



Kristen Brown, Mayor

January 9, 2015

Ms. Victoria Rutson
Director, Office of Environmental Analysis
395 E. Street, SW
Washington, DC 20423-001

**Re: Finance Docket No. FD 35523, CSX Transportation, Inc. – Joint
Use – Louisville and Indiana Railroad Company, Inc.**

Dear Ms. Rutson:

As stated in the previous joint response from the City of Columbus, City of Franklin, City of Greenwood, and City of Seymour, we felt it appropriate to once again specifically address the issues in each of our respective communities.

I want to specifically address the crossing at State Road 46 which has an average vehicle count of 37,100 which is the most highly traveled crossing and by far the most negatively impacted as measured by total vehicle traffic delay from Indianapolis to Louisville.

First of all, the data that is presented in your analysis is not representative of what we encounter in our community. The data for the current train volume is outdated as L&I has already increased traffic from two to three or four trains per day which has had a detrimental impact to our community. We have no idea what L&I's volume will be by the time the Proposed Transaction may or may not be approved and implemented. Your data also reflects an average train speed of 20 mph at that crossing. However, due to the line layout immediately before this intersection as well as the design of the Flatrock River Bridge and by L&I representatives own admission, trains are only able to cross this intersection at 10 mph. Your data representing a No Action scenario as reflected in Appendix C of the Draft Environmental Assessment reflects a Queue Length of 710 feet and an Average Delay per Delayed Vehicle of 1.49 minutes. We experience average queue lengths of easily four times the length stated and average delays of easily 10 times the amount stated. Our delays and backups during peak traffic times going east bound on SR 46 can take up to an hour to clear with the best alternate route being in excess of a 11 mile detour with a drive time of 18 minutes. We are concerned about the accuracy of your underlying data as well as not reflecting an accurate depiction of what is actually occurring at this crossing.

Secondly, assuming the data presented is valid, Total Vehicle Traffic Delay (24 hour) skyrockets from 176 minutes per day with No Action to 6,454 minutes per day with the Proposed Transaction. The anticipated total wait time per day per your calculation for this crossing is in excess of 107 hours which is almost three times the Federal Highway Administration's standard (40 vehicle hours delay per day) for consideration of grade separation. However, in the analysis, any consideration of grade separation is summarily

dismissed with a statement of, "Due to the layout of the intersection, the Proposed Transaction is not expected to reduce mobility of the community of Columbus, IN in the area of the SR #46 crossing." *Draft Environmental Assessment – August 2013, Page 3-6*. I and our community strongly disagree as a reduction in mobility has already occurred and an increase in train volume as being proposed would be debilitating.

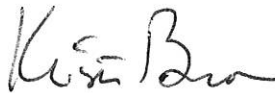
Once again, we feel that the analysis and potential impact as discussed above is understated. The data and impact for the Proposed Transaction does not take into account the already increased traffic volume of L&I and any future L&I increase that may occur. The impact could even be more staggering than reflected.

While we echo the various other concerns previously raised and being concurrently raised with this submission regarding general increase in train traffic and speeds, we felt it necessary to specifically call out the unique situation of our crossing at State Road 46 and the monumental impact such an increase in traffic would bring.

By the admission of the president of L&I and senior leaders of INDOT, the only solution to the problem is an overpass. We feel that because of the increased delays that would bring the Total Vehicle Traffic Delay figures well in excess of the Federal Highway Administration Standards for grade separation, some combination of L&I, CSX, Federal Highway, and the Federal Railroad Administration should be required to pay for the overpass at this intersection which is expected to cost approximately forty million dollars. Neither the City of Columbus nor INDOT can afford this level of investment which is required to remedy the harm which would be caused to our community.

We would very much welcome a discussion with you and any other member of Surface Transportation Board or the Office of Environmental Analysis on this topic. My office will be contacting your office with the hopes of scheduling a phone call to discuss our concerns next week.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Brown".

Kristen Brown, Mayor

cc: Governor Mike Pence, State of Indiana (via email)
Lt. Governor Sue Ellspermann, State of Indiana (via email)
Senator Dan Coats, United States Senate (via email)
Senator Joe Donnelly, United States Senate (via email)
Congressman Luke Messer, United States House of Representatives (via email)
Tony McClellan, INDOT, Seymour District (via email)