to understand how this project fits into and is consistent with identified long term plans.
- Further study of Alternate 5 warrants additional consideration and evaluation, and offers a long-term solution to addressing the separation of freight and passenger rail. Alternative 5 is consistent with the Hiawatha's long-term goal of a full 17 train per day service which would operate at 110 miles per hour and transfer freight to a 30-mile bypass.
- An unstudied alternative not mentioned in the EA that would separate freight from passenger rail operations and would improve Hiawatha service is worthy of further detailed consideration. Canadian Pacific could expand the use of its own line from Bensenville, IL to Savanna, IL, connecting to the Canadian Pacific to La Crosse connections to Canadian Pacific northern routes, rather than routing heavy freight trains through Milwaukee and entering Chicago from the North.
- A second unstudied alternative not mentioned in the EA would be to utilize the Union Pacific Milwaukee subdivision as a freight bypass all the way from Milwaukee to A-20, rather than co-mingling freight with passenger trains from Milwaukee to Truesdell. Doing this would extend the length of the dedicated passenger corridor all the way to Milwaukee and would avoid the high cost and environmental impact associated with the Truesdell connection. In addition, it would avoid the cost of adding three long sidings to the Canadian Pacific line north of Truesdell; since the Union Pacific line was formerly double tracked it should be easier to restore track to the Union Pacific line, than add new track to the Canadian Pacific line where it never existed before.

EA Comments/Deficiencies

GLENVIEW'S NATURAL RESOURCES

Glenview's first residents arrived in 1836 to settle in a specific natural setting as documented from letters of Dr. John Kennicott, the father of renowned naturalist Robert Kennicott. In 1970, the Kennicott homestead was added to the Glenview Park District's inventory through a referendum that raised Glenview taxes to purchase the land. Today the Kennicott Grove is an abundant 143 acre woodland area which is designated a National Historic Landmark and Illinois Nature Preserve. The Village formed a Natural Resources Commission which undertook a scientific assessment of natural areas in the community located throughout three watersheds. In the 2008 "Plan for Nature Technical Report" it is pointed out that the many natural areas form a green infrastructure corridor for nature in Glenview even though not legally connected on the land. Damage to one could affect health of the whole system. Additionally, the Village put protections in place through the municipal zoning code to regulate construction in and adjacent to Environmentally Significant Areas ("ESA's"), such as the Kent Fuller Air Station Prairie, Lake Glenview in Gallery Park, Techny Basin, and The Grove, which are to the east of the proposed A-20 Alternative and/or directly adjacent to the Metra/Amtrak line. In general, the ESA zoning standards protect designated environmental areas from vibrations, smoke, toxic and noxious fumes, radiation hazards, and fire and explosive hazards.

OVERVIEW OF ENVIRONMENTAL IMPACTS

The Purpose of the Project is stated to increase passenger rail capacity between Chicago and Milwaukee, however, the Project will also significantly impact freight traffic and the adjacent local communities. The most significant impacts to the Village will likely be related to adverse air quality impacts and increased noise from the proposed siding extension at A-20. It is difficult from the EA to quantify and therefore determine the exact impacts to nearby residents and businesses because the EA does not provide specific information including:

- Estimate in the number of freight train traffic;
- Length of time trains would be allowed to idle at the siding extension; and
- Expected capacity (i.e. train length) of the freight traffic.

The adverse environmental effects are primarily due to proposed freight capacity mitigation, rather than for passenger trains. If the freights were diverted to another alignment, the proposed holding track and siding extensions wouldn't be needed. How well Alternatives 1 or 2 meets the purpose and need of the Glenview side track cannot be adequately determined as

ENVIRONMENTAL IMPACTS

presented. The environmental resource sections do not provide sufficient detail to ascertain the site specific construction related impacts or operational issues associated with the proposed alternatives.

In order for the FRA to make a FONSI, impacts to environmental resources need to be quantified for a determination of the preferred alternative. Neither current, nor future projections of impacts on the property owners adjacent and near the Project are included. The EA fails to consider air quality, noise, vibration impacts, and ecological system impacts, and impacts to surface water quality from chronic contaminant loading and potential hazardous materials spills to extensive wetlands, ponds, lakes and streams bordering and “downstream” of the proposed siding, expanded rail operation corridors, and ESA’s. No records of existing air quality, water quality, noise, vibrational impacts, and no detailed air measurements or studies modeling of air quality, water and storm water impact studies, or vibration have been addressed in the EA. Idle times, parked times, and slower movement periods on the rail line bordering the Village’s ESA’s, has been observed to be associated with existing rail uses, and this would be expected to increase in the EA.

The EA fails to provide detailed analysis of the future increased rail traffic from the additional staging of trains while entering and exiting the proposed siding and provides no analysis because it simply appears to suggest that rail traffic is already present in this location and therefore no additional or only negligible additional impact would be expected. This dismissive approach has failed to review and understand the existing impacts, and completely disregarded the potential to have yet increased air quality and noise impacts on the ESA environs.

The FRA cannot make a FONSI for the Project without a full qualification of these environmental impacts. All potential negative impacts call for completion of a more comprehensive EIS for the Project.

ENVIRONMENTAL IMPACTS

A. COMMENT/DEFICIENCY: AIR AND WATER QUALITY IMPACTS

Significant water bodies traverse the Village ESA's and include Lake Glenview, Techny Basin, and other expansive wetlands and floodplains and lakes bordering areas downstream of the proposed rail siding and rail lines proposed to have increased rail use. The EA did not address the following:

- Air and water quality changes due to diesel emissions.
- The impacts of distributive locomotive power and engine placement in longer trains.
- Number of trains held in Glenview over the past two years, holding times, times of day when holding occurs, and root cause analysis for holding.
- The EA is incomplete by not evaluating the existing or projected impacts to water quality or environmental conditions in and around the extensive connected wetlands, lakes, ponds, floodplain systems associated with the existing and proposed rail sidings and to have increased rail traffic over or near the water bodies that flow in and through Glenview.
- The EA is incomplete by not considering the direct impact of a potential hazardous spill and chronic emissions to surface water resources within the adjacent ESA's that include wetlands, floodplains, streams, and ponds.
- Water quality impacts have not been considered from spills and normal combustion byproducts. Water quality concerns arise from fuel spills, oil and grease releases along the rail lines, and from combustion byproducts (heavy metals, Nox, Sox, soot and particulates, Co2, CO, and much more).
- The EA fails to consider air quality impacts to the forest cover, rare birds and other life, which has been conclusively documented elsewhere to contribute deleterious impacts to these ecological resources. Even with the newest fuel-use efficient locomotives, very large volumes of air emissions still are being released during idling, staging, and while slow or fast trains pass the ESA's.
- It appears that winds from the North, Northeast, and East contributes to a wind funneling effect that seems to follow the somewhat enclosed tree lined rail corridor from the southern areas of the terminus of the proposed holding track toward the National Historic Site, contributing under existing rail-use conditions to conspicuous diesel fume odors, and noise from the existing rail uses.
- The EA provides no quantification of floodplain or wetlands impacts; therefore, the extent of the Project's long-term or construction impacts are unknown. NEPA documentation should include avoidance, minimization, and mitigation measures when documenting wetland and floodplain impacts.
- The A-20 Design Alternative also would increase the amount of particulate matter and other air emissions to the local community. As determined by the EA, there is a park, residences, and other human receptors within 200 feet. The EA omits discussion of the air quality impacts and any options to reduce air impacts such as walls or vegetation barriers.
- Without any details on how long a freight train might be allowed to idle, this project could create a de facto rail yard in Glenview. Railyards have been determined to be a

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significant health concern by U.S. EPA (<https://www.epa.gov/air-research/research-near-roadway-and-other-near-source-air-pollution>).

- The EA should also include environmental and noise considerations of any construction project along the A-20 Design Alternative or the rail line improvement.
- Additional Amtrak service will negatively impact the existing delays along Glenview Road due to the long train car length which blocks the Glenview Road at-grade crossing, generates unnecessary air pollution through the idling of queued vehicles, and the loss of time to persons traversing the auto corridor.
- At rates of 5-6 gallons of diesel-use per hour of idling locomotives, using USEPA current locomotive emission coefficients and quantities (see Tables 1, 2, 3, and 4 below) and an unknown number of trains that will use the siding daily and the idling time during their staging the air quality emissions, including Greenhouse gas emissions, are going to increase above the existing levels. The EA is dismissive of the both the existing levels and future emissions.

Table 1. Summary of ERTAC Rail Inventories: U.S. Locomotive Emissions and Fuel Use for either 2007 or 2008*.

| | Fuel Use** (gal/yr) | Emissions (tons/yr) | | | | | | |
|----------------------|---------------------|---------------------|-------------------|--------|-----------------|---------|-----------------|-----------------|
| | | NO _x | PM _{2.5} | HC | SO ₂ | CO | NH ₃ | CO ₂ |
| Class I*** line-haul | 3,770,914,002 | 754,443 | 23,439 | 37,941 | 7,836 | 110,969 | 347 | 42,305k |

Table 2. Class I Railroads, Reported Locomotive Fuel Use, and Railroad Fuel Consumption Index (RFCI) ⁹.

| Class I Railroads* | R-1 Reported Locomotive Fuel Use (gal/yr) | | RFCI (ton-miles/gal) |
|----------------------|---|--------------------|----------------------|
| | Line-Haul (2007)** | Switcher (2008) | |
| BNSF | 1,393,874,954 | 52,497,057 | 883.14 |
| Canadian National | 93,830,751 | 12,290,022 | 1190.79 |
| Canadian Pacific*** | 50,320,233 | 4,594,067 | 1096.28 |
| CSX | 514,687,186 | 53,717,674 | 963.81 |
| Kansas City Southern | 69,787,071 | 1,816,759 | 785.89 |
| Norfolk Southern | 463,267,278 | 32,317,375 | 865.75 |
| Union Pacific | 1,185,146,529 | 143,470,336 | 974.64 |
| Total | 3,770,914,002 | 300,492,223 | 929.47 |

Table 3. EPA line-haul locomotive Emission Factors by Tier, 1997 standards (grams/gal). Note that the new standards released in 2008 did not apply to fleets in the year 2008. ¹³

| | PM ₁₀ | HC | NO _x | CO |
|-------------------------|------------------|-------|-----------------|--------|
| Uncontrolled (pre-1973) | 6.656 | 9.984 | 270.4 | 26.624 |
| Tier 0 (1973-2001) | 6.656 | 9.984 | 178.88 | 26.624 |
| Tier 1 (2002-2004) | 6.656 | 9.776 | 139.36 | 26.624 |
| Tier 2 (2005 +) | 3.744 | 5.408 | 102.96 | 26.624 |

Based on values in EPA Technical Highlights: Emission Factors for Locomotives, EPA Office of Transportation and Air Quality, EPA-420-F-09-025, April 2009.

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Table 4. EPA greenhouse gas emission factors for locomotive diesel fuel (grams/gal).¹⁵

| | CO₂ | N₂O | CH₄ |
|-------------------|-----------------------|-----------------------|-----------------------|
| Locomotive diesel | 1.015E4 | 0.26 | 0.80 |

Requested Relief:

- Relay the impacts of diesel emissions, which requires typical air quality studies.
- Union Pacific and Canadian Pacific must use alternate fuels that are emissions reducing. Long-term, all rail locomotives on this line must use LNG fuel to mitigate air quality concerns in Chicago non-attainment areas.
- Water quality impacts to the ESA's have not been evaluated in EA, and detailed air measurements and modeling study is needed along with an EIS to evaluate these impacts and to determine mitigation methods.
- The need for data to understand the prevailing winds, the many sinks for fumes and particles, the age and engine type of the locomotives in use, and confirmation that the current locomotive engines meet 2015 US EPA Standards.
- Relocation of the Hiawatha Amtrak station to the North Glen to mitigate the impacts of the added gate time necessary to accommodate the train cars blocking Glenview Road at the downtown Glenview train station.
- Conduct an EIS to consider the consequences of increased rail activity, increased idling and passing trains, regardless of spills occurring, and the chronic deleterious environmental impacts to the recreational uses along trails at the ESA's, and the many recreational properties present downstream of the proposed rail operations.

B. COMMENT/DEFICIENCY: NOISE AND VIBRATION IMPACTS

The EA did not complete any study of the noise or vibration impacts associated with the development of the proposed freight train holding sidings, however, these impacts are expected to be significant.

- When trains come to a stop or start, the noise of slack between train cars creates more noise than passing trains.
- Idling engines are audible and deteriorated air quality are conspicuously perceptible as trains pass or idle by residential neighborhoods and the ESA's.
- Noise is not considered appropriately by including/considering receptor locations within the ESA's to evaluate existing noise levels and projected levels under various rail-use scenarios.
- The EA does not include any discussion on potential noise and vibration impacts to nearby residences adjacent to the A-20 or the proposed universal crossovers planned in the Village. Based on aerial mapping, the closest houses in the adjacent subdivisions would be less than 100 feet and in some cases as close as 60 feet from the proposed track and therefore should be assessed for potential sustained noise and vibration impacts.

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- The noise analysis in the EA “indicated that there is potential for noise impact from locomotives idling on the new track....Because there is no proposed increase in train traffic and the idling noise would occur at the same locations, there would be no net change in idling noise level for the proposed condition.” Any existing noise related to trains currently holding on A-20 is a recent change in operations from a year ago and needs to be studied. If the purpose of the project is to improve rail capacity, then there is an obvious option for an increase in freight service. Conversely, any holding currently occurring along the A-20 is due to existing congestion and does not appear to be representative of the operations proposed in the Project, suggesting there would be no need for the proposed siding track at A-20. The EA does not provide any details on how the project will allow of freight traffic increases and it omits all consideration of impacts of an increase.
- The universal crossovers are occurring near single-family and multi-family residences located less than 200 feet from the noise-generating point of the switch on the crossover. The EA determined that the noise impacts would be moderate, however, this is not a measurable amount. The EA should have an estimated decibel value to determine what is “moderate” and indicate what measures will be taken to mitigate the impacts.
- Coal trains are among the heaviest trains operated along the corridor. The rail on this corridor has been upgraded to 286,000 lbs. gross weight limit, allowing rail cars to carry over a 130 tons of coal per car which create significant vibrations.
- Residents adjacent to the A-20 siding state they have cracks in their foundations and their house visibly shakes when trains are present, yet the study states no impacts.
- Vibrational impacts to trees, and rare biota within the ESA’s are not considered in the EA.

Requested Relief:

- An EIS is needed to address and quantify the impacts of sustained noise and vibrations on the adjacent residential neighborhoods and nearby ESA’s.
- Cost estimates are needed for long-term context sensitive solutions that would mitigate the impacts of noise and vibrations, such as increased vegetation, sound walls, methods to dampen vibrations, and better sound insulation of the adjacent buildings.
- Several of the improvement projects indicated a moderate impact to receptors. Further analysis beyond a general noise assessment is required. According to Section 3.2.5 of the Federal Transit Administration’s (FTA’s) Transit Noise and Vibration Impact Assessment, projected noise levels in the Moderate Impact range (as identified for the residences adjacent to the A-20 siding and the universal crossovers) will require consideration and adoption of mitigation measures when it is considered reasonable. The EA includes no consideration of any noise impact mitigation measures.

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- Relocation of the proposed universal crossovers to locations with industrial uses on both sides of the tracks in order to mitigate the noise impacts on the residential neighborhoods.
- An assessment of the impact of longer freight trains and where they will be held if they don't fit in the 10,000 foot proposed side track.

C. COMMENT/DEFICIENCY: IMPACTS ON PROPERTY VALUES

The EA did not complete any study of property value impacts associated with the development of the proposed freight train holding sidings, however, these impacts are expected to be significant.

- When track is replaced on an existing bed, as could likely be done if A-20 Alternative 5 were selected (running freight over the Union Pacific line) it is reasonable to expect very little to no wetland and community impacts. By comparison, if one seeks to expand the embankment and add new bridges, structures, fill, and retaining walls where they have never been before, then you can expect impacts, even if these are constructed on property that the railroad already owns. These new structures tend to have the direct impacts, more than the rails themselves. If the Union Pacific right of way is already wide enough for the replacement of a track that once existed, then why is the Project proposing to expand the embankment footprint of the Canadian Pacific corridor to place tracks where they have never been before, which is hardly the minimum impact solution?
- Property values will be impacted with 10,000 foot trains and multiple locomotives siting 15 feet closer and up to 35 feet tall in the air adjacent to residential properties that will lose the enjoyment of their backyard in addition to the detrimental effects on these resident's quality of life due to the aforementioned environmental impacts.

Requested Relief:

- Preserve vegetation that is providing a natural buffer, even if it is located within the rail right-of-way.
- Conduct a certified appraisal of those properties within 500 feet of the proposed A-20 siding track to determine the impacts on the property values given a Build – No-Build scenario.
- Conduct a detailed EIS analysis of freight alternatives to the Canadian Pacific line, which could altogether avoid the need for the proposed intrusive infrastructure additions.

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D. COMMENT/DEFICIENCY: HEALTH AND SAFETY IMPACTS

The EA did not complete any study of the health and safety impacts associated with the development of the proposed A-20 freight train holding sidings, however, these impacts are expected to be significant. The EA does not assess the following health and safety impacts:

- The southern section of the A-20 holding track is near the at-grade crossing of West Lake Avenue. West Lake Avenue is an arterial providing direct cyclist and vehicular access to Glenbrook South High School and is an emergency access to Glenbrook Hospital which serves the region. Increased delays on West Lake Avenue will occur as trains slowly coming in or leave the holding track.
- The proposed switches and universal crossovers increase the likelihood of a train derailment and/or hazardous materials disaster in this area which has previously had several derailments including fatalities.
- The A-20 holding track is directly adjacent to a neighborhood park and the EA has not identified the impacts of the proposed Project on Jennings Park.
- The EA does not project an increase in freight train activity in this location which is counter to the Purpose of the Project. Even if no increase in rail activity is projected, an increase in activity could occur at any moment following construction and such increases would go unregulated.
- The grade change from the Willow Road bridge to West Lake Avenue is significant and could result in runaway train cars traveling south from the holding track.
- Any proposed construction that contemplates closing Shermer Road will be detrimental to the survival of business in the area who endured two years of road closures.

Requested Relief:

- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, and freight and passenger coordination needs.
- An EIS is necessary to evaluate the impacts of the siding on the operations of West Lake Avenue and to confirm what measures are in place to mitigate the likelihood of a train derailment or hazardous materials disaster.
- Relocation of the proposed universal crossovers to locations with industrial uses on both sides of the tracks in order to mitigate the impacts on the residential neighborhoods.

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EA Comments/Deficiencies

THE EA'S SHORT-TERM VISION

The *Purpose and Need* listed in the EA defines the vision for the Project. Unfortunately, this statement expresses only short term goals while driving the infrastructure development in a direction that is incompatible with the needs for long term development of the corridor. **Since the *Purpose and Need* is clearly stated in terms of short term goals, the Village's objections are also based on the lack of a short term need for the project.** The A-20 Design Alternatives carried forward in the EA fall short of the real needs for supporting long-term growth of passenger rail service in the corridor or for improving mobility in the region.

1. COMMENT/DEFICIENCY: **NEED 1 - NEAR-CAPACITY AND OVER-CAPACITY CONDITIONS ABOARD HIAWATHA SERVICE TRAINS.**

The EA proposes that there is a need to increase the Hiawatha Service with three additional trains, yet only one train (339) in 2014 was shown to operate at capacity more than five times during all trips taken that year. The EA demonstrates that in recent years and without effective corridor service extension beyond Milwaukee that ridership numbers on the Hiawatha service have been relatively flat and when combined with the ridership of the Empire Builder is trending downward since 2013 (see below chart and Appendix). With the 2014 change in measuring Hiawatha passengers, the data is showing the actual ridership is lower than the estimates used (2008-2013) in the EA to justify ridership demands are at capacity. As such, there is no urgency for immediate action or a rush to judgement for implementing a short-term option that may turn out to be incompatible with the long-term strategy for developing the corridor.

| Amtrak Ridership | Passengers (000's) | | | |
|------------------|--------------------|----------------|--------------|----------|
| Year | Hiawatha | Empire Builder | Total Amtrak | % Change |
| 2009 | 727 | 505 | 1,232 | |
| 2010 | 772 | 523 | 1,295 | 5.1% |
| 2011 | 807 | 459 | 1,266 | -2.3% |
| 2012 | 827 | 533 | 1,360 | 7.4% |
| 2013 | 808 | 525 | 1,333 | -2% |
| 2014 | 789 | 443 | 1,232 | -7.6% |
| 2015 | 792 | 433 | 1,225 | -.6% |

Figure 1 Source: Amtrak

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The EA falls short of providing a long-term solution for any potential future ridership. The FRA must insist on the development of longer term forecasts of the ridership demand in the corridor, including the capacity needs for proposed connecting services north of Milwaukee, to ensure that the investment proposed by the EA will not be a "throw away" investment. Previous feasibility studies have suggested a need to build-out the corridor to support a level of up to 17 daily round trips between Chicago and Milwaukee. This was based on the development of run-through rail services from Chicago both to Green Bay, WI and the Twin Cities, both of which were assessed as components of the 2004 MWRRS. Recommendations in the EA should not be based only on short term, backward looking ridership data because the data, as currently presented, does not support the need for the project.

Passenger train service capacity could be expanded by adding cars, or by deploying double-decker rail equipment of higher capacity, such as the 88 cars funded by a \$352 million contract announced by former Illinois Governor Pat Quinn. These new cars are designed for operation at speeds up to 125 mph and will be equipped to deal with extreme weather conditions in the Midwest. Nippon Sharyo car models can carry up to 149 passengers per car. (Progressive Railroading Nov 2012). Current passenger cars in the Hiawatha service accommodate 70 passengers per car. The EA did not consider these cars.

Furthermore, Service Alternative D – Increased Capacity to Train Sets Alternative suggested adding a seventh coach car to each Hiawatha Service. If one of the purposes of the entire expansion is to improve ridership on the Hiawatha Service line, the rail agencies should be making immediate changes to confirm passenger demand. The EA itself concluded that "only two trains per day in each direction have historically had capacity issue." Therefore, it would be logical and cost effective to immediately begin with increasing seats on the Amtrak trains during peak travel periods along with the implantation of a reservations systems, similar to what is being done during the 2016 Thanksgiving holiday. Without a commitment from Amtrak to increase its ridership by adding train cars and reservations now, it appears the main purpose of this siding extension is to improve the rail capacity for freight trains, not passenger trains. In Section 3.19, the EA states "Fuel consumption in the No- Build and Build Alternatives are not anticipated to increase between 2019 and 2040 because the frequency of Amtrak service is not anticipated to change for either alternative." If that is correct, the purpose of the entire project is unclear and the EA has failed to demonstrate the need for the project.

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Requested Relief:

- A reservation system for peak trains could be implemented similar to what is being done for peak holiday periods, yet the EA falls short of sufficient analysis to examine the cost benefits.
- Additional coach cars could be used to accommodate peaks in ridership during the rush hour similar to what is being done for peak holiday periods, yet the EA falls short of sufficient analysis to examine the cost benefits.
- Upgrade current railcars with the new Nippon Sharyo equipment produced in Rochelle, IL and expected to come on line shortly for use in Illinois and California.
- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts.

2. COMMENT/DEFICIENCY: *NEED 2 – LIMITED PASSENGER TRAIN SCHEDULE OPTIONS TO MEET EXISTING AND FUTURE PASSENGER DEMAND TO OPTIMIZE MULTIMODAL CONNECTIONS.*

The Hiawatha Service between Milwaukee and Chicago acts like a commuter service with a high percentage of business travelers. Passenger rail riders want trips during peak travel times and are unlikely to travel during off-peak times. Due to the train curfews in Chicago, freight trains yield to passenger trains during morning and evening peak passenger travel periods. As proposed the EA recommends adding more half-empty trains each day during off-peak times to increase service levels, which has not been statistically identified as a need. The off-peak train trips directly impacts how the freight trains operate and creates the need for the A-20 Alternative.

The EA does not examine locomotive power options which could improve the train speed and meet the higher speed passenger rail service for this corridor. Using current heavy diesel locomotives designed on a freight platform, only achieve maximum speeds of 79 mph with a single power unit and cannot achieve the acceleration required to meet 110 mph standards. A second locomotive could be added to each service, but would still result in an underperforming corridor. Siemens Sprinter locomotives are specially designed to be paired with the new double-decker passenger cars such as the Nippon Sharyo models previously noted. These Sprinter locomotives are designed to deliver superior acceleration and performance, and put less load and wear on tracks.

Based on the lack of data and with no access to the SDP, train performance and associated higher speed equipment investments required to meet the Hiawatha Service goals cannot be effectively analyzed. The EA falls short of providing a full evaluation of the alternative means

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for adding train capacity to meet the short term capacity need; the EA has failed to demonstrate the need for the project.

Requested Relief:

- More data is needed than the 2011 survey can provide, therefore an updated ridership study is necessary to determine the actual need for additional cars or trains and the likelihood of commuters choosing to travel during off-peak times instead of peak times to reach their destination.
- Upgrade the current engines to the Siemens Sprinter and pair them with the increased capacity of the new Nippon Sharyo railcars to take advantage of network improvements.
- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts.

3. COMMENT/DEFICIENCY: NEED 3 - EXISTING AND FUTURE HIGHWAY CONGESTION RESULTING IN INCREASED TRAVEL TIMES.

The I-94 North-South Freeway Expansion in Wisconsin is a \$1.9 billion reconstruction project which spans 35 miles from the City of Milwaukee to the Illinois State Line. This project widened the corridor from six to eight lanes and will eventually include 17 interchanges. The project began in 2009 and is largely complete. During I-94 construction, the Hiawatha Service ridership increased, which was likely due to increased congestion and depressed economic conditions, however ridership levels have since stabilized. The I-94 highway now provides a fast and free flowing alternative to the train and two years of low energy prices have encouraged greater use of the highway and less use of rail. Over the longer term these trends may reverse or rail may continue to decline as driverless vehicles are projected to become more relevant in the next 15-20 years. In either case, it has provided a window of opportunity that could enable the proper studies to be completed as part of a new EIS scope.

A 79-mph rail service can simply not compete effectively with the expanded I-94 highway in an environment of low energy prices. Only a 110-mph or better service can effectively compete with the automobile to provide a rail travel alternative that will be attractive to large numbers of travelers in the current environment. A 79-mph Hiawatha Service compromises the original 110 mph service vision for the development of the MWRRI network, especially with other priority corridors such as Chicago to St. Louis and Chicago to Detroit corridors that run up to 110-mph. By ignoring the historical precedents set by previous planning studies, as well as ignoring what Illinois and Michigan DOT's are doing, the EA is remiss to not support 110-mph alternatives.

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By failing to accurately represent the competitive situation that now exists between the automobile and the train; the EA has failed to demonstrate the need for the project.

Requested Relief:

- The issue of highway traffic congestion and energy prices needs to be acknowledged, data on current and forecasted conditions presented, and a ridership forecast supporting the actual need for the project needs to be developed based on this data.
- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts.

4. COMMENT/DEFICIENCY: *NEED 4 - INADEQUATE SERVICE RELIABILITY DUE TO CONFLICTS WITH FREIGHT.*

In recent years, rail freight congestion in the Village has been complicated by the unintended consequences of a delayed and underfunded Chicago CREATE program. Since CREATE was introduced in 2003, and more recently over the past 5 years, regional rail improvement projects have been undertaken which impact the Canadian Pacific and Union Pacific rail operations which pass through Glenview and connect to Bensenville and Proviso terminals and beyond to Indiana Harbor Belt Railroad connections. Metra projects at Fox Lake and Deval construction efforts have also created congestion requiring trains to be held in Glenview. Once these short-term projects are complete there will not be a need for the EA's proposed alternative siding in Glenview.

The current drop in railroad freight includes reduced coal and crude oil traffic (Canadian Pacific energy traffic is down 63% during the first 9 months of 2016; Union Pacific's energy traffic is down 43% during the first quarter of 2016). The reduced freight traffic provides a window of opportunity to complete an EIS needed for implementing a long-term strategy for development of the Chicago-Milwaukee passenger rail corridor. The Canadian Pacific closure of their intermodal terminal in Milwaukee also reduces intermodal trains along this corridor. Conversely Canadian Pacific is running trains longer than 10,000 feet into Milwaukee and across their North American Network and it is unclear if a 10,000 foot holding track would be able to accommodate longer trains without blocking grade crossings.

No analysis has been provided for any alternatives to the continuing co-mingling of passenger and freight service on the current Canadian Pacific rail line, to the detriment of both services. Many of the new facilities proposed to be built with this Project are for the benefit of freight trains, not passenger trains, and would not be needed if the Canadian Pacific through freight

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service were moved either to the parallel Union Pacific line or to alternative routings via Savanna, IL. Previous planning studies have suggested that rerouting the freight trains to provide dedicated infrastructure for both freight and passenger trains, would be more cost effective than continuing to co-mingle these two incompatible types of rail traffic.

Since significant environmental impacts have, in fact, been identified and associated with the infrastructure plans of the EA and no alternative has been developed, it is clear that the level of freight alternatives analysis is insufficient.

Requested Relief:

- An EIS is needed to provide an adequate assessment of both the freight and passenger alternatives and should include a number of additional promising alternatives overlooked by the EA such as Canadian Pacific rail upgraded access to Bensenville, IL from the West via Savanna.
- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts.

5. COMMENT/DEFICIENCY: *NEED 5 - DEMAND TO ENHANCE MOBILITY AND TRANSPORTATION CHOICE AS IDENTIFIED BY STATE AND REGIONAL DOCUMENTS.*

The EA assessed the possibility of raising the train speed from 79-mph to 90-mph over a portion of the corridor, but reported only a two minute time savings. Undoubtedly this is because the EA did not use the appropriate type of rail equipment in the computer simulation. Purpose built high or higher speed trains (locomotives and passenger cars) are able to effectively take advantage of the infrastructure improvements. A 110-mph rail service typically produces a 20-30% improvement in the train schedule over a 79-mph option. This is a significant time savings which would enhance the Hiawatha Service. An evaluation of a 110-mph option using appropriate passenger rail equipment needs to be developed for the Chicago to Milwaukee rail corridor. Currently, the EA is proposing train frequency increases before train speed is increased, while the economically sensible solution would be to improve both train speed and frequency at the same time.

The EA provides no data or analysis associated with either the cost-benefit of using state and/or federal funds for the Project, besides the \$150M in anticipated infrastructure costs and the \$7M per year operating loss for Amtrak's Hiawatha Service. Neither does it provide any detailed information regarding train operations, results of capacity assessments, financial and economic performance, forecasted revenues, operating cost, or the long term State commitment to an

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increase in the operating subsidy that would result from the added 79-mph train frequencies. Some of this information might have been contained in the SDP, but as of this date it has yet to be released. NEPA requires transparency in the public outreach process, and without the missing data the public comment period is rendered incomplete and the EA process flawed.

Requested Relief:

- An EIS evaluating the long-term alternatives is needed to support the Hiawatha Service expansion.
- Rail locomotives designed for higher speed service and new passenger rail cars purchased for use in this corridor and California need to be analyzed for this service.
- The release of a SDP is needed to understand freight and passenger rail service demands, current and projected freight and passenger operations, freight and passenger coordination needs, and anticipated environmental impacts.

CONCLUSION

EIS Needed

ASSESS LONG-TERM REMEDIES

The Village believes alternatives need to be fact based and that all project components should be analyzed in a transparent way to enable informed public comment. Assumptions and environmental information is missing from the EA which is most likely in a full Service Design Plan which has not been made available to the public. A full SDP is required to understand the actual freight and passenger operations, and the resulting impacts to the Village if service changes are proposed. The purpose described in the EA has ignored the MWRRRI and Village long range plans and does not have an alternative which supports those documents.

The proposed impacts and mitigation measures identified in the EA are insufficient based on the publicly available data. Actual freight train volumes, operational profiles, service needs, network requirements, and impacts on the environment are missing from the EA. The EA does not account for the regional environmental conditions such as the CREATE network construction. Projected congestion mitigation results of the alternatives put forth is missing which is essential to evaluate the long term impact of the proposed alternatives. The Village cannot request mitigation or relief from proposed changes without a fact based and complete EA.

FINDINGS

Based on a thorough review of the EA the Village concludes the following:

1. The EA does not fully satisfy the long range purpose of the Project as described in the MWRRRI and MWRRS.
2. The EA is missing environmental measurement of impacts associated with proposes changes such as noise, vibration, sound, air, water and neighborhood impacts.
3. The Project would have an adverse impact on the character of the adjacent residential neighborhoods and on the public health, safety and welfare of Glenview residents and businesses.
4. The EA has not presented clear and convincing evidence for the need to expand the Hiawatha Service as proposed in the Project, as only selected trains are fully occupied.
5. The U.S. Department of Transportation Federal Railroad Administration, which is the lead federal agency for the Project must restart the environmental review process from the beginning with an EIS based on complete and realistic data prior to their consideration of a FONSI. The EIS will likely result in demonstrating this proposed Project is not economically justified and is not environmentally acceptable.

CONCLUSION

6. The opportunity to separate freight from passenger service exists if the Canadian Pacific would access Bensenville yard from the west via Savanna, IL which connects via Canadian Pacific owned or BNSF trackage rights to LaCrosse, WI. This alternative would support the long term MWRRRI and MWRRS vision for higher speed passenger rail service.
7. The EA ignores purpose built passenger locomotives and new bi-level rail cars purchased for this service and like passenger service in California.
8. The EA solves only a short-term scenario with the addition of three new trains, when as recently as 1968 there were four round trips to the Twin Cities in Minnesota, and three to four daily round trips to Green Bay and nearly a dozen passenger trains between Milwaukee and Chicago, operating on two Class 1 railroads. At that time there were also three Empire Builder roundtrips in the corridor with faster service than provided today.
9. The proposed Alternatives are in conflict with Glenview's long range plans, which call for the relocation of Glenview's Amtrak stop to the North Glen to mitigate downtown traffic congestion due to Amtrak trains blocking Glenview Road, and the relocation of universal crossovers to industrial locations on both sides of the track that do not impact adjacent residential areas.
10. The purpose and need are not sufficiently met by the proposed alternatives.
11. The freight system congestion has been amplified by the unintended consequence of delays caused by CREATE construction projects. As a result of an underfunded program these projects are only half completed and delays are expected to continue until 2030.
12. Construction delays associated with CREATE will not be remedied by the proposed A-20 holding track.
13. The EA is not of sufficient scope to support the long term investments in Hiawatha.
14. Glenview, Northbrook, Deerfield, Lake Forest and other communities along the Hiawatha corridor are missing environmental impact data demonstrating the impacts of the proposed Project.
15. A FONSI cannot be made based upon the facts presented in the EA.
16. A detailed EIS is required to identify the unmeasured environmental impacts in Glenview to understand if the proposed alternative creates a positive operational solution without creating undue environmental impacts.
17. A detailed EIS is required to select the right project based upon environmental impacts.
18. A detailed EIS is required to assess long term remedies.

Attachments

- 1.1 Glenview Resolution 16-163 Objecting to Recommendations in Draft EA
- 1.2 National Commitment to High-Speed Passenger Rail
- 1.3 Update on Chicago CREATE
- 1.4 Class I Performance
- 1.5 Amtrak Fact Sheets – Hiawatha
- 1.6 Amtrak Fact Sheets – Empire Builder

Any questions related to the comments in this Notice of Objection should be directed to Jeff Brady, Director of Planning, at (847) 904-4306 or by email to jeffb@glenview.il.us.

GLENVIEW RESOLUTION 16-163 OBJECTING TO RECOMMENDATIONS IN DRAFT EA

RESOLUTION NO. 16-163

RESOLUTION OF THE BOARD OF TRUSTEES OF THE VILLAGE OF GLENVIEW OBJECTING TO THE DESIGN ALTERNATIVES PROPOSED IN THE CHICAGO-MILWAUKEE INTERCITY PASSENGER RAIL CORRIDOR DRAFT ENVIRONMENTAL ASSESSMENT RELEASED OCTOBER 6, 2016

WHEREAS, the Village of Glenview (the “Village”) is a home rule municipality in accordance with the Constitution of the State of Illinois of 1970;

WHEREAS, the Wisconsin Department of Transportation (the “WisDOT”) and the Illinois Department of Transportation (the “IDOT”), in partnership with Amtrak, are proposing to increase passenger rail service between Chicago, Illinois and Milwaukee, Wisconsin on the existing Amtrak *Hiawatha Service* and construction of infrastructure improvements (the “Project”) to support the increase in frequencies;

WHEREAS, the Chicago-Milwaukee Intercity Passenger Rail Corridor Draft Environmental Assessment (the “EA”) was released October 6, 2016 and requires further environmental documentation by the U.S. Department of Transportation Federal Railroad Administration which is the lead federal agency for the Project prior to their consideration of a Finding of No Significant Impact (the “FONSI”), making the Project eligible for Federal funding;

WHEREAS, construction related to the Project is proposed along two rail lines within the corporate boundaries of the Village that diagonally bisect residential and commercial neighborhoods throughout the Village;

WHEREAS, the Project includes six new proposed *Hiawatha Service* trips occurring during off-peak capacity times which adversely impacts freight traffic operating in the Project area and results in significant construction in the Village attributed to the mitigation of the *Hiawatha Service* impacts on existing freight operations;

WHEREAS, the EA carries forward two alternatives from a total of six alternatives that were reviewed in conjunction with the EA for a portion of railroad right-of-way along the Union Pacific Milwaukee Subdivision rail line (the “A-20”) located south of Techny Road in Northbrook, crossing the Willow Road bridge and Shermer Road bridge (site of fatal train derailment in 2012) both located in the Village, and terminating north of West Lake Avenue in the Village;

WHEREAS, the two alternatives (the “Design Alternatives”) carried forward in the EA include:

- Alternative 1 - the construction of a 11,000 foot holding track for rail freight on the west side of the A-20; and

APPENDIX

- Alternative 2 - the construction of a 10,000 foot holding track for rail freight on the east side of the A-20, and

both of which would encroach on the existing neighbors and include elevated tracks that could require up to 20 foot tall retaining walls to support the track infrastructure;

WHEREAS, the Village is in the final stages of adopting an updated Glenview Comprehensive Plan (the “Comprehensive Plan”), a draft of which was reviewed by the Comprehensive Plan Committee and recommended to the Plan Commission, and which has been substantially reviewed by the Plan Commission who, on October 25, 2016, is anticipated to recommend the document’s approval to the Village Board of Trustees for the Board’s consideration of the document prior to its anticipated adoption in January 2017;

WHEREAS, within the draft Comprehensive Plan, goals are included that support transit oriented development, mobility, and connectivity such as:

- Goal RD-15 - Continue to support the implementation of the Downtown Revitalization Plan, which includes a mix of uses near the downtown train station,
- Goal TM-2 – Promote and improve convenience and connectivity in public transportation, and;
- Goal TM-6 – Develop opportunities for better mobility (automobiles, public transit, bicycles, and pedestrians) and context sensitive infrastructure design;

WHEREAS, within the draft Comprehensive Plan, goals are included that seek out opportunities to mitigate the impacts of trains passing through the community such as:

- Goal TM-3.1 - The Village shall continue discussions with Amtrak officials to identify feasible long-term solutions (*e.g.*, relocation of the Amtrak stop to the Glen of North Glenview Station) to eliminate Amtrak traffic disruptions on local streets,
- Goal TM-3.2- The Village shall adopt a resolution affirmatively opposing the proposed Union Pacific expansion in the Village that would add a third, elevated rail track along the rail line known as the ‘A-20’ track for the holding of up to 10,000 foot long trains adjacent to residential neighborhoods, and;
- Goal TM-3.3 - The Village should coordinate with rail officials and other local, state, and federal agencies to identify potential: Advancements in freight car safety; Methods to mitigate traffic, noise, and vibrations; Reduction of train engine idling at holding tracks;

WHEREAS, the Village has reviewed EA and considered the impacts on the Village of the proposed Project and the Design Alternatives carried forward in the EA;

WHEREAS, the Village has serious concerns relating to the need for the proposed Project, the resulting environmental health and safety impacts of the proposed Project on the residents of the Village, and the lack of fiscal responsibility in recommending short term ‘band-aids’ as viable long term rail system solutions that address the purpose of the Project are clearly identified in the EA;

APPENDIX

WHEREAS, the data in the EA does not support the need for the Hiawatha Service expansion based on the following:

- Current ridership is at only 39% of capacity and trending lower,
- As proposed, six more half empty trains a day would be added during off-peak times, which directly impact how the freight trains operate, when adding a seventh car during peak times or a reservation system would eliminate ridership pressure until a long term solution is reached, and;
- The EA provides little data or analysis associated with the cost-benefit of using state and/or federal funds for this Project;

WHEREAS, the EA provides no data on air quality, noise, and other health and safety impacts for residents living adjacent to the proposed holding track, such that the potential negative impacts really call for completion of a more comprehensive Environmental Impact Statement, or EIS;

WHEREAS, the EA is absent of fiscally responsible, big-picture approaches and ignores long-term solutions to alleviate passenger and rail congestion issues for the entire region, instead focusing on short-term 'band-aids' such as the 10,000 foot long A-20 holding track to mitigate the Project impacts:

- The A-20 holding track is a short-term approach as the lack of fluidity on the entire passenger and freight network is due antiquated interchanges which create chokepoints (specifically Rondout and Deval),
- The Design Alternatives at A-20 being put forward from the EA would use significant state and federal funds to fix what is primarily existing private rail conflicts compared to using those funds towards a more comprehensive solution,
- Only Alternative 5 in EA, which warrants additional consideration and evaluation, offers a long-term solution to addressing the passenger and freight issues through the proposal of a 30-mile freight bypass of the congested area, and;

WHEREAS, it is the conclusion of the corporate authorities that the EA has not presented clear and convincing evidence for the need to expand the Hiawatha Service as proposed in the Project, does not fully satisfy the long range purpose of the Project, and would have an adverse impact on the character of the adjacent residential neighborhoods and on the public health, safety and welfare of its residents in said area.

NOW, THEREFORE, BE IT RESOLVED by the President and Board of Trustees of the Village of Glenview, Cook County, Illinois as follows:

Section 1: The facts and statements contained in the preamble to this Resolution are found to be true and correct and are hereby adopted as part of this Resolution.

Section 1: That, for the reasons set forth herein, the President and Board of Trustees of the Village of Glenview, Cook County, Illinois, do hereby oppose and protest the findings of the draft EA,

APPENDIX

such that significant impacts would result from the proposed Project due to the EA lacking the necessary evidence for consideration of a FONSI.

Section 2: That the Village Clerk be and is hereby authorized and directed to send certified copies of this Resolution to WisDOT, IDOT, and the Federal Railway Administration, as well as a formal letter to each detailing the objections, along with requests for additional information and suggested remedies which could resolve the objections.

Section 3: That this Resolution shall be in full effect from and after its passage and approval.

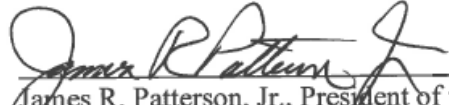
PASSED this 18th day of October, 2016.

AYES: Britton Detlefs Hinkamp Jenny Karton White

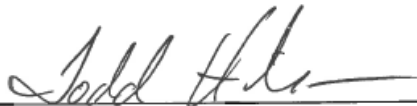
NAYS: None

ABSENT: None

APPROVED by me this 18th day of October, 2016.


James R. Patterson, Jr., President of the
Village of Glenview, Cook County, Illinois

ATTEST:


Todd Hileman, Village Clerk of the
Village of Glenview, Cook County, Illinois

APPENDIX

NATIONAL COMMITMENT TO HIGH-SPEED PASSENGER RAIL



The High Speed Rail Supply Chain report published in February of 2013 by The Environmental Law and Policy Center identifies that the proposed 3,000 mile hub-and-spoke system reaching mid-sized cities within a 400 mile radius of Chicago will operate modern, new trains which will operate at 110 mph on upgraded tracks, incorporating advanced signaling, positive train control and safer grade crossings. Travel times between major cities will be reduced by 30-50%.

As of 2012 Amtrak began 110 mph revenue service along the Chicago to Detroit Corridor.

As of 2014 Amtrak service between Chicago and St. Louis will operate at 110 mph for more than 75% of its route.

In 2010 President Obama set a national goal for 80% of American's to have access to high-speed rail service by 2035. The Vision for High Speed Rail in American (<https://www.fra.dot.gov/eLib/Details/L02833>) identifies goals for Emerging High Speed Rail corridors of 100-500 miles with top speeds of 90-110 mph.

APPENDIX

UPDATED ON CHICAGO CREATE

The total cost of the CREATE Program is estimated at \$4.4 billion in 2015 dollars. \$1.3 billion has been received so far. \$3.1 billion in additional funding is needed. 18 CREATE projects directly benefit Amtrak intercity service.

Nine projects benefiting passenger rail still await funding. (source:

<http://www.createprogram.org/factsheets/Passenger%20Rail%20Benefits%20February%202014%20FINAL.pdf>)

The latest rail network simulation of the CREATE network showed that investment in CREATE to date has resulted in a 28 percent reduction in freight delay and a 33 percent reduction in passenger delay compared to the system if no CREATE projects were built.

CREATE PROJECTS WITH IMPACTS ON TRAIN MOVEMENT THROUGH GLENVIEW

Below is a summary of CREATE projects and current status. Most troubling is fact that the tower projects are not scheduled yet because there is no funding. These tower projects are essential to the on-time performance of freight, commuter and passenger operations in the region. If these projects were funded, train velocity, and network fluidity would improve.

- B1 “CP Double & IHB Connection”. This project impacted Metra, CP, IHB and CN and is current shown as in IDOT Phase III construction.
- B2 “Proviso 3rd Main”. This project impacted IHB/UP/Metra and was completed in September 2013.
- B3 “Melrose connection” This project impacted IHB/UP and was completed in September 2009
- GS16 “Irving Park Road” in Bensenville, impacts CP directly and are in IDOT Phase III construction.
- T3 “Roundout Tower” in Lake Forest impacts CP/Metra/Amtrak. This project shows initiation pending funding availability and have not been scheduled
- T4 “A-5 Tower” in Chicago, impacts CP/Metra/Amtrak. This project shows initiation pending funding availability and have not been scheduled.
- T5 “B-17” in Bensenville, impacts CP/Metra/Amtrak. This project shows initiation pending funding availability and have not been scheduled.

APPENDIX

Status of CREATE Projects (7/19/2016)



Note: Viaduct projects in the City of Chicago are not displayed.



APPENDIX

CREATE Program - Overall Project Status Summary

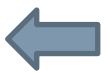
Revised - 19-Jul-16

| | Proj. No. | Project Name | Municipality | Railroads Affected | Lead Entity | Current Project Status - 19-Jul-16 | | | | | | Project Completion Date |
|---------------------------|-------------------------------|---|---|------------------------|-------------|---|-----------------------------------|-------------------------------------|-------------------------------|-------------------|------------|-------------------------|
| | | | | | | Initiation Pending Funding Availability | IDOT Phase I - Environmental + PE | IDOT Phase II - Final Design (PS&E) | IDOT Phase III - Construction | Project Completed | | |
| BELT CORRIDOR | B1 | CP double & IHB connection | Franklin Park | Metra/CP/IHB/CN | Metra | - | - | - | X | - | Sep 2013 | |
| | B2 | Proviso 3rd Main | Bellwood / Berkeley / Elmhurst / Melrose Park | IHB/UP/Metra | UP | - | - | - | - | X | Sep 2009 | |
| | B3 | Melrose connection | Bellwood | IHB/UP | UP | - | - | - | - | X | May 2012 | |
| | B4* | TCS LaGrange to CP Hill | LaGrange / LaGrange Park / McCook | IHB | IHB (CSX) | - | - | - | - | X | May 2012 | |
| | B5* | TCS LaGrange to CP Hill | Bellwood / Broadview / Melrose Park | IHB/CN | IHB (CSX) | - | - | - | - | X | Dec 2009 | |
| | B6 | McCook | McCook | CSX/BNSF/Amtrak/Metra | CSX | - | - | - | - | X | Mar 2009 | |
| | B8 | TCS Argo to Canal | Bedford Park / Bridgeview / Summit | CSX/Amtrak/Metra | CSX | - | - | - | - | X | Jul 2011 | |
| | B9** | Argo | Chicago / Bedford Park / Bridgeview / Summit | BRC/CSX/Amtrak/Metra | CSX | - | - | X | - | - | Sep 2012 | |
| | B12 | CP Francisco | Alsip / Blue Island | CSX | CSX | - | - | - | - | X | Sep 2012 | |
| | B15 | TCS Blue Island | Blue Island / Dolton / Riverdale | IHB | IHB (CSX) | - | - | - | - | X | Jun 2014 | |
| | B16 | Thornton Jct | South Holland | UP/CN | UP | - | - | - | - | X | | |
| E-W CORRIDOR | EW1** | Argo | Chicago / Bedford Park / Bridgeview / Summit | BRC/Amtrak/Metra | BRC (CSX) | - | - | - | X | - | | |
| | EW2*** | 80th Street | Chicago | BRC/Metra/UP/NS | BRC (NS) | - | X | - | - | - | | |
| | EW3 | Pullman Jct | Chicago | BRC/NS | NS | - | - | X | - | - | | |
| | EW4 | CP 509 | Chicago | BRC/NS/Amtrak | NS | - | - | - | - | X | Jul 2008 | |
| WESTERN AVE CORRIDOR | WA1 | Ogden Jct. | Chicago | CSX/NS/UP/Metra | UP | - | - | X | - | - | | |
| | WA2 | TCS Blue Island Sub | Chicago | CSX/Amtrak/Metra | CSX | - | - | - | X | - | ↑ Jun 2016 | |
| | WA3 | Ashland Ave. & C.J. Mains | Chicago | NS | NS | - | - | - | - | X | | |
| | WA4 | BNSF Horseshoe | Chicago | BNSF/CN/NS/CSX | BNSF | - | - | - | X | - | | |
| | WA5 | Corwith Tower | Chicago | BNSF/CN/Amtrak/Metra | BNSF | - | - | - | - | X | Jun 2009 | |
| | WA7 | Brighton Park | Chicago | NS/CSX/CN/Amtrak/Metra | NS | - | X | - | - | - | | |
| | WA10 | Blue Island Jct. | Blue Island | CN/CSX | CSX | - | - | - | - | X | Sep 2013 | |
| WA11 | Dolton Interlocking | Chicago / Dolton / Riverdale | IHB/CSX/UP/Amtrak | CSX | - | - | X | - | - | | | |
| PASSENGER CORRIDORS | P1 | 63rd & State | Chicago | Metra/NS | Metra | - | - | - | - | X | May 2016 | |
| | P2*** | 74th Street | Chicago | BRC/Metra/NS | Metra | - | X | - | - | - | | |
| | P3*** | 75th Street | Chicago | BRC/CSX/NS/Metra | Metra | - | X | - | - | - | | |
| | P4 | Grand Crossing | Chicago | NS/Amtrak | NS | - | X | - | - | - | | |
| | P5 | Brighton Park | Chicago | CN/Amtrak/Metra | Metra | X | - | - | - | - | | |
| | P6 | Canal | Summit | CN/Amtrak/Metra | Metra | - | X | - | - | - | | |
| | P7 | Chicago Ridge | Chicago Ridge | Metra/IHB | Metra | X | - | - | - | - | | |
| TOWER PROJECTS | T1 | 21st Street | Chicago | Amtrak/Metra | Amtrak | - | - | - | - | X | Feb 2005 | |
| | T2 | Blue Island Jct. | Blue Island | CN | CN | - | - | - | - | X | Aug 2014 | |
| | T3 | Roundout | Lake Forest | CP/Metra/Amtrak | CP/Metra | X | - | - | - | - | | |
| | T4 | A-5 | Chicago | CP/Metra/Amtrak | CP/Metra | X | - | - | - | - | | |
| | T5 | B-17 | Bensenville | CP/Metra | CP/Metra | X | - | - | - | - | | |
| | T6 | Calumet Tower (IN) | Indiana / Chicago | IHB | IHB | - | - | - | - | X | Mar 2013 | |
| | T7 | 16th Street | Chicago | Metra/Amtrak | Metra | X | - | - | - | - | | |
| | T8 | Gresham | Chicago | Metra | Metra | - | - | - | - | X | Jan 2010 | |
| | T9 | Blue Island | Blue Island | Metra | Metra | X | - | - | - | - | | |
| | T10 | Kensington | Chicago | Metra/NICTD/Amtrak | Metra | - | - | - | - | X | Jan 2010 | |
| | T11 | Hick (IN) | Indiana / Chicago | NS/Amtrak | NS | - | - | - | - | X | Jul 2010 | |
| | T12 | Deval | Des Plaines | UP/Metra | UP | - | - | - | - | X | May 2005 | |
| GRADE SEPARATION PROJECTS | GS1 | 63rd St / Harlem Ave | Chicago | BRC | IDOT | - | X | - | - | - | | |
| | GS2 | Central Ave / 54th St | Chicago | BRC | IDOT | - | X | - | - | - | | |
| | GS3a | Morgan St / Pershing Road | Chicago | NS | CDOT | - | X | - | - | - | | |
| | GS4 | Central Ave | Chicago Ridge / Oak Lawn | IHB | IDOT | X | - | - | - | - | | |
| | GS5a | Grand Ave | Franklin Park | IHB/CN/Metra | IDOT | - | - | - | - | X | Sep 2007 | |
| | GS6 | 25th Ave | Melrose Park / Bellwood | UP/Metra | IDOT/local | - | - | - | X | - | ↑ Oct 2012 | |
| | GS7 | Belmont Rd | Downers Grove | BNSF/Metra/Amtrak | Metra | - | - | - | - | X | | |
| | GS8a | 5th Ave | Maywood | UP/Metra | IDOT | X | - | - | - | - | | |
| | GS9 | Archer Ave / Kenton Ave | Chicago | BRC | CDOT | - | X | - | - | - | | |
| | GS10 | 47th St / East Ave | LaGrange / McCook | IHB | IDOT | X | - | - | - | - | | |
| | GS11 | Columbus Ave / Maplewood Ave | Chicago | BRC | CDOT | - | X | - | - | - | | |
| | GS12 | 1st Ave | Maywood | UP/Metra | IDOT | X | - | - | - | - | | |
| | GS13 | 31st St | LaGrange Park | IHB | IDOT | X | - | - | - | - | | |
| | GS14 | 71st St | Bridgeview | CSX | IDOT/local | - | - | - | - | X | Nov 2013 | |
| | GS15a | 130th St / Torrence Ave | Chicago | NS/NICTD | CDOT | - | - | - | - | X | Jul 2015 | |
| | GS16 | Irving Park Rd | Bensenville | CP | IDOT | - | - | - | X | - | ↑ | |
| | GS17 | Western Ave | Blue Island | CSX | IDOT | X | - | - | - | - | | |
| GS18 | Harlem Ave | Berwyn / Riverside | BNSF/Metra/Amtrak | IDOT | X | - | - | - | - | | | |
| GS19*** | 71st St / Bell Ave | Chicago | CSX | IDOT | - | X | - | - | - | | | |
| GS20 | 87th St / Rockwell St | Chicago / Evergreen Park | CSX | CDOT | X | - | - | - | - | | | |
| GS21a | 95th St / Eggleston Ave | Chicago | UP/Amtrak | CDOT | - | X | - | - | - | | | |
| GS22 | 115th St | Alsip | CSX | IDOT | X | - | - | - | - | | | |
| GS23a | Cottage Grove | Dolton | IHB/CSX | IDOT | X | - | - | - | - | | | |
| GS24 | Maple Ave | Brookfield | BNSF/Metra | IDOT | X | - | - | - | - | | | |
| GS25 | Roosevelt Road | West Chicago | UP/Metra | IDOT | - | - | - | - | X | Jul 2015 | | |
| Other | Common Operational Picture | Chicago and suburbs (Chicago Terminal District) | All Railroads | | | - | - | - | - | X | May 2015 | |
| Other | Viaduct Improvement Program | Chicago (various locations) | various | CDOT | | - | - | - | X | ↑ | | |
| Other | Grade Crossing Safety Program | Suburbs (various locations) | various | IDOT/CDOT | | X | - | - | - | - | | |
| Total Projects | | | | | | 19 | 13 | 4 | 7 | 27 | | |

Tower Projects which impact Hiawatha not yet complete

Grade Crossing construction projects created need to hold trains in Glenview during EA assessment inflating need for side track

* Projects B4 and B5 are linked for the purposes of environmental review and design/construction.
 ** Projects B9 and EW1 are linked for the purposes of environmental review and design/construction.
 *** Projects P2, P3, EW2, and GS19 are linked for the purposes of environmental review and collectively known as the "75th Street Corridor Improvement Project".
 † These projects are not yet complete but have secured a full funding commitment (from a combination of federal, state, local, and/or railroad sources) to advance through construction completion.



APPENDIX

CLASS I PERFORMANCE

Train operation through Chicago is a complicated process. The performance chart for the CP passenger rail operation is provided by Amtrak in their monthly performance reporting, details about delays are attributed to reason codes. The red line illustrates freight train interference as a delay trend. These delays, along with slow orders and signal delay reflect network disruption created by CREATE construction projects.

Canadian Pacific Delay Type 2011-2016

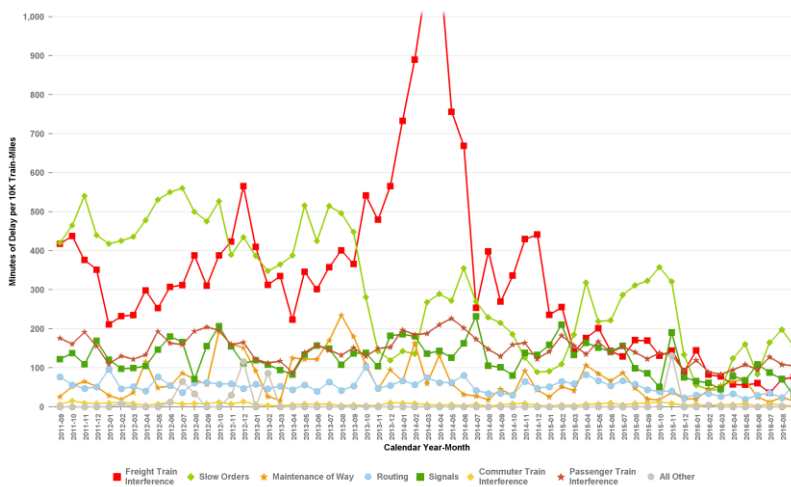


Figure 2 Source Amtrak Monthly Performance Report September 2016
Union Pacific Delay Type 2011-2016

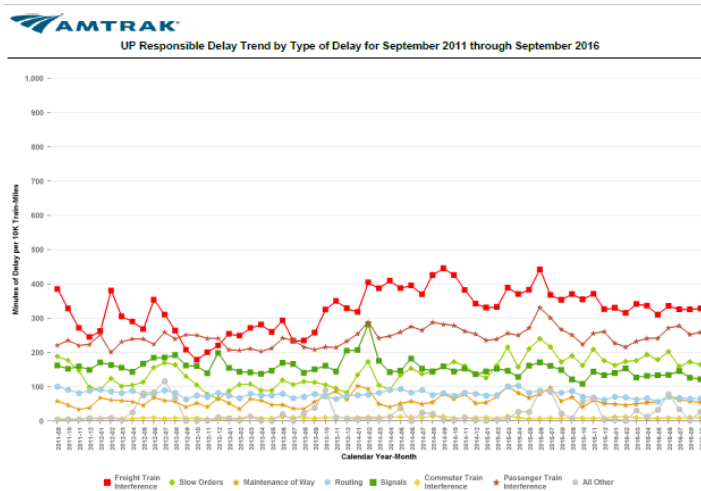
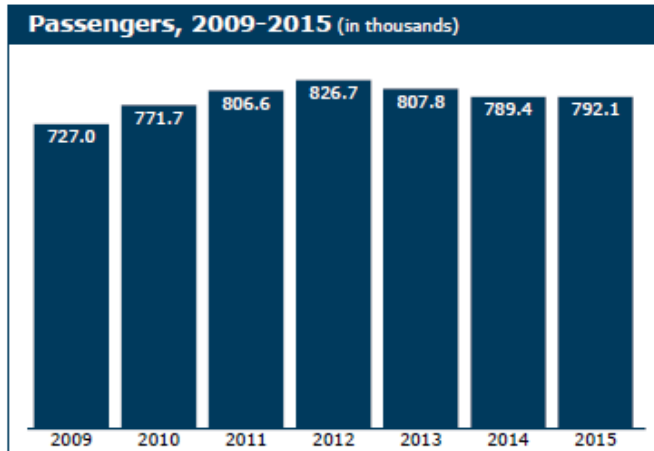


Figure 3 Source Amtrak Monthly Performance Report September 2016

APPENDIX

Amtrak fact sheet: Hiawatha service



Quick recap, 2015

| | Coach | Business | Total |
|--------------|----------|----------|----------|
| Passengers | 792,103 | | 792,103 |
| Average trip | 80 miles | n/a | 80 miles |

Top city pairs by ridership, 2015

| | |
|--|-------|
| 1. Chicago, IL - Milwaukee, WI | 86 mi |
| 2. Chicago, IL - Milwaukee Airport, WI | 78 mi |
| 3. Chicago, IL - Sturtevant, WI | 62 mi |
| 4. Glenview, IL - Milwaukee, WI | 68 mi |
| 5. Milwaukee, WI - Sturtevant, WI | 24 mi |
| 6. Glenview, IL - Milwaukee Airport, WI | 60 mi |
| 7. Chicago, IL - Glenview, IL | 18 mi |
| 8. Glenview, IL - Sturtevant, WI | 44 mi |
| 9. Milwaukee Airport, WI - Milwaukee, WI | 8 mi |
| 10. Milwaukee Airport, WI - Sturtevant, WI | 16 mi |

Top city pairs by revenue, 2015

| | |
|--|-------|
| 1. Chicago, IL - Milwaukee, WI | 86 mi |
| 2. Chicago, IL - Milwaukee Airport, WI | 78 mi |
| 3. Chicago, IL - Sturtevant, WI | 62 mi |
| 4. Glenview, IL - Milwaukee, WI | 68 mi |
| 5. Glenview, IL - Milwaukee Airport, WI | 60 mi |
| 6. Milwaukee, WI - Sturtevant, WI | 24 mi |
| 7. Chicago, IL - Glenview, IL | 18 mi |
| 8. Glenview, IL - Sturtevant, WI | 44 mi |
| 9. Milwaukee Airport, WI - Milwaukee, WI | 8 mi |
| 10. Milwaukee Airport, WI - Sturtevant, WI | 16 mi |

Note: Chicago is Amtrak's east-west gateway.

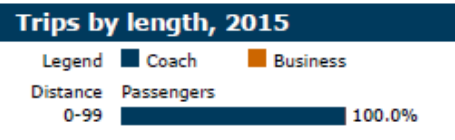


505 Capitol Ct NE #300
Washington, DC 20002
(202) 408-8362
www.narprail.org

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At a glance

- Part of Amtrak's State Supported sector
- Multiple trains daily: 5 cities in 2 states
- Population of service area
 - Within 25 miles: 8,516,599
 - Within 50 miles: 11,402,058
- Longest segment traveled: 86 miles
Chicago, IL - Milwaukee, WI



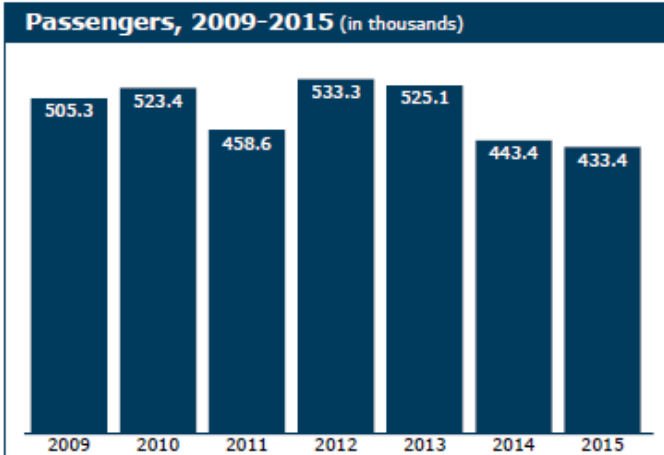
Activity by station

| | 2013 | 2014 | 2015 |
|-------------------|---------|---------|---------|
| Chicago | 742,147 | 732,438 | 736,536 |
| Glenview | 59,393 | 52,677 | 51,492 |
| Milwaukee | 579,871 | 563,531 | 564,664 |
| Milwaukee Airport | 160,254 | 159,869 | 157,042 |
| Sturtevant | 74,031 | 70,341 | 74,472 |

Ridership activity by station has fallen at Glenview and the Milwaukee Airport. These locations are extremely sensitive to transit times. To grow ridership at these stations 110 MPH rail service is essential to compete with new I-94 highway capacity projects.

APPENDIX

Amtrak fact sheet: Empire Builder service



Quick recap, 2015

| | Coach | Sleeper | Total |
|-----------------------|-----------|------------|-----------|
| Passengers | 357,200 | 76,182 | 433,382 |
| Average trip | 609 miles | 1263 miles | 724 miles |
| Average fare | \$ 75.00 | \$306.00 | \$116.00 |
| Average yield, per mi | 12.3¢ | 24.2¢ | 16.0¢ |

Top city pairs by ridership, 2015

| | |
|--------------------------------|---------|
| 1. Chicago, IL - St. Paul, MN | 418 mi |
| 2. Chicago, IL - Seattle, WA | 2205 mi |
| 3. Chicago, IL - La Crosse, WI | 281 mi |
| 4. Pasco, WA - Portland, OR | 231 mi |
| 5. Portland, OR - Spokane, WA | 377 mi |
| 6. Chicago, IL - Portland, OR | 2256 mi |
| 7. Chicago, IL - Winona, MN | 308 mi |
| 8. Minot, ND - St. Paul, MN | 522 mi |
| 9. Seattle, WA - Spokane, WA | 326 mi |

Top city pairs by revenue, 2015

| | |
|-----------------------------------|---------|
| 1. Chicago, IL - Seattle, WA | 2205 mi |
| 2. Chicago, IL - Portland, OR | 2256 mi |
| 3. Chicago, IL - St. Paul, MN | 418 mi |
| 4. Chicago, IL - Whitefish, MT | 1626 mi |
| 5. Chicago, IL - East Glacier, MT | 1547 mi |
| 6. Seattle, WA - St. Paul, MN | 1787 mi |
| 7. Portland, OR - St. Paul, MN | 1838 mi |
| 8. Chicago, IL - Spokane, WA | 1879 mi |
| 9. Seattle, WA - Whitefish, MT | 579 mi |

Note: Chicago is Amtrak's east-west gateway.



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At a glance

Part of Amtrak's Long Distance sector

Daily service: 46 cities in 8 states

Population of service area

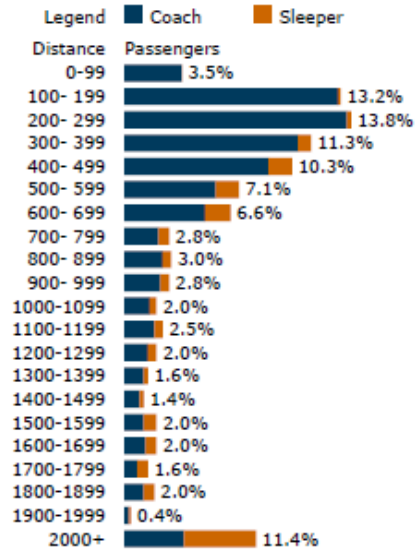
Within 25 miles: 14,132,550

Within 50 miles: 23,987,679

Longest segment traveled: 2,256 miles

Chicago, IL - Portland, OR

Trips by length, 2015



The Empire Builder is losing significant ridership. Two of the top three city pairs for this service are Midwest destinations (St. Paul, MN and La Crosse, WI) which would benefit from 110 MPH service.