Appendix L
Agency Scoping Comments
February 18, 2011

Mr. Steve Hands  
Strategic Planning & Policy  
Chicago Transit Authority  
P.O. Box 7602  
Chicago, Illinois 60680-7602  

Re: CTA North Red and Purple Modernization Project  
Chicago Department of Environment Written Comments  

Dear Mr. Hands,

The Chicago Department of Environment (DOE) appreciates the opportunity to comment on the proposed Chicago Transit Authority (CTA) North Red and Purple Modernization Project (the Project). We are supportive of the Project and the need to bring the Project into a good state of repair.

DOE has the following comments and concerns related to the Project:

1. **Material Reuse and Disposal.** Given the City’s ordinance to recycle at least 50% of the recyclable construction and demolition debris generated on site, will the Project provide opportunities for material reuse, either within the project itself or on other CTA projects? For materials that cannot be reused or recycled, how will construction and demolition debris be disposed? Further, what provisions will be made to ensure that hazardous materials such as lead-based paint, asbestos containing materials, PCB (polychlorinated biphenyl) containing materials and contaminated soils are properly handled, abated, and disposed? Finally, for those scenarios that require removal of the railroad embankments or the creation of new subway tunnels, how does CTA plan to handle the significant quantity of construction spoils generated by such an activity?

2. **Station Consolidation.** For those scenarios that propose to consolidate transit stations, what effect will this consolidation have on Americans with Disabilities Act (ADA) accessibility requirements? How will consolidation affect local businesses that rely on nearby stations slated for closure/consolidation?

3. **Service Interruptions.** DOE understands that the Project may cause service interruptions. How will CTA manage such interruptions and what alternative provisions will be utilized to limit the impact to commuters and local traffic?

4. **Air Quality.** Is new ridership expected to reduce overall motor vehicle trips? What effect will this have on air quality?

5. **Historic Resources and Environmental Justice.** Of particular concern to DOE are issues relating to neighborhood compatibility and environmental justice, primarily in relation to historical and/or privately
owned parcels that may need to be acquired for the project. DOE would also be interested in a detailed evaluation of noise and vibration, to determine how such issues will affect neighboring properties.

Additionally, DOE requests that CTA evaluate the following as part of the Project:

- Recycling opportunities at stations and parking areas;
- Alternative energy options including solar, solar thermal, wind and more to provide electricity, heating, and cooling where needed;
- Opportunities to install solar arrays (on rooftops, large expanses, etc.) to return energy to the grid;
- Reduction of light pollution through the use of downward-facing lighting;
- Compliance with the city's storm water ordinance, including using bio-swales, rain barrels and other methods to reduce the first flush of water into the sewer system;
- Native landscapes requiring little to no irrigation;
- Green roofs on any facilities;
- Bicycle access and parking;
- Permeable paving for any Park-N-Ride areas; and
- Charging stations for electric vehicles

We offer our support and assistance with any of our comments as appropriate. Thank you for the opportunity to comment on this important project.

Sincerely,

[Signature]

Kevin M. Laberge, P.E.
Environmental Engineer III

cc: John Kryl, DOE
February 16, 2011

Mr. Steve Hands
Chicago Transit Authority,
Strategic Planning & Policy
P.O. Box 7602,
Chicago, IL 60680-7602

Dear Mr. Hands:

The City of Evanston would like to thank the Chicago Transit Authority (CTA) for the opportunity for residents to offer comments on the six possible alternatives for improvements along the North Red and Purple Line at the Fleetwood Jourdain Center. Although it is required by Federal regulations, CTA's outreach on this issue was appreciated and laudable. The City of Evanston is strongly supportive of modernizing the entire Purple Line, and it believes residents will stoutly embrace renovating the stations, replacing the viaducts and maintaining the great service the Line provides residents in Evanston, Wilmette and Chicago. However, the proposed CTA Modernization alternatives that close existing stations in Evanston and alter Express service will not be supported by the City. For the reasons detailed in this letter, the City requests the formulation of a new Modernization alternative that maintains these important features. With these key details considered and implemented in the final design, it is the expectation that City officials and community members will be able to support the final alternative.

**Environmental Impacts Identified with No or Limited Rehabilitation**

Limited or no investments in the Purple Line, as outlined in the No Action Alternative, the Basic Rehabilitation Alternative or the Basic Rehabilitation Alternative with Transfer Stations cannot be serious choices entertained by the Chicago Transit Authority for this project. Although less expensive, alternatives that make limited capital investments would be analogous to a patient needing a heart transplant receiving a few stitches on a cut. Sure it makes the heart work easier for a short time, but it does not get to the root of the problem. The Purple Line is a 100 year transit line that is in dire need of a complete transplant. It will require significant investment as well as the political and public will to update the entire line to the standards required in the 21st century. The City of Evanston stands ready to be a strong partner in this process.
Environmental Impacts Identified with the Closure of the South Boulevard Station

Retention of the South Boulevard Station is critical due to its proximity to a major job center, its role in neighborhood stabilization, the access it provides to a high-density population, many of whom are dependent upon public transportation to get to work, and the planned residential development in the immediate vicinity.

The South Boulevard station is an essential hub that serves neighborhoods to its south, east and west. One of Evanston's largest employers, St. Francis Hospital, is within walking distance of this station. This 375 bed hospital employs over 1,280 workers and has more than 200 volunteers. Removing this station would impact these workers and visitors to the hospital on a daily basis and would only lead to increased automobile congestion and commute times for those who live or work in this neighborhood. In recognition of its use by employees, the hospital has funded improvements to pedestrian access and amenities along the walking route to the station.

The station is also a key component of local and federal efforts to revitalize a neighborhood hard hit during the recession. In 2010, the Department of Housing and Urban Development (HUD) awarded the City of Evanston $18.5 million in Neighborhood Stabilization Program (NSP2) funding to halt the decline and instability resulting from the foreclosure crisis. A key rating factor in HUD's selection process was convenient access to transportation options. Removing this station would reverse efforts to stabilize this neighborhood and to provide quality affordable housing with diverse transportation options.

This NSP2 neighborhood (Census Tract 8102) has no good alternative with respect to transit access. The additional access point proposed at Washington Street is a more than ½-mile walk for most residents living in this neighborhood. Slightly more of this Census Tract is within ½-mile of CTA's Howard Street Station. However, pedestrian routes there are severely limited by the Union Pacific railroad embankment and CTA Yellow line tracks which effectively block or interrupt the east-west and north-south street grids, respectively.

Nearly 24% of residents living within ½-mile of the South Blvd. station take public transportation to work. [Source: Center for Neighborhood Technology (CNT) Transit Oriented Development (TOD) Database]. Further, over 50% of the households living within this same radius are at or below the median household income for the City of Evanston ($56,335) [CNT TOD Database]. Any alternative that proposes the elimination of the South Boulevard Station will have a significant negative impact upon the travel times and access for these commuters, a large percentage of whom are low or moderate income. South Boulevard also has the highest density of minority populations living within ½-mile [Source: CNT TOD Database].

Access to bus service, current ridership totals, and proximity to adjacent stations were the criteria used by the CTA to determine station consolidation and/or closure. What this methodology does not account for is the potential to capture new ridership.
Of Evanston's transit stations, South Boulevard Station has the second highest population density next to Davis Street (downtown Evanston). Its location serves the southern leg of the Chicago Avenue arterial corridor, which was second only to the downtown area in terms of the production of new residential units since 2000. In 2011, a new planned development is slated to break ground adding 214 residential units and 8,400 square feet in commercial retail space to the area.

**Environmental Impacts Identified with the Closure of the Foster Station**

Alternatives which propose the closure of the Foster Station will reduce access to Evanston's largest employer, Northwestern University. Further, an adjacent 1-acre, university owned property is planned for future redevelopment and is ideally suited for a transit-oriented, mixed use project. Closure of the Foster Station will increase the carbon footprint of this neighborhood by eliminating or limiting alternative transportation options for future development of this site. It will also increase travel times for existing commuters due to longer walking trips to access transit or other public transportation options which are not as convenient as existing Purple Line Service.

This station is also located within a one block walk from three residential facilities serving elderly populations, Mather Pavilion, Ebenezer Primm Towers and Jane R. Perlman Apartments (CHA). Together, they attract numerous employees and care workers, of whom a large number commute by public transportation. Visitors and a majority of the residents of the Perlman Apartments are also reliant upon public transportation for their discretionary trips, including Purple Line service currently provided by the Foster Station.

**Environmental Impacts Identified with Elimination of 2-Way Express Service**

The negative impacts caused by possible elimination or limitations of two-way, rush hour express service would be disturbing to Evanston, but would also ripple throughout the north suburban region. Many Evanston businesses, major institutions and employers have come to rely on this convenient reverse commute service. More than an amenity, it makes it possible for many workers traveling from both the north and south sides of Chicago and beyond to work early morning or afternoon shifts at Northwestern University, two hospitals and several nursing and skill care facilities. Maintaining this service is critical to Evanston if it is to remain competitive in both attracting and retaining business.

Beyond the immediate impact upon Evanston, the elimination of reverse express service to the Davis Street or Linden Street stations also results in the loss of transfer options to major regional destinations in adjacent suburbs. From Davis Street, these include: Oakton Community College (Pace 208); Lutheran General Hospital, downtown Des Plaines, and O'Hare (Pace 250). From Linden, they are: Edens Plaza; Glenview and Northbrook Court (Pace 422).
Conclusion

The City of Evanston stands eager to partner with Chicago Transit Authority to modernize the North Red and Purple Line. Reviving the transportation heart of our community is in the best interest of the residents of Evanston as well as those of the entire northern regional corridor. Evanston is extremely pleased that the Chicago Transit Authority is focusing both time and resources to get this critical project completed when funding becomes available. For the reasons cited in the above paragraphs, the City of Evanston respectfully requests the development and analysis of one or more new alternative(s) that examine(s) both the cost and efficiency of a 4-track modernization option retaining the South Boulevard and Foster Stations as well as express and reverse commute services. Furthermore, to fully understand their respective effects upon commute time, future analyses of alternatives should provide the travel time savings attributable to track improvements or and/or other proposed changes. Only then can the public, business community and local government understand the trade-offs they are being asked to consider.

For over 100 years, the Chicago Transit Authority’s (CTA) Purple Line has become a central fixture of the Evanston community. It transports people to/from Evanston and surrounding communities to destinations throughout the Chicago metropolitan region. Whether this transportation is for business, schooling, shopping or just plain leisure the Purple line remains an integral part of the city and the residents it serves. To lose just one fraction of its current service would be akin to Evanston and the entire the North Shore region losing a part of its character.

The City of Evanston envisions the bright outlook for modernization on the North Red and Purple Line. Breathing life into heart of public transit touches a wide variety neighborhoods, institutions, businesses and residents. It is this vivid future that both the City of Evanston and the Chicago Transit Authority can look forward to for another 100 years and be proud to have accomplished.

Please do not hesitate to contact me with any questions regarding this letter.

Sincerely,

Wally Bobkiewicz
City Manager
We want your input on the North Red and Purple Modernization Project. The purpose of the scoping process is to identify public and agency concerns early in the environmental process, define the issues and alternatives that will be examined in the Environmental Impact Statement (EIS) and facilitate an efficient EIS preparation process. The RPM project is one part of CTA’s efforts to enhance and expand the entire Red Line. Please PRINT.

Name: Elizabeth Tiedall
Organization: City of Evanston Title: Mayor
Address: 2100 Ridge
City: Evanston State: IL Zip: 60201
Phone: E-mail:

☐ Check here to also receive updates about other projects along the Red Line.

Please comment on the proposed alternatives, the purpose and need for the project, the proposed topics of evaluation and the potential impacts and mitigation measures to be considered. Comments must be submitted by the close of business on February 18, 2011.

Evanston needs 4 track modernization to keep and expand the number of express trains and to retain the Foster and S Boulevard station. We have 2 hospitals and need ADA access.
Mr. George Perez
Vice President
Strategic Planning and Policy
Chicago Transit Authority
567 West Lake Street
Chicago, Illinois 60661-1498

Dear Mr. Perez:

The Agency has reviewed the proposed project for the CTA North Red and Purple Modernization Project for the repair from north of Belmont Station to the Linden Terminal.

The Agency has no objections to the proposed project; however a permit will be required from the Division of Water Pollution Control for one or more acres of land being disturbed during construction. A construction site activity stormwater NPDES permit will be required. For questions or comments, you may contact Al Keller, 217-782-0610.

Demolition / asbestos notification will be required 10 working days prior to the project start date. Please contact Alan Grimmett, Bureau of Air, for all questions on this matter, 217-557-1438.

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

Sincerely,

Lisa Bonnett
Acting Deputy Director
January 21, 2011

Steve Hands
Chicago Transit Authority
Strategic Planning and Policy
P.O. Box 7602
Chicago, IL 60680-7602

Dear Mr. Hands:

We have received the information provided for the above referenced project. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: “Protection of Historic Properties”.

The first step in the consultation process is to perform a cultural resources survey within the project area. No survey of CTA structures has been undertaken for almost 30 years. Therefore, we required that it be done as part of the EIS process.

If you have any questions or would like a list of firms qualified to perform this work, please contact me at 217/785-5027.

Sincerely,

Anne E. Haaker
Deputy State Historic Preservation Officer
February 18, 2011

Mr. Steve Hands
Strategic Planning and Policy
Chicago Transit Authority
567 W. Lake Street
Chicago, IL 60661

Dear Mr. Hands:

Metra appreciates the opportunity to comment on the scoping of the Environmental Impact Statement for the North Red and Purple Modernization (RPM) Project.

Metra requests that the RPM’s projected effects on ridership of Metra and other transit services, both during and after construction, be addressed during the study. This information is necessary for the optimal capital and operations planning of complementary transit service within and adjacent to the RPM corridor.

In addition, Metra requests that any impacts to adjacent commuter rail operations in Evanston be fully considered during this EIS. It is important that pedestrian access to the Metra stations in this study area and access to commuter parking in the study area be maintained during construction and in the completed project.

We look forward to continued participation in the North Red and Purple Modernization Project planning process.

Sincerely,

Lynnette H. Ciavarella
Assistant Senior Division Director
Capital & Strategic Planning

Metra is the registered service mark for the Northeast Illinois Regional Commuter Railroad Corporation.
January 27, 2011

Mr. Jorge Perez  
Vice President  
Strategic Planning and Policy  
Chicago Transit Authority  
567 West Lake Street  
Chicago, IL 60661-1498

Dear Mr. Perez:

Subject: Environmental Review Process for the CTA North Red and Purple Modernization (RPM) Project

Reference is made to your letter dated December 29, 2010, concerning the subject matter.

The Metropolitan Water Reclamation District of Greater Chicago (District) attended the agency scoping meeting on January 24, 2011. We are hereby informing you that the District wishes to be a participating agency in the process.

The District’s principal concern is the effect that the proposed project will have on District facilities and property. The CTA leases property from the District for part of the Purple Line in Evanston.

The District’s contact for this project is Mr. Joe Schuessler, Principal Civil Engineer, phone: 312-751-3236, email: joseph.schuessler@mwrdd.org.

Very truly yours,

Kenneth A. Kits  
Director of Engineering

WSS:JMS
Pace Bus Participating Agency Response and Comments.

Best,
Steve

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Steve Hands
Strategic Planner
Chicago Transit Authority
Strategic Planning and Policy
(312) 681-4169

please consider the environment before printing this email

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From: North Red & Purple Modernization
Sent: Thursday, February 17, 2011 4:36 PM
To: Hands, Steve
Subject: FW: CTA North Red and Purple Modernization Environmental Impact Statement Comments

Chicago Transit Authority
Red and Purple Modernization (RPM)
Improving your commute. Improving your community.
www.transitchicago.com/RPMproject
RPM@transitchicago.com

From: David Tomzik [David.Tomzik@Pacebus.com]
Sent: Thursday, February 17, 2011 4:27 PM
To: North Red & Purple Modernization
Cc: Lorraine Snorden
Subject: CTA North Red and Purple Modernization Environmental Impact Statement Comments

Dear Mr. Hands:

Pace scoping comments regarding CTA North Red and Purple Modernization Environmental Impact Statement
Thank you for the opportunity to review and comment on the scoping of the Environmental Impact Statement for the North Red and Purple Modernization Project. Below are comments regarding the proposed project alternatives and potential environmental impacts relating to the proposed improvements.

- The reverse travel market should be a consideration in the alternatives review. Increased passenger travel times associated with the local train alternatives will reduce market potential in this corridor and impact regional connectivity for passengers traveling beyond the North Red line and Purple line. Pace currently provides connecting service at Linden, Davis Street, Howard Stations and at Dempster Street and Oakton (future) on the connecting Yellow Line.

- Pace requests participation in the planning development and design of any proposed station facilities improvements served by both fixed route and Regional ADA Paratransit services. Pace currently operates fixed route service at Linden, Davis Street and Howard Stations. Design should include sufficient bays/boarding zones to accommodate both Pace and CTA bus routes (where applicable), Regional ADA Paratransit, operator facilities, passenger information as well as bus priority access such as Transit Signal Priority or bus activated signals to allow buses to operate with minimal congestion.

We look forward to participating in this regional planning process.

David Tomzik
Manager, Long Range Planning
Pace Suburban Bus Service
550 W. Algonquin Road
Arlington Heights, IL 60005
847 228-2463
fax 847 228-2330

david.tomzik@pacebus.com
Lea, Claudia

From: North Red & Purple Modernization [RPM@transitchicago.com]
Sent: Monday, February 07, 2011 4:29 PM
To: Lea, Claudia
Cc: Hands, Steve
Subject: FW: Electronic distribution of ER 11/17 - NOI for the Proposed Transit Improvements to the North Red and Purple Lines

This is a response from the U.S. Fish and Wildlife Service. This is not a public comment.

Thanks Claudia,

Best,
Steve
Chicago Transit Authority
Red and Purple Modernization (RPM)
Improving your commute. Improving your community.
www.transitchicago.com/RPMproject
RPM@transitchicago.com

From: Shawn_Cirton@fws.gov [Shawn_Cirton@fws.gov]
Sent: Monday, February 07, 2011 4:14 PM
To: North Red & Purple Modernization
Cc: Stephanie_Nash@fws.gov; Michael_Chezik@ios.doi.gov; Paul_Richert@fws.gov; reginald.arkell@dot.gov; Jody_Millar@fws.gov
Subject: Re: Electronic distribution of ER 11/17 - NOI for the Proposed Transit Improvements to the North Red and Purple Lines

Steve,

The U.S. Fish and Wildlife Service has no substantive comments to offer for the Notice of Intent to Prepare an Environmental Impact Statement for the USDOT FTA Proposed Transit Improvements to the North Red and Purple Lines. Based on the location of the proposed actions, the project is unlikely to have impacts to fish and wildlife resources of concern to the Service.

Shawn
******************************
Shawn Cirton
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Chicago Illinois Field Office
1250 South Grove Avenue, Suite 103
Barrington, IL 60010
(847)381-2253 xt.19
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shawn_cirton@fws.gov
http://midwest.fws.gov/chicago

The mission of the U. S. Fish and Wildlife Service: Working with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people.
February 15, 2011

Richard Rodriguez  
President  
Chicago Transit Authority  
567 West Lake Street, 5th Floor  
Chicago, IL 60661

Re: RTA Support for North Red and Purple Line Modernization Alternatives

Dear Mr. Rodriguez:

The Regional Transportation Authority (RTA) supports the Modernization Alternatives proposed through the North Red and Purple Modernization (RPM) Project Environmental Impact Statement (EIS) Scoping process. The Modernization Alternatives include full replacement of new infrastructure on the North Red and Purple Lines, extending the useful life by 60-80 years and will increase speed and reliability as well as improve safety and accessibility. While the EIS process will quantify costs, benefits and risks of each alternative, a specific Modernization Alternative or an amalgam of the three proposed alternatives all encompass the type of investment that the RTA supports in the region.

The RTA is enthusiastic about the opportunity to better serve a well-established transit market through the Modernization Alternatives – potentially increasing existing ridership and further encouraging transit and relieving local congested roadways. The North Red and Purple Lines are adjacent to the highest population density corridor in the region and carry 128,000 riders per day, or 19 percent of Chicago Transit Authority’s (CTA) weekday rail passengers – in traditional and reverse commute directions. Modernization Alternatives could increase speed and better serve changing travel patterns. The RTA believes that reinvesting in existing high-demand infrastructure in an established corridor at the end of its lifecycle is good practice for a world-class transit system.

The RTA also supports development of Modernization Alternatives which will reduce long-term operating and maintenance costs. Because the infrastructure is well beyond its useful life – built between 1900 and 1922 – continued degradation could increase the cost of maintenance and compromise service in the future. The RTA Capital Asset Condition Assessment shows a $24 billion existing 10-year state of good repair program need across all three service boards (including 10 percent directly attributed to the current needs of the North Red and Purple Lines). These unmet needs are a risk to the future of our system. The RTA supports alternatives that rebuild infrastructure to be more efficient, improve mobility and
create a climate for economic growth. Capitalizing on opportunities to increase the efficiency of regional transit services must be a cornerstone of today’s strategic planning for a viable and sustainable system tomorrow.

Meanwhile, the RTA supports the CTA in fully examining issues raised during the Scoping process and developing responsive solutions. Moreover, allocating project resources to truly understand the uncertainties associated with construction and the potential impacts of each alternative will minimize project risk. The RTA is looking forward to working with the CTA and Federal Transit Administration as a Participating Agency throughout the EIS process.

RTA believes that to support and sustain a world-class regional transit system, the region must adequately maintain and modernize itself. The detailed study of Modernization Alternatives will resolve questions and ultimately determine which alternative or components of alternatives best align with regional priorities. Because CTA’s proposed Modernization Alternatives will bring the North Red and Purple Lines into a state of good repair while strategically planning to provide more efficient service to meet the needs of tomorrow’s customers, the RTA enthusiastically supports these alternatives in the North Red and Purple Environmental Impact Statement Scoping process.

Sincerely,

[Signature]

Joseph G. Costello
Executive Director

cc: Reginald Arkell, Federal Transit Administration, Region V
    Steve Hands, Chicago Transit Authority
    Leanne Redden, Regional Transportation Authority
Thank you for the invitation to the IL Department of Natural Resources to participate in the environmental review of this project. Our Transportation Program Manager has looked over the project information and noted that it upgrades existing stations, viaducts, power systems and signals on existing alignment in the city/urban built area. We do not need to attend the Open House, but suggest that you submit the project to our Ecological Compliance Assessment Tool (EcoCAT) at [http://www.dnrecocat.state.il.us/ecopublic/](http://www.dnrecocat.state.il.us/ecopublic/) as a request for consultation, with the CTA being the jurisdictional unit of government performing the action. You can break the project up into three sections, for example, a north, central and south portion of the project area. If no protected species or natural areas are in the vicinity of the location you mapped for the project, EcoCAT will terminate the consultation. If resources are listed, the program manager will respond by letter. Please call me at the number listed below if you have any questions.

Karen M. Miller  
Division of Ecosystems & Environment  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, IL 62702  
217-524-1048