



**ROBERT R. KIELY, JR.**  
CITY MANAGER

March 30, 2017

Mr. Arun D. Rao, AICP  
Passenger Rail Implementation Manager  
Wisconsin Department of Transportation  
4802 Sheboygan Ave, Room 701  
Madison, WI 53707

Mr. Elliot Ramos, P.E.  
Passenger Rail Engineer  
Illinois Department of Transportation  
69 West Washington Street, Suite 2100  
Chicago, IL 60602

**RE: Amtrak EA**

Dear Mr. Rao and Mr. Ramos:

Thank you for your letter of March 16, 2017. The City appreciates learning that the project sponsors have thoroughly reviewed our comments and are undertaking additional analyses to further quantify the potential impacts from the proposed track improvements.

However, one specific area not mentioned in your letter that we would respectfully request be addressed was clearly articulated by the US EPA in its comment letter submitted November 8, 2016 to the FRA pursuant to NEPA. The detailed comments by the EPA on the FRA's draft EA stated that the "implications for freight operations are unclear." We concur. The EPA recommended:

"For each of the 10 investment improvement projects, describe how the proposed project would impact freight operations." For example, would extending sidings or adding new holding areas enable freight operators to run more trains? Or, would proposed changes allow freight trains to wait within the corridor for extended periods of time, since the project would provide a place to do so off of the main-line track?"

If there is any such potential change in freight operations from any of the proposed 10 investment improvement projects, the EPA recommends an assessment of the potential impacts as to air quality, emissions, noise, and public safety.

As has been previously communicated to the project sponsors and their consultants, the City's primary concern is not with the existing and proposed commuter service (Metra and Amtrak), but rather with the implications on freight operations on this rail line. The City of Lake Forest shares the EPA's concerns and concurs that further assessment is appropriate unless assurances can be given that freight operations will not increase in volume or in idling time due to the proposed improvements associated with the increased Hiawatha traffic.

We appreciate your thoroughness and ask that we be kept advised as you undertake additional analyses of these issues.

Sincerely,



Robert Kiely  
City Manager

CC: City Council



March 16, 2017

Mr. Robert R. Kiely, Jr.  
City Manager, City of Lake Forest  
220 East Deerpath  
Lake Forest, Illinois 60045

Dear Mr. Kiely:

The Wisconsin Department of Transportation (WisDOT) and Illinois Department of Transportation (IDOT), in partnership with Amtrak and in coordination with the Federal Railroad Administration (FRA), are in the process of completing an Environmental Assessment (EA) and Service Development Plan (SDP) required to increase the Amtrak *Hiawatha Service* from 7 to 10 round trips per day between Chicago, IL and Milwaukee, WI.

A Draft of the EA was made available to the public on October 6, 2016 with a public comment period open through January 15, 2017. The project sponsors received the letter dated November 14, 2016 containing the Resolution passed by the City of Lake Forest on November 7, 2016 and specific comments on the Draft EA made by Hanson Professional Services Inc. on behalf of the City. The project sponsors have thoroughly reviewed the comments made by the City and are undertaking additional analyses to further quantify the potential impacts resulting from the increase in *Hiawatha Service*. The analyses will include further evaluation of infrastructure investment projects, including the Rondout Third Main Track Design Alternative 2; construction impacts; and impacts to noise and vibration, air quality, socioeconomics, grade crossings, and threatened and endangered species. Updates to the purpose and need, alternatives analysis, and environmental review sections of the EA will be made.

Once the additional analyses are complete, an agency coordination webinar and meetings with municipal leaders will be held to present the results of the analyses. Following this coordination, a final EA and SDP will be completed reflecting the additional analyses. The completion of the EA and SDP is anticipated to occur during the second half of 2017.

If you have any questions or need additional information, please contact WisDOT's Project Manager, Arun Rao, at (608) 266-3015 or the IDOT Project Manager, Elliot Ramos, at (312) 793-0478.

Very truly yours,

Arun D. Rao, AICP  
Passenger Rail Implementation Manager  
Wisconsin Department of Transportation  
Rails and Harbors Section

Elliot Ramos, P.E.  
Passenger Rail Engineer  
Illinois Department of Transportation  
Office of Intermodal Project Implementation

## Enclosure 1

EPA'S DETAILED COMMENTS ON FEDERAL RAILROAD ADMINISTRATION'S DRAFT ENVIRONMENTAL ASSESSMENT FOR THE CHICAGO-MILWAUKEE INTERCITY PASSENGER RAIL PROGRAM IN ILLINOIS AND WISCONSIN, NOVEMBER 8, 2016

### Project Description

Chapter 2 of the Draft Environmental Assessment (EA) describes the alternatives analysis process and defines the alternatives that are currently under consideration. Appendix A provides additional details on the alternatives analysis. In addition to the no action alternative, the project team selected a single action alternative for full analysis in the EA, which consists of 10 distinct infrastructure improvement projects. One of those 10 infrastructure improvements, the Union Pacific Railroad (UPRR) Siding Extension at A-20 improvement project, has action two sub-alternatives, while the other nine infrastructure improvement projects have one action alternative. While text briefly describes project features and high level maps show locations for some features, detailed footprints of project elements are not included. It is difficult to tell exactly where project elements would be located, and how they would fit into the surrounding neighborhoods. While changes to infrastructure would increase Hiawatha passenger capacity from 7 to 10 trains per day, implications for freight operations are unclear.

### **Recommendations for the Subsequent NEPA Document:**

- To help clarify the proposed actions, in Chapter 2 include a clear list of each proposed infrastructure improvement project with a full description of what the action would entail. Include location, footprint, and construction needs.
- For all infrastructure improvement projects that would involve construction, include aerial imagery with an overlay of the project footprint at a scale that depicts how the proposed project would interact with the surrounding areas. Such information is critical to understanding what exactly the project would entail and whether or not impacts could be significant.
- For each of the 10 investment improvement projects, describe how the proposed project would impact freight operations. For example, would extending sidings or adding new holding areas enable freight operators to run more trains? Or, would proposed changes allow freight trains to wait within the corridor for extended periods of time, since the project would provide a place to do so off of the main-line track?
- Disclose when construction would occur and how long it would last for each infrastructure improvement project.
- Clarify train equipment that would be procured under this project. Page 2-15 states that the project includes one PRR 305 Locomotive and three sets of PRR 305 cars. Page 3-50 states that the build alternative includes three sets of equipment consisting of one PRR 305 locomotive, five PRR 305 coaches, and one baggage car each. The number of cleaner locomotives procured under this project is important for understanding air quality impacts from overall operations.

### Air Quality

EPA's General Conformity Regulations ensure that federal actions comply with the National Ambient Air Quality Standards. In order to meet this Clean Air Act requirement, a federal agency must demonstrate that every action that it undertakes, approves, permits or supports in