SSC RPC Springfield-Sangamon County Regional Planning Commission

An Initial Consideration of Planning Issues Associated with High Speed Rail and Increased Freight on Springfield's 3rd Street Rail Corridor

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As the joint planning agency for the City of Springfield and Sangamon County, as well as the Metropolitan Planning Organization for transportation in the region, it is the responsibility of the Springfield-Sangamon County Regional Planning Commission (SSCRPC) to assist local officials in the identification of potential problems and opportunities that might arise from contemplated programs and projects.

With the announcement that the long-awaited High Speed Rail (HSR) project is expected to be located on the 3rd Street (Union Pacific) rail corridor, the SSCRPC staff began to look at some of the unique planning challenges associated with the use of the 3rd Street corridor. Our assessment is based upon our understanding that the improvement of the 3rd Street corridor will generate both additional freight and passenger trains; possibly in excess of 40 trains each day, or an increase of approximately 30 more trains than were estimated to be using the corridor in 2008. It is limited by the fact that little information has been provided to the SSCRPC at this point concerning plans for this project or explanations as to how anticipated local impacts associated with the use of this corridor might be mitigated.

As a planning agency, the Commission customarily deals with such planning issues as: impact on land use and development; environmental impacts; effect on public health and safety; and impact on transportation, including both motorized and non-motorized transport. These areas generally frame our initial review of the local planning challenges that the anticipated use of the 3rd Street rail corridor creates. This preliminary review is intended to help the SSCRPC create an initial local planning agenda based upon anticipated HSR project impacts. It is also to provide initial information for consideration in the development of, and response to, any Environmental Impact Statement (EIS) for this project.

Transportation Planning Challenges

As a general statement, Springfield's center-city is burdened with more rail corridors than most cities of its size. All run north-south, significantly effecting east-west vehicular movement. This problem is exacerbated by the lack of complete east-west arterials in many areas. Additionally these corridors often run through some densely developed areas of the City, and the 3rd Street corridor operates within a particularly dense and largely residential area.

However, the 3rd Street rail corridor also involves unique transportation planning challenges in that this corridor contains more at-grade road crossings, both in total number and per mile, than either the 10th Street or 19th Street corridors. In addition it includes fewer vehicle underpasses per mile than the 10th Street corridor, with at-grade crossings at numerous choke-points in the center-city.

Roads and Highways

To begin to judge the potential impact of additional train traffic on the arterial roadway network, the SSCRPC used its travel demand model (TDM) to assess the effect that a 5-minute per hour delay would have on downtown arterials. The 5-min. delay is being used initially for test purposes because it is consistent with sample counts that include both the time it takes for a single train to clear a crossing after triggering a gate and the time required for vehicles to "un-stack" after a train delay. We believe that a 5-minute delay is conservative in that if 40 trains were to use the corridor each day, this would result in a daily average of 1.67 train delays per hour. Initial tests indicate that a 5-min. per hour delay causes a noticeable deterioration in the level of service on a number of downtown arterials. Additional tests using different scenarios will be done once we can assemble a reasonable sampling of gate closing and vehicle stacking times along the 3rd St. corridor.

This effect on level of service is not surprising and can be expressed in a simple way. Using just the 5-min. average delay per train and assuming 40 trains per day (1.67 trains/hr), yields a loss of 8.5-min. per hour, or 3.4 hours each day that at-grade crossings along the 3rd Street line will be closed due to trains. If the number of trains using this line were to increase to 60, this would result in a per day delay of 5 hours. This is aside from the additional time that Jefferson and Washington streets would be closed due to passenger trains stopping at the Amtrak station if this facility remains in use.

We cannot understate our concern about the impact that additional trains will have in generating transportation delays along a corridor as dense as the 3rd Street one. Keep in mind that a 50 car train, made up of units that average 60 ft. in length, will stretch over 3,000 ft. This is approximately .57 miles, meaning that a single 50 car train would close multiple crossings in the downtown area at the same time. We understand that the freight trains could be in excess of 100 cars, meaning that crossings along a 1.14 mile segment of the corridor would all be closed at the same time. To provide some context, this would mean that as a 50-car train travelling south begins to cross Capital Ave., the Carpenter Ave. crossing is just opening up. Or conversely, as a 100 car train travelling north begins to clear the South Grand crossing, it is beginning to close Washington St. These multiple simultaneous closings would not be mitigated by train speed as they result from train length, and their impact should be considered separately from the impact of the length of time any one crossing might be closed. This significantly complicates the difficulties inherent in modeling the impact that the use of this corridor will have on traffic flow.

Since the TDM does not include neighborhood streets, only arterials, it cannot tell us how a delay might specifically affect these roads. We know that in some cases neighborhood streets are used as "shortcuts" by residents. Our expectation is that a delay might force additional vehicular traffic out of the neighborhoods – off of the shortcuts – and onto the arterials, but the TDM results should somewhat account for this. What is more uncertain is the result that the closure of neighborhood streets necessitated by the HSR might have. In this case local traffic would have to move from local roads to arterials, potentially reducing their level of service further. We will be able to better understand the effect road closures might have once we know which streets might be recommended for closure. The 2003 Chicago-St. Louis high-speed rail project environmental impact statement (EIS)[1] indicated that there would be 3 road closures in Sangamon County, only one of which appears to be in the Springfield urban area: Scarritt Street. But this EIS was only addressing HSR, not HSR in conjunction with additional use for freight, and was limited in the options it considered.

Given the complications caused by the large number of at-grade crossings along the 3rd Street corridor (by our initial count, 26), and the number of at-grade crossings on major downtown arterials, the SSCRPC began to look at the possibility of creating grade separations at these arterial crossings by bringing the roadway above or below the rail line. This appears to generate additional complications for this dense, urban area. For example, the 3rd Street corridor cuts across both Jefferson and Madison streets in downtown Springfield. Both are major one-way arterials, with Jefferson moving traffic from east to west and Madison taking traffic from west to east. To remove the at-grade crossings, both roads would either need to be bridged over the rail line or taken below it. But to do either requires that these roads be sloped for some distance before and after the crossing. Since these two roads run a block apart and parallel to one another, and depending upon the distance on either side of the crossing that a grade change might begin, the end result of such grading would be to leave the properties in between "land-locked" and with little or no access from these arterials. Given how compact the area is, it would be extremely difficult to provide access to the properties from a north-south roadway; there simply does not appear to be enough available space on the lots to consider this approach.

Based upon past experience, it has been suggested that such a grade would most likely need to begin up to one block on either side of the crossing. If this is the case, access would be lost to properties on up to two standard blocks between roadways subject to grade separations. But such an approach becomes even more difficult for shorter blocks than the Jefferson and Madison street ones, or blocks that are bisected with alley-ways that provide access to the structures there.

We also note that since many of these east-west arterials are commercial truck routes, the ability to shorten the grade separation may be especially limited. For example, trucking companies have in the past complained about the grades of the underpasses at both South Grand and 11th Street and Cook and 11th Street as being more steep than they would like. This is aside from any storm water drainage problems (and associated costs) that steeper below-grade crossings might generate. So while changing the grades

[1] U.S. Dept. of Transportation, et al. (2003). *Final Environmental Impact Statement: Chicago-St. Louis High-Speed Rail Project.*

may be possible in some cases, they will not be on a number of the most actively used east-west arterials.

We also initially considered looking at the possibility of reversing the direction of Jefferson and Madison to see if this would provide any assistance, but rejected this option as properties would still be land-locked and this alternative would require major reconstruction at points to the east and west of the 3rd Street corridor where these roads cross-over and become one-way streets.

It might be possible for some of the problems with arterial at-grade crossings to be addressed by taking the rail-line below grade and under the streets. This would require further analysis beyond the means of the SSCRPC. This does seem more feasible than the other alternative, bridging the rail line above the grade, as this would entail a great amount of bridging over quite long distances to meet the grade requirements of rail.

Finally, one must remember that many of the effected arterials (such as Jefferson and Madison) are, as noted above, major commercial truck corridors. Delays along this route will significantly affect their use and scheduling, as it will local package and freight delivery. The impact of road closures, delays and loss of level of service for these routes needs to be seriously assessed.

Pedestrian Safety

The 3rd Street rail corridor is unique in regard to the large number of community and neighborhood facilities adjacent to it as well as the narrowness of its right-of-way. For example, in our initial review we found 7 schools within walking distance (.25 mile) of this corridor and two senior high-rises. This is in addition to large pedestrian uses such as the YMCA and visitor sites such as the Capitol Complex and Dana-Thomas House. The SSCRPC is currently working to develop an initial inventory of these sorts of uses within typical walking distance of the 3rd Street corridor.

The existence of these sorts of uses should not be unanticipated given the primarily residential character of land use along a corridor that lies in an older part of the city. This causes us to make particular note of pedestrian and bicycle safety issues that will be generated by additional use of the corridor by both passenger and freight trains. The 2003 EIS indicates that 6 pedestrian crossings would be closed in Sangamon County, but we were unable to determine where these closings were anticipated to occur so we do not know if any are within the city-center itself.

A related issue is handicapped access. The SSCRPC would need to know where pedestrian-way closures would be implemented in order to assess the effect such closures would have on accessibility. Handicapped accessibility could be limited by other factors than street and pedestrian closures, however. The installation of new gates and other barriers on or near pedestrian ways could have a similar effect, and would need to be assessed on a case-by-case basis. This may result in a particular problem at some at-grade crossings along one-way streets as there may not be enough room in the road right-of-way to move the sidewalk further into the road space in order to provide for

sufficient wheelchair access. This sort of problem is typical to what one might find in a dense, established urban area where there is a need for wheelchair access. The nearness of senior living facilities in the area complicates this problem.

We also do not know at this time what plans Union Pacific might have to restrict pedestrian or bicycle access to the right-of-way, although we can consider some of the implications of such restrictions. For example, the Carpenter to Lawrence right-of-way and the Lawrence and South Grand right of way (in and around the Prescott Bloom Building), are often used by pedestrians. Should this right-of-way be closed, and no alternative pedestrian walkway be provided, we would anticipate either a reduction in use of neighborhood community and commercial facilities, or a change in the behavior of those in the area as they switch from walking to vehicular use. In the first case we would expect a reduced use of neighborhood facilities, with its negative impact on local businesses, and in the second, additional roadway congestion as additional cars are put on local roads.

Multi-Modal Capabilities

One of the critical transportation needs previously identified for the Springfield city-center is a multi-modal transportation facility that would bring together bus, train and other transportation services. The need for, and advantages of, such a facility in downtown Springfield has been addressed in other reports, so will not be further addressed here. What does need to be considered, however, are some of the unique challenges posed to this facility by the use of the 3rd Street rail corridor.

We must begin by assuming that if a new multi-modal facility is developed proximate to the 3rd Street corridor, it would be at or near the existing Amtrak facility. We assume this because we believe that moving the new facility further north or south of this location would decouple it from the Springfield city-center and the primary facilities located there, lead to additional land costs and property acquisition problems, and may negatively affect bus scheduling.

We are currently focusing on planning problems associated with the use of the existing Amtrak facility and the blocks to its immediate north and south, largely because these sites were considered previously.[2] There are, however, significant complications related to the use of this location for bus and passenger traffic. Realize that the blocks in question are currently served and bordered solely by one-way, heavily travelled, streets on three sides: Madison (carrying traffic west-to-east), Jefferson (east-west), Washington (west-east), and 4th Street (south-north). To the west they are, of course, bordered by the rail-line. This appears to create a bus and passenger ingress/egress problem in that at any time a train is moving through the crossings at these locations or stopped at the station, passengers and buses simply could not enter or leave the facility due to traffic back-ups at the crossings. We anticipate that this would have a significant

[2] John Lampros Associates, et al. (1980). *Multi-Modal Transportation Center Feasibility Study.* Springfield, IL: Springfield-Sangamon County Regional Planning Commission; John Lampros Associates and Metro Transportation Group, Inc. (1989). *Feasibility Study: Downtown Transportation Center: Springfield, Illinois.* Springfield, IL: John Lampros Associates, Ltd.

effect on the difficulty of bus scheduling, which will only be exacerbated by additional freight trains, since they do not run on any particular (and known) schedule.

Of course this property would also be adversely affected if above- or below- grade auto crossings were established at Madison, Jefferson and/or Washington, as noted above.

Travel Delay Costs

Ultimately additional trains on the 3rd Street corridor will lead to traffic delays; both for passengers (car and bus) and truck-carried freight. This travel delay has a cost, and in one study of the cost of congestion in the Chicago area this cost was calculated to be in excess of $14.00 per person per commuter hour. Since our expectation is that the use of the 3rd Street corridor by HSR will increase its use for both passenger and freight, travel delay is an additional project cost that must be borne by the public and should be considered in a cost-benefit analysis of the various route options. A time savings for the railroad may be off-set by a time loss for the public and highway freight carriers.

We will address this further below, but it is important to note that the cost of the HSR project is not limited to just costs "internal" to the project; such as new rail lines and rail equipment. Such projects have both external costs and benefits that must be calculated when options are considered. If they are not, associated external costs of the project are simply shifted to others. This becomes a significant planning problem in that those subject to this cost-shifting may not have the resources to address them, or may have to pull resources from other critical needs. Assessing these external costs should be central to any EIS.

Public Health and Safety Planning Challenges

Medical District

Since the 3rd Street rail corridor cuts through the Medical District, dividing it nearly in half, it is important to assess any impacts that additional rail use might have on medical services. As we noted above, additional rail use is anticipated to add delays and increase congestion on local streets; including those in the Medical District. Since the district includes two major hospitals, the SIU School of Medicine, and numerous smaller medical facilities, this will have a day-to-day impact on the movement of patients within the district and affect the operations of proposed patient "circulators" that would operate within the district. But more importantly, it will affect emergency vehicle movement into and within the district.

Currently the two hospitals (St. John's and Memorial) provide the only access to a Level I Trauma Center in the region. Delays of any sort in getting patients to the Trauma Center will critically affect patient care. Access to emergency care would be further complicated by additional freight use of the corridor, as these trains do not operate on any regular schedule. This means that an emergency vehicle coming to the Trauma Center could not know in advance if a train would be scheduled at any particular time,

and thereby know to use some alternate route. It is further complicated by the Trauma Center rotating annually between the two hospitals. Alternate routes would have to be established for both hospitals with approaches from multiple directions. Any alternative that would have to be selected in-route would cause a greater time delay for a critical patient than would be the case if the most direct routes were always available.

We believe that particular attention needs to be given as to how this problem might be resolved or mitigated.

An additional health and safety problem associated with the Medical District will be discussed further below.

Fire Safety

In our initial review of the properties in the city-center that adjoin the 3rd Street corridor, our attention was also drawn to possible fire safety issues. One fire safety issue is direct and similar to the one noted above concerning emergency vehicle access to the hospitals in the medical district. Additional congestion and delays on roadways crossing the rail line, or closed due to the HSR project, will add to delays in the movement of fire equipment. This is not a subtle problem, and may be compounded by the present location of fire houses and the distribution of equipment, as well as the age of many of the structures in the city-center. This problem needs to be assessed by the Springfield Fire Department.

Another problem is more subtle. Many of the properties located along the corridor directly abut the rail right-of-way or lie along alley-ways that abut it. In a sampling of these properties it appears that fire equipment might only serve some of the structures if it were taken down these right-of-ways. However we do not know at the present time if the railroad plans to close or expand any of these right-of-ways, or if the HSR project would create other access problems due to the placement of gates or other barriers that might impede the use of right-of-ways and alleys by fire personnel. The 2003 EIS noted that some right-of-way might be fenced, for example.

Derailment

While one might hope that a derailment would not occur and safety features added to reduce the risk, from a planning perspective this risk must be considered just the same. As the number, length, type and speed of the trains using the 3rd Street corridor increases, it is intuitive that risk of derailment increases as well. The possibility of derailment is particularly troubling from a planning perspective given that the 3rd Street corridor: runs through a relatively dense residential area, it is estimated that there are in excess of 500 residences adjacent to the corridor; bisects the Medical District; is near a number of critical and important public facilities (e.g., the State Capitol, the Supreme Court Building, etc.); and is often quite close to surrounding commercial structures and visitor attractions.

Particular attention in any future EIS needs to be given to not just the anticipated risk associated with additional passenger trains, but that associated with additional freight trains and the cargo they carry. Unfortunately such assessment of increased risk is beyond the current capabilities of the SSCRPC.

We must note, however, the unique planning problems associated with the fact that this line runs through the Medical District. This area includes the city's only urgent care facilities, the vast majority of its in-patient facilities, and a number of residential long-term care and nursing facilities. With increased risk comes the possibility that a freight derailment in the Medical District might not simply affect access to patient care, but even necessitate the relocation of resident patients and medical services if toxic or dangerous materials were involved. We believe that the Springfield police and fire departments should consider the implications of the use of this line to their planning.

Environmental Planning Challenges

Aside from the environmental challenge that a freight train derailment might create given the land uses in and around the 3rd Street corridor, two other environmental problems came to our attention.

Sound

Sound is an environmental factor and was addressed somewhat in the 2003 EIS. What this EIS appears not to consider is the additional freight traffic to be generated as an outcome of the HSR project. One must consider the noise from additional passenger and freight trains in the context of the corridor through which they are expected to pass. The 3rd Street corridor does not run through vacant rural land or a primarily industrial area; it runs largely through a dense residential one. To the extent that land uses along this corridor are not residential, we find that they are not any more amenable to additional rail traffic than residential areas, as they include the Medical District, the central downtown, the Capitol Complex, and associated neighborhood and public venues.

The sound associated with the trains themselves cannot be directly mitigated in any enforceable way, and may increase as their speed increases. We understand that their signaling at crossings could be addressed by making the length of the corridor a "quiet zone". Since the creation of a quiet zone is largely dependent upon the types of gates that are used at crossings, and we do not know what the plans are for these gates, it is difficult for us to assess the option that a quiet zone might offer. We also understand that in most situations a municipality requesting that a quiet zone be created must pay for the needed crossing gates, and we do not know if this would be required if it were to become an aspect of the HSR project.

We do anticipate, however, that if the 3rd Street corridor were to become a quite zone, there would be significant public pressure to create quiet zones along at least the 10th

Street corridor, and possibly the 19th Street one as well. This, we anticipate, would require municipal spending as neither would be a part of the HSR project.

Additional problems related to sound will be addressed below when we consider development and redevelopment planning issues.

Vibration

As with noise, vibration is an inherent environmental problem associated with rail use. It is intuitive that as rail use goes up, vibration will increase. This is true whether or not the increased use is for passenger or freight, for as the 2003 EIS notes, passenger trains may increase vibration even more than freight trains as they often move at higher speeds.

Vibration creates unique problems along the 3rd Street corridor because of the nature of current and planned land uses along this corridor. We have already noted that the current surrounding land uses are primarily residential, but it also includes many older structures that would be particularly susceptible to damage cause by vibration. It also includes more historic and public buildings than the other corridors, making vibration along this route a particular cause for concern.

It is additionally troubling in terms of the impact that vibration may have on facilities and uses in the Medical District. Many of the facilities in that area utilize equipment that is significantly affected by vibration. Moreover, it has long been hoped that this area will provide the engine for future job growth in the region that would depend upon medical technology development. It is the SSCRPC's understanding that additional vibration may conservatively affect technological applications for a block on either side of the corridor. This would mean that approximately six standard-sized city blocks now indicated on the Medical District master plan as suitable for medical or technology-related development would be lost for this use. This would include at least one large site between Madison and Carpenter that had been targeted for this use in the past.

This presents a planning dilemma. If economic growth in the Medical District is dependent upon technologies that would be negatively affected by vibration, this could only be mitigated by moving these uses further from the 3rd Street rail lines. This would cause these uses to be moved more-and-more into the surrounding residential areas that the Medical District and its associated master plan were intended to protect from medical facility encroachment. Conversely, if the residential areas are to be protected from this encroachment, the Medical District as an economic development tool will be significantly limited. It may effectively be limited to uses that involve patient-care alone, but even this could be restricted by the impact of additional vibration.

Air Quality and Environmental Justice

Issues associated with air quality and environmental justice must also be considered in any future planning and the development of a new EIS for the HSR project. The

SSCRPC has just begun to consider these questions. Since Springfield and the surrounding area is an "attainment" area, air quality does not appear to be an immediate issue. However, given the demographics of the area adjacent to the 3rd Street corridor and the fact that much of the land area is currently identified as lying with the U.S. Department of Housing and Urban Development's low-income treatment area, particular attention needs to be given to environmental justice issues.

Development and Redevelopment Planning Challenges

Residential Impacts

As has been noted several times, the 3rd Street corridor includes some very dense residential areas, many of which are already in need of redevelopment. Routes that would be more amenable to additional rail use and its associated environmental and other effects would include less residential or more industrial areas. It is unlikely that the properties along the 3rd Street corridor would ever be converted into a non-residential use even if this were contemplated. To do so would be to anticipate a large industrial or heavy commercial corridor not well served by roads that would run from north to south through the heart of the city. This would not only be difficult to induce but would exemplify very poor land use planning.

With increased rail use along an older residential corridor that is now often a challenge for redevelopment, one might expect additional loss of residential use and redevelopment with an associated decline in land values. Redevelopment might only be possible through the use of large public subsidies and investment.

Conversely, and because of the anticipated location of a multi-modal center located on or around the existing Amtrak station, the effected area would not be able to benefit from any Transit Oriented Development (TOD) that might occur. Research and experience suggests that any TOD would most likely occur adjacent to the multi-modal center, and that even this would be limited by the site itself and the nature of the surrounding uses. To the extent that it would occur, we would anticipate that it would occur to the north of the existing Amtrak station site, further limiting development opportunities associated with the Medical District.

We should also note that our initial assessment of uses along the corridor leads us to believe that the project may have additional, more subtle effects on residential stability that will require a more detailed analysis than we can provide at the present time. For example, there appears to be structures encroaching on railroad property adjacent to the 4th Street crossing. If automatic gates are added to the 4th Street crossing, it is likely that access to two homes would be lost. It may seem like the loss of two homes is an inconsequential problem given the scope of the HSR project, but we do not at this point know how many similar situations will exist, or how the properties on which these lost structures are located will be maintained or used. It is possible that when all of these slight impacts are combined, residential areas may suffer a "death of a thousand cuts", with numerous slight changes along the right-of-way reducing the stability of block faces

if not neighborhoods. This cannot be effectively assessed until more is known about the plans for the corridor.

Economic Development Impacts

We have noted previously the negative effect that we anticipate a more active 3rd Street rail corridor will have on residential life along it as well as development and redevelopment in and around the Medical District. But planning for development and redevelopment of the Springfield city-center should this corridor be used for HSR and associated freight requires some particular attention.

Development and redevelopment in Springfield's downtown is currently restricted by the 3rd Street corridor. This limitation has been noted by previous studies, the most recent being the independent R/UDAT study of the downtown. Because of its location and use, the 3rd Street rail corridor creates a barrier to redevelopment moving west, and creates an additional hurdle for residential redevelopment throughout the downtown. Residential redevelopment is seriously impeded because of the congestion, noise and vibrations caused by rail traffic. The expansion of the use of the 3rd Street corridor would most likely curtail any significant opportunities for residential redevelopment, resulting in a loss of opportunity for new retail-commercial development that would be expected to be drawn to the area in light of additional residential growth.

We must also note that depending upon use of right-of-way and access to it, the project may also have an effect on existing downtown commercial uses. We noted previously when addressing fire safety that many of the structures in the downtown that lie along the corridor are accessed along what appears to be the right-of-way or alleys adjacent to the right-of-way. We do not at this time know whether or not the HSR project would require the expansion of this right-of-way, or whether any gates or barriers would effectively limit access to these properties. A brief review of aerial photographs appears to show that in a number of cases downtown businesses may receive services off of these access points: e.g., dumpsters are shown adjacent to these areas. Should these areas be closed to service for whatever reason, that may leave the business with no way to obtain the service except from the street. This may require zoning changes and/or variances on a case-by-case, parcel-by-parcel basis.

When our attention was drawn to this problem, we also noted that right-of-way and access changes may also affect parking and setbacks. This appears to be true for some residential properties along the corridor as well as commercial properties. This may also generate requests for variances and zoning changes. As with the 4th Street crossing problem noted above, this may seem like a small problem in light of the importance of the HSR project. But it is one that the property owners would have to contend with, and one that under current ordinance they would have to pay to resolve.

It is currently beyond the staff capacity of the SSCRPC to review all of the properties along the 3rd Street corridor to determine the extent to which such problems might occur, and it would not be meaningful to do so absent additional information about

changes that will need to be made to it in light of HSR, but it is something that should be on the planning agenda.

"Rent Seeking" and Cost/Benefit Analysis.

It is relevant to this initial analysis to again point out that the SSCRPC is limited by the fact that little information appears to be available concerning plans for this corridor and how it will be used. The 2003 EIS provides little information concerning particular segments of the HSR route, and the number and type of trains that will use the corridor seems to be shifting. We are aware, however, that once the route is improved, even the number of trains we are using at this time (40 per day) might be conservative.

But throughout our review we continued to return to the possibility that while the benefits of HSR to the area are significant, they might entail an unknown cost arising from additional freight use that will ultimately be externalized. In economics, the externalization of such costs is sometimes termed "rent seeking". Rent seeking occurs when income accrues to a person, organization or company due to the extraction of uncompensated value from others.

We have noted above potential cases in which the use of the 3rd Street corridor for HSR and additional freight might shift costs onto individuals, property owners, businesses, and municipalities, because of the corridor's unique location and surrounding land uses. These costs must be considered during planning and taken into account should there be a desire to mitigate negative impacts.

We believe that this cost shifting might only be assessed through a cost/benefit analysis that would compare the benefits arising from HSR in the Springfield area to the costs that HSR plus additional freight trains would externalize. One must realize that while the availability of HSR would be expected to have a real and positive benefit to the area, there is no discernable reason to believe that the additional freight traffic would. The local, externalized, costs of the additional freight would accrue to the railroad and the locations where the freight is being moved from and to, not to Springfield and Sangamon County residents.

In Conclusion

Our initial opinion is that the expanded use of the 3rd Street rail corridor creates numerous planning challenges because of the unique nature of the corridor and its surrounding uses. Some of these difficulties would arise from the use of the corridor by additional passenger trains, but they are compounded by the anticipated increase in freight. We have used 40 trains per day as a base number because this number of trains has been mentioned publicly. We understand, however, that the number of additional trains using the corridor may increase over time due to the addition of a second track dedicated to freight; potentially growing to 60 trains each day. Should use grow to this extent, the difficulties mentioned above will grow in magnitude. We do not at this point know if they will grow in problem type.

Our ability to assess the totality of the planning challenge associated with expansion of the 3rd Street corridor is largely limited by a lack of information. We hope that this may be resolved in the near term or through the development of a new EIS.

We encourage the development of a new EIS for this project that takes into account not only the HSR, but the additional freight trains that improvements along the corridor will bring with it. We believe that the EIS should not simply look at the gross environmental impact associated with the entire St. Louis to Chicago route, but also include an assessment of impact along particular segments, particularly the Springfield-Sangamon County segment. We believe that this is called for because of the unique nature of the 3rd Street corridor, as noted above, but also because other options exist within this segment that may resolve many of the unique problems that use of the 3 rd Street corridor creates.

In addition to the EIS, we would strongly recommend that a cost/benefit analysis be conducted that compares use of the 3 rd Street corridor to other options. This analysis should not just be a comparison of the HSR costs of one option compared to another, but should identify any externalized costs so as to compare them. We anticipate that such a study will not only identify and quantify any externalized costs, but would be useful in making reasoned assumptions about corridor options as well as help identify the financial magnitude of any problems that local units of government may be called upon to mitigate.

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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.
