

MEMO

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TO: Richard Pfaff, Regional Review Coordinator

FROM: Bridgett Hewitt

SUBJECT: Review of STB Finance Docket 34040, Riverview Trenton Railroad Company's Petition for Exemption: Acquisition and Operation of a Rail Line in Wayne County

I have reviewed the Environmental Report submitted with the Riverview Trenton Railroad Company's (RTRR) Petition for Exemption for its consistency with SEMCOG's 2025 Regional Transportation Plan (RTF). In this memo, I outline the RTRR's proposal, proposed action and its importance, the impacts of the proposed action on the area, and SEMCOG's conclusion and recommendation.

Proposal:

Riverview Trenton Railroad Company (RTRR) is seeking a regulatory exemption to allow it to proceed with its rail operations.

Proposed Action:

RTRR proposes to acquire a shortline railroad and operate over existing track and construct facilities for storing and maintaining containerized cargo and transferring the containers from trucks to rail and vice versa. Ultimately, the intermodal terminal would include a third mode of transportation — ships and barges at facilities to be refurbished along the Trenton Channel of the Detroit River.

Need for Proposed Action:

Given the increasing demand for intermodal transport facilities in the Detroit region, RTRR has developed a specialized niche within the intermodal transportation industry to allow auto manufacturers to benefit from containerization of automobile component parts. RTRR will be able to develop a market of both in-bound and out-bound containerized freight. The action will help to satisfy some of the regional demands for intermodal services and provide benefits of more efficient transport of cargo in a short of time.

Results of Proposed Action mentioned in the Environmental Plan:

Surface Water and Wetlands

No impact; action consistent with federal, state, and local water quality standards

Ground Water

No impact

Biological Resources

No impact

Transportation and Energy Resources

Positive Impacts:

- Meets pressing regional need of the lack of intermodal transfer facilities
- Decrease in truck traffic regionally because of increased shipping efficiencies
- Decrease in fuel usage because of decrease in truck traffic overall
- Overall increase in energy efficiency

Negative Impacts:

- Adverse impacts in the immediate vicinity of the RTRR site:
 - 140 trucks initially to maximum of 300 per day; approximately 25 trucks per hour or one every two minutes.
 - two trains per day; maximum train length - 100 cars with each car approximately 80 feet to equal a maximum of 8,000 feet
 - the cost of upgrading roads will be between \$40 and \$60 million

Air Quality

Positive Impacts:

- Reduced truck traffic from intermodal transportation
- No emissions from stationary point sources

Negative impacts:

- Local deterioration of air quality (if trucks left to idle too long on RTRR property or at intersections during rush hour traffic)
- Possible creation of a carbon monoxide "hot spot" (if large number of trucks left to idle in addition to other mobile source emissions in the vicinity)

Noise Conditions

Negative impacts:

- Generation of noise from the movement of large trucks, the operation of cranes transferring containerized cargoes, and the movement of trains

Cultural Resources

No impact

Recreational and Visual Resources

Positive impacts:

- No impact on existing recreational resources

Negative impacts:

- Some residence will have a diminished view of the river and Grosse Ile once the intermodal transfer operations begin

Unavoidable Adverse Impacts

- Increase in local truck traffic, with attendant increases in traffic-related noise, emissions, and congestion.
- Local traffic affected with the generation of about two trains per day only when the grade level track crossing on the north end of the line in Riverview is used - interference with commuting and movement of emergency vehicles as there is the potential for a 20-minute delay at maximum train lengths and minimal speeds.

Cumulative Environmental Effects:

(Result when the effects of a proposed action are added to or interact with other effects.)

- With operation of the marina, one ship per month will be serviced.
- Minor and short-term disruption to aquatic recreation and ecology - with ships and barges moving through the Trenton Channel of the Detroit River.
- Traffic on Grosse Ile toll bridge will be stopped when a ship passes.
- Commensurate increase in delays at grade level crossings and other effects of rail traffic including noise to nearby residents.
- Incremental increase over current levels of train traffic on the Conrail and GTW Railroad lines.

RTRR Mitigation Measures:

- Due Care Plan - designed to protect public health and natural resources; addressed what could potentially be the most significant adverse environmental impact from the proposed action; addresses any future construction on the site, any renovation of the McLouth Plan infrastructure, including existing rail lines, and dormant land activities.

SEMCOG's Conclusion:

As previously noted, the Environmental Report was reviewed for its consistency with the RTP. Comments are as follows:

- The RTP recognizes the need for a combined, shared rail/truck facility in the metro Detroit region. The lack of such facilities has caused inefficiencies in the region's transportation system. The proposed action of RTRR would address this need and create a multimodal facility that would add to the region's economic competitiveness. This competitiveness will increase with the eventual addition of shipping at the facility.
- The RTP also states that increasing amounts of freight traffic negatively impact the already poor condition of the region's freeways and major roadways. By having one facility capable of handling truck traffic along with other modes of transportation, RTRR's proposed action would help with the decrease in regional truck traffic as trucks would be diverted to one specific area.

- However, the decrease in truck traffic regionally does have a negative impact on communities adjacent to the site (i.e. there would be an increase in local truck traffic). This increase in local truck traffic will ultimately lead to increases in traffic-related noise, emissions, and congestion. These effects are not in line with the RTP's objective of reducing potential negative effects of the transportation on households and neighborhoods in the region.
- The increase in rail traffic would also result in increased noise and congestion, especially at grade crossings. In addition, the issue of blockages at grade crossings is a serious issue for communities in the region. It was noted in the Environmental Report, that a delay of up to 20 minutes would occur at grade-level crossings in the area (specifically at Jefferson Avenue). This poses a serious problem as delays to emergency vehicles would jeopardize the public safety of citizens in the communities of both Riverview and Trenton.
- The air quality concerns outlined in the Environmental Report (deterioration of air quality and the possible creation of a "carbon monoxide" hot spot) need to be analyzed. According to the RTP, air quality deterioration may potentially cause or exacerbate health problems, as well as affect ecosystems, and the built environment, through corrosion. If RTRR's proposed action can lead to these problems, then the surrounding communities will be at risk. In addition, the creation of a hot spot could affect the region's attainment status for carbon monoxide.
- An important goal of the RTP is the protection and enhancement of the environment. The Environmental Report does indicate that there would be minor and short-term disruption to the aquatic recreation and ecology of the area. Although termed as minor, the disruptions may have long term effects on the environment locally and regionally.
- Finally, the RTP calls for coordination and communication between private companies and local communities regarding freight issues and projects. As both the Cities of Riverview and Trenton have voiced concerns regarding the proposed operations at the site, RTRR should work with them to adequately address their concerns. By not going through the regulatory process, the concerns of local citizens may not get dealt with.

SEMCOG's Recommendation:

SEMCOG recommends that the petition for exemption be withheld at this time so that a full review of the project and the associated impacts can be analyzed. The analysis needs to identify all benefits, costs, and impacts prior to continuing with the project. It is also important that concerns raised by the Cities of Riverview and Trenton be addressed prior to proceeding with the project.