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*As part of public engagement activities related to the Chicago-St. Louis High Speed Rail Corridor project, the Illinois Department of Transportation (IDOT) offered the public the opportunity to comment on its plan. A public meeting was held in Springfield on Oct. 7, 2009, where comments could be submitted. The Springfield-Sangamon County Regional Planning Commission (SSCRPC) submitted comments to IDOT at that time.*

*Since it has been to policy of the Commission to provide the public with access to its analytic work, this document includes the comments submitted by the SSCRPC to IDOT on Oct. 7. The documents referenced in the comments can be found on the SSCRPC website.*

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The Springfield-Sangamon County Regional Planning Commission (SSCRPC) is taking this opportunity to comment on the Illinois Department of Transportation's proposal for high-speed inter-city passenger rail between St. Louis and Chicago (HSR 20010000239). As the joint planning agency for the City of Springfield and Sangamon County, as well as the Metropolitan Planning Organization for transportation planning in the region through the Springfield Area Transportation Study (SATS), it is the responsibility of the SSCRPC to assist local officials in the identification of potential problems and opportunities that might arise from contemplated local, state or federal programs and projects.

While we see great opportunities in high speed rail (HSR) for the Springfield area, we believe that the *Tier 1 Service Level Environmental Assessment (EA)* recently submitted to the Federal Railroad Administration, and the *Final Environmental Impact Statement (EIS)* approved in January of 2003 upon which the environmental assessment is based, are inadequate in supporting the project proposal. We come to this conclusion for both general and specific reasons that will be briefly addressed below. We would note that while the EA includes the SSCRPC in its distribution list (EA p. 6-2), the Commission did not receive a copy from the agency and therefore has only had a short time to review it since it was made available as part of the state's HSR proposal. For this reason our comments should not be considered complete and additional comments may be made in the future.

We attach our report *Initial Consideration of Planning Issues Associated with High Speed Rail and Increased Freight on Springfield's 3<sup>rd</sup> Street Rail Corridor* (July 20, 2009) [Attachment A] as additional commentary concerning the proposal to use this corridor through Springfield that should be addressed in any response to our comments.

In general, we believe that the new EA and the previous EIS are flawed because they did not adequately consider alternative segments along the preferred corridor and then *fully* consider these segments as options in light of their comparative impacts on the surrounding community. This, of course, relates to the consideration of Springfield's 10<sup>th</sup> Street rail corridor as a relevant option to use of the 3<sup>rd</sup> Street line. We believe that the new EA demonstrates the need for alternate segments along the St. Louis-Chicago corridor to be considered. We found such consideration in the EIS of other competing states, such as the one prepared for the Florida High Speed Rail Authority's Tampa-Orlando route.

While the clear purpose of an EIS or EA is to consider the impact of a proposed project in context with the surrounding area, in the case of HSR identifying the pros and cons of route and build options, the review of the Springfield alternatives in Section 2.3.2 of the EA seems to center around three basic contentions rather than comparative findings of fact. Those appear to be that: the 2005 City of Springfield study of railroad consolidation did not take into account the magnitude of future intercity passenger and Union Pacific freight service; the 3<sup>rd</sup> Street corridor is available for the project and could be used; and the implications for the railroads of using one corridor rather than the other is more relevant to the consideration of route options than is the impact of this use on the surrounding area.

First, while the City's 2005 study did not consider additional high speed passenger trains and freight along a two-track corridor, we must make note of the fact that neither did IDOT's 2003 EIS. The 2003 EIS dealt only with increased passenger use, absent any consideration of additional freight, and only on a one-track corridor. Some of the implications of additional track capacity are addressed in Attachment E. We believe that the additional rail use proposed, which is far different from that proposed in 2003, calls for a new EIS that would contrast and compare both Springfield route options, leading to a recommendation as to the corridor that would have the least impact on the surrounding area. This has not been done, and the new EA does little to rectify this situation, leading us to believe that the EA is not appropriate to the purpose of assessing the proposed project's impact. This leads us to the second item.

Clearly the 3<sup>rd</sup> Street corridor is available for use, but the purpose of an EA or EIS is not to simply assess which corridor would be easier for the project's proposer or any fund recipients. If that were the ultimate purpose, an EA or EIS would be of marginal value. The fact that the 3<sup>rd</sup> Street corridor has been used for many years or had two tracks in the past does not mean that it has less impact on the surrounding area than the use of the 10<sup>th</sup> Street one for the same purpose. I attach several studies conducted by the SSCRPC that point out not only basic environmental issues pertaining to the 3<sup>rd</sup> Street corridor, but several that compare the two corridors and find that: fewer residential properties would be affected by the 10<sup>th</sup> Street corridor than the 3<sup>rd</sup> Street corridor [Attachment C]; use of the 10<sup>th</sup> Street corridor appears to cause fewer problems for traffic movement than would the use of 3<sup>rd</sup> Street [Attachments B & F]; and that fewer critical and community facilities would be affected by the use of 10<sup>th</sup> Street rather than 3<sup>rd</sup> [Attachment G]. Our preliminary review even indicates that 10<sup>th</sup> Street would be more amenable to mitigation efforts to improve traffic flow than those proposed for 3<sup>rd</sup> Street [Attachment D].

As to the last contention, that it could be more difficult for the railroads to use the 10<sup>th</sup> Street rather than 3<sup>rd</sup> Street corridor, current information has been presented to IDOT

and the railroads by Springfield and Sangamon County officials that suggests that this is not the case. Even so, we contend that while the impact on rail traffic is a reasonable consideration in any EA or EIS, it is not the sole criterion for route selection. For example, while EA section 2.3.2.3, addressing the 3<sup>rd</sup> Street alternative, opines that in contrast to 10<sup>th</sup> Street “no new structures would be required, minimizing impacts during the track restoration”, it makes no comment concerning the nine overpasses and one underpass proposed to mitigate vehicular traffic problems associated with additional rail use of the 3<sup>rd</sup> Street corridor.

It would appear prudent to us to consider the implications of the use of individual, alternative route segments, taking into account impact on both the railroads *and* the communities that lie along their routes, selecting the one with the least quantifiable impact. The lack of such review is evidenced by the lack of data and analysis in both the EIS and EA comparing and contrasting Springfield’s alternate routes and the uses and structures proximate to both. We believe that community interests should be at least of equal, if not greater, importance to the State when preparing an EA or EIS, and should not be out-weighted by proposer or project recipient interests. We do not find that this was effectively done in either the 2003 EIS or the 2009 EA.

This is demonstrated in some specific items in regard to Springfield that can serve as examples.

Section 3.1.3 of the EA addresses noise and vibration. In evaluating the section that would include Springfield (Joliet – St. Louis), the EA appears to limit its assumptions to “nine round trips of steel wheel trains per day (17 day, 1 night trips) running on continuously welded rail at speeds up to 110 miles per hour between stations.” We believe that this assumption is flawed for two reasons.

First, we would note that this assessment includes only the proposed passenger trains and does not include the additional 20+ freight trains reported in the EA as being generated because of the UP facility in Joliet. Second, it assumes only freely moving fast trains.

If segment options, such as both Springfield’s 3<sup>rd</sup> Street and 10<sup>th</sup> Street corridors, had been considered in the EA rather than large sections of the entire route, such as Joliet to St. Louis, the effect of lower speeds through urban areas would be considered. Generally ground vibration increases with train speed. That is why the 2003 EIS notes that passenger trains cause more vibration than freights because passenger trains move at higher speeds. But as the trains move at lower speeds, it takes them longer to clear an area generating more noise and vibration over a longer period of time. The magnitude of the vibration may have a different effect on structures than the length of time the vibration is present, its duration, but the duration of the vibration appears to have more effect on technological equipment, such as the diagnostic equipment located in the Mid-Illinois Medical District that is bisected by Springfield’s 3<sup>rd</sup> Street rail line. We would refer the Department to studies done for the Mayo Clinic and the University of Maryland that addressed such matters related to similar facilities.

Also, if impact on local segments had been fully considered, the EA and EIS would have addressed the effect of vibration caused by train breaking rather than just the vibration caused by freely-moving trains. We understand that breaking trains cause more noise and vibration than do freely-moving trains. As the 3<sup>rd</sup> Street corridor runs through the

Mid-Illinois Medical District and a very dense residential area with a number of fragile structures (including historic properties as well as buildings more than 50 years old), the impact of vibration caused by breaking cannot be underestimated. This is particularly the case if the passenger trains are to be served by the existing Amtrak station (or any site proximate to it), as the EA proposes. In that case the primary breaking area for passenger trains moving into the station from the north will be through the Medical District.

Section 3.1.4 addresses visual resources. We note that visually sensitive resources are defined as those that are important for scenic, historic or recreational reasons. However the only resource noted in this section pertaining to Springfield is the existing Amtrak station. While this may be a visual resource to some, we believe that it pales in comparison to other structures along this line that go unmentioned. The Dana-Thomas House and the State Capitol are just two examples of structures along the 3<sup>rd</sup> Street corridor that are important for scenic, historic or recreational reasons. The SSCRPC's report on critical and community facilities along the 3<sup>rd</sup> and 10<sup>th</sup> Street rail lines [Attachment G] identifies many others. If the EIS and EA addressed optional route segments through Springfield, rather than the entire line, we believe that these visual resources would have been better noted and reported.

Section 3.3.1 considers transportation impacts, including additional impacts to vehicular operations in 3.3.1.3. As with other parts of the EIS and EA, no assessment of individual segments is included. We believe that if they had been, the differentiation that the SSCRPC found related to vehicular traffic for both Springfield corridors would have been identified. Our preliminary study found the 3<sup>rd</sup> Street corridor to have a more systemic and negative effect on traffic patterns than did the use of the 10<sup>th</sup> Street corridor [Attachments B & F] *ceteris paribus*. Based upon our review of the Sangamon County travel demand model output, we came to the conclusion that the model's output underestimates the *negative* effect on traffic caused by additional delays along the 3<sup>rd</sup> Street corridor, and also underestimates the *positive* effect on traffic of using the 10<sup>th</sup> Street one.

We must also mention our concern about impact on pedestrian traffic, which we could not find addressed by the EA at all out-side of some very limited comments concerning safety. We believe that this is a significant missing component in the EA given that the Preferred Route crosses many urban areas, including some densely developed ones. This is particularly troubling in regard to the EA's contention that Springfield's 3<sup>rd</sup> Street corridor is the best option. This corridor is proximate to 42 medical facilities, 76 government facilities, 10 schools and educational facilities, and three senior high-rises, all of which generate significant pedestrian traffic [Attachment G]. It is also proximate to a residential facility that is the home of a large number of disabled individuals (Near North Village). We are concerned not only about the project's impact on pedestrian movement and access for our disabled, but troubled by the fact that we could not find these impacts addressed in the EA at all. We believe that this is because the EA and the previous EIS did not address route segments in any detail, preferring to look at the entirety of the route.

Section 3.3.1.4 addresses intermodal connections. The commentary here related to Springfield only considers the current 3<sup>rd</sup> Street rail station, as the EA assumed existing Amtrak stations would be used. The EA therefore overlooks existing plans to build a multi-modal rail-public transit facility in Springfield, and additionally overlooks the fact

that the additional rail traffic contemplated would make it extremely difficult to schedule buses if the current Amtrak station on the 3<sup>rd</sup> Street corridor is used. This is largely due to the fact that the impact of the additional freight traffic is not considered. Since freight trains are unscheduled, bus marshalling is difficult at this location as freight trains may disrupt bus schedules as well as vehicular and pedestrian access to the site. This problem is exacerbated at the 3<sup>rd</sup> Street Amtrak site because of the surrounding one-way streets. In addition, road mitigation proposed for the area would effectively leave the area “landlocked” and without sufficient road access [Attachment D].

We must note in passing that in section 3.5.1 (Secondary Impacts) the EA notes that the Preferred Alternative would have some positive indirect impacts. Included is the stimulating of transit oriented development (TOD) in the vicinity of stations. While this may be true in other areas, we believe that it is much less so along Springfield’s 3<sup>rd</sup> Street corridor due to the nature of the existing development in the area, proximity to much State-controlled or owned property, and the likelihood that the properties in and around the existing station would become landlocked due to the proposed road mitigation. At this point in our review, we believe that properties along the 10<sup>th</sup> Street corridor would be much more amenable to TOD and in greater need of the economic development benefits that would arise from it. The SSCRPC is currently researching this matter and hopes to provide an analytic review in the near future.

Section 3.3.2.1 deals with existing conditions relative to community services and facilities. Again, no attempt is made to consider segments of the corridor or alternative options. We attach a report prepared by the SSCRPC that looks at critical and community facilities along both Springfield’s 3<sup>rd</sup> and 10<sup>th</sup> Street corridors [Attachment G]. We find a greater concentration of such facilities along the 3<sup>rd</sup> Street corridor than the 10<sup>th</sup> Street one. While some of these uses lie between the two corridors and are therefore affected by both, a review of the maps included in the report will show that these uses lie west rather than east of the 10<sup>th</sup> Street corridor, and are therefore more dense and proximate to the 3<sup>rd</sup> Street one.

We believe that if an attempt had been made to consider alternative segments, this outcome would have been noted in both the EIS and the EA. It is notable that little specific attention was given to urban areas in the EA, which is surprising in that community service facilities (such as schools, medical centers, fire and police stations, as well as other governmental and service facilities) are much more numerous and dense in central urban areas such as that which contains Springfield’s 3<sup>rd</sup> Street corridor.

Section 3.3.4 addresses public health and safety. It again addresses the route from Chicago to St. Louis as a whole without considering the implications of the route for particular segments. This is a particularly critical problem for Springfield as the 3<sup>rd</sup> Street corridor bisects the City’s medical district and separates the two hospitals that share the region’s only Class 1 trauma center. The SSCRPC’s attached report on planning issues associated with the use of the 3<sup>rd</sup> Street corridor addresses the barrier to emergency access to the hospitals that the use of this corridor would create [Attachment A].

Section 3.3.6 addresses cultural resources, such as historic structures. Because of its history, Springfield contains many such resources. However the impact on these structures appears to be minimized in the EA because of the evaluative criteria used. Adverse effects would primarily arise only if a structure were to be in some way physically damaged by the project or removed from its location, or would be affected by

station development/redevelopment. Of course such structures and sites may be affected in other ways. We note that the EA includes four previously evaluated cultural resources in Table 3-26, but does not address the scores of Lincoln-era and other fragile 50+ year old structures along the 3<sup>rd</sup> Street line. We must agree with the National Trust for Historic Preservation in expressing our concerns about the impact of the project on historic structures, particularly those along the 3<sup>rd</sup> Street corridor.

Finally, Section 3.5 addresses secondary and cumulative impacts. It is interesting in that the EA finds little negative secondary or cumulative impacts. We believe that this is because: (a) individual route segments were not addressed in any useful detail; (b) secondary effects of mitigation were not addressed [see Attachment D for examples]; (c) the EA did not consider the impact on existing local plans; and (d) no cost-benefit analysis is provided. While the first two items were considered previously, we would like to draw some attention to the last two.

We believe that the absence of any consideration of existing local plans in the EA is a significant flaw. We find these plans nowhere discussed in the EA or its predecessor EIS. For example, no consideration appears to have been given as to the impact of additional rail use on the Mid-Illinois Medical District's master plan, funded and prepared for this State entity in 2005. In addition, no attention is given to the Springfield Area Transportation Study's (SATS) 2030 Long Range Transportation Plan (March 2005) that notes on page 34 that SATS has always supported the concept of consolidating the railroad corridors, and specifically cites as a planned improvement project:

Railroad Corridor Unification proposes to relocate the 3<sup>rd</sup>, 10<sup>th</sup>, and 19<sup>th</sup> Street railroad corridors into one unified corridor. Significant benefits to Springfield would include: a) increase safety and reduce traffic congestion by eliminating the number of at-grade crossings; b) increase the response time of emergency vehicles; c) provide recreational opportunities on the abandoned corridors; and d) revitalize downtown Springfield as outlined by the Regional/Urban Design Assistance Team (R/UDAT).

It is our understanding that acceptable EIS and EA must consider existing plans and the effect of the proposed project on these plans. We do not find this to be the case with the EIS, which may be explained by the fact that many of these plans were not in place many years ago when the EIS was done. To us, this provides an additional rationale for an updated EIS.

We can find no reason, however, as to why these existing plans were not addressed in the new EA, particularly in regard to secondary and cumulative impact. While we could have drawn attention to other plans that are in place that would be affected by the selected HSR route, we particularly chose these two plans because they were either done for a State entity and/or IDOT was involved in the plan's development. In any event, the implications of the HSR corridor selection should have been addressed in the EA, and we believe that they must be.

Second, while the HSR proposal addresses project costs, no attempt is made in the EA to estimate the nature and amount of "rent seeking" associated with the project [see Attachment A]. It appears to us that while the benefits of HSR to the State and localities are significant, the project also entails unknown costs arising from additional rail use (particularly for freight) that will ultimately be externalized as a cost to local governments

and local economies. In economics the externalization of such costs is sometimes termed “rent seeking”. Rent seeking occurs when income accrues to a person, organization or company – such as a railroad – due to the extraction of uncompensated value from others.

In our analysis of use of the 3<sup>rd</sup> Street corridor for HSR, we found examples where additional costs may be shifted onto individuals, property owners, businesses and municipalities, because of the corridor’s unique location and surrounding land uses. With a project of the scale of HSR, we believe these costs should be considered during planning and taken into account in any analysis of impact.

Again, we have just recently been afforded the opportunity to review the EA and time prevents us from providing additional detail regarding our concerns. However, we continue to make the following recommendations:

- 1) The HSR project as currently contemplated is significantly different from that considered in the 2003 EIS. A new EIS needs to be done due to these changes.
- 2) Where segment options exist – such as in the case of Springfield which has three rail corridors running north-south – these options need to be considered in detail, and then compared and contrasted to identify the option that has the least impact on the surrounding community.
- 3) Existing local plans should be considered in any review, taking into account the recommendations contained in these plans and the assessment of the impact of the individual corridor options. As segments are compared and contrasted, particular attention should be given as to which corridor option tends to advance existing plans rather than retard them. Immediate and long-term impacts related to the plans must be considered. We believe that the consideration of these other existing plans is one of the reasons why Federal transportation funding requires continuous, comprehensive and cooperative planning.
- 4) As part of this review, the Context Sensitive Solutions process should be utilized for community input and option assessment.
- 5) Due to the scale of the project and the implications of route choice, a cost/benefit analysis of externalities arising from the project options should be considered. While one must know the cost of the project itself in order to craft a proposal, secondary and external costs often arise from a project. These costs should be assessed so that the true value of route options can be considered.

The Illinois high speed rail project is sometimes spoken of as a “century project”, as these opportunities do not arise very often. The SSCRPC believes that high speed rail does offer significant benefits to Springfield as well as Illinois. However we wish to ensure that once the project is completed it does not leave a century of problems that the citizens of Springfield and Sangamon County must address on their own.

The SSCRPC will continue to research questions and issues related to HSR and corridor choice and as they are completed make them available on our website (sscrpc.com). If we can be of any assistance to the Department in this matter, please let us know. The SSCRPC meets twice each month with representatives of IDOT through the Springfield Area Transportation Study, which provides an on-going forum for continuous, comprehensive and cooperative transportation planning.

Sincerely,

E. Norman Sims  
Executive Director

Attachments: A – An Initial Consideration of Planning Issues Associated with High Speed Rail and Increased Freight on Springfield’s 3<sup>rd</sup> Street Rail Corridor (July 20, 2009).  
B – Preliminary Report of Impacts on Travel Associated with Increased Freight Traffic on the 3<sup>rd</sup> Street rail Corridor (Aug. 5, 2009).  
C – Effect of Increased Freight Trains on Property Values Along Springfield’s 3<sup>rd</sup> Street Rail Corridor (Aug. 20, 2009; update, Sept. 2, 2009).  
D – A Review of Proposed Mitigation Activities on Springfield’s 3<sup>rd</sup> Street Rail Corridor for Planning Purposes (Aug. 25, 2009).  
E – Assessing Train Corridor Capacity (Sept. 16, 2009).  
F – Preliminary Report of Impacts on Travel Associated with Increased Train Traffic Following Consolidation of the 3<sup>rd</sup> Street and 10<sup>th</sup> Street Rail Corridors (Sept. 25, 2009).  
G – Critical and Community Facilities Near Springfield’s 3<sup>rd</sup> and 10<sup>th</sup> Street Rail Corridors (Sept. 30, 2009).

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The Springfield-Sangamon County Regional Planning Commission (SCRPC) serves as the joint planning body for Sangamon County and the City of Springfield, as well as the Metropolitan Planning Organization for transportation planning in the region.

The Commission has 17 members including representatives from the Sangamon County Board, Springfield City Council, special units of government, and six appointed citizens from the city and county. The Executive Director is appointed by the Executive Board of the Commission.

The Commission works with other public and semi-public agencies throughout the area to promote orderly growth and redevelopment, and assists other Sangamon County communities with their planning needs. Through its professional staff, the SSCRPC provides overall planning services related to land use, housing, recreation, transportation, economics, environment, and special projects. It also houses the Sangamon County Department of Zoning and Building Safety which oversees zoning, building permits and code, and liquor licensing for the County.

The Commission prepares area-wide planning documents and assists the County, cities, and villages, as well as special districts, with planning activities. The staff reviews all proposed subdivisions and makes recommendations on all Springfield and Sangamon County zoning and variance requests. The agency serves as the county’s Plat Officer, Floodplain Administrator, Census coordinator, and local A-95 review clearinghouse to process and review all federally funded applications for the county. The agency also maintains existing base maps, census tract maps, township and zoning maps and the road name map for the county.

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