



City of St. Francis

Melinda K. Dejewski, PE, City Engineer/Director of Public Works

July 14, 2016

Mr. Dave Navecky
Surface Transportation Board
Docket No. FD 35952
395 E. Street SW
Washington, DC 20423-0001

Subject: Objection to Docket No FD 35952, Great Lakes Basin Transportation, Inc. – Authority to Construct and Operate a Rail Line in Indiana, Illinois, and Wisconsin: Notice of Intent to Prepare an Environmental Impact Statement, Draft Scope of Study, Notice of Scoping Meetings, and Request for Comments on Draft Scope

Dear Mr. Navecky:

The City of St. Francis is formally objecting to the construction and expansion of the proposed rail line as outlined in the subject docket number FD 35952.

The City of St. Francis is a city with a population of about 10,000 people that is located in southeast Wisconsin; specifically in Milwaukee County situated to the south and east of the City of Milwaukee, north of the City of Cudahy, and west of Lake Michigan. It is about 2.9 square miles in size and has 2 rail lines that go through the City. The westerly track abuts and is parallel to I-794, the Lake Parkway. The easterly track runs north/south through the center of the City just west of S. Kinnickinnic Avenue.

The west track has approximately 10 trains per day and can block one intersection at Crossing 176791C. The east track has approximately 4 trains per day and can block 4 streets at Crossings 199860X, 176782D, 176778N, 176783K. Anytime the trains cross the streets, it becomes a life safety issue for our residents and businesses. As mentioned above, the east track divides the City in half. On each side of the track there are nursing homes and assisted living centers which require many trips by the Fire Department which provides emergency medical services to these nursing homes and assisted living centers on a daily basis. The delay in reaching those facilities or any property can literally mean life or death. The 4 trains per day, while is not a high train count, does impact the City functionality. Occasionally, the Police Department has to wait for a train but the occurrence is infrequent; while the Fire Department has not been stopped by a train in several years thankfully. The trains do delay traffic but again, at 4 trains per day, the impact is minimal. However, if the train traffic increases especially on the east track, it will have a huge impact on life safety and the functionality of the City. One example of impact on life safety and functionality was experienced in 2015 when a maintenance train carrying rail collided with an freight train carrying coal at Crossing 176783K. This crossing has houses within 125 feet and businesses within 220 feet. The damage was minimal but had the freight train been loaded with more hazardous materials,

it could have been disastrous. The addition of trains to this and the other crossings in St. Francis only increases the risk of a disaster.

It is the understanding of the City that the proposed rail line will increase the train traffic in St. Francis to between 20 and 30 trains per day. That will basically render our City unusable. 20 to 30 trains per day equates to about one train every hour of the day and night. All our east/west streets will be blocked once per hour for an unknown duration. If each train takes 5 minutes, at once per hour, that equates to 2 hours per day that the streets are blocked. If the trains take more than 5 minutes, the delay increases. The Fire and Police Departments will not be able to respond timely which could cost lives. The increase in train traffic will create an increase in noise from the trains. The City already gets complaints about trains blowing their horns with only 4 trains per day. If 20 or 30 trains need to blow their horn, the complaints will be never ending. It is not just the horns, trains generate noise just from traveling over the tracks. That noise will also increase. People will not want to live in a City with so much noise. Traffic in the City will be at a standstill. E. Howard Avenue is one of the main arterial roads in the City which has a traffic count of about 10,000 vehicles per day. If traffic has to stop once per hour, it will create backups and make people avoid the City of St. Francis. If people do not use our streets because they cannot get through, it will impact business in the City. People will not want to shop or visit the restaurants because they will probably get delayed by a train on either the way in or the way out or due to all the increased noise. Businesses will fail due to the lack of customers. People will not want to locate and live in a City where they cannot travel without hourly delays. People may even leave because of the delays and the City will have many, many issues on top of the challenges it already faces.

These economic concerns are not the only concerns. As demonstrated above, the increased train traffic significantly increases the risk from hazardous materials which are transported on both the east and west sets of tracks. Many people live immediately adjacent to both sets of tracks and with so many trains going through the City, the chances of a collision increase which could impact the adjacent properties including the City Library which also is adjacent to the east tracks.

Attached is a map of our City and the crossings we have demonstrating how the west and east tracks break up our City. Any increase of trains will have a detrimental effect on the City of St. Francis by causing delays in life safety services and traffic impacts affecting businesses and residents.

In closing, the City of St. Francis formally objects to the construction and expansion of the proposed rail line as outlined in Docket FD 35952 due to the extreme adverse effects it will have on our community.

Please contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Melinda K. Dejewski". The ink is dark and the signature is fluid.

Melinda K. Dejewski, PE
City Engineer/Director of Public Works

