# **Public Comment Report**

# 2018-2021 Transportation Improvement Program, Amendment #4 to the Comprehensive Regional Plan Update, & Air Quality Conformity Analysis

The Northwestern Indiana Regional Planning Commission (NIRPC) held a 30-day public comment period on the 2018-2021 Transportation Improvement Program (TIP), Amendment #4 to the 2040 Comprehensive Regional Plan (CRP) Update Companion, and an updated Air Quality Conformity Analysis. The comment period will began on March 14, 2017 and ended on April 21, 2017 after being extended from the original date of April 13.

As required in NIRPC's 2014 *Public Participation Plan*, a series of six public meetings were held as part of the comment period. The public meeting times and locations were as follows:

- March 21, 2017: NIRPC, 6100 Southport Road, Portage, IN 6:00-8:00 pm
- March 22, 2017: Hammond Civic Center, 5825 Sohl Avenue, Hammond, IN 2:00-4:00 pm and 6:00 to 8:00 pm
- March 28, 2017: Center for Visual and Performing Arts, 1040 Ridge Road, Munster, IN 6:00-8:00 pm
- March 29, 2017: Michigan City City Hall, 100 E Michigan Boulevard, Michigan City, IN 6:00-8:00 pm
- March 30, 2017: The Centennial, 504 Broadway, Gary, IN 6:00-8:00 pm

In addition to being able to comment at the open houses, comments could also be submitted in the following ways:

- Email: comments@nirpc.org
- A form on the NIRPC website
- Phone: 219-763-6060, ext. 160
- United States Postal Service: NIRPC, 6100 Southport Road, Portage, IN 46368

Project information, including the draft documents, relevant maps, and presentations, were made available at <a href="https://www.nirpc.org">www.nirpc.org</a>, and stakeholders were made aware via email, a news release, and social media.

Of the comments received, none were considered significant, resulting in no need to modify any of the documents out for comment. There was one comment that was not significant but required adding of text.

NOTE: The public involvement activities and time established for public review and comment on the TIP will satisfy the program of projects requirements of the Urbanized Area Formula Grant Program [49 USC Section 5307 (C)] for FTA grantees NIRPC, NICTD, GPTC, and Michigan City.

Comment	Manner Considered by Staff	Significant? Need to Modify?
Portage Public Meeting	, March 21, 2017	
What kinds of environmental projects are included in the TIP? Specifically, anything with stormwater or bike trails around Valparaiso?	Environmental projects related to alternative fuel infrastructure and public education are included in the TIP, though none of these are specifically in Valparaiso. There are two standalone bike trail projects that are included from the previous TIP, plus two road rebuilds with a trail on the side. These have already been built or let, except for the trail along US 30 from Washington St. to Hayes/Leonard Road, which is included in this new TIP. There are no standalone stormwater management projects planned (or funded) in the greater Valparaiso area.	No
Would more trains increase delay times at Hillcrest Road in Ogden Dunes? I support the double tracking project, but have concerns about the dwell times at the station.	NICTD response: The Northern Indiana Commuter Transportation District (NICTD) plans to add high-level platforms to the Ogden Dunes station as a part of the Double Track Northwest Indiana project, so there should be a significant reductions in dwell times at this station.	No
Will the South Shore's change from being an interurban to a commuter railroad have an impact?	NICTD Response: The South Shore Line is already a commuter railroad.	No
I would like to see more bike and pedestrian facilities and alternative forms of transportation.	Encouraging the development of other modes of transportation, including bike and pedestrian facilities, is an important part of NIRPC's 2040 Comprehensive Regional Plan. Additionally, NIRPC is working to finalize its Greenways + Blueways 2020 Plan, which will provide an updated plan for bike and pedestrian facilities in the region.	No

What projects are happening in the Miller area?	NIRPC Response: INDOT is planning a pavement project on US 12 east of Lake Street.  NICTD Response: As part of its Double Track Northwest Indiana Project, the Northern Indiana Commuter Transportation District (NICTD) is developing new station plans in Miller that will include two high-level boarding platforms,	No
	reconfigured parking, and realigned tracks.	
Hammond Public Meetin	g, March 22, 2017  Staff updated the website with the information	1
My comments pertain to the 2040 CRP - it was difficult for me to figure out what Amendment #4 was actually changing in the plan and also find the information on the website. It is hard to figure out how the CRP and TIP fit together. The staff was wonderful explaining.	the participant mentioned in order to make it easier to find. The informational boards for the remaining meetings were also updated to help explain the process better. Staff appreciates the comments and suggestions to help improve the understanding of participants.	No
Munster Public Meeting	, March 28, 2017	
Please consider a regional bus service system that is meaningful.	A regional bus system, or similar regional transit service, has been a priority for NIRPC for many years. In fact this recommendation has appeared in every major transit study conducted over the last 33 years, as well as NIRPC's 2040 Comprehensive Regional Plan. A transit network that crosses municipal boundaries is a priority for our region, however there are many political and fiscal challenges to implementing that goal. Even though we are not yet ready to implement a comprehensive regional transit service, it is a goal NIRPC is actively working towards.	No

NIRPC should require that project sponsors have an ethics clause in proposals to eliminate the possibility of personal gain by sponsors.	This would be outside of NIRPC's jurisdiction. However, we do encourage the commenter to bring any concerns they may have to the relevant local unit of government. Additionally, it might be good to contact the Shared Ethics Advisory Committee regarding any further questions or concerns.	No
Strongly opposed to West Lake Corridor extension as a waste of taxpayer money for limited return and extended subsidiesforever. Also an excuse for unneeded development by the RDA - more taxpayer money wasted.	NIRPC thanks you for your participation in this process.	No
Very informativeliked the use of diagrams to show exactly what regions will be involved. Scott answered a lot of my questions!	NIRPC thanks you for your participation in this process.	No
Will NICTD be acquiring property for transit-oriented developemnt (TOD) in addition to land required for the railroad?	NICTD Response: The Northern Indiana Commuter Transportation District (NICTD) will only purchase property required for its West Lake Corridor Project and Double Track Northwest Indiana Project stations, and associated amenities. NICTD is not acquiring property for Transit Oriented Development (TOD).	No

Concern was expressed for those who might need to be relocated due to property acquisition.	NICTD Response: Acquisitions and displacements will be identified by the Northern Indiana Commuter Transportation District (NICTD) as part of its efforts for West Lake Corridor Project and Double Track Northwest Indiana Project. Acquisitions and displacements are subject to the Uniform Relocation Assistance and Real Property Acquisition Polices Act of 1970. This Act provides for uniform and equitable treatment of persons displaced from their homes, businesses, or farms by federal and federally-assisted programs, and establishes uniform and equitable land acquisition policies. Federal regulations implementing the Uniform Act (49 CFR Part 24) establish the process that must be followed. NICTD will begin purchase of properties in the Engineering phase of each Project.	No
An attendee expressed strong support for the West Lake Extension who believed it would lay the foundation for renewed growth in Munster.	NIRPC thanks you for your participation in this process.	No
How much money is in the Transportation Improvement Program for the West Lake Corridor and the double tracking projects? What is the source of federal funds for those projects?	In the 2018-2021 Transportation Improvement Program, the West Lake Corridor is programmed for \$604,030,000. The federal source of money for that is the New Starts program. For double tracking, there is \$299,737,597 programmed. The federal source for that money is Core Capacity and Section 5337 State of Good Repair funds.	No

Why, if NICTD is already being subsidized by the State of Indiana at a rate NICTD Response: Starting in 1989, a number of of about \$21 million annually, would it be proposing these massive studies have been conducted that included exapnsion projects (particularly the West Lake Corridor)? extensive coordination with stakeholders and members of the public to develop, evaluate, and refine a range of transportation alternatives within the West Lake Corridor Project study area. In 1989, the Northwestern Indiana Regional Planning Commission's West Lake County Transportation Corridor Study examined ways of improving travel between areas of Lake County and downtown Chicago, including upgrades to existing facilities, exclusive bus ways, light rail, and commuter rail. The study concluded that commuter rail would have the lowest capital costs and the highest ridership, and would be the best long-term option No for improving mobility and spurring economic development. The West Lake Corridor Project's National Environmental Policy Act (NEPA) Preferred Alternative is consistent with and supports the transportation goals and objectives of the Project and is in line with long-range planning goals of the region. The NEPA Preferred Alternative will increase transportation options to central and southern Lake County residents traveling to downtown Chicago, reduce travel time and travel costs, and promote economic development opportunities in Lake County.

There are already tracks further to the east, just east of US 41, that lead across US 231 closer to Crown Point where more people (Northwest Indiana residents) would ride the train. Why isn't NICTD proposing a line there instead?

NICTD Response: An expansion of the Northern Indiana Commuter Transportation District's (NICTD) South Shore Line has long been recognized by local residents, stakeholders, municipalities, NICTD, and other agencies as a value to the Northwest Indiana regional community. As early as 1989, the Northwestern Indiana Regional Planning Commission (NIRPC) released a study that identified an extension to the South Shore Line as a potentially viable means to expand mass transit in the region (NIRPC 1989). In 1993, NICTD, along with the City of Hammond and the Town of Munster, jointly purchased the former Monon Railroad corridor with the clear intent of constructing a commuter rail line there in the future. Since that time, multiple evaluations have occurred. In 2011, NICTD's West Lake Corridor Study concluded

No

that a rail-based service between the Munster/Dyer area and Metra's Millennium Station in downtown Chicago would best meet the public transportation needs of the Study Area (NICTD 2011). In June 2014, NICTD and the Northwest Indiana Regional Development Authority (RDA) released the 20- Year Strategic Business Plan, which highlighted the importance of a West Lake Corridor Project (NICTD and RDA 2014). The West Lake Corridor Project's NEPA Preferred Alternative is consistent with and supports the transportation goals and objectives of the Project. The NEPA Preferred Alternative will improve the transportation system by providing the West Lake Corridor with more travel choices and faster travel times between residential areas, major destinations, and employment centers.

These same people who are saying that the West Lake Corridor will bring in so much economic impact were the same people who said the Gary/Chicago Airport project would bring in 80,000+ jobs, and that didn't exactly pan out. Why should we trust them for this project?	residents traveling to downtown Chicago, reduce	No
We don't really have a direct say over whether this passes. The best we can hope for is voting Dave Shafer out of office after he votes to pass this, but then it is too late.	This comment period provides the opportunity for the public to comment on items to be brought before NIRPC for approval. This comment report is provided to those decisionmakers in advance in order to inform them of the questions and comments received during the comment period to help inform their decisions.	No
Michigan City Public Meeting, March 29, 2017  No comments were submitted by any of the attendees of the meeting at Michigan City.		

Gary Public Meeting, I	March 30, 2017	
Consider rebranding the Gary bus as it currently serves more than Gary.	Thank you for the suggestion. This decision would ultimately be made by the Gary Public Transportation Corporation.	No
Electronic Con	nments	
Rep. Visclosky and other leaders have stated that the goal for WLC is that people with high paying jobs in Chicago metro will locate in NWI. Numbers such as 15,000 new residents are alleged. Rep. Visclosky is quoted, that these desirable high-earning people, seek the Chicago lifestyle. The question then is: why would they move to NWI if what they actually seek is not here? By human nature, they would not take the train into Chicago, for work and lifestyle, and then take the train back to NWI to reside. My challenge to your board is to produce significant numbers of real people (not projected studies) who affirm, that they will so locate in NWI, either people coming to Chicago jobs, or already working them. Also, secondarily, can significant commercial entities actually state that they are now planning to build, nearby the proposed stations.  The final cost of the project is realistically over \$1B, as all such construction eventuates. Consider what an attractive NWI region we could have, if only some of that amount would be invested for us, real and true people, now living here. Consider the range of lifestyle enhancements for us, right here, that would make NWI attractive to the "high earners" education, recreation, eating, entertainment, sports, family.  May I close by observing that the rationale for WLC is classic "bait and switch", i. e., "you who love Chicago, will you come and live here, and we will build a train for you to get to where you really want to be". Really, hmm, why would I live somewhere that I don't want to be, but take a train to where I want to be. That just is not how real people think, act	NICTD Response: The Northern Indiana Commuter Transportation District (NICTD) uses a travel forecasting model developed by the Federal Transit Administration (FTA) to determine	No

and buy.

Why move its [the Illiana] completion to 2040? Why not just bury the idea and be done with it? It was stoo-ooo-ooo-pid to begin with!	The completion date of the Illiana Expressway is being moved from 2020 to 2040 in NIRPC's Comprehensive Regional Plan in order to align with the Chicago Metropolitan Agency for Planning's documents. The project cannot be removed from NIRPC's documents until a request to do so has been received from the Indiana Department of Transportation (the Illiana Expressway project's sponsor) to amend our documents to remove the project.	No
I am a resident of Southern Lake county near the proposed corridor for the Illiana Toll Road. I cannot express enough how much of a boondoggle this idea is. The idea of a privately funded toll road being built is ludicrous. Toll Roads in general are a failing financial endeavor. The only folks who will benefit from it are those who are involved with it's construction and initial sale once it is established. Leaving the financial burden upon the good people of Indiana to foot the bill.  Being a local resident and seeing the effects this road already has on all of the local residents is painfully obvious. My Aunt and Uncle passed away in the last few years and left their 80 acre farm with new house and new barn to their daughters who were 14 and 20 years old. Due to the threat of this tollroad the farm would not sell. It took several years and finally sold for about half of its appraised value to the detriment of those young girls who lost their parents early to health issues. This is just a shining example of the duress placed upon the people who are in the path of this toll road. It has a significant detrimental burden carried by those who live near it.  The idea of continuing this tollroad idea until 2040 will do nothing but cement this burden upon the people in its path for the next 20 years. This project has been rejected. Leave it there and let us go on with our lives. I urge you to reject the continuation of this toll road by removing it from the 2040 plan.	The completion date of the Illiana Expressway is being moved from 2020 to 2040 in NIRPC's Comprehensive Regional Plan in order to align with the Chicago Metropolitan Agency for Planning's documents. The project cannot be removed from NIRPC's documents until a request to do so has been received from the Indiana Department of Transportation (the Illiana Expressway project's sponsor) to amend our documents to remove the project.	No

Regarding NICTD's double tracking from Gary to Michigan City, this should be a priority. The commuter time to Chicago will be shorter and more on time.  It now seems that the double tracking and the West Lake extension are NOT in Trump's budget. I hope this will change, and I will work to make that happen. If the West Lake extension does get federal funding, the proposed station at Ridge R. and Manor Ave. in Munster should be on the southeast side of Ridge Rd. and Manor. There is much more available land in that location and it is flat. I believe that property values will increase in the area. The northwest quadrant of Munster needs some sprucing up in order to remain a diverse and vibrant area with new	NIRPC thanks you for your participation in this process.	No
housing and new businesses.		
We are writing to voice our strong support for this important transportation project. The West Lake extension will provide a critically important link to rail access to Chicago, bringing high paying jobs to northwestern Indiana. We live near the proposed Munster station, and we are extremely positive about the improvements to aesthetics and local quality of life that will result from the transit oriented development that will accompany the new Munster station. In addition, we anticipate that property values in Munster will increase as a corollary benefit.  We appreciate the opportunity to comment on this essential infrastructure investment.	NIRPC thanks you for your participation in this process.	No

We appreciate the opportunity to comment on this essential infrastructure investment.  Talent attraction is critically important to the growth of the Northwest Indiana economy. Infrastructure projects like the Westlake Corridor Expansion and the double tracking of the current line offer greater opportunities for Northwest Indiana residents increasing access to the third largest economy in the nation and ninth largest in the world. As our local companies look to attract more talent, being more attractive to talented workers is important. They look for quick access to amenities that commuter rail offers. When we look at the Chicago suburbs, the 489 miles of commuter rail line and the growth that has occurred there, now is the time for us to start competing.	NIRPC thanks you for your participation in this process.	No
I strongly support the commuter rail projects as they are the most dynamic economic development projects for NWI in my lifetime.	NIRPC thanks you for your participation in this process.	No
Although outside NIRPC boundaries, I use the South Shore. Double tracking would be of immense benefit to me and Starke County making commuting between Chicago and Starke possible. The proposed new extension of service will permit mobility heretofore unknown and will serve to advance the economic opportunities for all persons and communities within NIRPC.	NIRPC thanks you for your participation in this process.	No
I am very positive on the double tracking and west lake extension. Both will add significantly to the economic development of NWI.	NIRPC thanks you for your participation in this process.	No
I commend and support your proposals to add double tracking and the West Lake expansion to the financially constrained category. I support the ongoing efforts to locate funding for these projects.	NIRPC thanks you for your participation in this process.	No
Important project for region and will help provide more employment opportunities. Good planning for future.	NIRPC thanks you for your participation in this process.	No

I support the double tracking of the South Shore project and the Westlake corridor project being added to the 2040 Comprehensive Regional Plan and TIP. These important transportation projects are vital to the Northwest Indiana region's ability to be competitive in an everchanging marketplace.	NIRPC thanks you for your participation in this process.	No
I think the program you've been working on for the 20/20 plan is absolutely helpful in my pursuit of attracting companies out of the state or area that are unfamiliar to what NW Indiana has to offer. Adding the new information would magnify that effort!	NIRPC thanks you for your participation in this process.	No

I am opposed to the location of a South Shore Station at Ridge Road in Munster Indiana.

#### My reasons are:

- 1. It would be very disruptive to the adjacent residential community.
- 2. It would impact a major arterial Ridge Rd.
- a. Trains will be stopped across Ridge Rd. while passengers board and alight the train.
- b. Also, some passengers will be crossing Ridge Rd. to get to their cars at the same time.
- c. Due to cars entering and leaving commuter parking lots, movements on the streets in the area around the station will be disrupted. (Was a 20 year traffic study done for this station?)
- 3. One of the potential parking lots for this station was designated by the Town of Munster to be a lineal park. The Town bought the residential properties at this location for the specific use as a park. Aren't they legally obligated to honor that commitment?
- 4. There is not enough available open land in vicinity of the station for future parking expansion.

In summary: There are two proposed stations not far from Ridge Rd. (one north of Ridge Rd., in Hammond and the other south of Ridge Rd., in Munster), which are more adaptable to function as train station facilities. There is no need to flood the area with RR stations. The South Shore West Lake Line would function better with one less stop. Thank you for your consideration.

NICTD Response: The Northern Indiana Commuter Transportation District's (NICTD)West Lake Corridor Project has a National Environmental Policy Act (NEPA) Preferred Alternative. This NEPA Preferred Alternative is consistent with and supports the transportation goals and objectives of the project. The NEPA Preferred Alternative will improve the transportation system by providing the West Lake Corridor with more travel choices and faster travel times between residential areas, major destinations, and employment centers. Options for station locations are being reviewed to minimize impacts to surrounding neighborhoods as part of the Environmental Impact Statement (EIS) process. The intent of the placement and design of the stations is to enhance the community.

As the project is being refined, NICTD will provide access to roadways, properties, and businesses. Not all cars arrive or depart the stations at the same time; approximately 25% of the traffic occurs during peak hours. The remainder of the traffic occurs at other periods of the day. As detailed in Chapter 3

and Appendix H1 of the Draft Environmental Impact Statement (found at www.nictdwestlake.com), traffic analyses reflect no significant change to traffic operations. If the addition of commuter traffic reflects a decrease in operations, NICTD is obligated to make roadway improvements to restore acceptable operations. The Traffic Technical Report will be updated with the FEIS to define impacts due to community growth versus impacts due to commuter traffic.

The trains will be no longer than eight cars and are designed to fit at the station platforms without blocking any roads. Main Street will be an underpass to the Munster/Dyer station. The Draft Environmental Impact Statement (DEIS) traffic analysis based on traffic modeling indicates

	the intersection of Main Street at Sheffield will operate at an acceptable level of service.  However, additional traffic analysis is underway	
	and will be updated as part of the Final Environmental Impact Statement (FEIS). Also, NICTD uses a travel forecasting model developed by the Federal Transit Administration (FTA) to determine ridership levels with regards to the	
	need for projects, referred to as the Simplified Trips-On-Project Software, or STOPS. The modeling results of the STOPS model indicate the number of stations needed to satisfy the travel	
	demand. We suggest you contact the Town of Munster to secure additional details relating to the park referenced in item #3.	
Telephone Comi	ment Line	
I am against this boondoggle of a train. It has done nothing for Hammond. It has done nothing for Hegewisch. It has done nothing for Gary. What in the world do you think it's going to do for Munster? This is nothing but another boondoggle like the airport in Gary. Thank you.	NIRPC thanks you for your participation in this process.	No

I am a resident of Lake County. I used to live in Hammond, now I live in Merrillville and I saw an article in the Hammond Times the other day regarding calling this number to leave a comment and my comment would be this: Although I agree with the double tracking, I don't agree with the West Lake Corridor Extension and I'm really on board with some involvement program, in coordination with the of the cities and towns around here which are objecting to that. I think that they have every right to do so, and I think what is most bothersome is the officials who are putting this West Lake Corridor through really have not listened to the people. They say they have, and yeah maybe they listen, but the whole point behind listening and commenting is that Dyer all substantive comments are being maybe you will change direction, going in the direction that the people want you to instead of going your own way. They seem to do that, they just seem to do what they want to do regardless of whether they hear comment or not. I know they're trying to be nice by hearing comments, but to me that's very deceptive. They really are not taking into account that they're doing what they want to

do and I don't like that. They're making it seem like they're being good about taking comments. I am not in favor of the West Lake Corridor because initially it was supposed to be for people in Northwest Indiana and this thing is so far over to the west. You might as well make it for people in Illinois. It's an inconvenience

for most of us, and to me that's wasting money. The other thing is that it was supposed to help get people from here to jobs in Chicago, and they're not even concerned about that. They're more concerned about transit oriented development, which would occur regardless of where the train is. They're also talking about bringing in Chicago professional people. What happened to the whole idea that we were supposed to be helped with jobs ourselves here rather than bringing people in from Chicago who already have jobs. That really makes no sense to me, and I don't blame some of the cities and towns who do not want to participate in this. I feel that they have been duped, and that's my message.

The Northern Indiana Commuter Transportation District (NICTD) has developed and implemented a comprehensive agency coordination and public Federal Transit Administration found in Chapter 9 of the Draft Environmental Impact Statement (DEIS). Public Hearings on the DEIS were held from January 16 - 18, 2017 in Munster, Hammond, and addressed and will be fully documented in the Final Environmental Impact Statement (FEIS).

Please check the Project website at www.nictdwestlake.com for updates, which will be continually updated as Project design progresses.

The West Lake Corridor Project's National Environmental Policy Act (NEPA) Preferred Alternative is consistent with and supports the transportation goals and objectives of the Project. The NEPA Preferred Alternative will improve the transportation system by providing the West Lake Corridor with more travel choices and faster travel times between residential areas, major destinations, and employment centers. The current TOD project is a separate process being conducted by the RDA. NICTD encourages residents to participate in the Transit Oriented Development (TOD) process to express your vision for development

No

around station areas. See more information at: www.in.gov/rda.

Section 1 of the DEIS provides a summary of the purpose and need for the Project. The Project is intended to increase transportation options for accessing downtown Chicago, reduce travel time to downtown Chicago, reduce the parking burden at existing stations, reduce travel costs, and promote economic development. Analyses of the NEPA Preferred Alternative indicate the Project will result in 122,362 less vehicle miles traveled and 4,714 less vehicle hours traveled annually. In addition, there is a worker-to-job deficit in Northwest Indiana with Chicago and Cook County, Illinois, showing a surplus of jobs. Between 2006 and 2010 approximately 22 percent of the workforce in Lake County worked in Cook County. For most industries, Cook County jobs pay an average of 40 percent more than Lake County jobs. The West Lake Corridor Project is intended to facilitate additional transportation options for residents of Northwest Indiana who currently work and will work in Chicago.



## Chicago South Shore & South Bend Railroad

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April 21, 2017

Northwest Indiana Regional Planning Commission 6100 Southport Road Portage, IN 46368

Re: CSS and IIDC Comments on 2040 Plan

The Chicago South Shore & South Bend Railroad Company (CSS) and its affiliate Illinois Indiana Development Company, LLC (IIDC) hereby submit the following comments to the NIRPC 2040 Plan, specifically the Westlake and NWI Double Track projects.

CSS is a common carrier freight railroad that provides vital rail freight services to many industrial customers in the Northwest Indiana Region. Our two largest customers, ArcelorMittal and NIPSCO, are particularly dependent on CSS freight service. CSS keeps the lights on in Northwest Indiana not to mention all the industrial jobs that depend on our service. CSS and NICTD share the same railroad track from Chicago to South Bend. This arrangement derives from a time when both the freight and the passenger operations were under common ownership. That company entered bankruptcy in 1989. Shortly thereafter CSS and NICTD, in a coordinated transaction, acquired the assets of the bankrupt railroad and formed separate passenger (NICTD) and freight (CSS) entities. NICTD is an agency of the State of Indiana. CSS is a privately held Indiana general partnership. IIDC is a privately held Indiana limited liability company, which is under common ownership with CSS.

The mainline from South Bend to the Indiana – Illinois state line near Hammond is owned by NICTD and CSS has the perpetual freight franchise. The mainline from the state line to the connection with Metra Electric Division near Kensington in the City of Chicago is owned by the IIDC. NICTD has a perpetual lease to provide passenger service over this line and CSS has an operating agreement with IIDC under which CSS provides freight service on it. NICTD has day-to-day operational control of the IIDC tracks. The two entities work very closely with each other to maintain safe, reliable freight and passenger services using the same tracks.

CSS and IIDC support the West Lake Corridor and Double Track projects. We believe it is good for the economic development of Northwest Indiana. Further we believe that these projects must be designed in such a way as not to impair CSS' ability to serve its customers.

Commuter trains and freight trains do not compete commercially, but they do compete for track capacity in shared corridors. The more trains of each type that are run, the more acute the competition becomes. Without adequate infrastructure, one or both are compromised. There are many locations around the country where busy freight and passenger railroads operate successfully with shared facilities (including locations where NICTD and CSS share today). The key is to have enough of the right infrastructure to minimize delays all around. NICTD and CSS are cooperatively seeking answers to these questions by modelling the proposed operation. Bottom line is that whatever gets

constructed must have sufficient capacity to accommodate the passenger *and* freight growth that will inevitably be the result of the projects included in the 2040 plan.

**Very Truly Yours** 

Todd Bjornstad

President

Chicago South Shore & South Bend RR

The current transportation policy, Fixing America's Surface Transportation Act (FAST) Act, was signed into law on December 4, 2015. The FAST Act, along with its predecessor, Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21), established new requirements for performance management to ensure the most efficient investment of Federal transportation funds. States will invest resources in projects to achieve individual targets that collectively will make progress toward the national goals.

National performance goals for Federal Highway programs:

- **Safety** to achieve a significant reduction in traffic fatalities and serious injuries on all public roads.
- **Infrastructure condition** To maintain the highway infrastructure asset system in a state of good repair.
- **Congestion reduction** To achieve a significant reduction in congestion on the National Highway System (NHS).
- **System reliability** To improve the efficiency of the surface transportation system.
- **Freight movement and economic vitality** To improve the national freight network, strengthen the ability of rural communities to access national and international trade markets, and support regional economic development.
- **Environmental sustainability** To enhance the performance of the transportation system while protecting and enhancing the natural environment.
- Reduced project delivery delays To reduce project costs, promote jobs and the
  economy, and expedite the movement of people and goods by accelerating project
  completion through eliminating delays in the project development and delivery
  process, including reducing regulatory burdens and improving agencies' work
  practices.

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) issued new transportation planning rules on the statewide and metropolitan transportation planning processes to reflect the use of a performance based approach to decision-making in support of the national goals. These processes must document in writing how the Metropolitan Planning Organizations (MPOs), Indiana Department of Transportation (INDOT) and providers of public transportation shall jointly agree to cooperatively develop and share information related to transportation performance data, the selection of performance targets, the reporting of performance to be used in tracking progress toward attainment of critical outcomes for the region of the MPO (see 23 CFR 450.306(d)) and the collection of data for the INDOT asset management plan for the National Highway System specified in in 23 CFR 450.314(h).

FTA has performance measures for Transit Asset Management, and final regulations are published and in effect. FHWA has performance measures and final regulations published for Safety, Bridge and Pavement Conditions, Congestion Reduction and System Reliability, but only the Safety Performance Measure regulation is in effect at this time.

INDOT along with the MPOs and FHWA will continue to collaborate to identify Performance Targets for each Performance Measure. Once Performance Targets are established, the Transportation Improvement Program (TIP) and Statewide Transportation Improvement Program (STIP) will be modified to reflect this information.

For FHWA and FTA to approve any TIP amendments after May 27, 2018, the INDOT, MPOs and Public Transit Operators must reflect this information and describe how projects in the TIP/STIP, to the maximum extent practicable, achieve the Federally required performance targets identified in the Statewide and Metropolitan Transportation Plans, linking investment priorities to these performance targets.

## **Safety**

The INDOT, the MPOs, FHWA, and Indiana Criminal Justice Institute (ICJI) are actively discussing and collaborating on the Safety Performance Measures and Safety Performance Targets. INDOT will submit their Safety Performance Measures by August 31, 2017, and the MPOs will have until February 27, 2018 to follow INDOT's submission to either support the INDOT Safety Targets or set independent targets. The Highway Safety Improvement Program (HSIP) is a primary source of federal funds for qualifying safety improvement projects. HSIP along with other funding sources are used to implement safety improvements with the purpose to reduce roadway crashes, and a corresponding reduction in fatalities and serious injuries on all public roads. The five specific safety performance measures are:

- 1) Number of fatalities;
- 2) Rate of fatalities;
- 3) Number of serious injuries;
- 4) Rate of serious injuries; and
- 5) Number of non-motorized fatalities and non-motorized serious injuries

If FHWA makes effective the rules they have published for assessing pavement and bridge condition for the National Highway Performance Program and performance of the National Highway System (NHS), freight movement on the Interstate System and Congestion Mitigation and Air Quality (CMAQ) improvement program, INDOT and the MPOs will have to establish performance targets for these measures, too.

### Pavement and Bridge

The pavement and bridge condition performance measures are applicable to the Interstate and non-Interstate Highways that comprise the National Highway System (NHS). The NHS includes the Interstate Highway System as well as other roads important to the nation's economy, defense, and mobility. The measures are focused on the condition of pavement and bridges, including ramps utilized to access the system. There are four measures to assess pavement condition and two measures for assessing bridge condition.

**Pavement Performance Measures** 

- 1) Percentage of pavements of the Interstate System in Good condition
- 2) Percentage of pavements of the Interstate System in Poor condition
- 3) Percentage of pavements of the non-Interstate NHS in Good condition
- 4) Percentage of pavements of the non-interstate NHS in Poor condition

#### **Bridge Performance Measures**

- 1) Percentage of NHS bridges classified as in Good condition
- 2) Percentage of NHS bridges classified as in Poor condition

The INDOT, the MPO and FHWA will collectively develop targets for the pavement and bridge performance measures. The National Highway Performance Program is a core Federal-aid highway program that provides financial support to improve the condition and performance of the NHS, and the construction of new NHS facilities. INDOT utilizes these funds for maintenance activities on the NHS.

#### System Performance

The system performance measures are also applicable to the Interstate and non-Interstate NHS. These performance measures assess system reliability and freight movement, and establish several measures for on-road mobile source emissions consistent with the Congestion Mitigation and Air Quality (CMAQ) Program. There are two measures for assessing reliability, one measure to assess freight movement, and three measures for the CMAQ program.

#### Reliability Performance Measures

- 1) Percent of the Person-Miles Traveled on the Interstate System That Are Reliable
- 2) Percent of Person-Miles Traveled on the Non-Interstate NHS That Are Reliable

#### Freight Movement Performance Measure

1) Truck Travel Time Reliability (TTTR) Index

#### **CMAQ** Measures

- 1) Annual Hours of Peak-Hour Excessive Delay Per Capita Percent of Non-SOV Travel
- Percent Change in Tailpipe CO2 Emissions on the NHS Compared to the Calendar Year 2017 Level
- 3) Total Emissions Reductions