

NORTHEAST INDIANA
Passenger Rail
ASSOCIATION

P. O. Box 10463
Fort Wayne, IN 46852-0463

Ms Venetta Keefe
Indiana Department of Transportation
100 N. Senate Avenue, N955
Indianapolis, IN 46204-2220

RE: Indiana State Rail Plan 2011

Dear Ms Keefe:

The attached comments are sent to INDOT in response to the draft of the Indiana State Rail Plan 2011 (*ISRP 2011*) which we have reviewed. We appreciate the opportunity to respond to the plan.

The comments are self - explanatory. Perhaps the most important comments relate to the **2002 Northern Indiana / Northwest Ohio Routing Study**, prepared for INDOT and other recipients in November 2002. NIPRA believes that the conclusions of that study, intended to evaluate the relative merits of two alternative east - west corridor routes for passenger rail through Northern Indiana, were unambiguous and should be referenced as such in the 2011 ISRP.

The Northeast Indiana Passenger Rail Association also appreciates the reference to the Midwest Regional Rail Initiative and to the Midwest Regional Rail System (MWRRS), the nine-state partnership including Indiana, and the expressed commitment to development of the system within the constraints of funding. The 2004 Executive Report prepared for the nine states defining the MWRRS is referenced in the ISRP 2011 on page 9-11. NIPRA notes that the map describing the MRRS on page 9-2 of the ISRP 2011 is not the map actually contained in the 2004 MWRRS Executive Report; this is a simple oversight that can be easily remedied.

At present, NIPRA is taking steps, with other regional partners, to complete a business plan to determine if a public / private partnership may be a suitable vehicle for developing a passenger rail system from Chicago to Fort Wayne with connections to Toledo and Detroit. The intent is to maximize the local, regional, and private sector roles that would be needed to build, own, operate, and finance such a corridor system. Benefits to the State as well as to passengers, to local tax base growth, and to economic activity and business growth along the corridor, would be expected to significantly exceed costs.

Thanks again for the opportunity to comment. An e-mail confirmation of receipt to falanahan@frontier.com will be much appreciated.

Sincerely,

Fred A. Lanahan, President
Northeast Indiana Passenger Rail Association

Comments on Indiana State Rail Plan (ISRP) 2011 by Northeast Indiana Passenger Rail Association

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Section 2.7.2., *Rail Passenger Studies*, references the Northern Indiana / Northwest Ohio Routing Study (2002). The actual study did arrive at a clear conclusion regarding the costs and benefits of the Northern vs Southern Route for passenger rail which should be noted in the 2011 plan. "The analysis shows that the Southern Routes, both with and without express NICTD service, outperform the Northern Route. Given its stronger economic performance, the Southern Route is the most cost effective alternative."

Key recommendations of the *Northern Indiana / Northwest Ohio Routing Study*, prepared for Indiana Department of Transportation, Ohio Rail Development Commission, and The National Rail Passenger Corporation by Transportation Economics & Management Systems, Inc. (November 2002), "Conclusions & Recommendations" pp 9-1, 9-2. are noted below. The impression given on p. 2-16 of the *ISRP 2011* is that this was a study without a clear set of recommendations, i.e. the study merely "provided recommended alternatives for further analysis." NIPRA would strongly suggest that the 2002 Routing Study be clearly identified as a Study performed for the Indiana Department of Transportation, and that the intent of the study was to carry out a comprehensive benefit / cost analysis of the performance of the northern vs southern corridors for east - west passenger rail service through Northern Indiana.

"The analysis shows that the Southern Routes, both with and without express NICTD service, outperform the Northern Route. Given its stronger economic performance, the Southern Route is the most cost effective alternative. Much of the benefit of the Northern Route is captured by providing express NICTD service to South Bend as part of the Southern Route. This combination maximizes the benefits to travelers in Northern Indiana and across the whole of the MWRRI system and therefore the Southern Route with Express NICTD service is the strategy recommended for implementation as a result of this study.

"Other considerations provide additional reasons to support the recommendations in this study. One issue is that it would be less than ideal to have two publicly provided passenger rail operations in the South Bend region competing against each other for customers. Increased subsidy needs for both services could be a result of such a situation. An additional issue is that the Ft. Wayne region is not served by a direct East – West interstate highway to connect it with Chicago and Cleveland. High-speed rail would therefore provide a very competitive modal alternative to the automobile.

"The recommendations in this report have defined the most cost-efficient routing for this

Chicago-to-Cleveland corridor. However, actual implementation of such recommendations could still be relatively far into the future. Certain tasks such as environmental review for all or portions of the corridor as well as other pre-construction activities would first need to be initiated. Modifications to the findings could occur as these additional steps are taken. Adequate funding sources for the improvements also need to be identified before real progress on the Midwest corridors is likely to begin. Discussions and negotiations with the freight railroads obviously must also continue, to assure that the operating plans are developed in a mutually satisfactory way that offers benefits for all parties. In addition, it must be assured that the design concepts for passenger rail do not hamper the freight railroads' ability to provide effective service to their customers or adversely impact their operational capacity."

The implementation plan for the MWRRS calls for the Cleveland corridor to be constructed in phases three, four and five of the six-phase buildout plan. This is later than several other segments that are proposed. In Indiana, for example, the Chicago-Indianapolis-Cincinnati segments would begin construction earlier than the Chicago to Toledo segment would. Although construction on this route may not begin in the near future, this corridor, as evidenced by the benefit-cost ratio, does offer excellent opportunities to be a strong and beneficial transportation corridor for the residents of this region of the Midwest.

By recommending development of the Southern Route, new direct rail passenger service can be extended to Fort Wayne on the more cost-effective of the two routes while the existing NICTD service to South Bend can be enhanced to ensure continued quality passenger rail service for that community. Direct rail access will be available from South Bend to downtown Chicago with one stop near the Gary/Chicago airport where passengers can access high-speed trains to Indianapolis and the western MWRRRI states. In addition, express bus service to Niles, MI, and Plymouth, IN, will allow South Bend area rail passengers to access high-speed trains to Cleveland, Detroit and points east." -- Northern Indiana / Northwest Ohio Routing Study, prepared for Indiana Department of Transportation, Ohio Rail Development Commission, and The National Rail Passenger Corporation by Transportation Economics & Management Systems, Inc. (November 2002), "Conclusions & Recommendations" pp 9-1, 9-2.

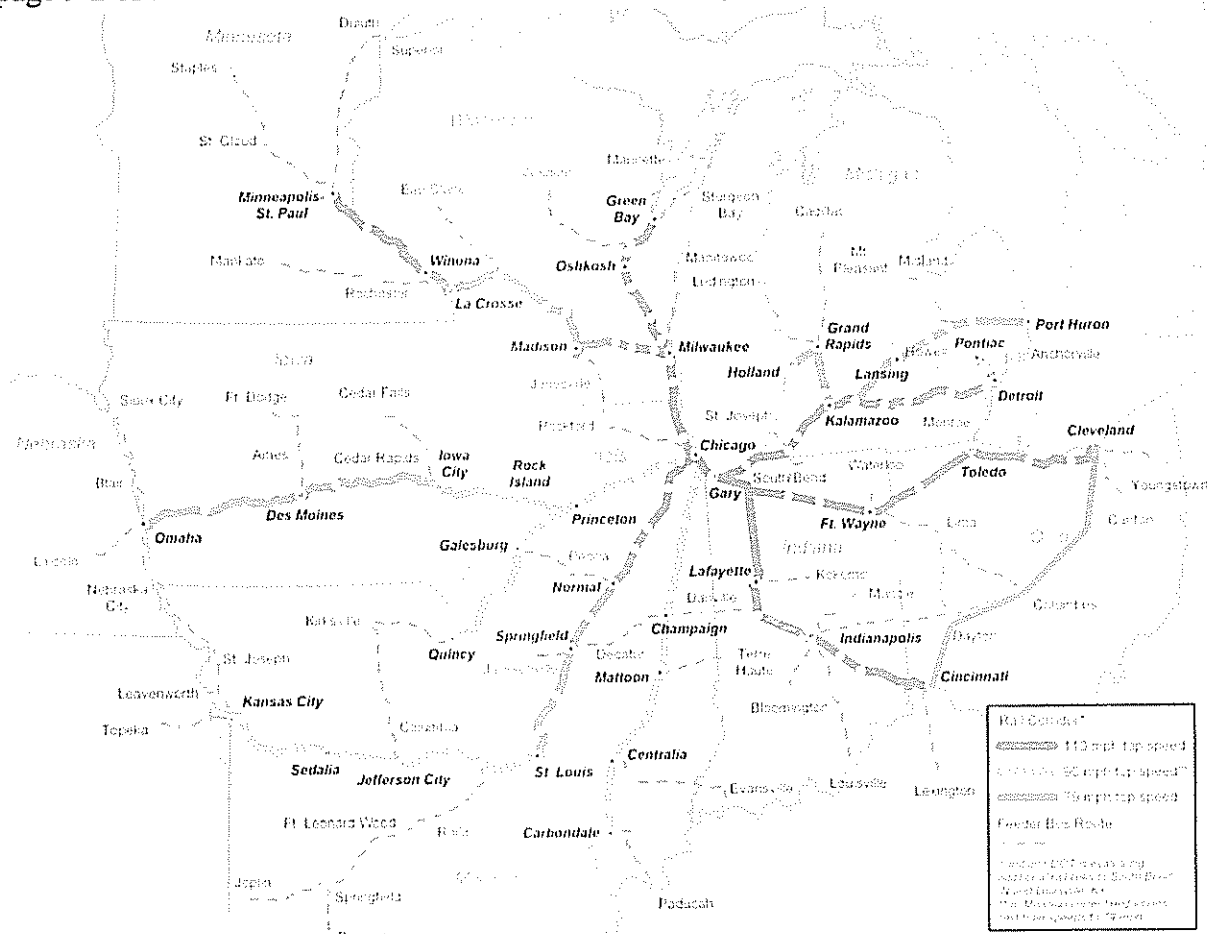
Pages 2-16, 2-17 Section 2.7.2., Rail Passenger Studies

Also in **Section 2.7.2.**, the ISRP cites several rail passenger studies in addition to the Northern Indiana / Northwest Ohio Routing Study, and in the following **Section (2.8)**, Indiana's involvement in multi-state planning efforts is reviewed. Plans and reports were prepared for the Indiana Department of Transportation, as an outcome of Indiana's involvement in these multi-state planning efforts.

NIPRA suggests that these reports need to be included by reference in **Section 2.7.2.**

- In 2004, the Midwest Regional Rail Initiative (MWRRS) in which Indiana is a participant, produced an Executive Report for the Departments of Transportation of the nine Midwestern states. The report updated and described the Midwest Regional Rail System (MWRRS), and in addition
 - updated prior plans for the Midwest Regional Rail System published in August 1998 and February 2000
 - refined and updated infrastructure and equipment capital cost estimates as well as ridership, revenue, and operating cost estimates;
 - provided further detail related to feeder bus operational requirements; and
 - assessed freight rail capacity needs related to the enhancement and expansion of passenger service.

The Midwest Regional Rail System was mapped and the map (on page 6 of the Executive Report) is shown below. {Note that the map of the Midwest Regional Rail System shown on page 9-2 of the Indiana State Rail Plan 2011 is incorrect.}



- In 2006, the Midwest Regional Rail Initiative states, including Indiana, commissioned a benefit cost & economic analysis of passenger rail links throughout the Midwest, which included many Indiana cities. Therefore, we strongly suggest that in the previous section (2.7.2), *the Midwest Regional Rail Initiative Benefit Cost & Economic Analysis* (TEMS / HNTB, November 2006) should be referenced among the studies of the feasibility of passenger rail and the appropriate web-based link provided.

Page 9-2, *Exhibit 9-1: the Midwest Regional Rail System*

The map shown in Exhibit 9-1 on page 9-2 of the ISRP 2011, is incorrect. The correct map, shown on page 6 of the September 2004 Executive Report to the Midwestern Departments of Transportation, *Midwest Regional Rail System*, is reproduced above, under comment regarding pp 2-16 and 2-17.

Page 9-11, *9.3 Passenger Rail Service Objectives*

In this section, INDOT sets forth conditions to be met regarding future consideration of any new passenger rail service in the State.

Analysis of costs and benefits of passenger rail investments by the Federal Railroad Administration / U. S. Department of Transportation should in our opinion include:

- passenger rail system user benefits
- other-mode user benefits (due to lower congestion levels)
- resource benefits--i.e. savings in other mode costs and reductions (savings) in emissions as a result of travelers being diverted from air, bus, and auto to rail
- additional benefits to commuter and passenger rail services
- environmental benefits
- freight rail transportation safety and productivity improvements
- benefits to communities linked to passenger / commuter rail systems, including
 - impacts on property values

- household income impacts
- joint development potential - i.e., the impact of "transit-oriented development" or TOD

These criteria for assessing the benefits of commuter and passenger rail improvements have been included in studies done for the Federal Railroad Administration and the U.S. Department of Transportation (as, for example, the 1997 Federal Railroad Administration / U.S. Department of Transportation (FRA/USDOT) study, *High-Speed Ground Transportation for America*). The same set of criteria have been used in studies prepared for the Indiana Department of Transportation and for other departments of transportation which take part in the Midwest Regional Rail Initiative (MWRRI), as for example, the *Midwest Regional Rail Initiative Benefit Cost & Economic Analysis* (Transportation Economics & Management Systems, Inc. in association with HNTB, November 2006).

When all such benefits are included in a comprehensive cost-benefit analysis, NIPRA is confident that investments by Indiana in passenger / commuter rail networks can compete effectively on a benefit / cost comparison with any other investment in transportation infrastructure within the State. This is particularly the case when many State investments in passenger / commuter rail systems can be applied to obtain Federal investments on an 80%/20% matching basis.

Page 9-11, Section 9.3, Passenger Rail Service Objectives (Freight Rail Transportation and Safety Improvements)

A further statement is imbedded in ISRP Section 9.3 regarding passenger rail service objectives which must be raised in comments to the Indiana Department of Transportation regarding ISRP 2011. That is the statement that "it is imperative that intercity and passenger rail investments not hinder current or future freight rail operations." Planning to date, relying on standard benefit / cost analyses, indicates that improvements and additions to existing rail infrastructure that will enable passenger / commuter rail systems to operate more efficiently and at higher speeds, will *by their nature* also improve the operating environment for freight rail. *The Midwest Regional Rail Initiative Benefit Cost & Economic Analysis (TEMS / HNTB, November 2006)*, prepared for 9 Midwestern states including Indiana, affirms that "MWRRI infrastructure improvements are expected to increase rail safety and productivity, both for its operations and for commuter, long distance, and freight rail services in the region. In addition, the provision of improved railway crossings and signaling equipment should result in increased highway safety."

With commuter / passenger rail infrastructure investments expected to improve the safety and operational parameters of the rail system as a whole, it is in fact fair to say that "intercity and passenger rail investments" will not only "not hinder current or future freight rail operations" but will actually improve them! Priorities among passenger and freight rail traffic, within that future system, will need to account for the improvements that passenger rail investments will have made possible and to fairly allocate track time *based on those shared improvements.*