

November 8, 2016

Mr. Robert R. Kiely, Jr., City Manager
The City of Lake Forest
220 E. Deerpath
Lake Forest, IL 60045

Dear Mr. Kiely:

Hanson Professional Services Inc. reviewed the Chicago – Milwaukee Amtrak Hiawatha Service Environmental Assessment (EA) with regards to the specific impacts to the City of Lake Forest. Each section of the EA has been reviewed along with the Appendices and the following comments are provided. Several documents supporting the preparation of this EA were not available for this review as they were not included in the appendices of the EA.

The purpose and need of the project is recognized as an intercity passenger rail improvement project between Milwaukee and Chicago. However, the nearest station stop to the City of Lake Forest is located 12 miles to the south in Glenview, IL. As such, no expected benefit to the City of Lake Forest is expected by this project. For the review of this EA, only those items identified as affecting the existing condition of the environment, residents, roadway and rail transportation systems have been reviewed and our comments are provided below.

Investment Alternatives

The EA discusses the need to have balanced transportation system among the different modes available; rail, air, bus and auto. Of these modes, intercity and commuter rail compete for usage along the same alignment and while it is agreed that there should be balanced choice between each, impacts of one should not supersede the other.

Infrastructure improvements were reviewed to increase intercity passenger rail service “while not **unreasonably** impairing ... commuter rail operations in the corridor” (see Section 2.2.2.3.1). ***The term unreasonably is concerning in that it identifies that an impact will take place, which is an unacceptable condition to a city that will be receiving no benefit from the proposed improvement.***

Metra Daily Ridership at the Lake Forest Station is 50 percent more than the Amtrak daily service and annual ridership along the Milwaukee District North (MD-N) line is nine times greater than the existing Hiawatha Service, and six times greater than the 2040 forecast ridership for the Hiawatha service. ***With the commuter service provided in the City of Lake Forest being substantially greater than the proposed intercity service, a reasonable expectation is that there should be no impact to the service provided by commuter rail to the City of Lake Forest.***

In addition, on time performance for the Milwaukee District North Line has averaged 92.6 percent from 2011-2015, below Metra’s goal of 95 percent on time performance, defined as a train arriving within five minutes and 59 seconds of its scheduled arrival time. No information was given on the effect of on-time performance to the Lake Forest station, but the inclusion of additional trains

without the appropriate infrastructure improvements will affect the current performance of the commuter service. **Additional information should be included to verify that the on-time performance to the Milwaukee District North Line has not been affected as a result of the proposed improvements.**

Service Alternative C was identified as the alternative carried forward for additional study, along with the no-build alternative. Service Alternative C would increase the number of daily round trips for the Hiawatha service from seven to 10. Passenger operating speeds would remain at 79 MPH. With the increase of service proposed, it was identified that infrastructure improvements would be needed throughout the corridor. The infrastructure and service improvements that affect the City of Lake Forest (see Section 2) include:

- Add three daily round trips to Hiawatha Service
- Install universal crossover in Lake Forest
- Extend freight siding south of Rondout
 - Alternative 1 - Construct extension track from Rondout south to IL Route 60.
 - Alternative 2 - Construction extension track from Rondout south over IL Route 60 to the Lake Forest Universal crossover, north of Conway Road.
- Increase freight speeds for certain freight trains from 40 MPH to 50 MPH

Table 3-19 summarizes the delays of the potential impacts of grade crossings through the corridor however, none of the segments shown include the crossings within the City of Lake Forest. While not specifically stated, other sections of the report indicated an increase in freight speeds in this section of the corridor. The increase in freight speed from 40 MPH to 50 MPH would reduce crossing delays by 34 seconds per freight train, but no information was given on the number of freight trains that would have increased speeds. Increasing the frequency of passenger trains by three daily (six additional crossing closures at each grade crossing to account for the round trip) would increase delay at these crossings by 25 seconds, 150 seconds total daily for the six additional gate closures. The number of freight trains that would need to have an increased speed would need to be at least five daily to realize a decrease in total gate closure time (see Section 3.6.2.2.2). **No information on the number of freight speed increases was included in the report.** Based on this analysis, if at least five freight trains were not expected to increase travel speed, the City of Lake Forest would experience additional vehicle delays at the existing grade crossings.

The rail network impact that the infrastructure improvements would mitigate includes the overall impact of the increased Hiawatha service on commuter rail (see Section 3.6.2.2.3). **No information in the EA provides supporting documentation to show the net zero impact to commuter rail based on the proposed improvements.** Without this information, the City of Lake Forest cannot accept the premise that Metra service has been mitigated. The proposed improvement in the City of Lake Forest is the Rondout Siding Extension, which consists of two alternatives; one stopping north of IL Route 60 and one stopping north of Conway Road. As stated earlier, the considerably larger daily commuter service should be protected against any delays in the City of Lake Forest. Since no information regarding the Alternative Impacts to service was provided, **Rondout Alternative 2 should remain as a viable alternative to help alleviate any proposed commuter rail service delays.** In addition, the extension of the siding south of IL Route 60 would allow freight traffic to idle adjacent to a wetland area and composting area, both owned by the City of Lake Forest, moving this siding away from the residential neighborhood as Alternative 1 proposes.

The City of Lake Forest has completed construction plans for a pedestrian bridge and trail connection about 950 feet north of IL Route 60, connecting the West Academy Trail with the

Middlefork Savanna Trail. The bridge will be constructed on existing abutments that are outside of the Metra right-of-way (ROW) and are not in conflict with the proposed siding location that is to be constructed within existing ROW. However, this is the location identified in Rondout Alternative 1 where freight engines are proposed to sit and idle. This proposed pedestrian trail bridge project is another reason that ***Rondout Alternative 2 should remain as a viable alternative.***

The Rondout Siding Extension graphics in Appendix A indicate that the proposed siding be constructed along the west side of the existing tracks. Based on the proposed trail bridge plans, the existing ROW is approximately 36 feet from the center of the western mainline to the western existing ROW line. In comparison, the distance between the center of eastern mainline track to the eastern existing ROW line is approximately 50 feet. ***It is recommended that the Rondout Siding Extension explore the use of the eastern ROW, building a new mainline track for Metra trains and using the existing western mainline for the Rondout Siding Extension.*** This would expand the rail facilities away from residential areas and use the wider portion of the existing ROW.

Over the last eight years there have been four accidents at the Metra station in the City of Lake Forest resulting in four pedestrian fatalities and two injuries. Two of the accidents were reported by Amtrak trains and two were reported by freight trains. The environment of the Metra station is one where pedestrian access to the rail environment is necessary for Metra commuter rail access. However, with additional trains in the corridor also traversing the station but not stopping, pedestrian warning and protection is of high importance. ***The EA does not discuss pedestrian safety at existing commuter rail stations along the corridor.*** With the increase of freight speeds proposed and the increase in the number of Hiawatha service trains, the exposure factor at the Metra stations will increase which should warrant the inclusion of pedestrian safety enhancements such as fencing and pedestrian access gates, additional signage and verbal warnings or pedestrian grade separations.

Environmental Considerations

“The purpose of the Rondout siding extension is to provide additional operational flexibility for freight and passenger trains traveling through the Rondout control point. By constructing a third track at least 10,000 feet in length, which is the average length of a freight train in this analysis, a train would be able to hold off the mainline, creating capacity for other trains on the mainline” (see Section 2.2.2.4.3). ***The EA does not provide maximum length of freight trains that travel through the Rondout control point.*** The preferred alternative (Alternative 1) would provide a total length of 13,000 feet for a third track. ***Is this sufficient length to handle all trains, most trains, or just trains of average length? How well Alternative 1 meets the purpose and need of the Rondout Siding Extension project cannot be adequately determined as presented.***

Many of the environmental resource sections do not provide sufficient detail to understand the extent of impacts and the locations. This is especially evident regarding tables, figures and exhibits. Impact exhibits are not provided for noise and vibration (location of sensitive receptors and clusters) and transportation (locations of grade crossings, etc.). Mapping provided in the EA is often too small to discern details, dark, low-resolution and has insufficient labeling. In addition, several resource categories, such as wetlands, floodplains and hazardous materials, are either assessed at a very broad level in which specific impacts are not quantified, or will be assessed during the design stage. ***In order for the FRA to make a Finding of No Significant Impact (FONSI), impacts to environmental resources need to be quantified for a determination of a preferred alternative.***

The noise and vibration evaluation has identified general areas where noise and vibration impacts would be expected. A more detailed evaluation would be required to identify impacts at specific

locations and to quantify the number of properties that may experience noise and vibration impacts” (see Section 3.7.4.2). In addition, Section 3.7.1.2 states that “A general assessment is considered the appropriate level of detail for estimating the noise effects associated with the proposed project. The general noise assessment is a conservative approach, and if no impact is projected, no further analysis is required.” The EA does not state why the determination that a general assessment is the appropriate level of detail. Several of the improvement projects indicated a moderate impact to receptors. Based on the above statement, **further analysis beyond a general noise assessment is required**. According to Section 3.2.5 of the Federal Transit Administration’s (FTA’s) Transit Noise and Vibration Impact Assessment, projected noise levels in the Moderate Impact range (as identified for the residences on Faculty Circle) will require consideration and adoption of mitigation measures when it is considered reasonable. The EA includes no consideration of any noise impact mitigation measures.

The noise and vibration evaluation discusses potential noise impacts from the proposed Rondout Siding Extension. The discussion concerns a proposed turnout just north of IL 60 and nearby residences at Faculty Circle, as well as any impacts from idling trains to the residences on Faculty Circle (see Section 3.7.4.2.3). **This section does not include any discussion on potential noise and vibration impacts to nearby residences in the Academy Woods subdivision located north of the Faculty Circle residences.** Based on aerial mapping, the closest houses in the Academy Woods subdivision would be approximately 100 feet from the proposed track and therefore should be assessed for potential noise impacts.

Several surveys were conducted for state-listed and federally-listed threatened and endangered species in the vicinity of the proposed Metra Fox Lake Second Track and Rondout Siding Extension projects. These species are known to occur in the Middlefork Savanna Natural Areas and Nature Preserve, which is located on each side of the project between Dundee Road and Rondout. The Illinois Department of Transportation (IDOT) Bureau of Design and Environment (BDE) determined that there would be no adverse effect to the Eastern Prairie Fringed Orchid by the project because the proposed rail work would occur on the west side of the right-of-way, which is on the opposite side of the tracks as the orchid population. However, the U.S. Fish and Wildlife Service did not concur with IDOT’s “No Effect” determination, and believes the project’s “May Affect, Not Likely to Adversely Affect” determination is appropriate because of existing herbicidal damage to the species and indirect impacts from the railroad’s herbicide spraying would result in a take of the species in areas of new construction. The EA states that FRA will engage USFWS in site-specific consultation once funding and construction timelines are identified (see Section 3.12.2.2.1). As previously mentioned, **in order for FRA to issue a FONSI, impacts to environmental resources need to be quantified for such a determination.**

The Rondout Siding Extension project would involve constructing new track on five-foot embankment and extending culverts in the 100-year floodplain. During final design, a 100-year flood analysis would be undertaken to determine if work would create an increase of 0.01 feet or more in the floodplain (see Section 3.15.2.2). **The EA provides no quantification of floodplain impacts; therefore, the extent of the impact is unknown.**

Eighteen wetland sites were identified in the Metra Fox Lake Second Track and Rondout Siding Extension project areas. During final design, Wetland Impact Evaluations (WIEs) would be completed and submitted to IDOT BDE to document wetlands impacts. Some sites would require 5.5:1 mitigation ratio because of high Floristic Quality Indices (FQIs) (see Section 3.16.2.2). The EA provides a table listing potential for impacts to wetlands, but no acreage or quantification of impacts. Therefore, **the extent of project impacts to wetlands is unknown. In addition, NEPA**

documentation should include avoidance, minimization and mitigation measures when documenting wetland and floodplain impacts.

The EA describes the Middlefork Greenway/Trail in the Section 4(f) properties section (see Section 3.17.1), but **does not mention if the Middlefork Savanna Natural Area and Nature Preserve would be considered a Section 4(f) property by FRA as a public wildlife and waterfowl refuge.** The Middlefork Savannah is listed in Appendix I – Figure I-1 in the list of Section 4(f) Parks, Recreation, and Natural Areas, but there is no discussion in the EA of its Section 4(f) status or whether there is any “use” of the resource.

Schedule

The Chicago – Milwaukee Amtrak Hiawatha Service EA is the first step necessary to obtain funding and move forward to construction. Currently, the Finding of No Significant Impact (FONSI) is scheduled for completion in late fall 2016 with the Federal Railroad Administration (FRA) administrative approval in winter 2016. The FONSI is a culmination of the National Environmental Protection Act (NEPA) EA review process, that has taken into consideration all design alternatives, comments received from the public and environmental considerations for the project. The FONSI identifies that the project will not have a significant impact on the environment or that the environmental impacts have been sufficiently mitigated and balanced with the projects benefits. The FRA administrative approval provides final approval for the project to proceed towards construction.

There is currently no construction funding identified for the project, which means there is no schedule for construction at the present time. The completion of the NEPA process and receiving FRA approval allows the project to qualify for construction funds as the environmental review process is complete.

Should funding become available, the following is a typical timeline of events with minimum durations for projects similar to the Chicago – Milwaukee Hiawatha Service project:

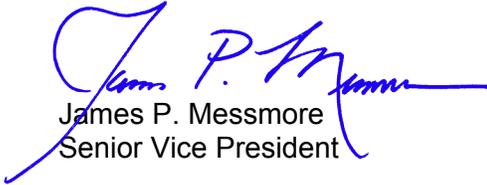
- Preliminary Design (30% Plans) – 9 months
- Railroad Agreements – 1 year
- ROW Acquisition (Wisconsin parcels) – 1 year
- Pre-Final Design (95% Plans) – 6 months
- Final Design (100% Plans) – 3 months
- Letting and Bidding – 3 months
- Construction – 3 years

Some of these tasks would occur concurrently, such as preliminary design, railroad agreements and ROW acquisition, while other tasks would occur subsequently such as Preliminary and Pre-Final design. In summary, at the earliest, it would take approximately two years from the funding announcement for construction to begin and another three years beyond that for construction to be completed.

Thank you for the opportunity to provide this service to the City of Lake Forest. We are happy to address any questions you have related to our comments.

Sincerely,

HANSON PROFESSIONAL SERVICES INC.



James P. Messmore
Senior Vice President