



Transportation Riders United

500 Griswold Suite 1650 Detroit, MI 48226

(313) 963-8872 Fax (313) 963-8876

"Moving Us Forward"

www.DetroitTransit.org

TRUmember@DetroitTransit.org

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STATE OF MICHIGAN

Bureau of Transportation Planning

Department of Transportation

PO Box 30050

Lansing, MI 48909

Attention: Lori Noblet

Regarding: **Comments in response to the Environmental Assessment (EA) for the Chicago-Detroit/Pontiac Rail Corridor**

Ms. Noblet:

Please accept the following comments in response to the "Service NEPA Environmental Assessment Chicago-Detroit/Pontiac Rail Corridor Improvements From Chicago, Illinois to Pontiac, Michigan." The comments have been prepared by members of Transportation Riders United (TRU), a Detroit-based transit advocacy organization.

TRU applauds MDOT in completing an Environmental Assessment (EA) that describes proposed improvements and steps to be taken to minimize harm to the surrounding areas. TRU believes that the Improvement Alternative project could yield significant economic, energy and environmental benefits along the corridor, and also believe that the project will pose no significant detrimental impacts. TRU encourages a rapid Finding of No Significant Impact (FONSI) on this EA and rapid completion of this important project to quickly start accruing benefits to the entire Pontiac-Chicago corridor.

TRU views the project as an important economic and quality of life improvement agent to cities and small towns along the corridor. High-speed rail (HSR) provides station cities with an opportunity to redefine their downtown areas to become more vibrant and healthy. Transit oriented development yields more responsible land use and promotes more walkable, safe streets that lead to healthy lifestyles for residents and enhanced quality of life. The project also provides significant environmental benefits by reducing the region's dependency on personal automobiles for intercity trips within the corridor.

While TRU primarily focuses on mass transit in Greater Detroit, we recognize that the improvements proposed within the above-mentioned EA will provide substantial improvements to an essential passenger rail corridor in the Detroit area and will connect in several locations with transportation improvements proposed by the Regional Transportation Coordinating Council (RTCC). These connections will help to develop a much-needed multimodal mobility network in Metro Detroit. Currently, this corridor between Pontiac and Ann Arbor is proposed for commuter rail use under the Southeast Michigan Council of Governments' (SEMCOG) Detroit to Ann Arbor Commuter Rail Project as well as the RTCC's Comprehensive Regional Transit Service Plan. In total, portions of the Chicago to Pontiac rail corridor will service up to 4 commuter rail routes as planned by SEMCOG and RTCC¹.

In planning for the successful implementation of improvements to the Chicago to Pontiac HSR

¹ Four commuter rail routes are proposed that will use the New Center Station and surrounding track: New Center to Ann Arbor (2010), New Center to Pontiac (2013), New Center to Port Huron (2016), New Center to Monroe (2016)

corridor, TRU wants to underscore how important the upgrades in this corridor are to local Detroit Transit projects currently under study. The Detroit Transit Options for Growth Study (DTOGS) light rail, and M1 Rail, a private public partnership and their joint New Starts funding bid are relying on the viability of the HSR improvements to drive up ridership for both Amtrak and regional commuter service, beginning with the Ann Arbor to Detroit commuter segment. The corridor improvements are crucial to the success of light rail and bus transit improvements for Detroit and the SMART & AATS service areas. The success of all of these initiatives is highly interrelated and synergistic. TRU requests a rapid issuance of a FONSI, and expeditious completion of the improvements proposed in the EA as well as the additional improvements recommended below.

1. SCOPE OF REVIEW

Given TRU's focus on transit issues within the Metropolitan Detroit area, this letter addresses the rail corridor between Ann Arbor and Pontiac, which has been proposed for commuter rail service. While we have reviewed the document in full and recognize the importance of all proposed improvements, we have only commented on this segment of the project.

2. EXISTING CONDITIONS

2.1. General

TRU is well aware of the current state of the existing rail service between Ann Arbor and Pontiac. This corridor currently suffers from three major problems that contribute to unreliable and slow service: track speed restrictions, track operation constraints (interlockings, single track, etc) and unreliable equipment. These result in lack of timeliness and unreliability that must be addressed to ensure public comfort and to provide a competitive option to intercity commuters.

2.2. Track Conditions, Interlockings and Geometry

Current timetables indicate that track along much of the corridor falls well under desired speed. As noted in Table 1.0 of the EA, the slowest portions of the Chicago to Pontiac Corridor are within the Metropolitan Detroit Area. Further, trains traveling between Ann Arbor to Pontiac must pass through 7 interlockings over three separate railroads. This results in a 59 minute trip between Detroit and Ann Arbor (per published Amtrak timetables).

2.3. Timeliness

TRU has conducted an analysis of Amtrak's current reliability over the studied corridor. Over a 30-day period during February and March 2009, Westbound Amtrak Trains traveling between Detroit and Ann Arbor ran on average 5 minutes behind the scheduled departure times. Eastbound trains between this same corridor fared far worse averaging a delay of 24 minutes behind the scheduled departure time.

3. PROPOSED IMPROVEMENT ALTERNATIVE

In general, TRU offers its full support to the Improvement Alternative prepared in the EA. The proposed projects address a number of known operational issues within the Ann Arbor to Pontiac corridor. The project also brings a much-needed upgrade in the reliability, frequency and quality of service provided on-board trains. Specific improvements that we agree with are discussed below:

3.1. Railroad Ownership

The EA proposes that the Norfolk Southern Michigan Line between Kalamazoo and Control Point Mort in Dearborn be purchased by MDOT. Given the current owner's recent threats to downgrade this vital corridor through sale or diminished maintenance standards based on a significant drop in freight traffic, we feel that an MDOT purchase of the line would offer stability and also would ensure track priority for high-speed rail vehicles. This would also permit the upgrade to Positive Train Control, which would allow for speeds of up to 110 miles per hour. The increased speeds and sole control over passenger movements would yield extremely competitive travel times and would help ensure success of the high-speed service.

3.2. Mainline Improvements

Given the proposed increase in passenger rail traffic over the Norfolk Southern Michigan Line (Ann Arbor to Dearborn), it is important to implement a second mainline track between CP Mort and the Wayne Interlocking as proposed in the EA. Similar recommendations have also been made by SEMCOG as part of the ongoing Ann Arbor to Detroit Commuter Rail project.

Further, we note that Centralized Traffic Control (CTC) signaling has been proposed between West Detroit and Milwaukee Junction. These signal upgrades will ensure more efficient use of the existing rail corridor for all intercity, commuter and freight movements and will therefore help to ensure faster, more efficient operations.

3.3. Interlocking Improvements

The EA recommends several essential improvements for interlockings along the corridor. TRU has long advocated the installation of a direct connection between the Conrail Shared Asset tracks and the CN Shoreline Subdivision at West Detroit. This improvement by itself is estimated to shave upwards of 15 minutes off the travel time between Detroit and Ann Arbor without even considering other track improvements proposed in the EA.

3.4. Station Improvements

TRU supports ongoing efforts by the Cities of Troy, Birmingham and Dearborn in their efforts to develop multimodal transit centers that will implement high-speed rail with surrounding transit modes. The development of such intermodal centers will provide real mode choice to transportation users surrounding the stations. We encourage the implementation of state of the art designs to minimize energy consumption, for both building and operation.

4. ADDITIONAL RECOMMENDATIONS / COMMENTS

4.1. General Comments

The EA clearly demonstrates that the project will provide a significant improvement over the existing service while also showing that minimal environmental impacts will occur as a result of the work. We would like to note, however, some areas where the EA could be revised to more accurately portray the project:

4.1.1. EA Section 2.3 Proposed Improvement Alternative.

TRU believes that the EA used an extremely conservative estimate in passenger growth. We can't believe that increased efficiencies and amenities, reliability and the reduction in travel time will generate only a 7% increase in ridership. We believe that there is a significant pent-up demand for this service when quality and reliability are increased and travel time is reduced. It was also our understanding that the project would also increase the frequency of trips, which would also lead to ridership growth.

4.1.2. EA Section 3.13 Environmental Justice.

We believe that not only is there no significant impact but actually a significant positive impact for minority and low-income populations along the corridor. Existing connectivity to the bus systems at Pontiac, Royal Oak and Detroit provide access to the enhanced rail service. Intermodal stations proposed in Ann Arbor, Birmingham and Dearborn will provide enhanced access to bus service with exclusive on-site bus bays proposed at each.

4.1.3. EA Section 3.14 Safety and Security.

Personal safety will be increased if these rail improvements induce more people to take the train rather than drive as rail transit is statistically safer than driving a personal vehicle. In addition, the project proposes enhanced grade crossing protection and/or elimination. High speed rail standards also require that improved right of way safety fencing is provided which diminishes the possibility for trespassing within the right of way.

4.1.4. EA Section 3.15.1 Historic.

There are many dilapidated historic resources near the train stations. If this project results in more vibrant and healthy neighborhoods near the stations, as anticipated because rail transit investment stimulates development, then there will be private economic resources to renovate and reinvigorate some historic resources, thereby having a positive impact on historic preservation.

4.2. Proposed Improvements for Future Consideration

We recognize that the Improvement Alternative in the EA focuses on projects that can be constructed immediately to improve service within existing rights of way. We recommend that MDOT also consider the following improvements in subsequent improvement projects to ensure fast and reliable service within the Detroit region.

4.2.1. Milwaukee Junction Improvements

We note that the prepared EA includes construction of a layover siding east of the Beaubien interlocking, which is also scheduled for an upgrade under the Improvement Alternative. We would also recommend that future corridor improvements include a direct connection between the Canadian National Shore Line subdivision and the Canadian National Holly Subdivision. An improvement similar to this is proposed as part of the Locally Preferred Alternative of the Detroit International Freight Terminal (DIFT) project². The DIFT improvement involves consolidating the CN (2 tracks) and Conrail (2 tracks) into a three-track mainline with a wye provided to the Holly Subdivision from the northernmost main. While the three-track main is not proposed in the submitted EA, we recommend that a bypass be provided in addition to the Beaubien Interlocking Improvements. This will provide a more simple connection that will remove potential impediments caused by slower moving freight movements on the Canadian National and Conrail Shared Assets tracks.

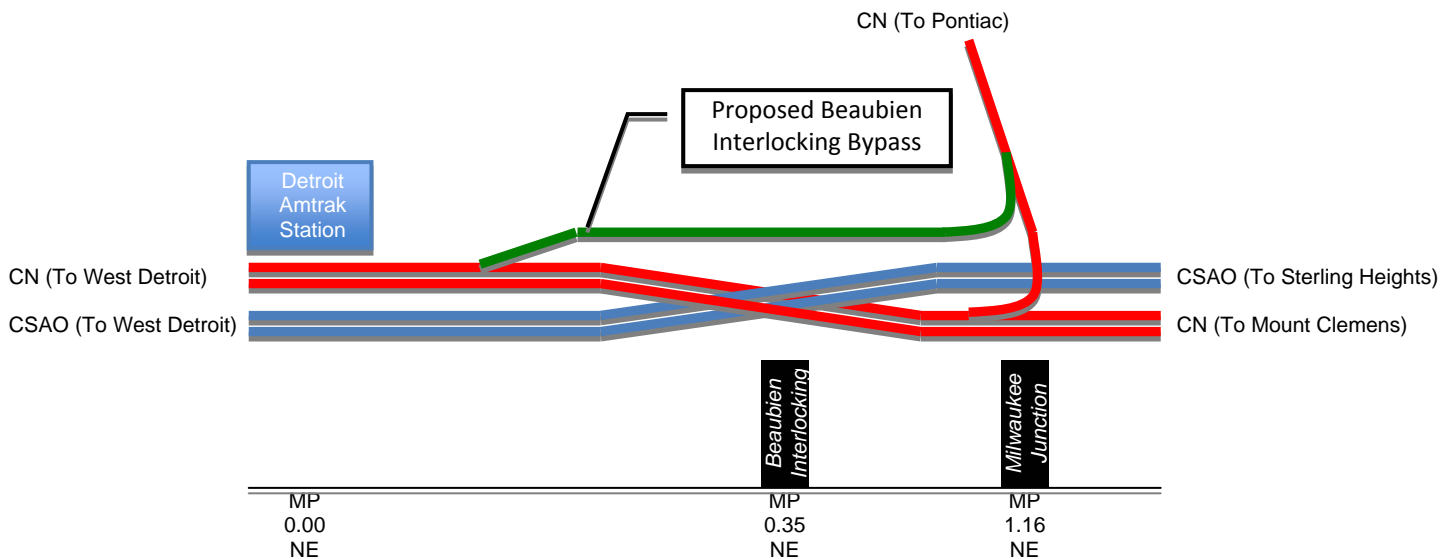


Figure 1. Beaubien Interlocking Bypass

4.2.2. Detroit-New Center Station Upgrades

While it was not specifically clear within the EA, other documents, such as the 2004 *Midwest Regional Rail Initiative Project Notebook* suggest that the Detroit to Chicago trip frequency would increase from 3 to 9 directional trains per day³. This represents a rather significant increase in the number of trains departing and arriving at the Detroit New Center Station. Currently, the Detroit New Center

² DIFT Preferred Alternative Report Final, Section 8.1.6

³ MWRRRI Project Notebook (final_2004):

<http://www.michigan.gov/mdot/0,1607,7-151-11056-166461--,00.html>

station only provides a single platform. Over the next 10 years, this station is proposed to serve up to 4 commuter rail routes in addition to the proposed increase in intercity trains. We recommend that MDOT, SEMCOG and the RTCC move forward with appropriate planning and design necessary to accommodate commuter and intercity service and the Woodward Avenue Light Rail Project at this station.

4.2.3. Operating Agreements

Current Amtrak operations are many times compromised by freight railroads that own the tracks over which passenger trains are operated. When completing improvements that will benefit freight railroads and passenger service alike, such as those at Milwaukee Junction, West Detroit and Battle Creek, we recommend that MDOT obtain agreements where Passenger Trains are guaranteed priority at interlockings.

4.2.4. Woodward Avenue Light Rail

The New Center Station is located approximately 2 miles north of Downtown Detroit and a majority of the hotels, businesses and attractions likely to be used by riders deboarding. This station location has been maintained based on the assumption that a quick and reliable rapid transit system will be in place capable of connecting train riders to Downtown Detroit. We recommend that MDOT coordinate with the M1 team to ensure that a reliable rapid transit option is provided between the New Center station and Downtown Detroit. We also recommend that the New Center M1 station is designed to allow for easy intermodal transfers between the Amtrak Station and the M1 Rail System.

5. RECOMMENDATION

TRU encourages a rapid Finding of No Significant Impact (FONSI) on this EA and rapid completion of this important project to quickly start accruing benefits to the entire Pontiac-Chicago corridor.

Yours Truly,

TRANSPORTATION RIDERS UNITED



Patrick M. Droze
Board Secretary
Chair of Rapid Transit Committee

Cc: Tim Hoeffner, MDOT HSR (e-mail)
John Hertel, RTCC (e-mail)
Paul Childs, Project Manager, M1 Rail (e-mail)
TRU Leadership Team

Carmine Palombo, SEMCOG (e-mail)
Michigan Association of Rail Passengers
Tim Roseboom, DDOT Project Manager (e-mail)