



Appendix J DEIS Public Comment Period and Public Hearing Summary

J3 AGENCY COMMENTS

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Table J-3-1: Agency Comments Received during the DEIS Comment Period

Comment Code	Commenter	Comment(s)	Response
L 1	United States Department of the Interior Office of the Secretary Office of Environmental Policy and Compliance Custom House, Room 244 200 Chestnut Street Philadelphia, Pennsylvania 19106-2904	The Department of the Interior stated that they had no comment on the Draft Environmental Impact Statement for the 75 th Street Corridor Improvement Project located in Chicago, IL.	No response required.
L 2	U.S. Department of Transportation Federal Railroad Administration Environment and Systems Planning Division 1200 New Jersey Avenue, SE Washington, DC 20590	<p>FRA had several questions about how the P2 Project will change railroad operations including:</p> <ul style="list-style-type: none"> • Is there sufficient capacity in LaSalle Street terminal to handle the additional Southwest Corridor METRA trains? • Is there capacity on the existing double track main line to handle the additional train movements? • Will the existing [Metra] 47th St. Yard be able to absorb the additional Southwest Corridor trains? <p>FRA also noted that in partnership with the IDOT, a Tier 1 EIS was completed with a ROD in December 2012 which calls for rerouting Chicago-St. Louis Amtrak services over the Metra Rock Island District Line, and that another EIS has begun on the Chicago to Joliet Corridor relating to the rerouting. These EISs need to be coordinated with P2 to understand any impacts to the Rock Island District Line.</p>	<p>The concept for the P2 project was born out of many years of discussions at Metra intending to address congestion in the 75th Street corridor as well as to better balance the distribution of demand at Metra's terminal stations in downtown Chicago. This project will improve reliability of Metra SWS trains as well as relieve capacity at the South side of Chicago Union Station through the shift of SWS trains to LaSalle Street Station. Metra is committed to bringing this project to fruition to achieve those goals, while helping move the agency toward a state of good repair.</p> <p>Metra has been working with the project team from the Illinois Department of Transportation (IDOT) Chicago-St. Louis High Speed Rail (HSR) EIS over the past several years to evaluate the ability for high speed intercity trains to operate over the Rock Island District (RID) corridor. This ongoing coordination has been significant and frequent including quarterly coordination meetings and more frequent intermediate exchanges. Metra and the IDOT project team have been evaluating the RID corridor to consider all the improvements necessary to accommodate as many of the proposed increases in service as are practical within this corridor. The re-routing of SWS trains to the RID is a key assumption of the future traffic levels on the corridor that must be accommodated before any new intercity service can be considered.</p> <p>Through the evaluation that has taken place previous to and during the IDOT HSR coordination, it has been confirmed that LaSalle Street Station and the double track RID main line track both have sufficient capacity to accommodate the re-routed SWS trains. Metra's evaluations thus far of the yard capacity at the existing 47th Street Coach Yard and Maintenance</p>



Comment Code	Commenter	Comment(s)	Response
			<p>Facility indicates that it will be able to absorb the additional SouthWest Corridor trains within the existing yard facility, which is located on property currently owned by Metra.</p> <p>IDOT, FHWA, and the CREATE rail partners, including Metra and Amtrak, look forward to continued collaboration and coordination with FRA throughout the P2 and IL-HSR projects.</p>
L 3	<p>United States Environmental Protection Agency, Region 5 Office of Enforcement and Compliance Assurance 77 West Jackson Boulevard Chicago, Illinois 60604-2590</p>	<p>a) The EPA “rated the overall Draft EIS as Lack of Objections”, and further stated that “EPA does not have any significant objections to the project or the identified Preferred Alternatives.” They further stated that “the overall scope of the work that is proposed under the 75th Street Corridor Improvement Project will have minimal adverse environmental impacts.” EPA also stated “The identified preferred alternatives have been carried forward as a result of extensive environmental research, community outreach, and transportation coordination between involved agencies.”</p> <p>EPA offered several detailed comments, as presented in the following subsections:</p> <p>b) Air Quality – “EPA asks that updated information on the train idling times be recorded to determine how those changes in idling times affect the air quality in the area. EPA asks that the findings from the studies FHWA has stated they will conduct be included in the Final EIS”.</p> <p>c) Safety – EPA stated that the project proposes to separate and reconfigure 25 critical at-grade crossings in the study area. Coordination with EPA indicated that this comment referred to the 25 at-grade crossings in the entire CREATE Program, rather than the 75th Street CIP, which includes one</p>	<p>Per EPA request, the Record of Decision has been drafted in a way to differentiate between the 75th Street CIP and the CREATE Program as a whole more clearly to avoid reader confusion.</p> <p>a) This project has been advanced utilizing IDOT’s Context Sensitive Solutions (CSS) process, with close coordination with local advisory groups.</p> <p>b) The EPA mention of FHWA “studies” and train idling times was a reference to statements on the project website which referred to the detailed air and noise studies presented in the DEIS/FEIS and Appendices. In further coordination, USEPA subsequently clarified that no additional studies were needed.</p> <p>c) The 71st St. grade separation project will be constructed to the current City of Chicago design standards, including Americans with Disabilities Act requirements. The preliminary design for 71st Street includes sidewalks on both sides of the street for pedestrians. Dedicated bicycle facilities are not included as part of the design for 71st Street because the corridor was not identified as part of the recommended bicycle network in the City of Chicago’s Streets for Cycling Plan 2020.</p> <p>The FEIS and Record of Decision include a commitment to work with the City of Chicago to coordinate during Phase II (final) design to advance the planning and design of additional mitigation measures that are beyond the jurisdiction of IDOT/FHWA and require actions from an external agency to implement. It is important to note that the 75th Street CIP project would provide capital funding only. The City of Chicago would need to commit the resources required to perform the work to plan, design, operate and</p>

Comment Code	Commenter	Comment(s)	Response
		<p>proposed grade separation at 71st Street. EPA asks that “grade crossings [to be separated] be designed to accommodate pedestrian and bicycle modes where feasible”. EPA notes that the DEIS refers to “collaborative efforts with the City of Chicago’s bike route planning efforts. EPA asks that these concepts and plans be further elaborated on in the Final EIS. The Record of Decision (ROD) should commit to specific measures to accommodate pedestrian and bicycle modes.”</p> <p>d) Noise and Vibration – “EPA asks that the Final EIS describes the procedure for analysis of both noise and vibration and provide the results of that analysis for impacts on public health and infrastructure related to or adjacent to the rail lines. Mitigation measures to address noise and vibration should be discussed and committed to in the Final EIS and ROD.”</p> <p>e) Construction Impacts – EPA states that “There will be a temporary increase in air emissions, noise, vibration, traffic pattern disruption, road closures, and other disruption of the surrounding communities. In the Final EIS, Best Management Practices (BMPs) and other mitigation measures should be included to address these temporary impacts.” EPA further states “These measures should be committed to in the Final EIS and ROD.”</p> <p>f) Community Impacts and Displacement – EPA asks that “the process under the Uniform Relocation Assistance and Real Property Acquisitions Policies Act be fully described in the</p>	<p>maintain any bicycle and pedestrian mitigation measures identified through the NEPA process (see Section 3.21.2). These actions would need to occur during the Phase II (final) design process so that the required funding could be procured to allow for construction within the same time period as the proposed 75th Street CIP. While the implementation of these additional mitigation measures is desirable, IDOT’s and FHWA’s decision to move forward with the project would not change if the additional mitigation measures outside of their control are not implemented. Consequently, if these additional mitigation measures are not implemented by the responsible external agency, it will not affect the commitments stated in the Final EIS and would not create the need for a re-evaluation of the Preferred Alternative.</p> <p>d) The methodology for analysis of noise impacts is discussed in Sec. 3.7.1.2 of the DEIS/FEIS; results of the analysis are presented in Sec. 3.7.1.5 of the FEIS; and mitigation measures are discussed in Sec. 3.7.1.6. For vibration, analysis methodology is addressed in Sec. 3.7.2.2, results in Sec. 3.7.2.4, and mitigation in Sec. 3.7.2.5 of the FEIS. Further backup information is included in Appendices E – Noise and F - Vibration.</p> <p>e) Once construction of the 75th St. CIP commences, it is estimated that construction activities will continue over a period of five years utilizing dozens of construction contracts for a wide variety of work throughout the study area. Each contract will be evaluated by the Federal Highway Administration (FHWA), the Illinois Department of Transportation (IDOT), the City of Chicago, and the other CREATE partners prior to execution to ensure that it includes all relevant Best Management Practices (BMPs) required for protection of the public during construction. Section 3.21 of the DEIS details the BMPs that are included as environmental commitments. These commitments will be included in the FEIS and ROD.</p> <p>IDOT’s CSS process was used to develop the project to this point in cooperation with the local Community Advisory Groups, and will continue throughout the final design and construction periods, ensuring the consideration of local views on impacts during construction throughout that process.</p>



Comment Code	Commenter	Comment(s)	Response
		<p>Final EIS" and that the Final EIS "describe how the project will ensure that replacement housing is decent, safe, and sanitary." EPA also asks that "the Final EIS include a community engagement strategy, including addressing the EJ Executive Order, both during and after construction."</p> <p>g) Climate Change Adaptation and Mitigation – EPA asks that the Final EIS "address the potential impacts of climate change to the resources of this project. What would the impact be to the project of increased frequency and intensity of precipitation events? How would a severe drought affect the project, such as overheated rails? What adaptations will be considered to address these potential climate change impacts, such as stormwater management techniques?"</p> <p>h) Conclusion - USEPA's final comments stated that EPA "supports the goals of this project", and noted that, "The CREATE project proposes a set of preferred alternatives that should improve transportation efficiency and safety, while reducing overall impacts to community."</p>	<p>Because of the unique construction requirements of this project - very constricted work zones and the need to maintain full operation of the freight and passenger rail systems during the construction phase of the project - it is not possible to make commitments regarding time restrictions, types of equipment utilized, or construction methods that would be applicable to all construction work across the entire project. Each construction contract will be specifically tailored to address the identified local concerns and the latest federal, state and local requirements for protection of the environment and the local community.</p> <p>Impacts during construction are discussed in detail in Sec. 3.16 of the DEIS/FEIS, and a number of specific mitigation commitments that are applicable to all construction activities are presented in Sec. 3.21, and will be included in the Record of Decision (ROD). The DEIS/FEIS specifically evaluates measures to mitigate noise and vibration impacts during construction throughout the project area, including in those locations where construction would be nearest to sensitive receptors. This discussion is presented in Sec. 3.16.1.</p> <p>f) The DEIS/FEIS discusses the Uniform Act relocation process in Sections 3.2.6.2, 3.2.6.3, and 3.21.1. All relocations conducted for the project will comply fully with FHWA, IDOT and City of Chicago relocation policies and requirements, which include provisions to perform inspections to ensure that all replacement housing is decent, safe and sanitary. Housing must meet local housing and occupancy codes in order for the resident to be eligible for a replacement housing payment. IDOT's property brochure "Highway and Railroad Improvements & Property Rights" was distributed at the Public Hearing.</p> <p>As further discussed in the DEIS/FEIS – Section 3.2.6.3 – Mitigation of Right-of-Way Acquisition Impact, relocation advisory assistance would be provided to owners and renters of displaced properties. Relocation advisory benefits would include determining the needs and preferences of displaced persons, providing current and ongoing listings of comparable dwellings for residential displacements, providing transportation to search</p>

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			<p>for replacement housing, as well as financial referrals and housing inspection. Displaced residents would also be entitled to counseling and other assistance to minimize hardship in adjusting to the relocation. The Uniform Act would allow for reimbursement for moving expenses and payment for the added cost of renting or purchasing comparable replacement housing. Per IDOT policy, to be eligible for a replacement housing payment, the resident's new dwelling must be inspected to ensure that the replacement housing meets local housing and occupancy codes.</p> <p>The community engagement strategy employed for the project is described in detail in Sec. 4.1 of the DEIS/FEIS. Note that the project has been conducted to this point under IDOT's Context Sensitive Solutions program, and IDOT/FHWA are committed to continue working in a collaborative manner with the local community during the final design and construction stages (see Section 3.21.11) to ensure that the community is informed and has an opportunity for input on design details, construction, and scheduling.</p> <p>Environmental Justice concerns are discussed fully in the DEIS/FEIS. See Sec. 3.2.7 and Sec. 3.21.2.</p> <p>g) Climate change and its potential effects on the project are discussed in Sec. 3.6.5.5 of the DEIS/FEIS. Drainage for the project was designed in accordance with current City of Chicago Stormwater Management Ordinance (January 2012) requirements and using stringent hydrologic design criteria. The stormwater management features included in the preliminary design are based on the 100-year storm event. The final drainage design will need to comply with whichever ordinance is in place during the Phase II (final) design. In addition to the project's drainage design, stormwater management is a daily activity that is routinely managed by the railroads throughout their systems.</p> <p>With respect to potential track misalignment due to temperature extremes, the participating railroads are continuously monitoring rails for any misalignment. Management of track misalignment is considered a normal and routine activity by the railroads.</p>



Comment Code	Commenter	Comment(s)	Response
			h) No response necessary.
L 4	Illinois Environmental Protection Agency 1021 N Grand Ave East PO Box 19276 Springfield, IL 62794-9276	IEPA had no objection to the project and provided contact information for permitting and actions required relative to construction should the project be funded.	IEPA will be contacted at the appropriate times prior to construction regarding permitting.
L 5	Terry Tatum Coordinating Planner I Historic Preservation Division Department of Planning and Development City Hall, 121 N. LaSalle St., Room 1101 Chicago, IL 60602 312-744-9147 (phone) 312-744-9140 (fax) Terry.Tatum@cityofchicago.org	The Historic Preservation Division of the Department of Planning and Development staffs the Commission. The Division was asked to review the draft EIS on the Commission's behalf. Based on information provided, the Division had no comments.	No response required.
L 6	Ward Miller Executive Director Preservation Chicago 4410 N Ravenswood Ave Chicago, IL 60640 773-334-8800	<p>Preservation Chicago is concerned about the impact of the 75th Street Corridor Improvement Project and the many associated changes within the Ashburn, Englewood, Auburn Gresham and West Chatham communities. This is a very large project comprising many acres of both private and public lands and every effort should be made to reduce adverse effects on these communities.</p> <p>Preservation Chicago recommended "that the historic properties be documented with any resources that may be eligible for the National Register of Historic Places, to be photographed as a record and included in future reports and discussions regarding this project. These properties may also include multiple impact studies on Hamilton Park and possible solutions to help mitigate other negative impacts on these resources and communities. Such a document was recently released by CTA in a Historic and</p>	<p>The DEIS/FEIS documents IDOT and FHWA's work to evaluate and mitigate impacts on cultural resources in the project area. The following information can be found in Chapter 3: Environmental Resources, Impacts, and Mitigation. In particular, Sec. 2.2.4.3 of the DEIS/FEIS details the extensive studies undertaken to minimize or avoid impacts to Hamilton Park.</p> <p>Surveys conducted in 2005 and 2010 determined that none of the potentially-affected structures in the project area are eligible to be listed on the National Register of Historic Places, and in June 2010 the State Historic Preservation Officer concurred with this finding.</p> <p>There are, however, two properties associated with Hamilton Park that are listed on the National Register of Historic Places: the park itself, and its field house. The 75th St. CIP would not require any acquisition of property from Hamilton Park. It would need to use a small area of the southeastern corner of the park on a temporary basis to allow construction of a new retaining wall on railroad property. IDOT/FHWA have committed to re-landscaping the park area according to a landscape design plan developed in coordination with the Chicago Park District (see Section</p>

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		Cultural Resources Effects Report for the Chicago Red Line Extension Project.”	<p>3.21.9 in the FEIS). The Chicago Park District and the State Historic Preservation Officer (SHPO) concurred with this plan in 2012 (see Appendix G of the FEIS).</p> <p>At the request of the Illinois Historic Preservation Agency, IDOT and FHWA have also committed to preserve and/or replicate the Art Deco design features of the Damen Avenue viaduct, which is proposed to be widened and renovated as part of the 75th St. CIP. The IHPA acknowledged that the structure had been reviewed and determined to not be eligible for listing on the National Register, but recognized that the structure had aesthetic merit.</p>
L 7	Metra 547 W. Jackson Chicago, IL 60661	Metra provided eight comments suggesting edits to the DEIS text in an effort to “ensure the clarity and accuracy of the Final EIS.” The comments were generally related to the status of ongoing Metra projects, and updates to existing ridership and on-time performance figures.	The suggested revisions to the text provided by Metra to ensure clarity and to update ridership and on-time performance figures will be incorporated into the FEIS.



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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904



IN REPLY REFER TO:

May 6, 2014

9043.1
ER 14/0199

Ms. Emily Kushto, P.E., Ph. D.
Division of Public and Intermodal Transportation
Illinois Department of Transportation
100 West Randolph Street, Suite 6-600
Chicago, IL 60601-3229

Dear Ms. Kushto:

The Department of the Interior (Department) has no comment on the Draft Environmental Impact Statement for the 75th Street Corridor Improvement Project located in Chicago, IL.

Thank you for the opportunity to comment.

Sincerely,

Lindy Nelson
Regional Environmental Officer



U.S. Department
of Transportation

**Federal Railroad
Administration**

L 2

1200 New Jersey Avenue, SE
Washington, DC 20590

JUN - 2 2014

Catherine Batey
Division Administrator, Illinois
Federal Highway Administration
3250 Executive Park Drive
Springfield, IL 62703

Ms. Emily Kushto, P.E., Ph. D.
Division of Public and Intermodal Transportation
Illinois Department of Transportation
100 West Randolph Street, Suite 6-600
Chicago, IL 60601

Dear Ms. Batey and Ms. Kushto;

The Federal Railroad Administration (FRA) is providing comments as a cooperating agency in accordance with 40 CFR 1501.5 of the National Environmental Policy Act (NEPA), on the Draft Environmental Impact Statement (EIS), completed by the Federal Highway Administration and the Illinois Department of Transportation for the Chicago Region Environmental and Transportation Efficiency Program (CREATE) 75th Street Corridor Improvement Project, hereafter referenced as P2.

The P2 Project adds a new rail connection to the Rock Island line in the vicinity of 75th Street, north of the Blue Island suburban loop junction. The end result of the P2 Project will be to reroute approximately 30 METRA Southwest Corridor trains per day from their current Chicago terminal stop at Chicago Union Station to the Chicago La Salle Street terminal, which currently handles approximately 70 METRA Rock Island District trains per day (both the Joliet and Blue Island services). The La Salle Street terminal is an eight-track stub end facility with a double track main line leading into it from the south. The mid-day yard/layover/service facility is located at 47th Street approximately six- miles south of the La Salle Street terminal.

The METRA southwest service will now merge with, or separate from, all of the 70 Rock Island line trains in the vicinity of 75th Street, increasing current rail traffic by 42%. The new trains arriving at the La Salle Street terminal will need to lay over possibly by reversing direction to either the 47th Street Yard or back to Orland Park on the Southwest Corridor. FRA has several questions about how the P2 Project will change railroad operations:

- Is there sufficient capacity in La Salle Street terminal to handle the additional Southwest Corridor METRA trains?
- Is there capacity on the existing double track main line to handle the additional train movements?
- Will the existing 47th Street Yard be able to absorb the additional Southwest Corridor trains?

Additionally, FRA in partnership with the Illinois Department of Transportation completed a Tier I EIS with a Record of Decision in December 2012, which calls for rerouting all the Chicago – St. Louis

Corridor services over the Rock Island Line from Joliet to a point north of the METRA 47th Street Yard facility. IDOT and FRA have begun an EIS study for the Chicago to Joliet Corridor that is addressing this rerouting. The rerouting will add 18-20 Amtrak trains per day to a part of the Rock Island route that will also carry the additional Southwest Corridor trains related to the P2 Project. Coordination of these two EISs will be important to understand the effects to Rock Island Line.

Should you have any questions about this letter please contact Andrea Martin of my staff at (202) 493-6201. FRA remains committed to working with FHWA and IDOT on the Final EIS.

Respectfully,

A handwritten signature in black ink, appearing to read "David Valenstein". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Valenstein
Chief, Environment and Systems Planning Division

cc: Yamilée P. Volcy, FHWA
Samuel Tuck III, Illinois Department of Transportation
Joseph Shacter, Illinois Department of Transportation



U.S. Department
of Transportation
**Federal Highway
Administration**

Illinois Division

August 1, 2014

3250 Executive Park Dr.
Springfield, IL 62703
(217) 492-4640
www.fhwa.dot.gov/ildiv

In Reply Refer To:
HFE-IL

Mr. David Valenstein
Chief Environment and Systems Planning Division
Federal Railroad Administration
1200 New Jersey Avenue SE, MS-20
Washington, DC 20590

Subject: Draft Environmental Impact Statement
Chicago Region Environmental and Transportation Efficiency
75th Corridor Improvement Project

Dear Mr. Valenstein:

The Federal Highway Administration (FHWA), in cooperation with the Illinois Department of Transportation (IDOT), is in receipt of your letter dated June 2, 2014 in which you provided comments on the Draft Environmental Impact Statement (EIS) for the 75th Corridor Improvement Project (CIP) in Cook County, Illinois.

The FHWA is appreciative of your response and based on our review of the letter and coordination with the CREATE partners have the following response.

As stated in the letter, the Federal Railroad Administration's (FRA) main concern is with the following questions on how P2 will change railroad operations:

- Is there sufficient capacity in LaSalle Street terminal to handle the additional Southwest Corridor Metra Trains?
- Is there capacity on the existing double track main line to handle the additional train movements?
- Will the existing 47th Street yard be able to absorb the additional Southwest Corridor trains?

The answer is yes to all. The following statements will be documented in the Final EIS addressing your concern:

“Through the evaluation that has taken place previous to and during the IDOT High Speed Rail (HSR) coordination, it has been confirmed that LaSalle Street Station and the double track Rock Island District (RID) main line track both have sufficient capacity to accommodate the re-routed SWS trains. Metra's evaluations thus far of the yard capacity at the existing 47th Street Coach

Yard and Maintenance Facility indicates that it will be able to absorb the additional SW Corridor trains within the existing yard facility, which is located on property currently owned by Metra.”

“The concept of the P2 project was initiated from many years of discussions at Metra intending to address congestion in the 75th Street corridor as well as to better balance the distribution of demand at Metra’s terminal stations in downtown Chicago. This project will improve reliability of Metra SWS trains as well as relieve capacity at the south side of Chicago Union Station through the shift of SWS trains to LaSalle Street Station. Metra is committed to bringing this project to fruition to achieve those goals, while helping move the agency toward a state of good repair.”

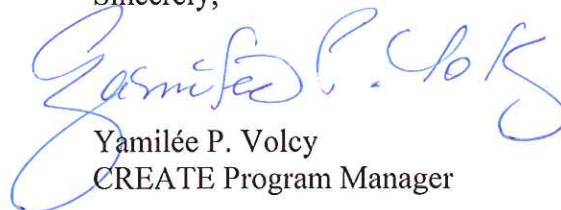
It was also stated that FRA in partnership with IDOT completed a Tier I EIS with a Record of Decision in December 2012, which calls for rerouting all the Chicago-St. Louis Corridor services over the Rock Island Line from Joliet to a point north of the Metra 47th Street Yard facility. The IDOT and FRA have begun an EIS study for the Chicago to Joliet Corridor that is addressing this rerouting. The rerouting will add 18-20 Amtrak trains per day to a part of the Rock Island route that will also carry the additional Southwest Corridor trains related to the P2 Project. Coordination of these two EIS will be important to understand the effects to Rock Island Line.

Therefore it should be noted, that “Metra has been working with the project team from IDOT Chicago-St. Louis HSR EIS over the past several years to evaluate the ability for high speed intercity trains to operate over the RID corridor. This ongoing coordination has been significant and frequent. Metra and IDOT project team have been evaluating the RID corridor to consider all the improvements necessary to accommodate as many of the proposed increases in service as are practical within this corridor. The re-routing of SWS trains to the RID is a key assumption of the future traffic levels on the corridor that must be accommodated before any new intercity service can be considered.”

The FHWA, IDOT and the CREATE partners look forward to continued collaboration and coordination with FRA throughout the P2 and IL-HSR projects.

Should you have any questions, comments or would like to discuss in more detail this letter or project details, please feel free to contact me at (312) 886-1604 or by email at Yamilee.Volcy@dot.gov .

Sincerely,



Yamilee P. Volcy
CREATE Program Manager

ecc: Ms. Andrea Martin, Federal Railroad Administration
Ms. Emily Kushto, Chicago Region Environmental and Transportation Efficiency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 22 2014

REPLY TO THE ATTENTION OF:

E-19J

Catherine Batey
Division Administrator
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Re: **Draft Environmental Impact Statement for the 75th Street Corridor Improvement Project, Chicago, Illinois. CEQ No. 20140096**

Dear Ms. Batey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the 75th Street Corridor Improvement Project prepared by the Federal Highway Administration (FHWA). EPA conducted this review pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), Section 309 of the Clean Air Act, and Section 404 of the Clean Water Act.

The Chicago Regional Environmental and Transportation and Efficiency (CREATE) Program is a collaborative effort with partners including FHWA, Illinois Department of Transportation (IDOT), Chicago Department of Transportation (CDOT), and the Association of American Railroads (AAR). CREATE has identified several elements in the 75th Street Corridor Improvement Project (CIP) that are intended to address the rail-rail conflicts, the highway-rail crossing issues, problems with local mobility, and a need for improved passenger rail service reliability. The project area designated within the 75th Street CIP experiences some of the highest volume of rail traffic, related congestion, and delays in the Chicago area. The rail congestion is due to both freight traffic and passenger rail traffic. The CREATE Draft EIS states that the projected ridership and freight rail use will steadily increase in the Chicago area, thus worsening the delays and congestion if no action is taken. The CREATE project intends to address the rail traffic congestion issues, aging infrastructure, local community and safety concerns.

The Chicago regional handles more than 37,500 rail cars per day. That number is expected to increase to 67,000 cars per day by 2023. On an average day, there are a total number of 996 hours of individual freight train hours of operation in the CREATE Program area. Of that,

approximately 138 hours or 14%, consisted entirely of freight train delay time. During these delays, freight train locomotives were idling, therefore consuming fuel, and emitting air pollutants. One of the main objectives of the CREATE Project is to reduce this congestion and expedite the movement of freight trains through the area.

In 2012, Metra provided 83.2 million rides in the region and is predicted to carry over 101 million customers by 2030. There are over 9 hours of passenger train (Metra and Amtrak) delays per day due to the congestion in the CREATE Project area. The goals of this project are to expedite the movement of passenger trains through the Chicago region.

Based upon the documentation provided, EPA has rated the overall Draft EIS as Lack of Objections (LO). This rating was given to this project as a result of the minimal negative impacts that it will have on the environment and to the public health. At this time, EPA does not have any significant objections to the project or the identified Preferred Alternatives.

A different preferred alternative was identified separately for each of the five designated improvement areas. The alternatives that were chosen as the preferred routes or “build options” are characterized as being the least environmentally damaging alternative and will have a resulting cumulative positive impact to the local community and to the regional efforts that this project intends to resolve.

As a solution to this issue, five “improvement areas” have been defined.

1. Forest Hill Junction/71st Street
2. 80th Street Junction
3. Metra Rock Island District (RID) Line Connection
4. Metra along Columbus Avenue
5. Belt Junction

The Draft EIS has identified the preferred, “build alternative” for each of these improvement areas. The preferred alternatives are as follows:

1. The build alternative for the Forest Hill Junction/71st Street Area is Alternative FH-2. This would raise the two north-south CSX tracks over the four east-west tracks at Forest Hill Junction and over 71st street.
2. The preferred alternative for the 80th Street Junction is Alternative 80-2. This option meets the purpose and need by eliminating rail-rail conflicts at both the 80th Street Junction and at the Belt Junction. This alternative adds additional track capacity through the 80th Street Junction, but does not eliminate all the crossing conflicts.
3. The preferred alternative for the Metra SWS connection to the RID Line is Alternative RI-1. This decision was based on the ability to meet Metra design criteria, the lack of property impacts to Hamilton Park, strong community support and fewer residential units remaining directly adjacent to the property to be acquired.

4. For the Metra Columbus Avenue improvement area, the preferred alternative is Alternative CA-2. This was identified as the preferred alternative primarily for safety and maintenance concerns associated with moving the track closer to Columbus Avenue.

5. The Belt Junction area has conflicts at both the Belt Junction and the 80th Street Junction. These will be eliminated in Alternative 80-2. The other conflicts in this area will be addressed in the other preferred alternatives identified for the respective improvement areas.

Another major issue that this project will address is local mobility and viaduct deficiencies. The preferred alternative to address these issues is Alternative LM-1. This alternative will fully meet the Purpose and Need by correcting the identified local mobility deficiencies at 36 surveyed viaducts within the study area. One additional surveyed viaduct, Union Avenue, would be permanently closed. The scope of the work is based on meeting current FHWA policy standards for items such as lighting systems and handicap accessible ramps.

The overall scope of the work that is proposed under the 75th Street Corridor Improvement Project will have minimal adverse environmental impacts. The purpose of the CREATE program is to reduce transportation conflicts so as to improve both efficiency and community and health benefits. The identified preferred alternatives have been carried forward as a result of extensive environmental research, community outreach, and transportation coordination between involved agencies.

Detailed EPA Comments:

Air Quality

The Draft EIS states that the preferred alternatives will improve overall air quality in the community directly associated with the rail transportation volume and congestion by reducing the number of idling trains at rail conflict points. The document states that there will be a reduction in the total time that passenger and freight trains spend idling, waiting for their turn to move through the rail corridor. EPA asks that updated information on the train idling times be recorded to determine how those changes in idling times affect the air quality in the area. EPA asks that the findings from the studies FHWA has stated they will conduct be included in the Final EIS. FHWA explains that these additional studies are meant to quantify the predicted idling reductions and increased train traffic for the related effects to air quality, particularly as it is directly related to the community residents, especially sensitive receptors, such as children whose playgrounds and schools are in close proximity to the railroad tracks.

Safety

Local residents and elected officials have expressed safety concerns about the current number of at-grade crossings. The Draft EIS documents that on average there are approximately eight collisions annually occurring at at-grade crossing in the study area. The project proposes to separate and reconfigure 25 critical at-grade crossings in the study area in order to address the safety concerns. Separated grade crossings will eliminate collisions and increase free-flow vehicular and pedestrian traffic. EPA asks that these grade crossings be designed to accommodate pedestrian and bicycle modes where feasible, as well as motor vehicles. The Draft EIS states that the 75th Street CIP is using the Context Sensitive Solutions process to find transportation solutions to balance the needs of the project with the concerns of the surrounding community. The project team has indicated that there will also be collaborative efforts with the City of Chicago's bike route planning efforts. EPA asks that these concepts and plans be further elaborated on in the Final EIS. The Record of Decision (ROD) should commit to specific measures to accommodate pedestrian and bicycle modes.

Noise and Vibration

The Draft EIS identifies noise and vibration from rail traffic as an existing problem in the area. Both noise and vibration adversely affect the human health in of the community. Vibration also causes damage to infrastructure. The Draft EIS mentions that characterizing past effects of noise and vibration were not feasible to address. The project plans to evaluate and mitigate for both noise and vibration. EPA asks that the Final EIS describes the procedure for analysis of both noise and vibration and provide the results of that analysis for impacts on public health and infrastructure related to or adjacent to the rail lines. Mitigation measures to address noise and vibration should be discussed and committed to in the Final EIS and ROD.

Construction Impacts

The Draft EIS states that construction impacts will have the most effects on the local residents of the community. There will be a temporary increase in air emissions, noise, vibration, traffic pattern disruption, road closures, and other disruption of the surrounding communities. In the Final EIS, Best Management Practices (BMPs) and other mitigation measures should be included to address these temporary impacts.

BMPs may address issues such as:

- water suppression methods to control fugitive dust,
- time restrictions for construction operations,
- Special considerations for sensitive receptors in the areas, such as schools, parks, playgrounds, day care facilities, etc.,
- considerations for noise and vibration resulting from construction that would have an additive effect to the existing rail noise levels,
- clean diesel construction strategies, such as anti-idling measures and the use of low-sulfur fuels and newer diesel equipment.

These measures should be committed to in the Final EIS and ROD.

Community Impacts and Displacement

The Draft EIS discusses the need to acquire properties that fall within the anticipated new footprints of the rail lines and rights of way. This acquisition of land, houses and buildings has generally not received negative feedback from the local community, but local elected officials have expressed concern on the effects on the local economy and social well being of the residents. The Draft EIS described proposed plans on how to engage the community and determine the best alternatives. EPA asks that, since there will need to be some resident relocations, that the process under the Uniform Relocation Assistance and Real Property Acquisitions Policies Act be fully described in the Final EIS. If some of the housing to be displaced is substandard, the Final EIS should describe how the project will ensure that replacement housing is decent, safe, and sanitary. Because the study area includes communities with environmental justice (EJ) concerns, we ask that the Final EIS include a community engagement strategy, including addressing the EJ Executive Order, both during and after construction.

Climate Change Adaptation and Mitigation

The Draft EIS did not mention an analysis of climate change or adaptation to climate change. EPA asks that in the Final EIS, FHWA address the potential impacts of climate change to the resources of this project. What would the impact be to the project of increased frequency and intensity of precipitation events? How would a severe drought affect the project, such as overheated rails? What adaptations will be considered to address these potential climate change impacts, such as stormwater management techniques?

Overall, EPA supports the goals of this project. The current transportation issues are a burden on the freight and passenger rail systems in the region, and impose direct and indirect negative environmental and public health impacts on the surrounding communities. The CREATE project proposes to address these problems with a set of preferred alternatives that should improve transportation efficiency and safety, while reducing overall impacts to community.

We are available to discuss these comments at your convenience. Please feel free to contact me at 312-886-2910 or Shanna Horvatin of my staff at 312-886-7887 or via e-mail at horvatin.shanna@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure: Ratings Definitions

cc: Emily Kushto
Illinois Department of Transportation
100 West Randolph Street, Suite 6-600
Chicago, Illinois 60601

Matt Fuller
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

L4

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217)782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

APR 08 2014

Ms. Emily Kushto, P.E, Ph.D.
Division of Public and Intermodal Transportation
Illinois Department of Transportation
100 West Randolph Street, Suite 6-600
Chicago, IL 60601-3229

RECEIVED
APR 10 2014

Illinois Dept. of Transportation
Division of Public and
Intermodal Transportation

RE: Draft EIS/75th Street Corridor Improvement Project/Cook County

Dear Ms. Kushto:

The Agency has no objections to the project: however, a construction site activity stormwater NPDES permit is required for each separate contract for the rail corridor improvement project. You may contact Al Keller with any questions at 217-782-0610. In addition, if any water mains are relocated during this project, a Division of Public Water Supply permit will be required as well. You may contact David Cook at 217-782-9470 with any questions.

Also, demolition, asbestos and lead paint should be addressed before actual repairs are performed to ensure proper abatement is done if needed. If demolition and/or abatement is needed notification will be required 10 working days prior to the project start date. Please contact Ron Robeen with any questions on this matter at 217-524-0229.

Solid and hazardous waste must be properly disposed of or recycled.

Sincerely,

Lisa Bonnett
Director

From: Tatum, Terry [<mailto:Terry.Tatum@cityofchicago.org>]
Sent: Tuesday, May 20, 2014 3:30 PM
To: Underwood, Thomas (Denver)
Cc: Haaker, Anne
Subject: 75th Street CIP, City of Chicago - Draft EIS

Dear Mr. Underwood,

Thank you for offering the Commission on Chicago Landmarks the opportunity to comment on the 75th Street CIP Draft EIS. The Historic Preservation Division, Department of Planning and Development, staffs the Commission, and we have been asked to review the draft EIS on the Commission's behalf. Based on information provided, we have no comments.

Please let me know if you have any questions.

Sincerely,

Terry Tatum
Coordinating Planner I
Historic Preservation Division
Department of Planning and Development
City Hall, 121 N. LaSalle St., Room 1101
Chicago, IL 60602
312-744-9147 (phone)
312-744-9140 (fax)
Terry.Tatum@cityofchicago.org

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Citizens advocating for the preservation of Chicago's historic architecture

Ward Miller

May 20, 2014

President

Adam Natenshon

75th Street CIP-Corridor Improvement Project
525 W. Monroe Street, Suite 200
Chicago, Illinois 60661

*Vice President**

Lisa Napoles

Re: Draft Environmental Statement Comments

Secretary

Dear 75th Street CIP Team,

Charlie Keel

Preservation Chicago is concerned about the impact of the 75th Street Corridor Improvement Project and the many associated changes within the Ashburn, Englewood, Auburn Gresham and West Chatham communities. This is a very large project comprising many acres of both private and public lands and every effort should be made to reduce adverse effects on these communities.

Treasurer

Board of Directors

Gladys Alcazar-
Anselmo

We would recommend that the historic properties be documented with any resources that may be eligible for the National Register of Historic Places, to be photographed as a record and included in future reports and discussions regarding this project. These properties may also include multiple impact studies on Hamilton Park and possible solutions to help mitigate other negative impacts on these resources and communities. Such a document was recently released by CTA in a Historic and Cultural Resources Effects Report for the Chicago Red Line Extension Project.

Stuart Berman

Nicholas Bianchi

Joyce Jackson

Jacob Kaplan

We look forward to continuing discussions with the project and your findings.

Charles Leeks

Jack Spicer

Sincerely,

Brad Suster



Susannah Ribstein

Charles Vinz

Ward Miller, Executive Director
Preservation Chicago

L7

May 22, 2014

Ms. Emily Kushto, P.E., Ph.D.
Division of Public and Intermodal Transportation
Illinois Department of Transportation
100 West Randolph Street, Suite 6-600
Chicago, IL 60601-3229

Dear Ms. Kushto:

Metra is pleased to review the Draft Environmental Impact Statement (DEIS) prepared for the 75th Street Corridor Improvement Project. Metra has a vested interest in the outcome of this project, which will improve efficiency, increase capacity, and reduce delay for Metra and all users of this rail corridor. Attached are comments on the DEIS, intended to ensure the clarity and accuracy of the Final EIS.

Illinois Department of Transportation and the project team have worked closely with Metra throughout the environmental process. We look forward to continuing this coordination as this project moves towards implementation, addressing the needs of the region's transportation system.

Sincerely,



Lynnette H. Ciavarella
Senior Division Director, Strategic Capital Planning

Attachment: Comments

75th Street Corridor Improvement Project Draft Environmental Impact Statement

Metra Comments – 5/22/14

S-38

First paragraph: “a new train station on the Metra RID Line at ~~78th Street~~ in the Auburn Park area”

1-7

“In general, Metra and the freight railroads coordinate schedules to minimize conflicts, and freight trains often stand aside during Metra’s peak service periods. For the most part, this operating approach allows passenger rail traffic to operate essentially on schedule. However, it creates substantial delays for freight traffic that must avoid locations where their operations conflict with daily passenger operations.”

Average on-time performance (OTP) on Metra’s SouthWest Service (SWS) during 2013 was 91.1%, well below Metra’s OTP goal of 95%. A significant source of SWS delays are caused by conflicts in the 71st Street Corridor, so Metra disputes the assertion that passenger trains “operate essentially on schedule” in this area. Substandard OTP on the SWS demonstrates the need for the passenger and freight rail improvements proposed in the DEIS.

1-17

“Ridership has grown steadily over the past decade from approximately 1.5 million trips in 1999 to ~~nearly~~ over 2.5 million trips in 2012”

SWS rides totaled 2,530,663 in 2012 (Source: Metra, Commuter Rail System Ridership Trends, December 2012

http://metrarail.com/content/dam/metra/documents/Board_Information/2013/February2013/Item%2025%20-%20ridership%20report%20and%20year-end%20report%20final.pdf)

3-35

“Metra is planning to construct a new station on the RID Line within the neighborhood of Auburn Gresham. ~~The station would be constructed in the vicinity of 79th Street and Fielding Avenue.~~ The project began the design engineering phase in 2012. Construction is anticipated to begin in 2015 and be completed in 2016.”

3-73

“...a new station on the RID Line in the Auburn Park area is being planned by Metra. Construction is partially funded, and is expected to begin in 2015 and be completed in 2016.”

3-74

Table 3.3-8: Revise Weekday Total of trains at RID Gresham Station to 25 (from 24)

3-206

West Loop Transportation Center

- Revise Location to: Expands capacity at Union Station through various projects
- Revise Status to: Union Station Master Plan, Stage 2, underway to evaluate options in more detail

Metra Auburn Park Station

- Revise Description to: RID Line in Auburn Park area
- Revise Location to: Auburn Park Area
- Revise Status to: Construction expected to begin in 2015 and be completed in 2016

3-210

*“The relocation of the Metra SWS plus the addition of two run-through tracks and one stub-ended southbound station track... would create the capacity needed at Union Station to allow the expansion of other Metra and Amtrak services, as well as ~~the full~~ **substantial** build-out of the Midwest Regional Rail Initiative high speed rail program.”*