



# Chicago Metropolitan Agency for Planning

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June 13, 2016

Via e-filing:

<http://www.stb.dot.gov/stb/efilings.nsf>

Mr. David Navecky, Environmental Protection Specialist  
Office of Environmental Analysis  
Surface Transportation Board  
395 E Street, SW  
Washington, D.C. 20423-0001

Re: Comment on Docket No. FD 35952

Dear Mr. Navecky:

Thank you for this opportunity to comment on the draft scope of study for the environmental impact statement (EIS) of the proposed Great Lakes Basin Transportation (GLBT) railroad. While located just outside our formal metropolitan planning area, the proposal has the potential for significant impacts on transportation, land use, and the economy in northeastern Illinois. To assess these impacts, we encourage the Surface Transportation Board (STB) to include the following regional impacts within the scope of its EIS.

The basic premise behind the GLBT proposal is to allow through traffic to bypass the congested Chicago Terminal, improving velocity by an estimated 24-26 hours for a one-way trip through the greater Chicago region. However, the publicly available materials provided to date do not provide any analysis of the anticipated performance impacts of the proposed railroad, or of impacts on adjacent road and passenger rail networks. CMAP is particularly interested in potential impacts on rail traffic within the Chicago Terminal -- including any changes in train volumes or speeds -- as well as impacts on motorist delay at new or existing highway-rail grade crossings and on-time performance for Amtrak and Metra services. The EIS should analyze these items in detail.

Moreover, the region has substantive existing rail infrastructure, with longstanding plans to improve that infrastructure through the CREATE program. Initiated more than a decade ago, CREATE has already attracted \$1 billion dollars of public investment to smooth movement of rail freight through the region, and completing the CREATE program's 70 projects is a key freight policy recommendation in GO TO 2040, the Chicago region's long-long range comprehensive plan. The EIS should thoroughly evaluate whether coordinated improvements to the existing regional rail network, such as the CREATE program, can achieve similar performance benefits to the proposed GLBT facility.

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The GLBT proposal also raises questions about the long-term land use impacts of the project, particularly in the area of the large proposed “railport” near Manteno, IL. According to the proposal, the railport would be used for rail operations like train staging, switching, and mechanical servicing. However, the presence of such a large freight facility -- particularly one located in close proximity to longstanding proposals for the Illiana Expressway and South Suburban Airport, as well as logistics parks -- could lead to increased development pressure in what is currently an undeveloped area with minimal existing public road and utility infrastructure.

GO TO 2040 emphasizes the need to reinvest in our region’s existing infrastructure and to promote compact, livable communities to leverage those investments. Potential new development induced by a new railroad raises concerns about loss of agricultural and natural resources, lack of appropriate public infrastructure, and local zoning changes required to mitigate land use conflicts, as well as the broader issue of failing to reinvest in existing communities. These issues should be evaluated in the EIS.

Further, the proposal raises local transportation concerns, particularly near the proposed railport. These concerns include unanticipated demand for adequate highway access in the area, such as new interchanges on I-57, improvements to the IL-394/IL-1 corridor, and new east-west highway connections from Will or Kankakee Counties to Lake County, IN. The capital requirements to meet this demand for improved access would be substantial and are likely to far outstrip the region’s already limited capital resources. Development of a major new employment center so far from the region’s core will also pose challenges in getting workers, many of whom may depend on public transit, to these new facilities.

In addition to providing access, local transportation projects would likely be needed to provide appropriate pavement designs for trucks on local roads, separate local highways from busy rail lines, coordinate permitting of oversized and overweight trucks, and ensure direct truck routing. Our region has previously experienced the challenges of inadequate local transportation infrastructure after large intermodal facilities were sited in undeveloped areas, and the ensuing costs continue to be significant. There is reason to believe these challenges would be created with the GLBT project.

Lastly, the STB should thoroughly analyze the safety impacts of the GLBT proposal. The STB should pay particular attention to the potential for an increase in accidents related to the proposed rail operations, both along the corridor and the Chicago terminal as a whole. The STB should also investigate the impacts of any change in routing of hazardous material and high-hazard flammable trains that would occur if the GLBT rail line as proposed is constructed.

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If built, the Great Lakes Basin proposal would greatly affect the fabric of the northeastern Illinois for generations to come. Therefore, it is imperative to take a broad view of the proposal's environmental impacts, acknowledging the major transportation and land use consequences that would likely follow from the project.

Sincerely,

Chicago Metropolitan Agency for Planning (CMAP)

A handwritten signature in black ink, appearing to read "Tom Kotarac", is written over a light blue rectangular background.

Thomas G. Kotarac  
Deputy Executive Director for Policy and Programming

TK/stk