#### **Federal Transit Administration**

#### **Region V**

# MILWAUKEE WEST LINE FOX RIVER BRIDGE IMPROVEMENT PROJECT (Metra Bridge Z-100) Elgin, Illinois

#### **Finding of No Significant Impact (FONSI)**

#### A. Introduction

This document provides the basis for a determination by the U.S. Department of Transportation (USDOT), Federal Transit Administration (FTA), of a Finding of No Significant Impact (FONSI) for the Milwaukee West Line Fox River Bridge Improvement Project (Metra Bridge Z-100) (the Project). This determination is made in accordance with the National Environmental Policy Act (NEPA) of 1969, 42 United States Code (U.S.C.) § 4331 et seq.; FTA's implementing procedures (23 Code of Federal Regulations [CFR] § 771.121); Section 4(f) of the USDOT Act of 1966, 49 U.S.C. § 303; and the National Historic Preservation Act of 1966, 54 U.S.C. § 300101 et seq.

FTA, as the federal lead agency, and Metra, as the local project sponsor, jointly prepared the Environmental Assessment (EA) to describe potential impacts on the physical, human, and natural environment that may result from the proposed Milwaukee West Line Fox River Bridge Improvement Project (Metra Bridge Z-100). The EA was prepared pursuant to 23 CFR § 771.119 and issued by FTA on February 8, 2017. This FONSI is prepared by FTA pursuant to 23 CFR § 771.121, and incorporates, by reference, the EA and other cited documentation.

#### **B.** Existing Conditions

The Project is located at the Metra Milwaukee West Line's crossing of the Fox River in Elgin, Illinois. **FIGURE 1** is a map of the project limits. The Metra Bridge Z-100 is located approximately 35 miles northwest of downtown Chicago. It is a single-track, 12-foot wide, 504-foot long railroad bridge structure over the Fox River. The Fox River is a tributary of the Illinois River, flowing from southeastern Wisconsin to Ottawa, Illinois. The Project is located in Township 41N, Range 8E, in Section 24 within the City of Elgin, Kane County, Illinois. Approximately 50 feet west of (downstream) and parallel to the Project bridge is another railroad bridge which is owned and operated by the Union Pacific Railroad (UPRR). US Route 20 is located adjacent to, and over, the two railroad bridges. It is owned and operated by the Illinois Department of Transportation (IDOT).

The Metra Milwaukee West Line is one of 11 commuter rail lines that Metra operates in northeastern Illinois. The Milwaukee West Line is 39.8 miles long and operates between the Big Timber Road Station in the City of Elgin and Chicago Union Station in the City of Chicago. Fifty-four Metra Milwaukee West Line commuter rail trains operate over the Fox River bridge daily, carrying over 6.8 million passengers per year. In addition to these commuter rail trains, up to eight Canadian Pacific (CP) freight trains also use the bridge over the Fox River daily.

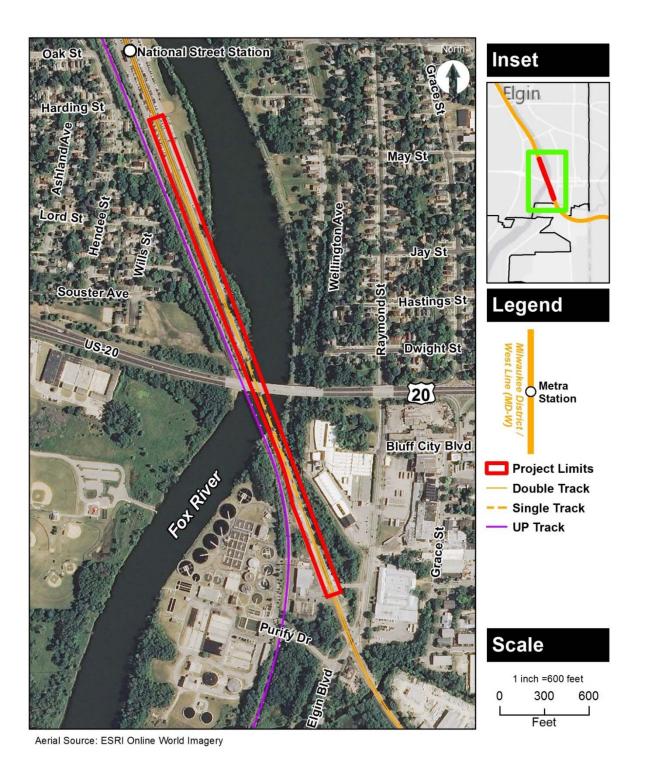


Figure 1: Project Limits Map

The existing, single-track bridge was constructed in 1881, consisting of six steel spans resting on masonry abutments and five piers. Extensive modifications to the bridge were made in 1905 and 1926. Three of the original spans were replaced in 1905, and the other three were replaced in 1926. The piers and abutments date from the original 1881 construction, with cast-in-place concrete modifications as required to accommodate the new span beams from 1905 and 1926. The existing bridge is owned and maintained by Metra.

Based on field inspections conducted in 2009, the bridge is in overall poor condition. This means that some bridge elements have advanced deficiencies and that these weaknesses affect the overall structural capacity and serviceability of the bridge. The bridge's steel spans, which date from 1905 and 1926, have been significantly corroded by moisture and salt. In addition, the masonry piers and abutments need to be strengthened to bring them into compliance with current railroad design criteria regarding resistance to forces generated by train movement on the structure.

The existing land use in the project area, which extends beyond the project limits, is currently zoned as CF – "Community Facility" on the 2010 City of Elgin Zoning Map. Conditional land uses enumerated for CF zoning include both railroad tracks and railroad bridges. A zoning change is not expected, as the railroad bridge would remain a public transit facility. A small portion of the southern end of the Project area is currently zoned as CI – "Commercial Industrial" on the 2010 City of Elgin Zoning Map. This zoning district is noted as the least restrictive type of zoning, and allows railroad tracks as a conditional use. The Project limits are already occupied by the existing bridge and track alignment.

#### C. Project Purpose and Need

The purpose of the Project is to provide an improved railroad bridge for the Metra Milwaukee West Line crossing of the Fox River – replacing the existing bridge and adding a second mainline crossing. This Project is needed to improve the bridge condition, reliability and operations.

The existing bridge shows significant deterioration. Spray from deicing salt on the US Route 20 highway bridge above has contributed to steel corrosion on the railroad bridge.

Recent inspections have found that some of the beam flanges have lost up to 25% of their steel from rust and corrosion. There is a crack in the top flange, and holes have rusted through the beam webs. In the past few years, structural steel on the bridge has required repairs on several occasions. However, even with the repairs, the bridge is not compliant with current design standards and requirements.

The existing piers and abutments are made of stone masonry and were constructed in 1881. In 1926 and 1941, concrete encasements, or coverings, were added to protect the stone masonry of the piers below the river water line. Though tests show that the piers are in "fair" to "good" condition, they do not meet current AREMA standards for resisting the back and forth stresses generated by the braking and acceleration of trains on the bridge.

The reliability and operation of the Milwaukee West Line are constrained by the existing single-track bridge. A single-tracked bridge is not typical of most mainline river crossings. Most new rail crossings provide two mainlines, or double-tracked bridges, which improve bridge capacity, improve reliability along the line, and allow for greater flexibility in operations and maintenance activities. Additionally, except for the existing bridge, there are a minimum of two mainline tracks along the Milwaukee West line from Elgin's Big Timber Station to Chicago Union Station. The existing single-track bridge acts as a bottleneck; trains that approach the bridge at the same time, from either direction, need to wait for their turn to pass over the bridge.

Fifty-four Metra trains and up to eight CP freight trains per day cross the Fox River on the existing bridge. With only one track across the bridge, train service schedules are unreliable. The current demand cannot be met without delays. The unreliable train service schedules and delays result in wasted fuel and additional emissions.

Increasingly frequent delays and unreliable service schedules, primarily due to increased frequency of maintenance activities on the existing bridge, would discourage riders from using passenger rail as an alternative to the automobile, and businesses and employees in the Milwaukee West Line corridor would lose much of the economic benefit currently provided by Metra service. In addition to traditional suburb-to-Chicago commuting patterns, the bridge currently links many reverse commuters with jobs in Elgin. Nearly 20% of passengers using Metra's Chicago Street Station in Elgin during the morning peak period alight rather than board, as commuters travel to Elgin employers. Dependable transportation links between jobs and qualified workers are particularly important to the City of Elgin, which qualifies under federal guidelines as an Economically Distressed Area.

#### **D.** Alternatives Considered

The Project evolved through a multi-year planning process that began in 2010. Two alternatives were considered as part of the EA, the No Build Alternative and the Preferred Build Alternative.

#### No Build Alternative

The No Build Alternative would maintain the existing single track bridge, and repairs and maintenance on the existing bridge would continue. However, the nature and extent of the repairs would become greater, more frequent, and more costly. Detailed repairs would include rehabilitation of the existing masonry piers, including repair of spalled/damaged stone, tuck pointing masonry joints, and pressure grouting. The three western spans located under US Route 20 would be replaced in the near future due to accelerated corrosion caused by salt spray and drainage from the highway facility above. Other maintenance concerns are documented in the EA. It is important to note that as a result of these required repairs, some of which are extensive, the No Build Alternative does not mean no construction would occur on the bridge.

The No Build Alternative would be the least environmentally disruptive alternative; however, the No Build Alternative does not meet the Project's Purpose and Need. If the bridge is not replaced, the current bridge would continue to deteriorate. The condition of the bridge has reached a point where

further repairs are not economically feasible. The No Build Alternative is quite expensive, with a construction cost estimate of \$14 million. If the bridge is not replaced, repairs would have to be made more frequently. Piecemeal repairs, especially unplanned projects, are an inefficient use of labor and may disrupt train schedules. Without replacement and upgrade of the existing bridge, future speed restrictions could be implemented and a critical point on the Line would continue to be vulnerable to blockage.

#### **Preferred Build Alternative**

**FIGURE 2** shows the components of Preferred Build Alternative. Improvements under the Preferred Build Alternative would construct a new single-track bridge immediately west (downstream) of the existing bridge. This new bridge would be aligned with the existing inbound track (Track #2) and located between the existing bridge and the Union Pacific Railroad bridge.

The proposed new bridge would have four spans, three piers, and two end abutments. After the new bridge is constructed and the Track #2 connections are made at the ends of the bridge, train service would be transferred from the existing bridge to the new bridge. The existing bridge would then be demolished. Next, the three piers on the new bridge would be extended easterly to the location of the demolished existing bridge. These piers would support the spans (or beams) for the new bridge along Track #1, which adds a second track crossing. This second track would become the outbound track and would align with the existing outbound Track #1 on both sides of the Fox River.

The new bridge would have a ballasted deck, providing a superior ride, less expensive maintenance, and better protection from moisture and salt damage than the existing open-deck design.

In addition to the bridge structure, the Preferred Build Alternative would replace signal components near the bridge, including the wayside signal devices, switch machines, snow-melters and a backup generator. A new interlocking would be installed, sheltered in two new relay houses on either side of the bridge. New underground cable for the signal system would be installed and would be compliant with Positive Train Control standards.

The preliminary construction cost estimate for the Preferred Build Alternative is based on conceptual engineering and will be refined through ongoing preliminary and final engineering. The anticipated capital cost of the Project is approximately \$34 million.

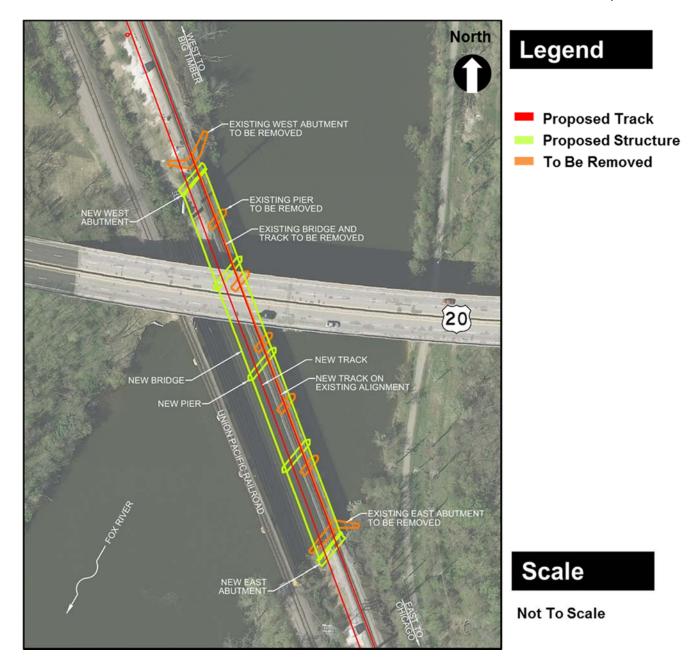


FIGURE 2: Preferred Build Alternative – Construct a New Double-Track Bridge on Existing and Downstream Alignment

#### E. Public Involvement, Agency Coordination, and Public Opportunity to Comment

The EA document was made available for public comment from February 10, 2017 to March 16, 2017. The legal Notice of Availability was published on February 10, 2017 in the Chicago Sun-Times, Elgin Courier-News and Daily Herald. Copies of the document were available for review online through the Metra website (in PDF format) and in hardcopy format during this period at the following locations:

Metra headquarters (547 W Jackson Blvd, Chicago, IL 60661), and Elgin – Gail Borden Public Library (270 N Grove Avenue, Elgin, IL 60120). Comments were accepted via the Project e-mail address, the Project phone number, and U.S. mail through March 16, 2017. Comments were also accepted in writing and verbally at the public hearing on March 2, 2017.

Metra held a public hearing on Thursday, March 2, 2017 at the Centre of Elgin Recreation Facility, Heritage Ballroom (100 Symphony Way, Elgin, IL 60120) from 5:00 p.m. to 7:30 p.m. The public hearing was publicized by directly mailing invitations to over 2,800 residents within a half-mile of the project limits. Email invitations were sent to staff at various state and federal agencies and to key stakeholders such as the City of Elgin, state and local elected officials, emergency services, Elgin Area Chamber of Commerce, Elgin Parks and Recreation, and special interest groups. Advertisements were also published in local newspapers and bilingual (English and Spanish) flyers were placed at the three Elgin stations and the Bartlett station. Over a dozen organizations and social media groups posted information about the public hearing, including Kane County Connects, Linked Local Elgin, City of Elgin, and Illinois State Senator Cristina Castro. A press release was sent to local media outlets and posted on the Metra Facebook page. Local media outlets published articles announcing the Project and the public hearing.

A total of thirty-four people, including one media representative, signed in at the public hearing. One attendee did not wish to sign in and only picked up a comment form. All attendees were provided with a project Factsheet (brochure) and a comment form at the sign-in desk.

The public hearing was held in an open house format. Six project exhibit boards were on display. The exhibit boards described the project area, the purpose and need, findings of the EA, the alternatives analysis, the public comment opportunities, the project cost and funding, the next steps and the schedule. Public hearing attendees were invited to view the exhibit boards, and speak with staff from Metra, FTA, and the consultant team to discuss specific issues and ask specific questions regarding the Project. Metra provided comment forms to all attendees at the sign-in desk and additional forms were available at the comment area tables. A court reporter was also available to take public comments verbally. A hardcopy of the EA with all EA appendices was available at the public hearing for attendees to review. Metra made the public hearing exhibit boards and comment form available on the Metra website after the public hearing.

Metra received a total of 8 comments from the public during the comment period, including an agency comment letter from the United States Environmental Protection Agency (USEPA). No comments were submitted verbally to the court reporter. No additional comments were received through the project email address, the U.S. mail, or phone number. FTA and Metra have addressed the comments received in this FONSI. **Attachment A** contains a summary table of the comments and responses, copies of the seven comments forms and the USEPA letter.

No changes to the EA were necessary as a result of the public comments. Five of the seven public comments generally stated support for the Project. Other comments included:

Support for lessening the number of piers in the river.

- Concerns of dust control during construction and its impacts to the river.
- Requesting a bike path under the bridge to connect to the west side of the river.
- Requesting additional bicycle accommodations and amenities on Metra trains and stations, including 1<sup>st</sup>-Last Mile shuttles, and bike-share stations.
- An agency comment letter from the USEPA seeking additional clarification on water quality, mussels, and air quality.

As stated above, responses to comments received are included in Attachment A.

#### F. Mitigation Measures to Minimize Harm

The EA describes the proposed Project, its likely impacts, and potential mitigation measures to avoid or minimize those impacts. **Attachment B** describes the mitigation commitments that FTA requires of Metra as a condition of FTA's finding that the project will have no significant impact. These mitigation commitments are based on the mitigation measures identified in the EA, and presented at the public hearing on March 2, 2017. Satisfaction of the mitigation commitments will be a condition of any grant that FTA may make for the project.

#### **G.** Environmental Determinations and Findings

#### **National Environmental Policy Act (NEPA) Finding**

FTA served as the lead agency under NEPA for the Project. Metra will construct the Project in accordance with the design features and mitigation measures presented in the EA as well as this Finding of No Significant Impact. Metra prepared the EA with FTA oversight in compliance with NEPA, 42 U.S.C. § 4321, et. seq., and 23 CFR § 771.121. FTA has made an independent evaluation of the EA.

After reviewing the EA and supporting documents, including public comments and responses made thereto, FTA finds that the Project would result in permanent impacts on two resource categories: Displacements and relocations of existing uses (0.33 acres of permanent easement will be acquired from the UPRR), and flooding (fill will be placed in the floodway from permanent piers and abutments, but will be mitigated by providing compensatory storage). FTA finds that the Project would not result in any substantial permanent impacts on the following resource categories: neighborhoods, communities, and businesses; historic and archaeological resources; water resources; biological resources; noise; vibration; hazardous materials; environmental justice communities; air quality; land use and economic development; navigable waterways and coastal zones; geology and soils; energy; safety and security; visual and aesthetic conditions; indirect and cumulative impacts; and Section 4(f) resources.

FTA finds that the Project would result in temporary construction impacts on the following resource categories: displacements and relocations of existing uses; neighborhoods, communities, and businesses; water resources; flooding; biological resources; and hazardous materials. **Attachment B** 

contains proposed measures to mitigate these impacts.

Pursuant to 23 CFR § 771.121, FTA finds that the proposed Project with mitigation, to which Metra has committed, will have no significant impact on the environment. The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.

#### **Section 106 Finding**

In compliance with Section 106 of the National Historic Preservation Act of 1966 and in accordance with the Criteria of Adverse Effect described in 36 CFR § 800.5, FTA determined that there are no properties on, or eligible for, the National Register of Historic Places within the Project's Area of Potential Affect (APE). The Illinois Historic Preservation Agency (IHPA), acting as the State Historic Preservation Officer (SHPO), concurred with these determinations on October 30, 2015. Since there are no historic properties in the APE, the Preferred Build Alternative would not directly or indirectly result in adverse effects on historic and cultural resources. Therefore, no additional measures to avoid or minimize harm are necessary as no adverse impacts are present.

Based on the historic resources analysis included in the EA as well as the consultation with IHPA, FTA finds, in accordance with 36 CFR § 800, that the Section 106 coordination and consultation requirements for the Project have been fulfilled.

#### **Environmental Justice Finding**

Executive Order 12898 provides that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and/or low-income populations." A disproportionately high and adverse effect on minority or low-income populations is defined as an adverse effect that: (a) is predominantly borne by a minority population and/or a low-income population; or (b) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Based on the analysis contained in the EA and the mitigation commitments made by Metra, the Milwaukee West Line Fox River Bridge Improvement Project (Metra Bridge Z-100) would not result in adverse environmental justice impacts. As a result, FTA finds that the Project will not result in disproportionately high and adverse effects on minority or low-income populations.

#### **Air Quality Conformity Finding**

The Milwaukee West Line Fox River Bridge Improvement Project (Metra Bridge Z-100) is identified in the FY 2016-2020 Chicago Metropolitan Agency for Planning's (CMAP) Transportation Improvement Program (TIP) under ID #18-16-0028 and was approved into the TIP on May 25, 2016. Funding for the Metra Bridge Z-100 Project is included in this constrained TIP endorsed by the Metropolitan Planning Organization Policy Committee of CMAP for the region in which the Project is located. As

this TIP is amended and TIPs for future years are developed, funding may be adjusted, if needed, to support construction of the Metra Bridge Z-100 Project. The Project is also consistent with CMAP's 2040 Regional Transportation Plan (GO TO 2040). On October 21, 2014, the Federal Highway Administration (FHWA) and FTA determined that the 2040 Regional Transportation Plan conforms to the State Implementation Plan (SIP) and the transportation—related requirements of the 1990 Clean Air Act Amendments. On June 5, 2015, FHWA and FTA approved the TIP for inclusion in the State Transportation Improvement Program (STIP) after determining that the TIP also conforms to the SIP and the Clean Air Act Amendments. These findings were in accordance with 40 CFR § 93, "Determining Conformity of Federal Actions to State or Federal Implementation Plans." The Metra Bridge Z-100 Project's design and scope are consistent with the project information used for the TIP conformity analysis; therefore, FTA finds that the Project conforms to the existing SIP and the transportation-related requirements of the 1990 Clean Air Act Amendments.

#### Section 4(f) Finding

Section 4(f) of the USDOT Act of 1966 (49 U.S.C. § 303) is a national policy which states that the Secretary of Transportation may not approve transportation projects that use publically owned parks, recreation areas, wildlife and waterfowl refuges, or any significant historic site unless a determination is made that there is no prudent or feasible alternative to using that land, and that all possible planning has been done to minimize harm. The requirements for treatment of these resources are codified in federal law in 49 U.S.C. § 303 and 23 U.S.C. § 138, and implemented through 23 CFR § 774.

Based on the evaluation in the EA, no public parklands, recreational areas, historic sites, or wildlife and waterfowl refuges that are afforded protection by Section 4(f) are within the proposed Project limits. FTA finds that the Project is in compliance with the Section 4(f) regulations at 23 CFR § 774.

#### H. Conclusion

Based on the EA and its associated supporting documents, FTA finds that pursuant to 23 CFR §771.121, there are no significant impacts on the environment associated with the development and operation of the proposed Milwaukee West Line Fox River Bridge Improvement Project (Metra Bridge Z-100). Preparation of an Environmental Impact Statement is not warranted.

May 22, 2017 Date)

Marisol Simóh

Regional Administrator

U.S. Department of Transportation

Federal Transit Administration

#### **ATTACHMENTS**

- A. Agency and Public Comments and Responses
- **B.** Mitigation Commitments Table

#### **ATTACHMENT A**

Agency and Public Comments and Responses

## Milwaukee West Line Fox River Bridge Improvement Project - Environmental Assessment Agency and Public Comment and Response Log

#	Commenter	Source	Agency and Public Comments	Response
AGENC	Y COMMENTS			
1	U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd Chicago, IL 60604	Letter	[Comment letter provided at the end of this log.]  Comments about Water Quality:  - Identify Metra's commitments to protect water quality during construction and demolition  - Consider including a drainage system to convey storm water to land for treatment to reduce long-term impacts to water quality	To minimize impacts to water quality during construction and demolition, Metra's Contract Documents would require compliance with the latest version of the Illinois Department of Transportation's (IDOT) Standard Specifications for Road and Bridge Construction, specifically Section 280 Temporary Erosion and Sediment Control and Section 501 Removal of Existing Structures (IDOT, 2016).  Regarding bridge drainage, Metra would follow the appropriate Section 404 and Section 10 permitting processes, and would comply with requirements of the permitting agency, i.e., the United States Army Corps of Engineers (USACE).  Metra has taken EPA's suggestion to include a drainage system to convey storm water to land for treatment into further consideration. However, our current analysis suggests that it would not be feasible given several constraints. Given currently developed land in the proximity of the bridge, this could involve the use of parklands or private property resulting in other impacts. Possible treatment options considered included bio-swales, retention basins, and other Best Management Practices (BMPs). In order for Metra to treat storm water before conveying it to a storm water system, land would need to be acquired. In the area west of the river and north of the tracks, the Fox River bank meets the bottom of the Metra embankment, so there is no room to fit a bio-swale or retention basin. West of the river and south of the tracks, there is an existing access road between Metra and UP's railroads leaving no room for a bio-swale or retention basin. East of the river and south of the tracks, the Preferred Build Alternative includes a retaining wall to avoid Union Pacific property and impacts to numerous electrical towers and poles. As a result, there is no room for a bio-swale or retention basin. The only possible quadrant for a bio-swale or retention basin. The only possible quadrant for a bio-swale or retention basin is east of the river and north of the Metra tracks. However, the Metra embankment ends

#	Commenter	Source	Agency and Public Comments	Response
1 cont'd	U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd Chicago, IL 60604	Letter		at the right-of-way line. The existing embankment slope is already steep (1.5:1). The bio-swale or retention basin would have to be placed outside the right-of-way on Kane County Forest Preserve property, posing a potential Section 4(f) impact. There would be associated tree impacts as well. In addition, there are wetlands along the riverfront at this location; this storm water feature may impact those wetlands. It is estimated that approximately 5,000 square feet (0.1 acres) of potentially Section 4(f) protected property may need to be acquired. Additionally, removal of approximately 40 trees and relocation of a segment of the existing Fox River Trail bike path would be required.

#	Commenter	Source	Public Comments	Response
AGENC	Y COMMENTS			
1 cont'd	U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd Chicago, IL 60604	Letter	Comments about Mussels:  - Identify Metra's commitments to protect mussels and coordination with IDNR in the NEPA decision document  Comments about Air Quality:  - Include all potential sources that may impact air quality  - Identify Metra's commitments to reduce construction emissions  - Address commitments related to impacts on children's health	Metra would apply for an Incidental Take Authorization (ITA) through the IDNR. Metra would implement the Conservation Plan to be developed as part of the ITA for the spike mussel.  The Conservation Plan would state that Metra would perform mussel surveys prior to construction and take measures to avoid, minimize, and mitigate impacts. The goal of the mussel surveys is to identify and capture live native mussels in the construction area and relocate them to suitable, similar habitat in the Fox River.  Section 3.12.2 of the EA states "The Preferred Build Alternative could result in some adverse impacts on air quality during construction from construction equipment exhaust. Impacts during construction would be primarily associated with fugitive dust and emissions from on-road and non-road vehicles." Temporary incremental air quality impacts during construction may also occur from demolition activities, construction worker commuting, and truck trips for delivery and hauling of materials. Despite an increase in vehicular traffic, no increases in traffic congestion during construction would be anticipated. As such, no adverse air quality effects from increased traffic resulting from construction would be expected.  The Project would comply with Illinois Environmental Protection Agency guidelines for controlling fugitive dust, diesel particulate emissions, and GHG emissions, so no impacts are anticipated. Potential impacts would be further controlled through implementation of appropriate construction BMPs. Because of the close proximity of the project site to sensitive receptors, such as residences, schools, and community facilities, diesel exhaust emissions will be minimized through the use of BMPs. These practices minimize air quality impacts by limiting idling times of trucks and equipment, maintaining equipment in proper working order, and reducing electricity consumption at the construction sites.

#	Commenter	Source	Public Comments	Response
AGENC	Y COMMENTS			
1 cont'd	U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd Chicago, IL 60604	Letter		To reduce construction emissions, Metra's Contract Documents would require the Contractor to comply with all applicable standards, orders, or regulations issued pursuant to the Clear Air Act, as amended, 42 U.S.C. §§ 7401 et seq. Metra's Contract Documents would also require compliance with the latest version of IDOT's Standard Specifications for Road and Bridge Construction, specifically Section 107.41 Construction Air Quality (IDOT, 2016).
				In regards to impacts on children's health, there are no schools or daycares within the project limits; however, there is a ballpark in the southwest quadrant of the project area and Gorlich Park in the southwest side of the project area. Three of the nearest elementary schools within the project area, are each located over a quarter mile away from the project limits. No significant construction or permanent air quality impacts would result from the project.
				To minimize any impacts on children's health, where feasible, Metra's Contract Documents would require compliance with the latest version of IDOT's Standard Specifications for Road and Bridge Construction, specifically Section 107.36 Dust Control (IDOT, 2016). Compliance with IDOT's Dust Control specification would reduce vehicle speed on unpaved roads, or on-site access roads or hauling routes, cover haul vehicles and minimize any track out of soil to nearby paved roads.
			Comments about Public Outreach and Input:  - Update the public outreach section with current information and input received	Section E of the FONSI includes a description of Public Outreach and Input, including how the EA was made available for public review, methods used to promote the public hearing, and a summary of comments received within the comment period. A total of eight comments were submitted within the comment period, including this agency comment letter from the USEPA.

#	Commenter	Source	Public Comments	Response
PUBLIC	COMMENTS			
1	Anonymous	Public Hearing Comment Form	Due to the traffic and the incredible lifespan, this bridge clearly needs to be replaced. I like the promise of less piers to lessen the impact on water flow. I am slightly concerned about the dust generated by the project and hope that great effort will be taken to reduce dust and contamination of the river.	Thank you for your comments. Metra would minimize the dust generated by the demolition and construction of the project by including specifications requiring the use of water sprayers and other BMPs in the design documents. BMPs would also be included to minimize contamination of the Fox River, including using a silt curtain, performing soils testing before excavation and working within a cofferdam or causeway to construct the bridge. These measures would minimize impacts to the river during construction of the Project.
2	Anonymous	Public Hearing Comment Form	Looks like a good thought out project, thinking about the commuters and the Elgin residents.  Well planned project.	Thank you for your comment.
3	Anonymous	Public Hearing Comment Form	Very good presentation Information boards were well done Staff answered a couple questions I had Look forward to the project No concerns.	Thank you for your comment.
4	Karen Kase kasekaren@gmail.com	Public Hearing Comment Form	Can you put a bike path under the bridge & connect to the ballparks on the west side?	Thank you for your comment. Although Metra supports the development of pedestrian and bicycle connections, there is no plan to add a bicycle path under the bridge as part of this Project. As the river is used for boating and other recreational activities, there is not sufficient available clearance between the surface of the river and the underside of the bridge spans to add a bike path under the bridge. Adding a bike path to either side of the bridge would require a cost-prohibitive new bridge span with extended piers in the river, and would add substantial delays in design and construction schedules. Extended piers in the river could also create negative impacts to water quality.

#	Commenter	Source	Public Comments	Response
PUBLIC	COMMENTS			
4 cont'd	Karen Kase kasekaren@gmail.com	Public Hearing Comment Form		Also, there is no existing connecting trail northwest of the bridge to the ball parks. A new trail would need to cross the railroad tracks (likely as a track-level separated tunnel or bridge) to connect from the ball parks, northwest of the bridge, to the existing trail, southeast of the bridge (see clearance issues above). This would require the participation of third party stakeholder(s) and/or land owner(s).
5	Glen Holland Metra Community Advisory Board Member 770 W. Highland Ave Elgin, IL 60123 224-325-8005 GlenRayHolland@live.com	Public Hearing Comment Form	It is outstanding to have such a complete and detailed plan shared with the riders and the public community at large.  I have had many occasions waiting a few or more minutes on this bridge wondering how long a single track. Long time overdue.  Very happy to see our government working well on planning and funding our future.  Thanks.	Thank you for your comments. The goal of the project is to both replace the deteriorating bridge and eliminate the bottleneck caused by having a single-track bridge. Metra looks forward to improving commuter rail operations by replacing the Fox River bridge.

#	Commenter	Source	Public Comments	Response
PUBLIC	COMMENTS			
6	Terry Witt Bartlett, IL 60103 terry@spindoctorcyclewerks.com	Public Hearing Comment Form	Overall Metra ridership can be improved in Elgin by supporting 1st-last mile shuttles to & from stations. Better bike parking at stations as well as bike share stations in the communities along the Fox River Trail would improve accessibility. Make bikes on trains 24/7 with new cars having better accommodations for bikes & passengers.	Thank you for your comments. Metra appreciates your suggestions and will consider them for future improvements to commuter rail services.
7	Joe Jastrzebski 550 W. Morse Ave Bartlett, IL 60103 630-841-8073 jastrzebski@comcast.net	Public Hearing Comment Form	Thank you for providing the information available at the public hearing. Glad to learn the Fox River Trail is outside of the construction zone, and will not be affected.  Pleased to find the Environmental Impact Study online as well. I'm impressed to learn how much work & effort goes into this kind of project.	Thank you for your comments.



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

MAR 13 2017

REPLY TO THE ATTENTION OF:

E-19J

Mark Assam Federal Transit Administration 200 W. Adams Street, Suite 320 Chicago, Illinois 60606

Andrew Roth Metra 547 W. Jackson Boulevard Chicago, Illinois 60661

Re: Milwaukee West Line Fox River Bridge Improvement Project (Metra Bridge Z-100) Environmental Assessment, City of Elgin, Kane County, Illinois

Dear Mr. Assam and Mr. Roth:

The U.S. Environmental Protection Agency is providing comments on the Draft Environmental Assessment (EA) for the above mentioned project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The Federal Transit Administration (FTA) is the lead agency for this project under NEPA, and Metra is the project proponent.

The proposed project would demolish the existing Metra Milwaukee West Line single-track bridge over the Fox River, including bridge piers, and construct a double-track bridge. The project would replace wayside signal devices, switch machines, snow-meters, the backup generator, and underground cables. The existing bridge was constructed in 1881 and modified in 1905 and 1926. The EA explains that it is in poor condition. In addition, the existing bridge is the only single-track segment of the Milwaukee West Line, creating a bottleneck for passenger and freight rail traffic. As the project moves forward, we offer the following recommendations for your consideration.

#### Water Quality

The proposed project calls for demolishing the existing bridge, including five piers, in the Fox River. The segment of the Fox River in the project area is designated as impaired under Section 303(d) of the Clean Water Act. The EA explains that causes of impairment, including mercury and PCBs, may be present in the sediment within the footprint of the proposed cofferdam and temporary causeway. It is important that the proposed project not further impair or impede timely remediation of water quality in the Fox River.

The EA also explains that the proposed action would not greatly increase the amount of stormwater entering the Fox River, and the quality of the stormwater runoff would be typical of

railways in urban areas (page 51). While runoff quantities would be incrementally small, EPA recognizes that stormwater from the bridge would impact the Fox River for the foreseeable future. With development of a new bridge, EPA encourages Metra to consider adopting best practices for conveying stormwater to land for treatment, rather than allowing direct runoff into the Fox River.

#### Recommendations

- Add further details to explain how demolition will be accomplished without releasing materials into the Fox River. In the NEPA decision document, include clear commitments to protect water quality from project construction in order to ensure that impacts would not be significant.
- Consider incorporating a drainage system to capture and convey stormwater to land for treatment to protect against cumulative long-term impacts to water quality.

#### Mussels

The EA describes coordination with the U.S. Fish and Wildlife Service and explains that the proposed project is not expected to impact federally threatened or endangered species. The project, however, has the potential to impact a state-listed species if mitigation is not implemented. The spike mussel is a state-listed threatened species found in the project area. Based on coordination with the Illinois Department of Natural Resources (IDNR), the EA states that the project team will request an Incidental Take Authorization. The EA also describes measures that the project team would implement to avoid adverse impacts, including surveying and relocating all native mussels (including the spike mussel) found within the project area.

#### Recommendation

Include all commitments to protect mussels in the NEPA decision document for this project. Document any further coordination with IDNR.

#### Air Quality

Short-term emissions from construction equipment have the potential to impact human health, especially in sensitive populations, such as the elderly, children, and those with impaired respiratory systems.

#### Recommendations

- Augment the description of construction air quality impacts in Section 3.12.2 to disclose all potential sources, including material hauling and demolition.
- Identify and commit to specific measures to reduce construction emissions. Consider best practices listed in the enclosed Construction Emission Control Checklist.
- In line with Executive Order 13045 on children's health, establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycare centers, and playgrounds.

#### **Public Outreach and Input**

The community outreach section of the EA is not current; it states that future outreach will occur when the EA is issued (page 82).

#### Recommendation

Update the NEPA document to disclose all public outreach related to this project that has occurred to date. Discuss public input received, and describe how the project team used public comments to inform the proposed action.

We appreciate the opportunity to provide comments. If you have any questions or would like to discuss our recommendations, please contact Jen Blonn Tyler, the lead reviewer for this project, at 312-886-6394 or tyler.jennifer@epa.gov.

Sincerely,

Kenneth A. Westlake

Chief, NEPA Implementation Section

Office of Enforcement and Compliance Assurance

Enclosure: Construc

Construction Emission Control Checklist

#### U.S. Environmental Protection Agency Construction Emission Control Checklist

#### Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles project should meet, or exceed, the U.S. EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).<sup>1</sup>
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the U.S. EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).<sup>2</sup>
- Locomotives: Locomotives servicing infrastructure sites should meet, or exceed, the EPA
  Tier 4 exhaust emissions standards for line-haul and switch locomotive engines where
  possible.<sup>3</sup>
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contacting or oversight process:

- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use ultra-low sulfur diesel fuel (15 ppm maximum) in construction vehicles and equipment.
- Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Repower older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric

http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm

<sup>&</sup>lt;sup>2</sup> http://www.epa.gov/otag/standards/nonroad/nonroadci.htm

<sup>3</sup> http://www.epa.gov/otaq/standards/nonroad/locomotives.htm

- vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.).
- Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest U.S. EPA exhaust emissions standards.

#### **Fugitive Dust Source Controls**

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

#### Occupational Health

- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.



### Milwaukee West Line Fox River Bridge Improvement Public Hearing - March 2, 2017

Metra prepared an Environmental Assessment (EA) for the proposed improvements of the Milwaukee West Line Fox River Bridge in the City of Elgin. The purpose of the project is to improve the Milwaukee West Line and address deteriorating infrastructure. The EA was made available for public review and comment on February 10, 2017 at https://metrarail.com/about-metra/reports-documents/project-studies/current-project-studies/z-100-ea, the Gail Borden Public Library in Elgin, and the Metra headquarters in Chicago.

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City/State

Phone No.

## Comment Form

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E-Mail Address

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Phone No.

## Comment Form

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Public comments will be accepted through Thursday, March 16, 2017. Please place your comment forms in the box marked "COMMENTS" today; or fold in thirds, tape closed, place a stamp and mail. Comments can also be submitted via email to ProjectZ100NEPA@metrarr.com. can you get a bike path under the bridge of connect to the ball parks on the west side? (Optional, Please Print) Name/Affiliation Karen Kase Resident Address Zip Code 60120 E-Mail Address Kase Karen@ gmail.con City/State



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Overall Metra ridership can be improved in Flan by supporting 1st-Last mile shuttles to & From stations, Better bike parking at stations as well as bike share stations in the communities along the Fox River trail would improve accessibility. Make bikes on trains 24 x 7 with new cars having better accompodations for bikes & passengers,
supporting 1st-Last mile shuttles to & From stations, Better
Communities along the Fox River trail would in arouse accessibility
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Optional, Please Print)
Name/Affiliation_Terry Witt
Address
City/State Bartlett, 1L Zip Code 60103 Phone No E-Mail Address Terry @spindoctorcycle werks, com
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Optional, Please Print) Name / Affiliation Joe Jastrzelski Bartlett Resident METRA PIDER Address 550 W. Worse Ave
Address SSD 61 Massa Ava
City/State Sartlett 12 Zip Code 60103
City/State Saxtlett 16 Zip Code 60103
Phone No. 630 841 8073 E-Mail Address Jastrzeluski @ comcast. net

#### **ATTACHMENT B**

Mitigation Commitments Table

### Milwaukee West Line Fox River Bridge Improvement Project Mitigation Comments Table

The mitigation measures and other features of the project that reduce adverse impacts, to which the Federal Transit Administration (FTA) and Metra committed in the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI), are summarized in the following table. Implementation of these mitigation commitments is part of the approval and issuance of this FONSI.

This summary is provided in the FONSI to facilitate the monitoring of the implementation of the mitigation commitments; however, the EA provides the context and the full description of all mitigation commitments that are included in the project. Metra will establish a program for monitoring the implementation of the mitigation commitments as part of its project management oversight. FTA will oversee Metra's program for monitoring environmental compliance through quarterly review meetings or other means specified by FTA. Metra will report on environmental compliance in the quarterly progress reports.

	Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency
Displa	cements and Relocations of Existing Uses - Construct	tion		
1	Construction activities would require a temporary construction easement of approximately 0.97 acres from the Union Pacific Railroad (UPRR). The easement would be limited to the unused land located between the UPRR and Metra Railroad tracks on the west side of the bridge, both north and south of the Fox River.	Α	Metra will coordinate with UPRR and provide just compensation for easements, measured by the fair market value of the property, as determined by Metra through an appraisal process.	Metra
Displa	cements and Relocations of Existing Uses - Permane	nt		
2	Approximately 0.33 acres of land or permanent easement would be acquired from the UPRR. Land acquisition would be limited to the unused land located between the UPRR and Metra Railroad tracks on the west side of the bridge, both north and south of the Fox River.	A	Metra will coordinate with UPRR and provide just compensation for easements, measured by the fair market value of the property, as determined by Metra through an appraisal process.	Metra

Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency		
Neighborhoods, Communities, and Businesses - Construction					
Minor temporary construction impacts would include noise, vibration, dust, temporary utility disruption, negative visual and aesthetic changes from demolition and construction, construction vehicle emissions, and truck traffic throughout the project area. Improvements would be made to the grade crossing at Elgin Avenue.	A	During construction, Metra and their Project Contractors will undertake efforts to minimize community disruptions through coordination with the City of Elgin. Metra and their Project Contractors will limit construction activities to daytime hours where feasible, though night and/or weekend work may be needed during track cutover, piling, excavation, deep foundation work, or other activities. If any planned work conflicts with the City of Elgin's noise ordinance, Metra will coordinate with the City. Metra and their Project Contractors will ensure that truck traffic will be primarily present along major roads near the project area and will use a defined access path to reach the project limits, likely along the existing right-of-way.	Metra, Project Contractor		
	В	Metra and their Project Contractors will provide a temporary track crossing to serve The Alphabet Group (300 Elgin Ave., Elgin, IL) while improvements are made to the crossing at Elgin Avenue near the south project limit.	Metra, Project Contractor		
Neighborhoods, Communities, and Businesses - Permanen	t				
None					
Historical and Archaeological Resources - Construction and Permanent	1				
None					
Water Resources - Construction					
Temporary impacts to water quality related to cofferdams and causeways required to construct the bridge. Sediment within the Fox River is expected to be disturbed temporarily due to construction of the piers or through the construction of a causeway if required.	A	Metra and their Project Contractors will use Best Management Practices (BMPs) including dewatering, silt curtain, and working "in the dry" inside a cofferdam or causeway to limit the potential for sediment to be disturbed and released downstream. Refer to hazardous materials mitigation commitments, Item 8	Metra, Project Contractor		

	Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency
			below, regarding sediment and soil testing.	
4 cont'd		В	To minimize impacts to water during construction and demolition, Metra's Contract Documents will comply with the latest version of the Illinois Department of Transportation's (IDOT) Standard Specifications for Road and Bridge Construction, specifically Section 280 Temporary Erosion and Sediment Control and Section 501 Removal of Existing Structures (IDOT, 2016).	Metra, Project Contractor
		С	Regarding bridge drainage, Metra will follow the appropriate Section 404 and Section 10 permitting processes, and will comply with requirements of the permitting agency, i.e., the United States Army Corps of Engineers (USACE).	Metra, Project Contractor
Water	Resources - Permanent			
	None			
Floodi	ng - Construction			
5	Temporary placement of fill within the floodway for a temporary causeway.	A	Metra and their Project Contractors will locate compensatory storage for floodway fill on the west bank of the Fox River, adjacent to the existing Metra and UPRR bridges and at the east abutment of the bridge. Metra and their Project Contractors will create a total of 4,999 cubic feet of compensatory storage below the 10-year floodway elevation.	Metra, Project Contractor
		В	Metra and their Project Contractors will create a total of 3,419 cubic feet of compensatory storage between the 10-year and 100-year floodway.	Metra, Project Contractor

	Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency		
Floodi	Flooding - Permanent					
6	Approximately 4,392 cubic feet of concrete would be placed in the floodway below the 10-year floodway elevation for piers and abutments. Approximately 3,096 cubic feet of concrete would be placed between the 10-year and 100-year floodway for piers and abutments.	Α	Metra and their Project Contractors will locate compensatory storage for floodway fill on the west bank of the Fox River, adjacent to the existing Metra and UPRR bridges and at the east abutment of the bridge. Metra and their Project Contractors will create a total of 4,999 cubic feet of compensatory storage below the 10-year floodway elevation, creating an excess of approximately 608 cubic feet of compensatory storage.	Metra, Project Contractor		
		В	Metra and their Project Contractors will create a total of 3,419 cubic feet of compensatory storage between the 10-year and 100-year floodway, creating an excess of 323 cubic feet of compensatory storage.	Metra, Project Contractor		
Biolog	ical Resources - Construction					
7	Impacts may result from tree trimming/removal and the use of causeways or cofferdams for work in the river to demolish the existing bridge and construct the new bridge.	A	Metra and their Project Contractors will implement BMPs and an Incidental Take Authorization (ITA) for the spike mussel. Metra will implement the Conservation Plan developed as part of the ITA for the spike mussel. Metra will also commit to conducting annual monitoring of the trans-located mussels for up to one year after completion of the bridge project. Metra will forward the results of the monitoring to the IDNR.	Metra, Project Contractor		
Biological Resources - Permanent						
	None					
Noise - Construction and Permanent						
	None					
Vibration - Construction and Permanent						
	None					

Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency		
Hazardous Materials - Construction					
There would be the potential to encounter hazardous materials during construction.	Α	Metra and their Project Contractors will follow federal, state, and local laws and regulations regarding hazardous materials before and during construction.	Metra, Project Contractor		
	В	Metra and their Project Contractors will perform soil and sediment testing in the areas associated with the Metra Railroad prior to the start of work to further investigate soil conditions and the potential presence of chemicals. If hazardous materials are identified within the project limits, Metra and their Project Contractors will implement appropriate safety measures ranging from ambient monitoring to spoils management and/or additional personal protective equipment for on-site personnel, to protect human health and the environment.	Metra, Project Contractor		
	С	Metra contractors will follow applicable laws and regulations concerning the proper certification and disposal of Clean Construction Demolition Debris (CCDD).	Metra, Project Contractor		
	D	Metra and their Project Contractors will conduct surveys for lead-based paint and hazardous material before reconstruction or demolition of any property to identify any asbestos, lead-based paint particles, and hazardous materials, such as polychlorinated biphenyl or mercury-containing equipment. If any hazardous materials are identified, they will be abated and disposed of by Metra and their Project Contractors in accordance with federal, state, and local regulations.	Metra, Project Contractor		
	E	Metra and their Project Contractors will develop a Construction Stormwater Pollution Control Plan if the Project encounters contaminated soil or other hazardous materials.	Metra, Project Contractor		

	Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency			
Hazard	Hazardous Materials - Permanent						
	None						
Enviro	nmental Justice - Construction and Permanent						
	None						
Air Qu	ality - Construction						
9	The Preferred Build Alternative could result in some adverse impacts on air quality during construction from construction equipment exhaust. Impacts during construction would be primarily associated with fugitive dust and emissions from on-road and on-road vehicles.		To reduce construction emissions, Metra's Contract Documents will require the Contractor to comply with applicable standards, orders, or regulations issued pursuant to the Clear Air Act, as amended, 42 U.S.C. §§ 7401 et seq. Metra's Contract Documents will also require compliance with the latest version of IDOT's Standard Specifications for Road and Bridge Construction, specifically Section 107.36 Dust Control and Section 107.41 Construction Air Quality (IDOT, 2016).	Metra, Project Contractor			
Air Qu	ality - Permanent						
Land U Perma	None  Use and Economic Development - Construction and Inent  None						
_	Navigable Waterways and Coastal Zones - Construction and Permanent						
rennu	None						
Geolog	Geology and Soils - Construction and Permanent						
	None						
Energy	Energy - Construction and Permanent						
	None						

	Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency			
Safety	Safety and Security - Construction and Permanent						
	None						
Visual	and Aesthetic Conditions - Construction and Perma	nent					
	None						
Indired	Indirect and Cumulative - Construction and Permanent						
	None						
Section	Section 4(f) - Construction and Permanent						
	None						