



ENVIRONMENTAL LAW & POLICY CENTER
Protecting the Midwest's Environment and Natural Heritage

October 23, 2012

Diana Wood
Surface Transportation Board
395 E Street, SW
Room 1110
Washington, DC 20423

RE: Docket No. FD 35522

Dear Ms. Wood,

On behalf of the Environmental Law & Policy Center, thank you for this opportunity to comment on the draft Environmental Assessment (“EA”) concerning CSX Transportation, Inc’s acquisition of an easement from Grand Truck Western Railway Company.

We are concerned that the discussion of intercity passenger rail service contained within the draft EA is inadequate.

In September 2010, Amtrak, as required by Section 210 of the Passenger Rail Investment and Improvement Act, submitted a report to Congress detailing its plans for improving the performance of the Cardinal – Amtrak’s train which runs between Chicago and New York via Indianapolis. That plan calls for rerouting the Cardinal as follows:

To improve reliability, Amtrak will explore a temporary reroute of the Cardinal into and out of Chicago. In the long run, and as a result of the CREATE Program for rail infrastructure improvements in Chicago, it is anticipated that the train will take a better and faster route via Englewood, the Norfolk Southern Chicago Line and a future track connection with the former Illinois Central Railroad at Grand Crossing. On an interim basis, however, Amtrak plans to ask Canadian National Railways (CN) for a temporary reroute over the former Grand Trunk Western Railway, the former Illinois Central mainline, and the St. Charles Air Line into Chicago Union Station. The team believes that the interim simplified route involving only CN would improve reliability compared to multiple handoffs of the train to different dispatchers from different railroads¹.

The “multiple handoffs” that rerouting this train would eliminate are significant. The Cardinal currently travels across seven different railroads between Munster, Indiana and Chicago’s Union Station. Each time the train switches to a different railroad, a new dispatcher must give the train permission to proceed – a scenario almost guaranteeing frequent delays of the passenger train.

¹ <http://www.amtrak.com/ccurl/536/878/PRIIA-210-Cardinal-PIP.pdf>

35 East Wacker Drive, Suite 1600 • Chicago, Illinois 60601

(312) 673-6500 • www.ELPC.org

Nancy Loeb, Chairperson • Howard A. Learner, Executive Director

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Indeed, the Hoosier State and the Cardinal have an average on-time performance rate of just 57.8 percent².

The proposed reroute involves use of the Elsdon Line for approximately two miles between Munster, Indiana and CN Junction. This reroute would cut the number of “handoffs” from six to one. Because the Cardinal already uses this corridor for approximately half of that distance (between Munster and Thornton Junction), the impact of Amtrak’s proposed reroute should be minimal on CSXT’s operations. However, the final EA should examine this in more detail.

Further, as a condition of the transaction, the Surface Transportation Board should direct CSXT to provide access over this additional segment of the corridor to Amtrak. Specifically, we request that Voluntary Measure 7 be rewritten to state that “CSXT shall work with Amtrak on transferring its relationship on the Elsdon Line from GTW to CSXT and rerouting Amtrak’s Cardinal trains onto this line and incorporating such into CSXT’s Operating Agreement with Amtrak.”

Sincerely,

A handwritten signature in blue ink that reads "Kevin L Brubaker".

Kevin Brubaker
Deputy Director

cc: Joseph Boardman, Amtrak
Thomas Connolly, Amtrak
Joseph Szabo, Federal Railroad Administration

² Data reported at <http://www.amtrak.com/cardinal-hoosier-state-train&mode=perf&overrideDefaultTemplate=OTPPageHorizontalRouteOverview> on October 12, 2012.