

Federal Transit Administration
Region V

LAWRENCE TO BRYN MAWR MODERNIZATION PROJECT IN THE CITY OF CHICAGO, 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 Lawrence to Bryn Mawr Modernization Project. This determination is made in accordance with the National Environmental Policy Act of 1969 (NEPA); 42 United States Code (U.S.C.) § 4332(2)(c); 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 Chicago Transit Authority (CTA) as the local project sponsor jointly prepared the Environmental Assessment (EA) and Section 4(f) Evaluation to describe potential impacts to the human and natural environment and historic integrity that may result from the Lawrence to Bryn Mawr Modernization Project on the CTA Red and Purple lines. The EA was prepared pursuant to 23 CFR § 771.119 and issued by FTA on April 29, 2015. 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 Lawrence to Bryn Mawr Modernization Project is located on approximately 1.3 miles of existing rail track (the Red and Purple lines) from Leland Avenue on the south to near Ardmore Avenue on the north in the Uptown and Edgewater community areas. The project area encompasses four existing Red Line stations: the Lawrence, Argyle, Berwyn, and Bryn Mawr stations. This section of the rail line opened in phases in the early 1900s, and both the stations and the structural infrastructure are substantially past their useful lives. The deteriorating structure results in slow zones throughout the corridor, reduces line capacity and reliability, and complicates emergency operations. Existing station platforms are narrow, do not adequately accommodate passenger demand, and are not currently accessible to riders with disabilities.

C. Project Purpose and Need

The Lawrence to Bryn Mawr Modernization Project would replace the Lawrence, Argyle, Berwyn, and Bryn Mawr stations and approximately 1.3 miles of rail transit structural infrastructure on the Red and Purple lines in the Uptown and Edgewater community areas. The project would provide for continued transit service connecting Chicago's North Side and northern suburbs to the Loop and the rest of the Chicago metropolitan area, expand capacity to meet growing ridership demand, reduce train travel times, and improve access to the system for people with disabilities.

The following key factors define the project need:

- A substantial number of transit passengers rely on the existing train line to connect Chicago's North Side and northern suburbs with the Loop and the rest of the Chicago metropolitan area.
- Peak ridership demand exceeds the existing infrastructure capacity, leading to passenger crowding both on trains and on station platforms.
- Station improvements are needed to ensure accessibility in compliance with Americans with Disabilities Act (ADA) requirements.
- Existing infrastructure is substantially past its useful life, and maintaining safe operating conditions has become more difficult and costly as the infrastructure continues to degrade.

D. Alternatives Considered

Two alternatives were developed and evaluated for the project: the No Build Alternative and the Build Alternative. The proposed Build Alternative, illustrated in **Figure 1**, would consist of reconstructing approximately 1.3 miles of existing Red and Purple lines from Leland Avenue on the south to near Ardmore Avenue on the north and reconstructing and modernizing four stations within the project limits. The Build Alternative, further described below, was developed and evolved through a multiyear alternatives development process that began in 2009 and included extensive public involvement. The Build Alternative is the Preferred Alternative that was analyzed in the NEPA EA.

No Build Alternative

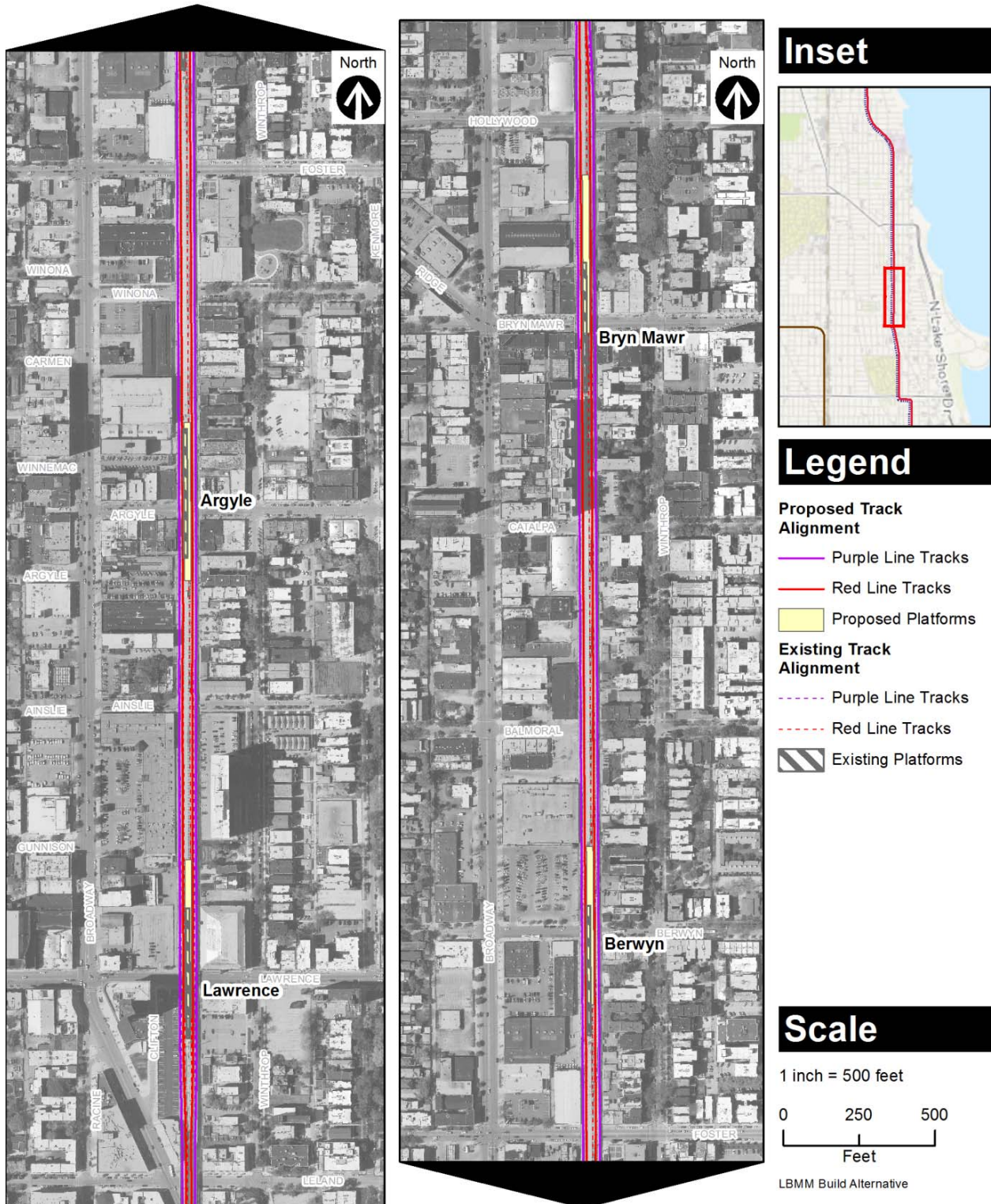
The No Build Alternative represents future conditions if the Lawrence to Bryn Mawr Modernization Project were not implemented. The No Build Alternative would not involve substantial changes to the existing infrastructure or major construction activities, but would include typical repairs to the Red and Purple lines within the corridor based on historic funding levels needed to keep the lines functional. Capital expenditures would be minor compared to the Build Alternative. Under the No Build Alternative, improvements would not be sufficient to respond to growing ridership demand, and would not be sufficient to meet the needs of aging infrastructure that is over 90 years old and past its useful life. Some expenditure would be made to keep the system operating; however, service quality and effective capacity would decline over time as new slow zones form across the system, and maintenance costs would rise due to continued aging of the infrastructure. The No Build Alternative would also not provide ADA accessibility at the four stations within the project limits.

Build Alternative

Major project elements of the Build Alternative include the following:

- **Stations** - The Lawrence, Argyle, Berwyn, and Bryn Mawr stations would be completely reconstructed. New features such as elevators, wider and longer platforms, and wider stairways would increase capacity, provide ADA accessibility, and improve passenger and emergency access.

Figure 1: The Lawrence to Bryn Mawr Modernization Project Preferred Alternative



- **Tracks** - The elevated track system from Leland Avenue to near Ardmore Avenue would be completely reconstructed. The proposed structure would be a closed-deck, aerial structure with direct-fixation track, welded rail, and noise barriers (approximately 3 to 5 feet in height) to reduce noise transmission at and below track level. Widening would take place over adjacent alleys along the east side of the alignment to minimize property displacements resulting from the project. Near the Aragon Ballroom at Lawrence Avenue, part of the widening would occur to the west of the existing alignment to avoid effects on the historic venue.
- **Viaducts** - The new aerial support structure would increase the height of the track by approximately 5 to 10 feet compared to existing tracks to meet Illinois Department of Transportation vertical clearance requirements for bridges. Viaducts would be replaced and improvements would remove piers in the roadway throughout the project corridor, improving sightlines and safety for pedestrians, drivers, and bicyclists.
- **Embankment Walls** - Reconstruction of stations would involve removal of portions of the existing embankment walls and earth-fill to construct the new stationhouses.

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

The EA and Section 4(f) Evaluation document was made available for public comment from April 29, 2015 through May 29, 2015. The legal Notice of Availability was published in the *Chicago Sun-Times* on April 29, 2015. Copies of the document were available for review online through the project website (in accessible and pdf versions) and in hardcopy format, during this period, at the following locations: (a) 46th Ward Office (4544 N. Broadway, Chicago, IL 60640) and 48th Ward Office (5533 N. Broadway, Chicago, IL 60640); (b) Bezazian Library at 1226 W. Ainslie Street, Chicago, IL 60640; (c) Uptown Library at 929 W. Buena Avenue, Chicago, IL 60613; (d) Edgewater Library at 6000 N. Broadway, Chicago, IL 60660; (e) Harold Washington Library Center at 400 S. State Street, Chicago, IL 60605; and (f) CTA Headquarters (standard size and large print version) at 567 W. Lake Street, Chicago, IL 60661. Comments were accepted via e-mail and U.S. mail through May 29, 2015. Comments were also accepted in writing and verbally at the public hearing on May 14, 2015.

CTA held a public hearing on Thursday, May 14, 2015 at the Broadway Armory (5917 N. Broadway Avenue, Chicago, IL 60660) from 6:30 PM to 8:00 PM. A total of 141 people signed in at the public hearing.

The public hearing was held in an open house format and included project exhibit boards that described the project and findings of the EA. Hearing attendees were invited to speak with CTA staff to discuss specific issues and ask specific questions regarding the project. Active discussion stations were also provided for more detailed and interactive discussions between CTA technical staff and members of the public concerning elements of the project. CTA provided comment cards to all attendees at the sign-in desk and a court reporter was available to take public comments verbally. Multiple copies of the EA and all EA appendices were available at the hearing for attendees to review. CTA made the public hearing exhibit boards available on the CTA project website after the meeting.

CTA received a total of 60 comments from the public during the comment period, one of which was received after the public comment period deadline. In addition, agency comments were

received from the United States Environmental Protection Agency (USEPA). FTA and CTA have addressed the comments received in this FONSI. **Attachment A** contains the agency and public comments received on the EA, and responses to these comments.

No changes were necessary to the EA as a result of the public comments received. The public comments primarily requested clarification of the results of the analysis contained in the EA. The responses to comments refer the commenter to the applicable chapter or section of the EA where the analysis was described. Overall, the community supports the proposed improvements and wanted to confirm that CTA will implement the project in the following manner:

- Provide access to persons with disabilities and improve overall system capacity
- Construct the project expeditiously and efficiently, while minimizing impacts during construction such as transit service interruptions, access to businesses, noise, and vibration
- Result in clean, safe, and secure facilities
- Design stations in a manner consistent with the surrounding community character

Based on comments from the USEPA, additional clarification and detail on mitigation measures related to the following two issues has been included in the Mitigation Commitments Table for the FONSI (**Attachment B**): (1) greater specification of contractor requirements for hazardous materials abatement and mitigation, and (2) greater specificity on utilization of USEPA best practices for reducing diesel emissions in construction practices for this project to reduce the potential for air quality impacts.

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 CTA as a condition of FTA's finding. These mitigation commitments are based on the mitigation measures identified in the EA, presented at the public hearing on May 14, 2015, and described in the Section 106 Memorandum of Agreement (**Attachment C**). 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. CTA will construct the project in accordance with the design features and mitigation measures presented in the EA and Section 4(f) Evaluation as well as this Finding of No Significant Impact. CTA 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 and Section 4(f) Evaluation.

After reviewing the EA and supporting documents, including public comments and responses made thereto, FTA finds that the project would not result in any substantial permanent negative impacts to the following resource categories: transportation; displacements and relocations of existing uses; land use and economic development; neighborhoods, communities, and businesses;

visual and aesthetic conditions; noise; vibration; hazardous materials; environmental justice communities; and indirect and cumulative impacts. The following resource categories would have limited or no impacts related to the project: air quality; water resources; biological resources; geology and soils; energy; and safety and security.

FTA finds that the project would result in temporary construction impacts to the following resource categories: transportation; displacements and relocations of existing uses; neighborhoods, communities, and businesses; visual and aesthetic conditions; noise; and vibration. **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 CTA 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 the project would have an Adverse Effect on the elevated track structure, a resource individually eligible for the National Register of Historic Places (NRHP), and also on the Uptown Square Historic District, the West Argyle Street Historic District, and the Bryn Mawr Avenue Historic District resulting from the physical demolition, dismantling, and reconstruction of contributing resources within the historic districts. Specific historic resources that would be adversely affected include the elevated track structure, which is both an individually NRHP-eligible resource and a contributing resource to the Uptown Square Historic District; the CTA Argyle station house and vacant CTA-owned retail space under the Argyle station, which are contributing resources to the West Argyle Street Historic District; and the vacant CTA-owned retail space under the Bryn Mawr station, which is a contributing resource to the Bryn Mawr Avenue Historic District. The specific locations of these CTA-owned retail spaces are 1117–1119 W. Argyle Street, 1116–1124 W. Argyle Street, and 1116 W. Bryn Mawr Avenue. The Illinois Historic Preservation Agency (IHPA), acting as the State Historic Preservation Officer, concurred with these determinations on September 5, 2014.

Mitigation measures were developed based on input from the Section 106 consulting parties to minimize and mitigate adverse effects to the elevated track structure and historic districts. These measures and stipulations are incorporated in the executed Memorandum of Agreement between FTA, the Advisory Council on Historic Preservation (ACHP), and IHPA, included as **Attachment C**. The project will have an adverse effect on the elevated track structure and several historic districts; however, the effects, when mitigated, will not be significant. Based on the historic resources analysis included in the EA as well as the consultation with IHPA, ACHP, and the other Section 106 consulting parties, **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 CTA, the Lawrence to Bryn Mawr Modernization Project would not result in adverse environmental impacts. As a result, **FTA finds that the project will not result in disproportionately high and adverse effects on minority or low-income populations.** In addition, the project would provide benefits to all customers surrounding the new stations, including minority and low-income populations.

Air Quality Conformity Finding

The Red and Purple Modernization (RPM) Project, which includes the Lawrence to Bryn Mawr Modernization Project, is identified in the Fiscal Year 2014–2019 Chicago Metropolitan Agency for Planning (CMAP) transportation improvement program (TIP) under ID #16-10-9001. A portion of the RPM Project funding is included in this constrained TIP endorsed by the Metropolitan Planning Organization Policy Committee of CMAP for the region in which the RPM Project is located. As this TIP is amended and TIPs for future years are developed, additional funding will be added to support construction of the RPM Project. The RPM Project is also within the fiscally constrained CMAP 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 Lawrence to Bryn Mawr Modernization 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.

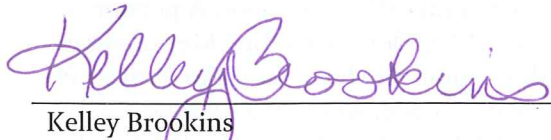
The existence of potential Section 4(f) resources was evaluated in the EA and Section 4(f) Evaluation. The project will result in the direct use of the individually NRHP-eligible elevated track structure, and contributing historic resources within the Uptown Square, West Argyle, and

Bryn Mawr Avenue Historic Districts. The use is the result of the physical demolition, dismantling, or reconstruction of the elevated track structure, the Argyle station house and CTA-owned retail underneath the Argyle and Bryn Mawr stations. To mitigate these impacts, CTA will implement the measures identified in the Memorandum of Agreement (see **Attachment C**).

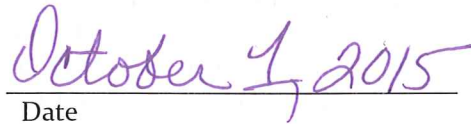
In a letter dated June 25, 2015, the USDOJ concurred with the FTA determination that there are no feasible or prudent alternatives to avoid use of a segment of the elevated track structure, retail space, and stations for the project. The attached executed Memorandum of Agreement between FTA, ACHP, and IHPA addresses the USDOJ's request for evidence that all possible planning to minimize harm to these historic resources has been taken. **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 Lawrence to Bryn Mawr Modernization Project. Preparation of an Environmental Impact Statement is not warranted.



Kelley Brookins
Deputy Regional Administrator
Federal Transit Administration, Region V



Date

ATTACHMENTS

- A. Agency and Public Comments and Responses**
- B. Mitigation Commitments Table**
- C. Section 106 Memorandum of Agreement**

A. Agency and Public Comments and Responses

Lawrence to Bryn Mawr Modernization Project

Responses to Public Comments

The Chicago Transit Authority (CTA) and the Federal Transit Administration (FTA) prepared an Environmental Assessment (EA) for the proposed project under the National Environmental Policy Act of 1969 (NEPA) and other applicable federal regulations. CTA and FTA made the EA available for public and agency review during a 30-day comment period from April 29 through May 29, 2015. During the public comment period, the team received 60 public comments. Comments were on numerous issues, but the majority could be grouped into general categories. Below are responses to these most common of comments. To the extent possible, the responses are organized by major topic areas covered in the EA.

The Agency and Public Comments and Response Log, attached, presents all comments received with references to these responses.

1. Purpose and Need for Modernization

While the majority of comments were supportive of the project, some comments questioned the need for the full modernization and capacity improvements proposed. These comments further questioned the condition of the infrastructure, why rehabilitation alternatives could not be considered instead of only the proposed Build Alternative, and the need for station improvements and capacity enhancements to provide for ridership growth. The comments also questioned whether new stations would reduce wait times. (See comments 52, 53, 54, and 55.)

The purpose of the proposed project is to provide continued high-speed transit service connecting Chicago's North Side and northern suburbs to the Loop and the rest of the Chicago metropolitan area and to expand capacity to meet growing ridership demand, while reducing train travel times and improving access to the system for people with disabilities. The capacity expansion would have the added benefit of bringing the aging rail infrastructure into a state of good repair, thereby improving efficiency and service reliability. Modern amenities at all stations, expanded passenger capacity, and enhanced speed and reliability would address safety and accessibility concerns and extend the useful life of the system for the next 60 to 80 years.

The No Build and Build Alternatives evaluated in the EA were defined through a multiyear planning process of alternatives development. Basic Rehabilitation alternatives were considered during this process. Community input indicated a strong desire for modernization over Basic Rehabilitation, and CTA conducted additional research and investigated more detailed conceptual design through the process to reduce environmental impacts. Section 2.2 of the EA provides additional information on the process that led to identification of the Build Alternative.

Sections 1.2 and 1.3 of the EA provide further details on the purpose and need for the project. Full details on project elements of the Build Alternative are included in Section 2.3.1 of the EA. These details are summarized below to address specific comments on elements of the Build Alternative.

A number of problems help define the overall need for the Lawrence to Bryn Mawr Modernization Project. Infrastructure problems include deteriorating track and embankment walls that create slow zones, lengthen travel times, and cause unreliability in service. The narrow right-of-way (60 feet wide), which is defined by full-height embankment walls, makes it impossible to widen platforms to accommodate elevators and higher capacity stairs—changes needed to make platforms accessible according to the Americans with Disabilities Act (ADA). The proposed Build

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Alternative would therefore not use the existing embankment walls, because these walls cannot be expanded to accommodate the modernized tracks and wider platforms proposed.

a. Comments questioned the need to modernization based on age alone.

While the notion of the “intended lifespan” may not have been in the mind of the original designers, various portions of walls and viaducts are structurally or functionally beyond their lifespan. Industry best practices use age as one factor to determine useful life. Please see the FTA *Asset Management Guide* and the *RTA Transit Asset Management Pilot Program (Volume 1)*, available through the FTA State of Good Repair & Asset Management webpage at <http://www.fta.dot.gov>.

Embankment Walls - The current structural condition of the existing embankment walls varies. A few sections are in “critical” condition. Some sections are in “good” condition, and the majority of sections are in “poor” or “fair” condition. In a number of cases, the “poor” rating is related to the concrete “cover,” meaning the layer of concrete that covers the steel reinforcement. When the reinforcing steel rusts, the rust causes expansion, which causes the cover to spall (break) off. Due to the thickness of many of the wall sections, the wall as a whole is not in danger of structural collapse.

At the top of the walls where the walls are thinnest, however, the structural condition has led to the loss of “ballast curbs” for nearly the entire length of the retaining walls. Ballast is the crushed rock that holds the ties in place, and the curbs hold the ballast on the embankment. In many cases, the slow zones—zones where the speed limit of the trains is restricted—are directly attributable to the condition of the tops of the walls. While other railroad structures of a similar age and design do exist within Chicago, few if any are configured like those on the North Red and Purple lines. The Purple Line express tracks are near the edge of the walls, and this arrangement puts added pressure on the walls and ballast curbs.

In most cases, freight rail embankments tend to have significantly wider clearance from support structure walls to the live operating track. The freight rail embankments also tend to be of a sloped configuration. Compared to the full-height, vertical walls on the North Red and Purple lines, the sloped embankments lessen the stress placed on the walls, especially the top of the walls. Reconstructing the tracks and structure would eliminate slow zones, and the modernized track and structures would be less susceptible to new slow zones.

The embankment walls have also deteriorated in part because the standards for concrete in 1914–1922 did not account for the effect of freeze-thaw cycles on the concrete. Track ballast, drainage systems within the embankment, and underlying soil along the embankment no longer drain properly. The lack of adequate drainage is worst during winter months when the combined impact of drainage issues and winter effects (e.g., frost heaving) can lead to deficiencies in the track. During these times, stormwater infiltrates into stationhouses, contributing to the difficulty in maintaining stations. The combined structural standards and testing methods available in 1914–1922 would not meet modern standards, and they contribute to some of the structural failures seen today.

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Viaducts - Every viaduct within the corridor needs replacement because they are functionally obsolete. The viaducts within the project limits do not provide required vertical clearance. Illinois Department of Transportation (IDOT) local roads policy for new bridges requires vertical clearances of 14 feet 9 inches. Wider horizontal clearances are also required, and the existing infrastructure limits how far the station platforms can be widened. In addition, existing piers in the middle of the street are a safety and security concern for both vehicular and pedestrian traffic. To address the project purpose and full list of needs identified in the EA, CTA is proposing single spans over the roadways to remove piers, improving sightlines and safety for pedestrians, drivers, and bicyclists.

While the replacement proposed is not based solely on age, the combination of 90-year-old standards and 90 years of weather has resulted in structural deterioration. These conditions translate to slow zones and cause longer travel times as well as unreliable service for transit users. For all of these reasons, the project proposes to fully replace—rather than continue to repair—the track system and stations.

b. Comments questioned the need for modern, ADA-accessible stations and capacity improvements that would require replacing the existing embankment wall support structure. Comments questioned why ADA amenities such as elevators could not be provided using the existing station right-of-way. Some questions concerned how expanded stations would reduce wait times.

In addition to the deterioration and condition of the embankment walls, as noted above, the existing embankment walls do not have the right geometry to provide the wider, ADA-accessible platforms proposed. The existing embankment walls support only a 60-foot right-of-way; therefore, simply repairing the existing embankment walls is not proposed, as it would not meet the purpose and need for the project.

The Lawrence to Bryn Mawr Modernization Project is part of Phase One of the overall Red and Purple Modernization (RPM) Program. The RPM Program is a series of proposed improvements to the North Red Line (from just north of Belmont station to the northern terminus of the Red Line at Howard station) and the Purple Line (from just north of Belmont station to Linden station in the Village of Wilmette). Within ½ mile of the project corridor, approximately 12 percent of the population is elderly and approximately 10 percent is disabled. Improving ADA accessibility is critical to meeting passenger needs. Although CTA has been making strides in increasing ADA accessibility across the system, the project area includes four stations that do not currently provide ADA access. A 2-mile gap would exist between accessible stations along the North Red Line even after the Wilson Transfer Station Project is complete (making Wilson station ADA accessible).

The narrow platforms at stations in the project corridor limit the number of and speed by which passengers can load and unload trains or enter and exit the platform, which contributes to long dwell times. CTA peak-hour growth, CTA annual average weekday boardings growth, and existing train crowding (in both AM and PM peak hours) indicate that additional capacity is needed. In addition, the limited number and narrowness of the stairs at the platform do not meet modern fire safety exiting requirements.

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Platform widths of approximately 22 feet are proposed, nearly double the size of existing platforms. The 22-foot-wide platforms would provide increased safety and capacity, improve circulation on the platform, and improve passenger boarding and alighting (leaving a train). The proposed width of the platforms is directly related to ADA accessibility. ADA-accessible elevators have requirements for minimum width and depth to provide enough space for a wheelchair-bound individual to enter, maneuver to reach the controls, and then exit the elevator. In addition to the width of the elevator, the platform needs to be wide enough to allow passengers to pass safely around the elevator on either side. The platform also needs to provide enough space for wheelchairs to maneuver onto small “gap-filler” ramps to board the train. Proposed features such as elevators and wider stairways would increase capacity, provide ADA accessibility, and improve access from the ground floor of each station to the platform. New stairways would be wider for greater safety and capacity, meeting emergency entrance and exit requirements for the larger stations. Platforms would also be lengthened (to 520 feet compared to an existing length of about 420 feet) to provide more waiting areas and improve circulation for passengers. These longer platforms could also accommodate ten-car trains in the future.

Wider and longer platforms would support increased capacity and decreased travel times. Wide platforms would greatly reduce the existing interference of passengers boarding and alighting at narrow platforms, thereby reducing the time trains are stopped at each station, reducing travel time. In addition, other amenities, such as enhanced passenger security features, longer canopies, more benches, and windscreens would be installed. Additional features to improve ADA accessibility would include improved communications and tactile features at each station.

Adding ADA access to the stations is not simple, because the existing narrow platforms in their current configuration prevent CTA from adding elevators. While ADA access is provided at the narrow-platform Granville station (two stations north of the project limits), its end-loaded configuration does not meet modern building and fire code requirements for emergency exiting. The Granville station design could not be replicated at other stations while meeting today’s requirements. The ADA requires that all station reconstruction projects of this magnitude accommodate access for people with disabilities.

Sections 1.2 and 1.3 of the EA provide further details on the purpose and need for the project. Section 2.1 provides additional information on the process that led to identification of the Build Alternative, and Section 2.3 of the EA describes the Build Alternative in detail. Response #2 below provides additional information on station improvements and amenities proposed as part of the Build Alternative.

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2. Station Improvements and Amenities

Commenters expressed a desire for elevators at stations or had questions about proposed station improvements and amenities such as elevators, escalators, lighting, restrooms, and bicycle facilities. Some comments questioned whether CTA-owned retail stations would remain in newly constructed stations. Some commenters asked for additional information on the size of elevators and whether access would be provided on both sides of the street. Additionally, one commenter asked for further details and reasons for including an auxiliary station exit at the Bryn Mawr station. Finally, one commenter suggested that CTA consider other auxiliary station entrances or exits on side streets (like Foster and Thorndale Avenues). (See comments 3, 7, 11, 15, 17, 24, 26, 41, and 42.)

The Lawrence, Argyle, Berwyn, and Bryn Mawr stations would be completely reconstructed as part of the Build Alternative. Features such as elevators and wider stairways would increase capacity, provide ADA accessibility, and improve access from the ground floor of each station to the platform. Elevator widths would meet modern ADA standards for passengers with disabilities, consistent with other modern elevators on the CTA system. Subsequent engineering and design, based on more detailed information on available space and location of other station amenities, will determine whether escalators would be added and whether new retail could be accommodated. Newly constructed stations would have increased lighting, including provisions for lighting at auxiliary and emergency-only exits. No CTA stations currently provide public restroom facilities, and as such, the station concept designs for this project do not include public restrooms. All four station areas in the project corridor have outdoor bicycle racks, and newly constructed stations would also include bicycle parking racks after construction.

The CTA-owned stationhouse and currently vacant retail spaces underneath the track structure at Argyle, Berwyn, and Bryn Mawr stations would be demolished to build modern, expanded stations with auxiliary entrances or exits.

Each newly constructed station would have a main entrance. Existing piers for the viaducts would be removed from the street to improve sightlines and safety for pedestrians, drivers, and bicyclists at these stations. As part of ongoing preliminary engineering, CTA is considering the addition of mid-block crosswalks to improve access to these station entrances from both sides of the street. This concept will be coordinated with the Chicago Department of Transportation (CDOT) as part of future engineering and design work.

At Bryn Mawr station, in addition to a main station entrance on Bryn Mawr Avenue, the Build Alternative would include a new auxiliary station entrance on Hollywood Avenue or on Broadway near Hollywood Avenue. The auxiliary entrance would improve circulation and provide passengers an additional way to access the station. CTA presented the idea for a new auxiliary station entrance on Broadway or Hollywood Avenue to the public as part of early RPM corridor vision community outreach, starting in 2011. In spring 2014, CTA discussed this concept with the alderman's office and surrounding neighborhood businesses as part of the early outreach. Based on feedback from this outreach, this entrance is anticipated to be a positive benefit to the community and surrounding businesses by better connecting CTA facilities with the surrounding neighborhood. Detailed station designs will be developed as part of subsequent engineering and design, and the design of this auxiliary entrance will consider the safety and circulation of pedestrians near Hollywood Avenue. The concept engineering process considered other auxiliary entrances or exits based on feasibility. An auxiliary entrance on Foster Avenue is not currently

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planned for the Berwyn station, because the Berwyn station is centered over Berwyn Avenue. Upgrades in the Thorndale and Granville station areas would occur under future phases of the RPM Program and auxiliary entrances or exits would be considered at those locations based on additional conceptual engineering and feasibility.

Section 2.3 of the EA provides additional details on station improvements proposed. Section 3.3 of the EA provides additional details on transportation impacts and benefits of the proposed project.

3. Project Design and Visual Character

Commenters requested additional information about the height of the structure and wanted to confirm that the new, taller structure would be compatible with the surrounding visual character of stations. Commenters requested that the new stations and structure be designed to respect the character of surrounding historic districts and/or also be consistent with the character of the surrounding communities that the stations serve. Some commenters also suggested specific design features to be included such as “green” features and vegetation, artwork at stations, and lighting. (See comments 7, 8, 24, 26, 30, 32, 34, 35, 40, 42, 45, 49, 51, and 55.)

The final design of the stations is anticipated to be sensitive to the context of the surrounding community. The Build Alternative would improve the visual quality by replacing deteriorating infrastructure with a modern structure and enhancing station areas near community commercial nodes. The project would introduce some visual changes and new visual elements to areas within view of the track structure and stations. Overall, the proposed improvements would enhance the current visual quality of the surrounding environment. The stationhouses would be larger and the new platforms would be wider than current ones, allowing for better sightlines. New station materials, colors, and detailing would be implemented to be aesthetically pleasing and complementary with surroundings. As part of the project, viaducts would be reconstructed, removing the piers that currently stand in the middle of the roadway. Proposed bump-outs or curb extensions at station locations would allow for some widening of sidewalks at stations. The changes would improve sightlines for pedestrians, drivers, and bicyclists, and would improve access to surrounding businesses, enhancing the sense of place at stations.

The IDOT local roads policy for new bridges requires vertical clearances of 14 feet 9 inches between the road surface and the bottom of the structure. Existing vertical clearances along roadways in the project corridor do not meet these standards, and would be increased for the Build Alternative to meet IDOT standards. The new track structure would be slightly higher (approximately 5 to 10 feet higher) than the existing structure and would contain noise barriers 3 to 5 feet high. Given this relatively minor change in this existing transportation corridor, adverse visual impacts are not anticipated. While the additional height of the structure might be perceivable once built, the resulting visual effect would be congruent with the inherent, established character of the environment. Comparable track heights are found in a number of neighborhood locations along the Brown Line, for example, at the Paulina Brown Line station.

Station designs would be consistent with the historic and architectural context of the surrounding communities. As design progresses, CTA will develop a Station Area Plan consistent with City of Chicago and local area plans and policies so that station designs will be sensitive to the context of the surrounding community.

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Specific design details, such as “green” features and vegetation, columns/pillars, fencing, lighting, signage, and artwork will be determined during later design phases. Response #4 addresses visual impacts and mitigation measures related to future decisions on embankment removal or retention. Response #13 provides additional details on mitigation measures proposed for historic-related resources and station design concerns. Response #18 provides additional details on sustainable design considerations.

Section 2.3 of the EA provides additional details on the station and track improvements that are proposed. Section 4.4 of the EA provides additional details about effects on historic properties. Section 4.5 of the EA provides additional details on visual impacts of the Build Alternative.

4. Embankment Removal

Commenters voiced opinions both for and against removing the embankment walls. Commenters also requested additional information about the potential for additional parking beneath the proposed track structure if the embankment walls were removed. (See comments 4, 12, 28, and 55.)

The current track support, referred to as “embankment,” was constructed in the 1920s using embankment walls with earth-fill. The Build Alternative includes raising the track profile 5 to 10 feet to meet IDOT vertical clearance requirements and to construct the modern support structure. This would require that the existing embankment track support system be replaced with a modern, aerial track support system. Response #1 (Purpose and Need for Modernization) contains additional information on the reasons that the embankment would no longer be used as the modern support structure.

Based on conceptual engineering, reconstruction of stations would require the removal of portions of the existing embankment walls and earth-fill to construct the new stationhouses and improve access from the ground floor of each station to the platform with elevators (for ADA accessibility) and wider stairways.

CTA is analyzing whether portions of the embankment wall could be kept for visual or aesthetic purposes, or whether the embankment would need to be removed along the project corridor between stations and viaducts. Due to the complex engineering required for this analysis, this decision will be made as part of future design phases. The decision will consider more detailed engineering factors including structural integrity and longevity of improvements, cost, access to alleys and temporary platforms during construction, access to construction areas, accessibility for maintenance and ongoing/required CTA inspections, and public input. Where the existing embankment wall could remain in place, the height of the embankment under the new aerial structure would be lowered (up to 7 feet) to allow access for required inspections and maintenance. Where embankment walls could be kept, stabilization and repair of the existing walls would be required as part of construction activities.

If the existing embankment between stations were kept, very little change in visual character would occur because the dominant visual object—the embankment walls—would remain between stations. If kept, the embankment would be at a lower height than it is currently, to provide adequate room for inspections and maintenance. If the existing embankment between stations were removed, open area would be created below the structure. Visual barriers could be

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included as part of the design to lessen visual effects on the surrounding historic districts and neighborhoods.

In addition, these other proposed measures would lessen effects on the historic elevated track structure:

- Because the elevated structure is a National Register of Historic Places (NRHP)-eligible historic resource, CTA will solicit visual preferences regarding the elevated track structure from local historic consulting parties, and will incorporate this feedback as appropriate into the reference materials provided to firms bidding on the project.
- As part of the project contractor selection process, CTA will also incorporate a selection criterion that provides additional points for proposals that consider the aesthetic qualities of the historic elevated track structure in their designs.
- Response #3 provides additional information on station design, visual impacts from the project, and mitigation proposed. Response #13 provides additional information on historic-related effects and mitigation measures proposed.

Future design phases will determine the extent to which the existing embankment would be removed. In locations where the embankment would remain, no parking would be possible under the tracks. If the embankment were to be removed, the space under the structure could be programmed for use, with parking being an option.

Section 2.3.1 of the EA provides additional details on the embankment walls.

5. Track Alignment and Alley Spanning

Commenters were concerned about the trains operating closer to residences. Commenters questioned why the alley between Argyle and Berwyn stations on the west side of the tracks could not be used instead of the east side alley, as there are fewer residences and more businesses on the west side of the track. (See comments 20, 25, and 49.)

Additional right-of-way would be required for the project to space the tracks farther apart and accommodate the new, wider platforms. To minimize impacts on adjacent properties, the right-of-way widening would take place mostly over the adjacent continuous alley along the east side of the alignment, where possible. This “alley spanning concept” was selected to minimize impacts on adjacent properties. The alley on the west side of the alignment is not continuous.

CTA undertook an in-depth research and conceptual design process in 2012 to identify a Build Alternative that would provide key benefits to the RPM corridor while reducing property displacements and other environmental impacts. Preliminary engineering is ongoing to look at ways to further reduce environmental impacts; however, the Build Alternative as presented in the EA addresses a balance of the total engineering constraints, environmental impacts, and the purpose and need for the project.

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In response to requests about widening to the west of the existing tracks rather than to the east at Berwyn station as proposed, the additional information below explains why the Build Alternative was ultimately chosen.

Compared to the Build Alternative, additional displacements would occur. On the west side of the rail corridor, 1122 W. Foster Avenue is directly against the embankment wall, as noted in comments received. Regardless of current occupancy, acquisition of this building would constitute a displacement requiring the same environmental evaluation and mitigation as any other property acquisition. Also on the west side, the Jewel-Osco abuts the embankment wall. CTA would not acquire such a property when the alternative to the east eliminates the need for property acquisition (other than for construction access and staging).

In order to shift the track entirely out of the east alley at this location, both the 1122 W. Foster Avenue and Jewel-Osco buildings would need to be acquired and demolished. In addition, this realignment would likely affect multiple additional properties that are immediately west of the CTA right-of-way to the north and south of the Berwyn station area. Because platforms should be located on straight (tangent) tracks, and tracks cannot have jogs without affecting speed, track realignment would require multiple blocks in order to shift from the east alley to the west alley (a shift of at least 12 feet). Based on a conceptual engineering review, the buildings listed below would likely be affected by shifting to the west instead of the east:

- Mixed-use building at 1125 W. Argyle Street that contributes to West Argyle Historic District
- Single-story building at 1124 W. Balmoral Avenue (a parcel that has been the subject of development discussions)
- Single-story building at 1123 W. Catalpa Avenue
- Residential towers at 1124 W. Catalpa Avenue
- Mixed-use building at 1125 W. Bryn Mawr Avenue that contributes to Bryn Mawr Avenue Historic District
- Single-story retail building at 1122 W. Bryn Mawr Avenue that contributes to Bryn Mawr Avenue Historic District

To avoid these buildings, while shifting west, multiple curves would need to be added into the Berwyn station platform.

A short west alley runs only between 1122 W. Foster Avenue and the Jewel-Osco at Berwyn station. To shift the track and platform only in this short stretch would introduce multiple curves into the Berwyn station platform and would gain very little—reducing the overhang of the east alley by only a few inches. These curves would be highly undesirable due to the gaps created between the platform edges and rail cars.

A westward alignment shift would also introduce new environmental impacts that the Build Alternative would not create. Additional safety impacts would occur. Because construction of the project would be split lengthwise, any shift to the west would reduce the distance between the

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operating tracks and the tracks under construction, which in turn would have consequences to train operations during construction. The large gap between the platform edge and the rail car doorway (created because the platform would be on curved tracks) would also introduce safety concerns on the platform itself.

The suggested alignment shift would result in higher operations and maintenance costs than with the proposed alignment, and there would be additional noise impacts. Additional curves result in higher track and wheel maintenance costs. Curves often introduce “wheel squeal” as wheel flanges touch the rails in the curve. The wheel squeal, in turn, increases the noise generated. A goal of the Build Alternative was to present a solution that would decrease noise, both at its source and as transmitted to noise receptors—a goal that the Build Alternative would achieve.

Section 2.3.1 of the EA and Appendix B-2 provide additional details on the track alignment and alley spanning.

6. Construction Duration

Commenters expressed a desire for construction to be completed sooner and for CTA to look at ways to reduce construction duration. (See comments 7 and 27.)

CTA is very aware of concerns regarding the construction schedule and will continue to identify ways to reduce construction schedule as design progresses. Two stages of track construction are anticipated for this project (referred to as Stage A and Stage B). This staging plan is proposed to allow for the maximum level of improvements to be made while minimizing the duration of construction and the operational impacts on passengers.

Construction of Stages A and B would take a total of 36 to 42 months. The timelines provided in the EA reflect the maximum construction duration for the evaluation of impacts. Preliminary engineering for this project is ongoing. After completion of preliminary engineering, the project is proposed as a design-build project, which would allow the greatest flexibility in addressing construction needs and use of innovative strategies to reduce construction timelines and/or costs. As such, timelines for construction may be reduced.

Section 2.3.2 of the EA provides further details on the proposed construction staging plan.

7. Project Costs and Funding

Commenters asked for clarification on why the project costs so much, asked for additional information on whether recent interim improvements to these same stations were a waste of money, or suggested that the project be funded locally rather than using federal or state funding. (See comments 2, 39, 45, and 53.)

Preliminary capital construction costs for the Lawrence to Bryn Mawr Modernization Project were developed based on conceptual engineering considerations and will be further refined through ongoing engineering and design. Anticipated capital costs for the Lawrence to Bryn Mawr Modernization Project are approximately \$1.33 billion in year-of-expenditure dollars. The \$1.33 billion would cover construction costs for the improvements to four stations, tracks, viaducts, and

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the embankment walls that support the elevated track structure. There are a number of reasons for the costs of a project of this size, including utility relocations, maintaining rail traffic during construction, maintaining passenger access to stations during construction, and other factors.

In terms of the investment at the seven North Red Line stations (Lawrence, Argyle, Berwyn, Thorndale, Morse, Granville, and Jarvis), as well as the separate \$10 million project at Loyola station, CTA has always been clear that these were intended to be interim improvements. When those investments were made, a timeline for implementation of the RPM Program was not clear and the improvements were absolutely necessary to maintain the existing aging stations. Because the underlying infrastructure was not addressed, many of the same issues will eventually resurface, including crumbling viaducts and embankment walls, leaking into stations and the resultant deterioration of station finishes. Unfortunately, if the RPM Program is not implemented, including the Lawrence to Bryn Mawr Modernization Project as part of Phase One, this type of investment will continue to be needed in order to maintain safe, reliable service and a reasonable environment for passengers. This would result in additional funding going toward limited-lifespan investments, instead of toward longer-lasting improvements.

CTA proposes to use a mixture of federal, state, and local funds to pay for this project. Use of federal funds requires a “local match” (state and local funds) equal to more than half of the project costs. CTA is continuing to work with federal, state, and local agencies and elected officials to secure the necessary funding to keep this project moving forward with the support of the community. CTA is investigating the potential for cost-saving strategies through alternate construction and financing methods.

Section 2.3.3 of the EA provides additional details on cost and funding for the project.

8. Future Phases of the Red and Purple Modernization Corridor

Commenters asked about future phases of the RPM Program, specifically expressing concerns about the condition of the Sheridan station and requesting further information on when improvements to Sheridan station would be done. (See comments 9, 17, 19, 39, and 43.)

The Sheridan station and curve are part of the RPM Program, which is a series of proposed improvements to the North Red Line (from just north of Belmont station to the northern terminus of the Red Line at Howard station) and the Purple Line (from just north of Belmont station to Linden station). These improvements would increase passenger capacity and modernize transit stations, track systems, and structures along the 9.6-mile RPM corridor through the Lakeview, Uptown, Edgewater, and Rogers Park community areas, the City of Evanston, and the Village of Wilmette. The RPM Program is proposed as a massive, multi-staged program to be completed in phases, allowing CTA to make the greatest number of improvements while meeting the public’s expectations for timely delivery of the improvements. This EA addresses one major element of the first phase of the RPM Program, the Lawrence to Bryn Mawr Modernization Project.

Planning for improvements to the Sheridan station is complex and challenging due to the constrained right-of-way at the station and the sharp curves on each end of the existing station platforms. Further analysis and engineering is required to determine how and when the

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modernization of the Sheridan station would be conducted within the RPM Program. CTA will determine subsequent phases of the RPM Program using factors consistent with selection of the Phase One improvements.

Because of its existing condition, and because more analysis is needed before modernizing Sheridan station, CTA plans near-term, interim improvements at Sheridan station to provide a safe and dry environment for CTA passengers. The Sheridan station interim improvements are currently moving out of planning and into design. The timing of the Sheridan station repair work needs to work with the Wilson station construction schedule.

CTA recognizes the need for improving and modernizing the entire RPM corridor comprehensively and will continue to engage the public and stakeholders through the phased development of the RPM Program.

Section 2.4 of the EA provides additional information on considerations in determining subsequent phases of the RPM Program.

9. Impacts on Rail Service during Construction (Red and Purple Lines)

Commenters asked about delays of trains during construction, impacts on Red and Purple line service during construction, service impacts on areas along the Red and Purple lines beyond the project limits, and whether trackwork would be conducted during evening and weekend hours. (See comments 9, 18, 36, 37, and 56.)

Passengers traveling through the project area during construction (not just starting or ending their trip at one of the project area stations) would experience slightly longer travel times and intermittent service disruptions to accommodate construction; however, trains would continue to pass through the project area to accommodate passenger demand. Construction work affecting operations would be scheduled to occur in off-peak hours or on weekends, to the extent possible.

In the first stage of construction (Stage A), all rail traffic would run on the existing two western tracks (known as Tracks 1 and 2, with Track 1 being furthest west). Red and Purple line service would merge to a single northbound and single southbound track through the project limits. The merge and diverge locations would be at new switches located north of Bryn Mawr station and south of Wilson station. Service patterns would need to be adjusted to reflect the constraint of only having two tracks operating through the project limits. While trains run on Tracks 1 and 2, the new eastern tracks (known as Tracks 3 and 4) would be constructed. After completion of the new Tracks 3 and 4, rail traffic would be switched to run on Tracks 3 and 4 during the second stage of construction. The second stage of construction (Stage B) would include construction of the new Tracks 1 and 2, new stationhouses, and new platforms. This staging plan allows for continued operation of north- and southbound trains throughout construction.

This constraint would require changes in service patterns to accommodate passengers, but train operations for Red and Purple line passengers would be similar to existing conditions. Red Line trains would normally continue to operate 24 hours per day and trains would operate at frequencies similar to current ones. Both the Red and Purple lines would continue to operate during peak hours. During construction, the Purple Line would continue to run express between

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Howard and Thorndale stations, then it would likely stop at the temporary stations at Bryn Mawr and Argyle (Stage A) and Bryn Mawr and Foster (Stage B) before stopping at Wilson station. Wilson station is being reconstructed as a transfer station and would be complete before construction on this project begins. No permanent changes to the Purple Line are proposed as part of this project. The project would result in shorter and more reliable travel times in both directions for passengers riding the Red and Purple lines.

Section 2.3.2 of the EA provides details on the proposed construction staging plan. Sections 3.3.3 and 3.3.4 of the EA provide further details on impacts and mitigation measures proposed for construction-related transportation impacts.

10. Temporary Station Closures and Alternative Public Transportation during Construction

Commenters questioned why Lawrence and Berwyn stations would need to be closed for the duration of construction. Commenters also had a number of questions or suggestions about alternative transportation services to be provided during construction and temporary station closures. Because of additional walk times between stations and passenger mobility needs, some commenters requested that connecting bus services from neighboring areas continue to be provided during construction, including providing 24-hour service during construction. Other commenters noted a desire for a coordination of resources during construction, including coordination of shuttles, bicycles, walking, and CTA rail stations to address temporary station closure impacts. Other commenters had concerns about coordinating bus rerouting during construction or were concerned that riding back from multiple closed stations would not be efficient. Finally, others suggested additional or specific alternative transportation during construction, such as providing additional bus shuttles on Broadway or providing additional north-south or east-west bicycle routes during construction. (See comments 1, 4, 19, 21, 22, 24, 29, 31, 33, 46, 47, 49, 50, and 60.)

Two stages of track construction are anticipated for this project (referred to as Stage A and Stage B). This staging plan is proposed to allow for the maximum level of improvements to be made while minimizing the duration of construction and the operational impacts on passengers. Lawrence and Berwyn stations would be closed during both stages of construction to facilitate the complex sequence of activities required for construction and to accomplish the work within the proposed construction timeframes.

During Stage A, passengers that typically use Lawrence station could use the newly constructed Wilson station or existing Argyle station. Passengers that typically use Berwyn station could use Argyle or Bryn Mawr stations. The Argyle and Bryn Mawr stations would remain open during Stage A. Due to the configuration of the alley west of the tracks at Bryn Mawr Avenue, southbound-boarding passengers would need to access a temporary platform from Broadway or Hollywood Avenue instead of Bryn Mawr Avenue during Stage A. Parallel bus service along Broadway, which is ½ block west of the Red Line tracks, would provide additional options for passengers.

During Stage B one temporary platform would be located between Winona Street and Foster Avenue with entrances from both streets, serving the Argyle and Berwyn station passengers. At

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this location, passengers could board both southbound and northbound trains. A second temporary platform would be located on the south side of Bryn Mawr Avenue. This location would allow passengers to board southbound trains only. Northbound passengers wanting to exit at Bryn Mawr station during construction would need to exit the train at Thorndale station and then ride a train back south to Bryn Mawr station or, as alternatives, walk from an adjacent station or use parallel bus service on Broadway, which is ½ block west of the Red Line tracks.

The EA assessed the additional walk times for passengers choosing to walk to a nearby open station or temporary station. During Stage A, the maximum additional walk time to a nearby open station would be between 5 and 9 minutes. During Stage B, the maximum additional walk time to a nearby open station would be between 4 and 6 minutes. Some passengers may experience shorter walking times due to the locations of stations and temporary platforms relative to the passengers' point of origin.

In addition to walking to an open station during construction, bus service along #36 Broadway (approximately ½ block west of the existing stations) would be increased during both stages of construction to provide additional options for passengers. CTA would add service to parallel and connecting bus routes as necessary to accommodate additional passengers who take buses instead of the Red Line due to temporary station closures, construction-related service disruptions, or longer travel times. Bus service connections to the Red Line would be maintained during construction through temporary rerouting that would connect passengers to open stations during construction. Rerouting would continue to offer connecting service to other buses as it does today, but with some variation in connecting locations due to construction activities. Bus tracker services would be updated to provide up to date information on rerouting. No additional impacts on passengers with mobility issues are anticipated with these service changes and enhancements. Construction-related train and bus service disruptions would occur during weekends and off-peak periods to the extent possible. CTA would provide notifications for temporary train service changes to neighboring property owners, residents, businesses and train passengers. CTA would follow customary procedures for temporary bus service changes. To maintain passenger safety during construction, existing station entrances would be reconfigured to separate passengers from active construction zones, and temporary station entrances would be provided.

During Stage B, Bryn Mawr station northbound would be closed, and passengers wanting to exit at that station when riding from the south could ride one station north of the project corridor (to Thorndale station) and ride back to the open southbound Bryn Mawr station. Passengers wanting to travel north from Bryn Mawr station during Stage B could board a southbound train and travel to the temporary Foster/Winona station, one stop to the south, where they could transfer to a northbound train. These are the only cases in either Stage A or Stage B where back-riding is anticipated.

Use of temporary stations, increased bus frequency within the corridor and rerouting to connect passengers to open stations would mitigate construction-related impacts on passengers. The EA (Chapter 3) provides details on anticipated service changes and bus rerouting, and specific operating plans will be developed after the environmental phase of this project as more detailed construction plans are developed.

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Some members of the public suggested that CTA provide additional shuttles during construction, particularly in the Uptown Entertainment District, which is currently served by the Lawrence station. The #36 Broadway service, ½ block west of existing stations, would be increased. Connecting bus services at Lawrence and Berwyn stations would be appropriately rerouted to open stations. Public transportation access would continue to be provided in this area during construction, and additional shuttle service would not be necessary. CTA understands that the #36 Broadway bus is not currently a 24-hour service. As specific operating plans are developed after the environmental phase of this project, CTA will ensure services are adjusted to address passenger needs. CTA's commitment to accommodate additional passengers on buses would include considering the time of day service is provided, including studying whether additional late night or overnight bus service would be required to accommodate passengers who normally use the stations that would be temporarily closed during construction. This analysis would include consideration of passengers that are traveling to and from the Uptown Entertainment District for concerts and special events.

An additional comment requested enhanced bicycle routes north-south or east-west of the project corridor during construction. Provision of additional bicycle corridors and the overall bicycle network is not under the jurisdiction of CTA. CDOT administers that program. Response #17 provides additional details on that program and informational resources. As part of this project, the only impacts on bicyclists would be that bicycle parking at stations would be temporarily displaced during construction. To minimize impacts on bicyclists, CTA will provide additional, temporary bicycle racks at stations that remain open during construction, to accommodate diverted bicycle traffic.

Section 2.3.2 of the EA provides details on the proposed construction staging plan. Sections 3.3.3 and 3.3.4 of the EA provide further details on impacts and mitigation measures proposed for construction-related transportation impacts and alternative public transportation services.

11. Neighborhood, Community, and Business Impacts during Construction

One commenter expressed concern about the Lawrence station being closed for the entirety of the construction period. The commenter also expressed concern about negative impacts on businesses and access to the Uptown Entertainment District during the Lawrence station closure. This included concerns about additional walk time, walk paths, and crime in areas where people would have to walk to access alternative stations in the construction period, particularly at night. (See comment 1.)

Project construction would result in temporary adverse impacts on the surrounding neighborhoods, communities, and businesses. Mitigation measures are outlined in the EA to minimize these impacts. Before construction, CTA will develop and implement a Construction Outreach and Coordination Plan. The plan will include a Business Outreach Program to assist local businesses and residents affected by construction. The plan will be tailored to business and community needs, and will consist of a number of strategies to minimize construction disruption to businesses and the surrounding community. During construction, CTA will work with community chambers of commerce and/or development corporations to help develop advertising plans to strengthen local visibility and patronage for businesses affected by temporary access changes during construction. CTA will also maintain access, or provide alternate access to

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businesses, residences, community facilities, and parks affected by temporary access changes during construction.

During construction, temporary easements would be needed at four surface parking lots along the corridor to accommodate construction activities and for equipment and materials storage. Two easements would be adjacent to Lawrence station. On-street parking would generally be maintained and construction workers would be required to park off-site. Passengers would be able to access Wilson station to the south or Argyle station to the north by walking or riding the #36 Broadway bus ½ block west of the Red Line tracks. The additional walk time for passengers that normally use the Lawrence station is expected to be a maximum of 5 minutes. CTA would add service to parallel and connecting bus routes as necessary to accommodate additional passengers who take buses instead of the Red Line due to temporary station closures, construction-related service disruptions, or longer travel times. As specific operating plans are developed after the environmental phase of this project, CTA will ensure services are adjusted to address passenger needs. CTA's commitment to accommodate additional passengers on buses would include considering the time of day service is provided, including studying whether additional late night or overnight bus service would be required to accommodate passengers who normally use the stations that would be temporarily closed during construction. This analysis would include consideration of passengers that are traveling to and from the Uptown Entertainment District for concerts and special events.

Chapter 3 of the EA provides additional information on the walk time analysis conducted as well as impacts on transportation. Section 2.3 of the EA provides additional information on neighborhood, business, and community impacts and proposed mitigation measures.

12. Property Displacements and Transit-Oriented Development

Commenters expressed concerns about using surface parking lots as temporary easements during construction (impacts on passengers that use proposed parking areas) or requested that CTA promote transit-oriented development at the two locations where permanent property displacements are proposed. (See comments 1, 24, and 27.)

During development of the project, citizens and businesses in the area expressed concerns about construction and permanent property impacts resulting from the project. Citizens and businesses were most concerned with impacts from street closures (due to equipment storage and construction employee parking) during construction. Suggestions included using off-street sites for construction equipment and material storage, and ensuring that construction employees did not use on-street parking that is critical for commercial businesses. Based on this public feedback, the Build Alternative would include temporary easements during construction at four surface parking lots along the corridor. These easements would accommodate construction activities, equipment, and materials storage. These temporary easements would meet construction site needs while minimizing street closures. Parking at these surface lots would become available again as soon as they are no longer needed for construction.

The Build Alternative would not result in permanent adverse impacts related to parking, loading zones, or access to building entrances. The permanent footprint of the project would not reduce the amount or general location of on-street parking, permit-regulated parking on residential

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streets, loading zones, or parking for car sharing. During construction, workers will be required to park at off-street parking locations to limit impacts on existing on-street parking. Alternative public transportation service, such as the #36 Broadway bus (½ block from existing stations), would be provided during construction to continue to serve travel needs near stations.

There are two commercial properties for which land acquisition and building demolition would be required, both occupied by the same business on unconnected parcels. These properties are north of Bryn Mawr station on Broadway near Hollywood Avenue. These properties would be acquired for permanent right-of-way needs and construction. Portions of these properties remaining after construction could be redeveloped with transit-related uses, in cooperation with CTA but independent of this project. A commitment of this project is that CTA will work with the City of Chicago Department of Planning and Development to provide incentives to encourage transit-oriented redevelopment, consistent with local and regional development plans, as soon as construction activities allow. The incentives will minimize the duration of temporary construction impacts and encourage mixed-use, pedestrian-friendly development. Incentives could include public/private partnerships, density bonuses, reduced development fees, reduced parking requirements, or expedited permitting. This measure could spur transit-oriented redevelopment and other land uses that support local and regional development plans after the project is complete by easing the path to construction for developers on parcels required for construction.

13. Historic Resources - Removal of CTA-Owned Retail Contributing to Historic Districts

Commenters requested that new stations be designed to be consistent with the historic character and quality of the existing stations and surrounding historic districts. One comment asked for further clarification on whether CTA-owned retail contributing to historic districts would be eliminated as a result of the project and for further information on how adverse effects on these contributing historic resources were addressed. (See comments 8, 34, 44, 51, and 55.)

In compliance with federal regulations, including Section 106 of the National Historic Preservation Act and Section 4(f) of the U.S. Department of Transportation Act of 1966, CTA and FTA analyzed the effects and use of the proposed project on historic resources. CTA and FTA also consulted with the Illinois Historic Preservation Agency (IHPA), the Advisory Council on Historic Preservation, the City of Chicago Historic Preservation Division, Preservation Chicago, Landmarks Illinois, the Edgewater Historical Society, the Uptown Chicago Commission, Friends of the Parks, and the Uptown Historical Society.

The Build Alternative would modernize the elevated track structure. Because the elevated track structure is both individually eligible for the NRHP and a resource contributing to the Uptown Square Historic District, there would be an adverse effect on the track structure and historic district as a result of the project. Lawrence station is not an individually eligible resource and is not a resource contributing to the Uptown Square Historic District. NEPA provides for review of impacts on non-historic resources like this station in considering impacts on the surrounding neighborhood and community and the visual environment. Response #3 discusses efforts to ensure that the designs at non-historic stations are consistent with the surrounding community.

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As part of the project, the CTA-owned stationhouse and currently vacant retail spaces underneath the track structure at Argyle, Berwyn, and Bryn Mawr stations would be demolished to build modern, expanded stations with auxiliary entrances or exits. At the Argyle and Bryn Mawr stations, some of the existing vacant retail (1117–1119 W. Argyle Street and 1116 W. Bryn Mawr Avenue) contributes to the surrounding historic district. In addition, the Argyle station, which would need to be demolished to implement the project and station modernization, is a resource contributing to the West Argyle Street Historic District. As such, there would be an adverse effect on the West Argyle Street and Bryn Mawr Avenue Historic Districts as a result of the project.

FTA and CTA, in consultation with IHPA, determined that there is no reasonable alternative to the proposed project improvements that meets the project purpose and need, and together the agencies developed a Memorandum of Agreement (MOA) to resolve the adverse effects on historic resources. The MOA incorporates consulting party input. The Draft MOA was made available for additional public input with the publication of the EA. The final, signed MOA is included in FTA's final NEPA decision document.

Mitigation measures are proposed and detailed in the MOA for these historic resources, and are summarized as follows:

- An interpretive exhibit highlighting the elevated track structure and its role in the development of Chicago will be displayed in coordination with the Wilson Transfer Station Project.
- Because the elevated structure is an NRHP-eligible historic resource, CTA will solicit visual preferences regarding the elevated track structure from consulting parties. CTA will incorporate the feedback received as appropriate into the reference materials provided to firms bidding on the project.
- As part of the project contractor selection process, CTA will also incorporate a selection criterion that provides additional points for proposals that consider the aesthetic qualities of the historic elevated track structure in their designs.
- CTA will prepare an updated NRHP nomination form for each district, removing the contributing CTA-retail resources from the forms.
- Based on suggestions from consulting parties, CTA will ensure that a Historic Preservation Plan is prepared for each of the three historic districts affected by the project.
- CTA will develop design plans for the Argyle and Bryn Mawr stations that are consistent with the design of the Prairie-style stations originally constructed in 1921, and that integrate into the setting of the encompassing historic district. In addition, before construction, CTA will examine the feasibility and cost implications of preserving existing Argyle station materials and reincorporating them into the station design.

Section 4.4 and Chapter 6 of the EA provide additional details on process leading to development of the MOA.

Lawrence to Bryn Mawr Modernization Project

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14. Noise and Vibration Impacts

Commenters expressed concern about the potential for noise impacts as a result of the trains operating closer to nearby residences. Commenters also asked whether CTA considered other operational/maintenance improvements to vehicles that could potentially reduce both noise and vibration. (See comments 1, 48, 49, and 55.)

CTA analyzed noise and vibration impacts according to the latest federal guidance, FTA's *Noise and Vibration Manual*. CTA first identified residences as noise- and vibration-sensitive receptors in the project corridor and then calculated potential impacts on these noise- and vibration-sensitive resources. Before mitigation, noise and vibration impacts due to the Build Alternative would occur where buildings would be near the track or near special trackwork. Several mitigation measures involving specific design features of the rail line are possible and are outlined within the EA. CTA has committed to incorporate noise mitigation measures into the project to reduce noise levels to below moderate or severe thresholds at noise-sensitive receivers. CTA has also committed to incorporate vibration mitigation measures into the project to reduce vibration levels to below impact thresholds at noise-sensitive receivers.

The analysis of environmental impacts assumes good wheel and track condition for both existing and future conditions; therefore, changes to wheel or track maintenance were not considered as potential mitigation measures for noise or vibration impacts. Additional considerations on changes to the types of wheels purchased for the CTA rail fleet are beyond the scope of the EA analysis and are a CTA policy decision. CTA will forward the commenters' suggestions on specific noise- and vibration-reducing wheel types to CTA's Infrastructure and Rail Vehicle Maintenance Departments for further consideration. The Build Alternative already includes other noise-reducing design elements, such as welded rail and noise barriers along the edges of the structure.

Regarding noise during construction, predicted construction noise levels exceed the limits provided in the FTA guidance manual for noise-sensitive receivers within 50 feet of the proposed construction area, but will be minimized through the implementation of best management practices (BMPs) by the contractor during construction. Section 4.6.4 of the EA lists the construction BMPs. The Mitigation Commitments Table, published as supporting documentation to the final NEPA decision documentation for this project, describes the construction BMPs further.

Sections 4.6 and 4.7 of the EA provide additional information on the noise and vibration analysis conducted for this project and the mitigation measures recommended.

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15. Safety and Security Impacts

Commenters asked general questions about safety and security, requested greater security at new stations, or had questions about project elements to deter crime, including graffiti adjacent to new stations. One comment requested that CTA include a “safe room” at each newly constructed station. (See comments 1, 35, 42, and 60.)

CTA is committed to maintaining a safe and secure environment for all passengers. The Lawrence to Bryn Mawr Modernization Project is being designed and would be operated consistent with federal, state, and local safety and security policies and guidance. The proposed improvements would improve both safety and security for CTA passengers and employees by providing upgraded facilities and amenities such as increased lighting, security cameras, wider platforms, and improved access. The proposed design would improve safety and security at stations. Wider platforms and elevators would result in safer maneuvering along the platforms and to ground-level stationhouses. Additional emergency egress points and wider stairs would reduce evacuation times at stations. The project design also involves replacing viaducts, which would improve sightlines along the sidewalks and streets adjacent to stations, improving safety and security conditions for pedestrians, drivers, and bicyclists. In addition, the project would fully replace aging track and viaducts, thereby reducing the risk of major incidents—including collisions and derailments—and improving safety and security under viaducts.

At stations, enhanced passenger security features, such as cameras, would be included as part of the project. CTA has taken a number of steps in recent years to assist police investigations on crimes committed at or near station areas, including installation and expansion of the surveillance camera network. Additional information on the surveillance camera network may be found on CTA’s website at <http://www.transitchicago.com/safety/cameras.aspx>.

CTA will maintain a safe and secure environment for passengers and the general public during construction. The contractor is also required to have an approved Health and Safety Plan and a Safety and Security Plan before the start of any construction work. The Safety and Security Plan would describe protection to be provided by the contractor for its employees, CTA passengers and employees, and the general public.

Streets and sidewalks would be closed temporarily when necessary for the protection of persons and/or property. CTA, the City of Chicago, and/or the project contractor will provide notifications of street and sidewalk disruptions, blockages, or closures to neighboring property owners, residents, and businesses using signs along streets, in nearby CTA stations, and in applicable CTA trains and buses. CTA will provide descriptions of safe alternate routes when necessary.

The recommendation to include a safe room as part of the design is beyond the scope of requirements of the NEPA analysis completed for this project; however, this comment/suggestion has been forwarded to CTA’s Safety Compliance & Risk Management Department, which evaluates safety measures at all stations.

Section 4.11.6 of the EA provides additional information on safety and security impacts of the project.

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16. Public Outreach during Construction

Commenters emphasized the importance of communicating transportation impacts to the general public and surrounding community during construction. (See comments 16 and 36.)

CTA understands the need for extensive communication and transparency during construction of this project. CTA will continue to work with the community as the project moves forward. The preliminary engineering phase is expected to be completed in fall 2015. CTA will coordinate additional community meetings through the aldermen's offices as further project details are known. CTA Government and Community Relations staff will continue to work with the aldermen's offices and community groups to develop marketing plans during construction. CTA will lead community meetings with local residents and business owners regarding construction impacts, develop a Construction Outreach and Coordination Plan to minimize construction disruption to businesses and the surrounding community, and maintain and update a dedicated webpage to provide passengers with information regarding work planned, scheduling, progress of construction and other pertinent construction details. As part of ongoing community meetings and coordination with the aldermen's office, a community task force may be further developed to ensure continued community outreach and involvement during construction. CTA Government and Community Relations staff will continue to coordinate with local businesses on construction updates and notifications to provide them with advance notice of construction activities and schedules. Efforts will be undertaken through design and construction to minimize disruption to communities and businesses during construction.

Section 5.4 of the EA lists the next steps for the project and summarizes a number of the commitments for additional public outreach efforts that will be conducted.

17. Additional Suggestions Received

Commenters offered additional suggestions on other enhanced facilities they would like to see, such as enhanced bicycle corridors or a bikeway on the east side of the embankment and provision of additional parking facilities near CTA stations to serve as park & ride facilities. (See comments 4, 26, and 46.)

Bicycle routes on the existing street network, including along the alley adjacent to the CTA rail alignment, are under the jurisdiction of CDOT. CDOT administers improvements as part of a separate program. A bicycle map for north-south and east-west corridors in the project vicinity is available online at the following location: <http://www.cityofchicago.org/cityinfo/cdot/bikemap>.

CDOT's Bicycle Program continues to look for ways to improve the bicycling environment in Chicago. A number of initiatives are planned for the areas adjacent to this project corridor. Additional information on plans as part of Chicago's Complete Streets program is available online at the following location: <http://chicagocompletestreets.org/your-streets/bikeways>. CDOT's plans for improvements to the bicycle network are also provided in the *Chicago Streets for Cycling Plan 2020*, also available online.

There would be no permanent impacts on parking as a result of the project and additional park & ride facilities are not proposed as part of this project. The Build Alternative would temporarily affect on- and off-street parking to accommodate construction and delivery of construction

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materials. On-street parking may also be temporarily affected by measures taken to maintain traffic during viaduct and station reconstruction. The Build Alternative would not result in permanent adverse impacts related to parking, loading zones, or access to building entrances. The permanent footprint of the project would not reduce the amount or general location of on-street parking, permit-regulated parking on residential streets, loading zones, or parking for car sharing. Additional off-street parking could be created where the existing embankment could be removed, primarily next to the reconstructed stations. This decision will be made as part of future design phases.

18. Sustainability and Green Building

Comments recommended CTA pursue the use of a variety of “green” materials and technology including solar panels, considering green walls, natural lighting, low-impact lighting, and other green approaches for construction and design. Additional comments expressed concern about additional stormwater impacts from impervious surfaces and energy use for construction and operation of the Build Alternative. (See comments 22, 32, 35, 50, 52, and 57.)

CTA is committed to using sustainable design and building materials. Preliminary engineering for the project is ongoing and will look at ways to incorporate sustainable design into the project and to balance engineering constraints and requirements with sustainability design criteria. Light-emitting diode (LED) lighting is already part of CTA standards. Coordination with community organizations, including those focused on green and sustainable practices, is also ongoing to address community concerns regarding the design of this project.

CTA has reviewed the suggestion for solar panels on the platform canopies. While this technology has certainly improved in recent years, information gathered from other transit agencies indicates the potential for substantial reliability problems with solar panels on transit projects.

The use of natural lighting is common practice in most architectural designs today and will be considered in the design of the stationhouses, although it will be balanced with historic features where applicable. The project will be designed consistent with federal, state, and local safety and security policies and guidance. Specific design details will be determined during later design phases.

CTA is reviewing the viability of implementation of green walls with vines or integrated planter wall structures, as suggested in a few comments, as part of the ongoing preliminary engineering work for this project. Due to the limited right-of-way available, a partnership with adjacent property owners would be necessary in order to build green wall infrastructure. As design progresses, CTA will consider a variety of factors, including maintenance cost and feasibility, as well as locations of available walls and viability of adjacent property partnerships.

To address the potential for stormwater impacts, CTA met with the Municipal Water Reclamation District regarding the very issues reflected in commenter’s concerns. Rather than add stormwater to the already overtaxed storm sewer system, the current design concepts propose using infiltration to direct stormwater slowly through the embankment and ground soil (which are primarily sand) under the aerial deck and into the groundwater.

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With regard to concerns about energy-related impacts, the project would result in only minimal changes to energy use due to train operations. The reconstructed stations would require additional energy to operate due to lighting at larger platforms and use of elevators for accessibility. The additional energy use would be less than a 4 percent change compared to the current energy use for stations along the Red Line between Belmont and Howard stations. The additional energy use at the four reconstructed stations would amount to less than 0.1 percent of total annual energy consumption for Cook County.

In addition, implementing the project would increase capacity, speed, and reliability of the existing transit service, effects that are expected to result in energy-related benefits by encouraging commuters to shift from automobile use to more energy-efficient modes such as transit. The one-time irreversible commitment of energy resources for construction would amount to less than 1 percent of the total annual energy consumption for Cook County. Construction of the Build Alternative would not have an impact on energy consumption on Cook County or the Chicago metropolitan area.

Section 2.3.1 of the EA provides additional details on current station design concepts and Section 4.11 and Appendix C-8 discuss water and energy resources. Section 5.4 of the EA lists the next steps for the project and summarizes a number of the commitments for additional public outreach efforts that will be conducted that could include coordination on station design and green features.

**Lawrence to Bryn Mawr Modernization Project – Environmental Assessment
Agency and Public Comment and Response Log**

<i>Agency Comment Log/ID</i>						
#	Date	Commenter	Comments/Responses	Response	Source	Topic Area
1	6/1/2015	Kenneth Westlake, U.S. Environmental Protection Agency (USEPA)	[Comment letter is provided at the end of this log.] Comments related to greater clarity and specificity of mitigation measures related to hazardous materials, public health, and environmental justice communities.	The mitigation commitments table, included as Attachment B to FTA’s Finding of No Significant Impact, includes further details and clarifications on mitigation measures that will be carried out as part of this project. The mitigation commitments included address the substantive comments received from USEPA.	Letter	Hazardous Materials, Public Health, Environmental Justice

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Public Comment Log/ID					
#	Date	Commenter	Comments/Responses	Response	Source
1	5/14/2015	Jen Reidenger, Private Citizen/Business Owner	My business is located directly across the street from the Lawrence station (just west of Aragon). I thought Rahm and the Alderman were pushing for the "Entertainment District" in the next 2-3 years yet the central hub (Lawrence Station) that directly delivers to Aragon, Riv, green mill, Uptown lounge (someday Uptown Theatre) will be closing at just that time for 2.5-3 years. My business will <u>NOT</u> survive. The Riv concert customers will have <u>NO</u> reason to walk past my location if they're going to the Wilson or temp. station on Winona. We are a 4 am bar (5 am Saturdays) and safety wise sending my customers down to Wilson at 12-5 am is a recipe for crime! Will you be increasing police presence on concert nights and from 12 am-5 am to protect my customers and staff? Last year the 5 week Red Line track upgrade during the concert season almost put me out of business due to the decrease in revenue during that time with concert goers going to alternate stations. The parking lot between Uptown Lounge and the Aragon is a city owned lot which assuring will be used for equipment and CTA parking etc. for the majority of the 2.5-3 years - so now I will be losing parking for customers. No el station + no parking = <u>NO BUSINESSSS</u> . 50% of my business is concert crowds (and we've already lost quite a bit of that because the Aragon and The Riv are booking all ages shows) which means zero business for the bars plus packed parking lots and el stations and no room for 21+ customers to go. I'm worried about <u>SAFETY</u> ! I'm worried about available parking! I'm worried about concert crowds! I'm worried about <u>NOISE</u> ! I'm worried about street closures! I truly feel I will be on the losing end of this renovation and won't financially survive the 2.5-3 years. *I came to this meeting thinking it was a presentation and open forum <u>NOT</u> a bunch of posters on easels*	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10, 11, 12, 14, 15.	Comment Card
2	5/14/2015	Ernie Norrman, Private Citizen	Great project, but why does it cost so much?!?	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #7.	Comment Card
3	5/14/2015	Ernie Norrman, Private Citizen	Will there be public restroom at CTA stations in the future? If not, why not? The rest of the civilized world has public restroom at transit stations (and many other locations as well).	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2. We will also forward your comment to CTA Customer Service to provide a more detailed response on CTA policy and considerations regarding the provision of public restrooms at CTA facilities.	Comment Card
4	5/14/2015	Melanie Eckner, Private Citizen	Please consider using the alleys to the east of the embankment as a bikeway, which is how local residents use it today. It is well-protected from wind, has dumpsters on only one side, and is in good condition from Leland (Greenway) north to at least Bryn Mawr; it can be ridden almost to Loyola. Given that much of Broadway is very difficult for cyclists (IDOT parts without bike lanes) and there are many curb cuts, this alley - especially with some rain cover from wider track structure - would be a great alternative. Thank you for your consideration. Please do not add parking under tracks - focus on how great an alternative CTA is to private cars. Could shuttles that are planned during closure of Lawrence station be used to pilot "green" modes for accessing the Uptown Entertainment District? Private car users accessing venues create a huge environmental negative impact on the lakefront residential community due to idling, looking for parking spaces, etc. I would like to see coordinated use of resources - shuttles, bikes, walking, CTA "L" to help solve this traffic problem.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #4, 10, 17.	Comment Card

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Public Comment Log/ID					
#	Date	Commenter	Comments/Responses	Response	Source
5	5/14/2015	<i>Isaac Brown-Palgrave, Private Citizen</i>	It is a great idea. I love it. We appreciate your hard work.	Thank you for your comment.	Comment Card
6	5/14/2015	<i>Mary Hartsfield, Private Citizen</i>	I am interested in job creation for x-offenders. Extending the x-offender program increase in their salaries, and jobs for African Americans who are in need of employment.	Thank you for your comment. While these comments relate to matters, such as hiring practices, that are outside of the National Environmental Policy Act of 1969 (NEPA) process, your comment will be forwarded to CTA's Diversity Programs Department. CTA's Disadvantaged Business Enterprise (DBE) Program demonstrates CTA's continued commitment to the success of minority/and women-owned businesses by promoting contracting opportunities to DBEs in the transit industry. Additional information on the DBE Program may be found on CTA's website at: http://www.transitchicago.com/dbe	Comment Card
7	5/14/2015	<i>Don Cortelyou, Private Citizen</i>	Keep escalators. Length of time of project should be shortened. Highly inefficient. Look of stations should reflect character of each stop. Place making efforts need to be considered.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2, 3, 6.	Comment Card
8	5/14/2015	<i>Patrick Waters, Private Citizen</i>	I am concerned regarding the Lawrence station. Tonight is the first time I heard that only Argyle and Bryn Mawr stations will have "Prairie style" station houses. We use to have a station house at Lawrence which was torn down about 20 years ago and replaced with chain link fencing, razor wire and a concrete block bunker with bullet proof glass. This is in a historic district and will be the primary access point for people taking the red line to the Entertainment District. It is important that it presents itself well with entrances more off of Broadway at Wilson this will be the transit gateway to the Entertainment District. The tone of the design is important to project a positive impact and given it is in a historic district and we have lost a number of buildings already due to Wilson rebuild.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 13.	Comment Card
9	5/14/2015	<i>Gail Beck, Private Citizen</i>	Will modernization plans allow for an increase in northbound Purple line trains departing from Howard? The frequency with which northbound trains heading for Skokie leave out places the northbound purple trains going to Evanston. This seems to be out of whack where parity is concerned. The northbound Purple line riders greatly outnumber the northbound Yellow line riders. Also, thinking on the fact that I only live 7 miles from Evanston Hospital (Bryn Mawr to Central St), it blows my mind that an only 30ish minute ride now takes 45 min. Going back to 2004 or 2005 I remember my rides being no later than 30 min. Basically Howard is a bottleneck that gets worse as time goes on. Otherwise, I love the CTA. I'm very satisfied and don't have anything to complain about. I hope the project moves swiftly, safely and efficiently for you. Thank you.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #8, 9.	Comment Card

**Lawrence to Bryn Mawr Modernization Project – Environmental Assessment
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Public Comment Log/ID					
#	Date	Commenter	Comments/Responses	Response	Source
10	5/14/2015	Greg Sommers, Private Citizen	I've been to other meetings with the CTA. Everyone has been very well throughout - excellent - Jeff Wilson always does a great job - Carol did a good job as well.	Thank you for your comment.	Comment Card
11	5/14/2015	Ophelia Jones, Private Citizen	I wish that the Bryn Mawr train station had an elevator. I can't walk stair steps.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2.	Comment Card
12	5/14/2015	Bob Remer, Private Citizen	Re: Embankments. Please do not replace embankments with "see through" steel girders. It will add to noise and will have a negative affect on the <u>appearance</u> of the neighborhood and the historic appearance of the elevated. It will also attract trash, abandoned cars, etc. Also embankments can be sites for growing vines and murals.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #4.	Comment Card
13	5/14/2015	Heather Armstrong, Private Citizen	[No written comment, but requested a hard copy of the Environmental Assessment. Circled Elements of Project Providing Comments on: Modernized Stations, Wider Platforms, ADA-Accessible Stations, Track/Structure Improvements, Capacity Improvements, Operational and Reliability Improvements, Construction Sites and Staging, Project Funding. Circled Impacts and Mitigations Providing Comments on: Transportation, Community and Business, Visual Changes.]	Thank you for filling out the comment card. You have been added to the project e-mail list for future updates. Additional information on items circled on this comment card may be found in the Environmental Assessment (EA) published and presented at the public hearing on May 14, 2015. Per your request to Government and Community Relations staff in your comment card, we have sent you a hard copy of the EA.	Comment Card
14	5/14/2015	Garland Armstrong, Private Citizen	[No written comment, but requested a hard copy of the Environmental Assessment. Circled Elements of Project Providing Comments on: Modernized Stations, Wider Platforms, ADA-Accessible Stations, Track/Structure Improvements, Capacity Improvements, Operational and Reliability Improvements, Construction Sites and Staging, Project Funding. Circled Impacts and Mitigations Providing Comments on: Transportation, Community and Business, Visual Changes.]	Thank you for filling out the comment card. You have been added to the project e-mail list for future updates. Additional information on items circled on this comment card may be found in the Environmental Assessment (EA) published and presented at the public hearing on May 14, 2015. Per your request to Government and Community Relations staff in your comment card, we have sent you a hard copy of the EA.	Comment Card
15	5/14/2015	James Carver, Private Citizen	I have heard that the CTA was going to have a northern exit at Hollywood at the Bryn Mawr station. Do not agree with this understand reasoning. 1) Why steer traffic away from Bryn Mawr. 2) Why steer "summer" traffic on Hollywood onto the beach traffic "foot" pattern. Hollywood is too busy and hectic for this foot traffic pattern.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2.	Comment Card

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Public Comment Log/ID					
#	Date	Commenter	Comments/Responses	Response	Source
16	5/14/2015	<i>LaTriece Cast-Swiney, Private Citizen</i>	Wider platforms are so important for every station so people can move safely. I'm thrilled CTA is making all new stations ADA accessible. Everyone should be able to use CTA equally. Improved reliability would be fantastic. CTA is my primary mode of transportation and it's important to feel like I can get where I need to be in a timely manner. Communication is going to be crucial for a project of this size.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #16.	Comment Card
17	5/14/2015	<i>Christina Arthur, Private Citizen</i>	Wider platforms are absolutely necessary for providing safe and inviting access to the transit system for all riders. I would like to see auxiliary entrances on side streets for stations being reconstructed (particularly on Foster for Berwyn station and on Glendale for Thorndale or Granville station).	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2, 8. As a note, Granville station is outside the project limits, but further information is provided in the Response on future phases of the Red and Purple Modernization Program.	Comment Card
18	5/14/2015	<i>James Kurzawa, Private Citizen</i>	I think it is great the CTA is going to be updated - it needs it badly. One concern I have is how taking the red line during the construction period will be effected. I go to Loyola and take the red line often to get to classes downtown along with other activities. Closing down one side with 3 different lines running is going to slow everything down. I know that is necessary to rebuild but is there a most efficient way for this to be dealt with? Will we be waiting hours to take one train down the red line	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #9.	Comment Card
19	5/14/2015	<i>Alisa Sheth, Private Citizen</i>	I am very glad to hear that all stations affected will be modernized to be ADA accessible, and I hope this means that Thorndale will be update soon as well. This is essential to ensuring Uptown/Edgewater is an inclusive and accessible community. While construction is occurring and stations close, it is essential that the community be given more bus options. A 5-9 minute walk, while no big deal for many of us, is very limiting for people with mobility issues (people with disabilities and elderly, etc.). I hope the CTA considers extending 36 service throughout and ensuring that community partners are informed to get the word out (Access Living, senior living centers, Triology, etc.). Thanks!	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #8, 10. As a note, Thorndale station is outside the project limits, but further information is provided in the Response on future phases of the Red and Purple Modernization Program.	Comment Card
20	5/14/2015	<i>Bernie Kienstal, Private Citizen</i>	At Berwyn station stop: Do not use the alley on the east side of the tracks. At Berwyn, residents on that side. Use the alley on the west side, where there are no residents. Use air rights over Jewel, build over the alley on the west, take out the abandoned building at Foster.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #5.	Comment Card
21	5/14/2015	<i>Jeremy Baker, Private Citizen</i>	In addition to increasing the frequency of the #36 bus, increasing the frequency and adding northern stops for LSD express buses would be appreciated during the closures. I read in a different CTA plan that closing the Lawrence station permanently was a possibility. If so, does it make sense to renovate it now? 18-24 months seems like such a long time. I know it's hard work, but ...	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10. Following construction, the Lawrence station would be reopened and made fully accessible.	Comment Card

**Lawrence to Bryn Mawr Modernization Project – Environmental Assessment
Agency and Public Comment and Response Log**

Public Comment Log/ID					
#	Date	Commenter	Comments/Responses	Response	Source
22	5/14/2015	<i>Ginny Sykes, Private Citizen</i>	My comments concern making the spaces that connect the red line easy and accessible for people, such as shuttle buses and drop off points. These stations should be conceived as also east west connectors, with buses to take people to the lakefront. Transit will be successful if it enhances businesses, green spaces and economic development from a grass roots perspective. Please no more security fences, prison style lighting and minimal concrete. We need <u>green</u> stations!!	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10, 18. Bus service in the corridor is designed to be flexible and meet passenger demands. Several bus routes currently serve as east-west connectors to these stations (including routes #81, #84, #92, #146). CTA's Planning Department continually monitors service and connectivity needs and addresses service requests.	Comment Card
23	5/14/2015	<i>Daryl Ramsey, Private Citizen</i>	Glad to see that it's finally being talked about. I've lived on the north side for 30+ years. Making the stations ADA accessible has been needed for a long time.	Thank you for your comment.	Comment Card
24	5/14/2015	<i>Sarah Wilson, Private Citizen</i>	I'm very excited about this project but wonder why Berwyn will be closed the entire time. I'm glad there will be a temporary station at Foster, 3 years is a long time for a station to be closed entirely. I would like to see each stationhouse be unique to that station. For example, Argyle should incorporate the "Asia on Argyle" theme. Will the new art pieces installed at Berwyn be incorporated into the new station? I encourage CTA to promote TOD along the stations and nearby available property. Also, will there be retail spaces available in the new stations? Overall, anything to reduce our commute time and provide a better riding experience (new stations and platforms, smoother rides), I'm all for it. Thanks for focusing on the far North side!	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2, 3, 10, 12.	Comment Card
25	5/14/2015	<i>Jose Galarza, Private Citizen</i>	I am very disappointed to have the el run closer to my building. The space between the alley and the El made my decision to buy. Seeing this new plan will force me to re-evaluate and move. Not sure why the CTA chose to move tracks closer to homes rather than the business side is very disappointing. There is a rather badly looking building near west side of Argyle station that could have easily been torn down to expand.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #5.	Comment Card
26	5/14/2015	<i>Claire Gavrel, Private Citizen</i>	Will modernized stations have improved lighting? I am very pleased for the improvement project of raising platforms. I would suggest to beautify the stations as passengers walk into the station with artwork and better lighting. Accommodation for parkers was park their cars to access the train system.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2, 3, 17.	Comment Card
27	5/14/2015	<i>Nicole GavrelFotz, Private Citizen</i>	I want to first comment that I greatly appreciate that CTA did not shut down Lawrence and Thorndale several years ago when considering the Red Ahead project. I really hope that this new project starting for 2017 gets completed ahead of schedule. It is exciting to see what all the stations will look like once completed. Please do your best to keep parking around Lawrence free and available. I beg you not to use any parking lots around Lawrence for construction supplies/trucks. Lawrence has a huge entertainment venue and we need all the parking to accommodate those going to concerts, music lounges, etc. Thank you for setting up today's wonderful meeting with all of the large posters and highly knowledgeable people who answered questions with great detail and understanding.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #6, 12.	Comment Card

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28	5/14/2015	<i>Anonymous Comment, Private Citizen</i>	Please demo the existing walls (retaining earth and supporting tracks) as much as possible. A fence on top of the wall will be ugly and probably won't keep everyone out. The walls will continue to deteriorate and be an ongoing maintenance issue.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #4.	Comment Card
29	5/14/2015	<i>Nick Wolff, Andersonville Chamber of Commerce</i>	The Andersonville Chamber of Commerce is requesting significant increase in CTA bus service on all lines that service (in and around) the Andersonville community. Adequate public transportation is a critical element to the walkability and pedestrian scale of our retail corridor. Our businesses depend on CTA/CDOT to provide a certain level of service, that we need maintained through the duration of the project.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10. Existing bus service connections to the Red Line and Andersonville would be maintained during construction. We will forward your comment and recommendations related to existing services outside of the project corridor to CTA's Planning Department.	Comment Card
30	5/14/2015	<i>Brad Hoganson, Private Citizen</i>	The Argyle station's Asian design is unique and honors the culture of the neighborhood. Please keep it.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3.	Comment Card
31	5/14/2015	<i>RH Danhauser, Private Citizen</i>	Please supply shuttle buses between impacted stations. Back riding is not efficient, especially when riding between two closed stations. For example, if one way service between Sheridan and Bryn Mawr and you are going between Wilson and Argyle you must go first Wilson to Sheridan, then Sheridan to Bryn Mawr and then Bryn Mawr to Argyle.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10.	Comment Card
32	5/14/2015	<i>Steve Meiss, Private Citizen</i>	Should provide for vegetation along the elevated to screen the steel infrastructure. Would also help to mitigate noise.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 18. Specific design details, such as "green" features and vegetation, fencing, lighting, and artwork will be determined during later design phases.	Comment Card
33	5/14/2015	<i>Steven Simons, Private Citizen</i>	If bus #92 Foster gets a re-route, make SURE that bus tracker is aware of every street and every stop this bus uses!	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10.	Comment Card

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34	5/14/2015	<i>Ward Miller, Preservation Chicago</i>	Thank you for your presentations. As stated, we should look and further study and implement historic fabric as much as possible. When raising the track level existing buildings should be preserved and extended upward. Arched poured-in-place columns and supports should be extended upward and made taller even if determined that these elements should be replaced in-kind with "replications". The authenticity of the stations and the "spirit" of the original design should be respected and replicated when possible. Please retain these features and adapt them as necessary. Also, don't make the elements too "heavy handed" on the design front, as the renderings look like a highway underpass!	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 13.	Comment Card
35	5/26/2015	<i>Pamela Bergdall, Private Citizen</i> [Mailed Comment Card]	Because funding, maintenance, costs, operating costs, rising fares, etc. are always an issue it only makes sense to spend money on upgrades that will at the same time if done thoughtfully, reduce operating costs. How improvements are designed and with what – can reduce future operating costs (i.e., maximizing natural light, use of solar on platform roofs, LED lights, etc.). Evaluate designs with this in mind, please! Underlying value! Foundational along with safety. Look at EVERYTHING with future costs in mind. How to reduce operating costs including maintenance.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 15, 18. CTA is committed to identifying ways to reduce cost and improve efficiencies, and has also weighed the benefits of repairs and upgrades versus replacement.	Comment Card
36	5/2/2015	<i>Tom Clowes, Private Citizen</i>	It's great, and overdue, to make the Red Line stations accessible, and renovate them so they don't look disgusting. However, as CTA renovates tracks, it creates some phenomenal delays for us customers. I can't imagine how much faster the trains would have to go to make up for all the time I've spent stuck on delayed trains slowed because of track work. Furthermore, while the track work is a very expensive way to improve commute times, a cheap way would be to put train tracker signs outside stations so that people know whether a train is coming soon, so that they can rush to catch one if one's coming, or decide to take a bus or another transportation if it's not. Also, trains could coordinate so that people aren't left staring from an unmoving train at the train they need to transfer to as it pulls out of the station before they arrive into the station. If track work has to be done, it should be done in the late night and early morning hours. Furthermore, better communication about track work and other delays would save people time, so they could, say, take a bus if the train will be very slow. Once, a train was so delayed, I could have walked to my destination in the half hour I spent waiting - but no announcement about the delay was ever made. Those improvements would cost next to nothing and would not cause temporary delays as track work does until it's finished. It seems CTA measures trains' speeds, not passengers' commute times, to evaluate itself, even though it's the commute time that's important to a commuter. Lastly, I rarely see employees actually working on the tracks. Their pace seems very, very slow. Is there a way to get track workers to work faster? Thanks for working on these things, and I look forward to the day the transit system seems like it is working for me.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #9, 16.	Email Comment
37	5/11/2015	<i>Catherine Juric, Private Citizen</i>	Currently the Purple line runs express through these stations. Will yah change during construction? How about after construction? Thank you.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #9. During construction, the Purple Line would continue to run express between Howard and Thorndale stations, then it would likely stop at the temporary stations at Bryn Mawr and Argyle (Stage A) and Bryn Mawr and Foster (Stage B) before stopping at Wilson	Email Comment

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				station. No permanent changes to the Purple Line are proposed as part of this project.	
38	5/11/2015	<i>Sarah Myers, Private Citizen</i>	<p>That's nice. I don't live in that area, anymore. What concerns me now is wanting to know what CTA/City of Chicago is going to do about the 2-hour bottleneck between Balbo-Michigan and Soldiers Field that occurs every time there is a Bears game, Lollapalooza, a Grant Park marathon and the like.</p> <p>South Side CTA bus riders (#6, #28, #26, #2, J14 Jeffery Jump) are also human beings who might need to get home to go to the bathroom (not to mention also bus drivers) or get to a hospital if they have a stroke or heart attack while waiting hysterically for buses to become untrapped by traffic - and cars going to the Bears game or the marathon or the Lollapalooza are always favored - and who were not expecting to have to wait 2 hours to get out of an area in Grant Park/Columbus Drive that usually takes 2 minutes!!!</p> <p>No wonder ridership is up on the trains and down on buses!!! (But I don't want to take the train. The bus is what is in my area and what I saw as an advantage when I arranged my new home at Rainbow Beach.)</p> <p>When are you people going to start doing something about finding an alternate way for busses to pass through this area when these events occur?!? I started sending postcards to the Mayor about this before election. I expect to start hearing from you people about this real soon...!!!</p>	<p>Thank you for your comment. We will forward your comment and recommendations related to existing services outside of the project corridor to CTA's Planning Department.</p>	Email Comment
39	5/11/2015	<i>Brian Kaempfen, Private Citizen</i>	<p>I would like to formally file my objection to this Phase 1 of the RPM due to poor planning and allocation of existing infrastructure funding. Specifically, my objection is rooted in the 2012 Red North Station Interim Improvements Project for Jarvis, Morse, Granville, Thorndale, Bryn Mawr, Berwyn, Argyle, and Lawrence. While there was no doubt improvements were needed at these stations, the \$57.4 million project came to an average \$8.2 million per station. Why was this collective \$32.8 million spent for renovations that would be in place for only 5 years, provided the start date for Phase 1 of the RPM stays 2017?</p> <p>The CTA doesn't have the extra money to be wasting \$30+ million every 5 years, especially when there are now larger priorities. The Sheridan Red Line station gets more daily riders than each of the four Phase 1 stations, yet Sheridan hasn't received ANY substantial investments since the summer 2012 repainting of the canopies. I have read that \$17 million have been allocated to Sheridan for renovation, but that was in early 2012, and now more than 3 years later, there is still no news about this money. Has this \$17 million actually been allocated, and if so, what is it for and what is the timetable for these renovations?</p> <p>The \$8.2 million spent on the RPM Phase 1 stations would be overkill for Sheridan, yet even that has not been funded yet. Sheridan, while eventually will be completely realigned as part of the RPM, NEEDS an interim fix. The stairs are rusting away, the platform is warped with no tactile edging, and whenever it rains, the stationhouse becomes a lake. Not a puddle, not a river, but 3+ inches of completely standing water at the base of both platform's staircases. Sheridan doesn't have a concrete embankment that needs waterproofing, it can't accept new concrete platforms, and has a lot less masonry to tuckpoint or repair than the previous stations had, so when will the CTA finally perform repairs at Sheridan? Until that time, I oppose any Red Purple Modernization work, especially to</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #7, 8.</p>	Email Comment

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			<p>stations that recently received major renovations.</p> <p>I also plan on presenting this information at the meeting on May 14th.</p>		
40	5/11/2015	<i>Rob Sherman, Private Citizen</i>	What will be the clearance between the street and the rail structures on the rebuilt Red Line?	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3. The new structure would meet Illinois Department of Transportation vertical clearance standards of 14 feet 9 inches.	Email Comment
41	5/12/2015	<i>Courtney Cobbs, Private Citizen</i>	<p>I live very close to the Bryn Mawr station and it's the primary stop I use-to exit and board the Red Line. I would love for this station to have an elevator and access on both ends of the station vs one main entrance. I sometimes miss my train having to wait for the cross signal to reach the side of the main entrance.</p> <p>An elevator at this location would be great for me personally and many people I know with mobility issues or who grocery shop via CTA. An elevator would also make it easier for bikers to use this station. I hope in the renovations there will be more bike racks or a bike storage area for rental. Thank you for your time</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2.	Email Comment
42	5/14/2015	<i>Jean SmilingCoyote, Private Citizen</i>	<p>I went to the 'hearing' this evening at Broadway Armory. Here are some comments:</p> <ol style="list-style-type: none"> 1. I think all the new stations should have a "safe room" on the ground floor per the advice in FEMA 320. Illinois is in the "high risk zone for extreme winds." For a map, see my website at http://EFTornadoSafeHome.com. It urges a "safe room" in every home and small business. I guess we could consider each L station a "small business." As far as I know, every L station has at least 1 room on the ground floor which is for employees only and has no windows. A "safe room" could be built to share 1 wall with this. Again, windows are not needed. This would be for sheltering of passengers and passersby who happened to be there when people needed to take shelter from an approaching tornado or derecho or squall line. I don't know how you'd separate people who'd gone through fare turnstiles from those who hadn't. Given the fact that the Red Line here is N-S aligned, and most tornadoes travel from a westerly direction, most paid passengers could be quickly removed by taking a train north or south. It's the station employees and other people who might need shelter. Given the history of Chicago building codes, one can't depend on a "safe room" being close enough. 2. Elevators in new stations should be big enough to hold a gurney and 2 paramedics on either side. This would make transport of passengers with medical emergencies on platforms and trains much smoother and safer for the patients. These elevators would also comfortably carry passengers' bicycles, which are allowed on some L trains. 3. I read that the Argyle and Bryn Mawr stations will be designed consistent with the manner of the original 1921 Prairie-Style stations. I like this a lot! I wonder if Argyle, in recognition of the ethnic setting, will have a "flavor" of South/East Asian style to the architecture and styling. I've read that some Prairie Style architecture did get some 	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #2, 3, 15. Regarding concerns about pigeon nesting, the preliminary engineering for this project is ongoing and will consider these types of elements as they are of concern on all CTA rail facilities. Regarding your comment on the definition of a viaduct, this comment relates to the handout provided at the public hearing, listing public-friendly definitions of technical terms used in documentation of this project. Please note that Section 2.3.1 of the EA defines viaducts: "Viaducts are the bridge structures supporting the trains above the streets."	Email Comment

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			<p>inspiration from Japanese architecture, so the relationship goes way back.</p> <p>4. Structures of all kinds must be made to keep pigeons from perching or nesting on them. It's all in the details. It will probably also require netting and/or fencing. And possibly bird spikes. I don't know if the geometry in this project will allow, but I must cite the example of the brick embankment under the Main Street L viaduct in Evanston. The sloped part is stepped back with single widths of bricks - too narrow for pigeons to sit on, even lengthwise.</p> <p>5. The picture of an alley span raises the question: how will trespassing vandals bent on committing graffiti be prevented from using the proximity of the CTA structure to the adjacent building as part of the way to get from one place to another? Yes, there is the 3rd rail, but if CTA employees can get past it, so can others. Already, graffiti mars the tops and sides of many buildings visible best from CTA property. The vandals are not being arrested and prosecuted. You mustn't add to the potential for more. Another part of the solution the CTA could contribute are surveillance cameras looking at the adjacent buildings. Those on platforms could observe 24/7.</p> <p>6. In the Glossary you say a viaduct is a "bridge-like" structure. Not. It's a kind of bridge. Please fix this.</p>		
43	5/17/2015	<i>Apres Ski, Private Citizen</i>	<p>Why is the Sheridan CTA stop being completely left out of the total rehab of the north side stations?</p> <p>Do you know how many people park their cars on Irving Park RD and take the CTA to Wrigley? It's the 2nd most used stop during the spring and summer. And yet, I see nothing in any of the notes about Sheridan getting a MUCH NEEDED upgrade.</p> <p>No need to climb any of the mountains in Nepal or Canada. Just try climbing those stairs on the Sheridan stop or try running up those stairs to catch a train. Only those who are in extremely good shape could run up those steep steps and catch the train without breathing hard and heavy.</p> <p>What exactly is the plan for the CTA Sheridan stop???</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #8.</p>	Email Comment
44	5/19/2015	<i>Kathy Gemperle, Edgewater Historical Society</i>	<p>The Edgewater Historical Society has produced an exhibit featuring the landmark buildings in Edgewater, including those individually named on the national register of historic places. Our efforts have included a map of the community which includes the historic districts of Bryn Mawr, Lakewood Balmoral and the Andersonville Historic District. In searching for a map of these districts we found one for the Bryn Mawr Historic District which extends across Broadway to the two historic buildings on two corners. This brought up the question of the actual boundaries of the Bryn Mawr Historic District which we find in a verbal form in the application. We are seeking a map of the district for an overlay. At the time of the application were these two buildings considered for the district? could they be added to the district?</p> <p>We are also concerned about the CTA statement that they will "update" the Bryn Mawr Historic District with their plan to change the Red line stop at Bryn Mawr. They also state they have a "letter of agreement" with your agency. The plan shows that they will alter the storefronts on the north side of Bryn Mawr which were station shops. Is</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #13. This includes answers to your more specific questions concerning the historic Memorandum of Agreement developed for the project and information on historic impacts to retail at Bryn Mawr station. CTA provided additional information on historic boundaries via e-mail to you on May 26, 2015. CTA obtains information on the boundaries of historic districts from a variety of sources,</p>	Email Comment

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			there such a letter of agreement and what does it indicate about the shops on the south side of Bryn Mawr?	primarily the Illinois Historic Preservation Agency’s online Historical Architectural Resources Geographic Information Systems database, but also the district’s nomination form, previous architectural studies conducted in the area, and City of Chicago map sources. According to these sources, the district’s western boundary ends at Broadway, with the two east-side buildings included in the district. Our sources do not indicate that the district’s boundary extends to the west side of Broadway.	
45	5/23/2015	<i>Peter Nicholson, Private Citizen</i>	<p>I attended the public meeting on the Lawrence to Bryn Mawr Modernization Project at the Broadway Armory last week. Here are some comments. I've followed the outline of the comment form:</p> <p>a. I am not comfortable with the plan to raise the entire track structure 5 to 10 feet to provide better clearances at the numerous undergrade street bridges. This will make the 'L' structure much more obtrusive in the neighborhood (and it will cost more, too). Many of the streets are residential side streets and don't need 14+ foot clearances. The Metra bridge project along Ravenswood Avenue to the west has clearances as low as 11 feet (e.g., at Leland), and with no trucks allowed on Lake Shore Drive I am wondering where all these high vehicles needing high bridges will come from. I can see raising the top of rail a little bit because the clear-span bridges will likely have greater girder depth than the current short concrete spans with piers, but full clearance could be limited to a few major streets by lowering the street instead of raising the railroad (once again, this is what you find on the Metra-UP North Line, for example at Lawrence Avenue which has a 14-foot clearance just one block north of the previously-mentioned 11-foot clearance Leland Avenue bridge).</p> <p>b. Regarding funding, I would prefer to keep our tax money in Chicago and fund the project locally, rather than sending taxes to Springfield or Washington, D.C. and getting back less than 100 cents on the dollar, and with strings attached. In the private sector, where we refer to "financing" rather than "funding", this is an ideal project for raising money in the capital markets and paying it off over the life of the asset, since we are talking about a capital investment with very long service life. Spending our own money directly rather than indirectly might also encourage a more cost-conscious approach to the design than seems to have been the case so far. \$1 billion per mile is a very high estimate when you already own nearly all the real estate for the project.</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 7.	Email Comment
46	5/26/2015	<i>Tina Revzin, Private Citizen</i>	<p>I would like provide comments related to the Lawrence to Bryn Mawr Modernization Project, specifically the impacts of construction staging on the local community and nearby transit systems.</p> <p>Have you considered providing a nearby north-south/east-west bike corridors to help ease the travel impacts during construction? In addition to the re-routed buses, you could extend and expand the bike lane network in the neighborhoods surrounding the project. You could incorporate these routes with the Mayor Emanuel’s cycling plan for Chicago and promote a safer, more bike friendly neighborhood in the future. This would increase access to the</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10, 17.	Email Comment

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			open stations during construction without increasing bus congestion. Thank you for the opportunity to take part in this project!		
47	5/26/2015	<i>Jane Phillips, Private Citizen</i>	<p>I live in Andersonville and regularly use the CTA to go to and from work downtown (Red Line) and to generally travel around Chicago (bus and train). I moved here from Dallas, where I lived for over 27 years and did not use public transportation. I will be 61 later this year, and consider public transportation a great asset to the city and to my life here. I use my car only when I have to and prefer to rely on public transportation as much as possible.</p> <p>As a regular user of the Red Line, I understand the need to upgrade the rail infrastructure and modernize a number of stations. However, I am writing to ask that the Berwyn Station be left open for as long as possible, at least through Phase I of the project. Closing it for 3 to 3-1/2 years is a huge hardship, given how many people currently use that station, and the distance from the alternative stations. In good weather, the daily walk between my home and the Bryn Mawr or Argyle stations would add 10-15 minutes to my commute. In the extremely bitter cold that we've had during the past two winters, I've been grateful the Berwyn Station has been a ten-minute walk. Adding 10-15 minutes additional exposure just to get to/from the station – let alone waiting for the train – at a minimum doubles the exposure time. Using the bus as an alternative would at least double the total commute time, and surface traffic year round, but especially during winter, is a certain cause for delay day in and day out. Given the number of people who rely on the Berwyn station, which IMHO appears to have the greatest use among stations north of Belmont, it would be a huge problem to close the station for the 3 to 3-1/2 years of the entire project. I know that substantially increased travel times will adversely affect my willingness to travel downtown and elsewhere in the city if returning home is difficult. I sincerely hope that your planners will try hard to find a way to keep it open during Phase 1. If that can be done, there will be substantially less hardship during Phase 2 when the temporary station at Foster/Winona is available.</p> <p>When I chose housing here in late November 2012, an important part of my decision was based on commuting issues. I decided not to locate in the suburbs because it would likely involve multiple transportation modes for a daily commute to downtown. I was told that the Berwyn Station had just been remodeled, so I could simplify my commute by just walking to and from the Red Line and taking the train to work. I had no indication that a three-year-plus closing was not just a possibility, but a certainty. The Berwyn station is certainly in better condition than Bryn Mawr and Argyle. I hope you will keep it open for as long as possible, and through Phase I of this project.</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10. Bus service connections to the Red Line would be maintained during construction. Re-routes of buses to open stations during construction is also proposed to provide continued connections for passengers. These reroutes would continue to offer connecting service to other buses as they do today, but with some variation in connecting locations due to construction activities.</p>	Email Comment
48	5/27/2015	<i>Donald Sweeney, Private Citizen</i>	<p>[Please see the attached comments for incorporation into the NEPA decision document. I appreciate any feedback that you may have on my comments. The verbiage is also below if it is easier to copy/paste for your needs.</p> <p>The project elements proposed to reduce noise included noise barriers, closed-deck structure, and welded rail. Those elements are fixed to the physical location of the infrastructure and do not allow noise reduction along the balance of the CTA track. Has the CTA taken any steps to look at vehicle methods of reducing both noise and vibration such as Bochum resilient wheels? Penn Machine Company is owned by Marmon, a Chicago-based company and is the North American licensee of Bochum resilient wheels. Those wheels would be able to provide noise and vibration reduction at all locations instead of just the 68 noise- and vibration-sensitive areas identified in the project area (Environmental Assessment) – likely more cost effective solution as well. Finally, the noise issue at CTA is system wide and not unique to the Lawrence to Bryn Mawr modernization project. Riders, residents,</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #14. CTA will forward this suggestion to CTA's Infrastructure and Rail Vehicle Maintenance Departments for further consideration on future purchasing considerations.</p>	Email Comment

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			businesses, and passers-by would all benefit from this needed change.		
49	5/27/2015	Andrew Suszek, Private Citizen	<p>I would like to make four comments regarding the RPM project that was the subject of the 4/29/15 Environmental Assessment and Section 4(f) Evaluation.</p> <ol style="list-style-type: none"> 1. Between Berwyn and Argyle, the current plan calls for the track area to be widened, and for alley-spanning to occur on the east side of the tracks, moving passing trains closer to the residences on the east side. It would be much better to use alley-spanning on the west side of the tracks to accomplish the widening, as moving the tracks closer to the buildings on the west side will not decrease any property values, whereas moving the tracks east is likely to decrease property values. 2. The Berwyn Station should remain open during Phase A of construction. 3. The lights at the newly constructed Berwyn Station should be angled downward so they do not cause light pollution to the residences to the east of the station. 4. The CTA should take as many sound reduction and vibration reduction measures as possible at the Berwyn Station, as the impact of sound and vibration significantly impact surrounding residences. <p>More complete explanation of my first comment:</p> <p>It does not make sense that the widening would occur on the east side of the Berwyn station. I understand that widening is needed, but the expansion should occur on the west side of the station for an important reason: the property on the east side of the station is almost all residential, and the property on the west side of the station is almost all commercial.</p> <p>Specifically, immediately to the west of the tracks is an alley. West of the alley is the rear of several commercial buildings. I think it is fair to say that moving the southbound tracks on the west side of the Berwyn platform 12 feet to the west (over the alley) would have little or no negative impact on the value of the commercial properties to the west.</p> <p>Meanwhile, immediately to the east of the Berwyn station is another alley, which is slightly smaller than the alley to the west. East of the alley are almost exclusively residential buildings, including my condo building at 5248 N. Winthrop. The tracks and platform are already quite close to these residential buildings, and moving them 12 feet closer to the buildings would make a significant difference in terms of noise, privacy, unsightliness, and even safety.</p> <p>I understand the need for the modernization and the expansion of the platform, but it seems to me that if an expansion can be accomplished on one side of the station or the other, the expansion should certainly occur on the west (commercial) side as opposed to the east (residential) side.</p> <p>CTA engineers have explained to me that the reason the tracks must move east is that the alley on the east side of</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 5, 10, 14.</p>	Email Comment

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			<p>the tracks is continuous, whereas the alley on the west side of the tracks is not. But considering this argument closely reveals that it does not hold water.</p> <p>There are two buildings near the Berwyn station on the west side of the tracks that abut the tracks and prevent any expansion to the west. One is the Jewel just north of Berwyn. The second is 1122 W. Foster. I understand that the Jewel is permanent. However, the 1122 W. Foster building is a different story. That building is an abandoned building. It has been unoccupied for more than two years. The CTA should acquire this building and demolish it. It is <i>the only building</i> preventing an expansion to the west at this segment of the line. There are no other buildings that abut the tracks between the Jewel and the Argyle station.</p> <p>I discussed this matter with a CTA engineer at the public hearing for this project. His response was that he had not really considered the removal of the 1122 W. Foster building, so he couldn't comment on whether it would allow for a westward expansion, but "if you give us more space to work with, there is more we can do."</p> <p>If the CTA can avoid moving track closer to residences, it should do so, even if the expansion occurs partially to the west and partially to the east. Every foot matters.</p> <p>Now, it may be the case that even if the 1122 W. Foster building were demolished, the widening would still have to occur largely on the east side of the tracks. If that is the case, then so be it. But the CTA should at least task an engineer with exploring the possibility of a westward expansion at that point in the track, assuming the 1122 W. Foster building is demolished. If the engineer can find a way to substantially reduce the eastward expansion at that point, it should be done.</p> <p>The CTA is quite literally faced with a choice between, on the one hand, moving track closer to numerous residential properties, which will undoubtedly have a negative impact on those residences, and on the other hand, acquiring one abandoned, blighted building that is currently negatively impacting the neighborhood by its mere existence (it is near an elementary school, a residential neighborhood, and a developing commercial area).</p> <p>The current plan is the easier one for the CTA: make the track go straight and acquire no buildings. But shouldn't common sense and the quality of the surrounding neighborhood outweigh the benefit of taking the easy route? Thank you for your time and consideration.</p>		
50	5/29/2015	<i>Ted Wysocki, The Institute of Cultural Affairs – GreenRise Uptown</i>	<p>The Institute of Cultural Affairs (ICA Green Rise) at 4750 N. Sheridan [corner of Lawrence & Sheridan] has as its mission "to build a just and equitable society in harmony with planet earth." We have undertaken many efforts to minimize our impact on the environment and to encourage the same in others. In 2014, we installed 483 solar panels on our roofs (the 2nd largest solar array in Chicago) and much of our programming centers on citywide sustainable community development initiatives such as Accelerate 77 and the Chicago Sustainability Leaders Network.</p> <p>The ICA Green Rise is the largest non-profit service center in the Midwest. It houses more than 20 non- profit service organizations and businesses, employing more than two hundred people who mostly rely on the CTA for their commutes. Our tenants' clients [numbering more than 1,000 per week] almost exclusively use the CTA, most likely the Lawrence Red Line stop and the Lawrence #81 bus that is due for re-routing in the proposal currently</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10, 18. CTA Government and Community Relations staff members are in contact with your organization to further involve your community group in the proposed mitigation measures and community outreach commitments in the Environmental Assessment (EA). The</p>	Email Comment

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			<p>under Environmental Assessment. In addition, our community of 32 residents within the ICA Green Rise, who intentionally minimize their environmental impact by sharing facilities, recycling, composting, and growing some of their own food, rely on the CTA for most of their transportation. Our conference facilities often attract an additional 500 attendees per month due to our proximity to public transit.</p> <p>The Chicago Commute Mode Map on www.transitized.com clearly shows that the Lawrence Red Line stop plays a significant role in the ability of area residents and employees to access sustainable commute options. In addition to the ICA Green Rise, some of the larger buildings whose employees and clients will be affected include Weiss Hospital, Chicago Lakeshore Hospital, and Bridgeview Bank. When the CTA finally makes the Lawrence Red Line stop accessible by elevators, ridership will further increase.</p> <p>In our census tract #8307, the most recent American Community Survey data (2013) showed 1,919 commuters, of whom 55% used public transit. In the tract just east of Sheridan along Lawrence, 49% of the 1,425 commuters used public transit. Right now over half of the residents in this area choose public transit and we do not want the planned closure of the Lawrence station to cause people to return to less sustainable practices.</p> <p>ICA Green Rise fully supports public transit and sees the CTA as a sustainable asset for helping to make our community and the City of Chicago a healthier and more sustainable place to live. We support transit-oriented development and would like to work with the CTA to develop a plan that optimizes opportunities to grow ridership despite planned closures and service interruptions during this next phase of the Red Purple Line Modernization Project.</p> <p>We see the CTA as a powerful ally in the effort to become a sustainable community and society, which preserves our health and our environment. Therefore, we want to encourage dialogue between the CTA and the community in order to ensure that the reconstruction of the Lawrence Red Line stop in particular will not become a negative burden on the community's existing "green" lifestyle, but rather will become an opportunity to create patterns that will further increase ridership and enable Chicago's sustainability efforts and goals.</p> <p>Right now, the proposed plan to shut down the Lawrence stop during both phases of the reconstruction plan appears to be an unusually harsh measure that risks serious environmental consequences. Per IL Department of Transportation, Lawrence Avenue in its approach to Lake Shore Drive already carries over 15,500 cars per day.</p> <p>The Lawrence stop closure will have a huge impact on the sustainable habits of residents, employees, and clients of the services offered in the ICA Green Rise. There is a danger that the closure-- especially for so long-- will tip the balance away from "green" options for commuting.</p> <p>The proposed project could, however, present a significant opportunity to pilot possible shuttle routes or staged use of the Lawrence station to address connectivity needs and help increase CTA ridership--to the Lake, to local entertainment venues, to the hospital campuses, and to other lakefront residential and work sites currently served by the Lawrence CTA stop and Lawrence bus.</p>	<p>preliminary engineering phase is ongoing and is expected to be completed in fall 2015. CTA plans to continue to work with the community (and groups such as yours) as the project moves forward to obtain additional information and insights that could be included in a design-build package.</p>	

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			<p>Therefore, the Institute of Cultural Affairs would like to partner with the CTA to facilitate a dialogue with the community in order to use this project as an opportunity-rather than a crisis-to create and test out other ways to mitigate traffic congestion, support sustainable travel and increase public transit ridership, rather than forcing people who are modeling highly desirable practices to choose modes that pollute the air and expend irreplaceable energy resources.</p> <p>We look forward to hosting the CTA here at the GreenRise Uptown Learning Laboratory. Thank you for your consideration of these comments and our request to meet.</p>		
51	5/29/2015	<i>Kathy Gemperle, Private Citizen, Edgewater Historical Society Member</i>	<p>The plan ignores the historic nature of the station stops in Edgewater. While the improvements such as handicap accessibility are wonderful the design presented is insensitive to the historic setting of the train stops. The stated intension to demolish all the CTA property on Bryn Mawr in the historic district does not respect the community and the design of the current buildings at the train stops along this section of the red line. It presents instead a superimposed industrial look with outsized columns and no detail in the style of the original stations. This is not difficult to produce as it was done in the 1920s. The concrete structures under the viaduct are good design and functional. Just because the CTA chooses to replace the concrete does not mean it should ignore the original proportion and detail of the PILLARS. Similarly the design of the part over the street with indented rectangles can be repeated in a new structure. Improving the train tracks and building at new stations does not have to be done without sensitivity to the historic design of the current stations.</p> <p>The CTA properties on the south side of Bryn Mawr are part of the street face of the historic district. I must object to the demolition of these properties as destructive to the Historic District. In my previous meeting with CTA officials I became aware of how the CTA does not want to be a property owner of retail space. However the large size of the station on the south side of the street and the small storefronts east of the tracks should not be demolished and replaced with open space. This will destroy the street face continuity and lead to problems like loitering. Better empty storefronts with art displays than open unused space. Bryn Mawr is Edgewater's main street and the main entrance to the community for thousands of residents. A great deal of effort has gone into the rehabilitation of Bryn Mawr and the CTA does not want to be part of the destruction of that community effort.</p> <p>The CTA should examine how all the train stops are gateways to our communities and provide site specific information about each area in the train stops and on the platforms. For instance at Bryn Mawr mention in signage of the Historic District would be appropriate.</p> <p>Also mention of the Kathy Osterman Beach to the east would be appropriate. Other buildings on Bryn Mawr that are on the National Register of Historic Places could also be identified as well as the two Chicago Landmark buildings-The Bryn Mawr and the Belle Shore At the Berwyn stop signage stating it was the original Edgewater Beach stop, that the Andersonville Historic District is 4 blocks to the west, that the Lakewood Balmoral Historic District is just two blocks west and that the Swedish American Museum and the Edgewater Historical Society Museum are just 5 blocks west. The CTA should acknowledge that these stops are a gateway to the Edgewater community. The Thorndale stop could note the location of the Broadway Armory, the Chicago Public Library Edgewater Branch and Nicholas Senn High School. Additionally a Chicago Landmark house, The Colvin House at Thorndale could be noted as well as the Lane Park and Beach. At Granville signage could mention Berger Park with</p>	<p>Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #3, 13. Analysis and consultation under Section 106 of the National Historic Preservation Act (NHPA) was conducted to address the potential for adverse effects on historic resources. Based on this analysis and consultation process, the CTA-owned retail spaces and station on the south side of Bryn Mawr Avenue are not individually eligible historic resources or elements contributing to the Bryn Mawr Avenue Historic District and therefore are not included in the historic Memorandum of Agreement developed for this project. These resources would still be subject to the visual and aesthetic mitigation measures, as further described in Response #3. While wayfinding and/or community signage is outside of the scope of the EA and Section 106 of the NHPA consultation process conducted for this stage of project, a number of measures to recognize and enhance historic and community resources or gateways are included in the mitigation measures identified as part of the EA. For instance, based on suggestions from historic consulting parties, CTA will ensure that a Historic Preservation Plan is prepared for the Uptown Square, West Argyle Street, and Bryn Mawr Avenue Historic Districts, for which adverse historic effects were</p>	Email Comment

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			two Chicago Landmark mansions, Loyola University and Sacred Heart School could also be mentioned. I noted with interest when the CTA wanted to upgrade the image of the transit stations in the Loop and get them incorporated into an historic district that the designing was historical in style and color. Where are those designers when this RPM planned improvement is presented? Is historic preservation only important downtown? Seriously, it looks that way. Rethink the street level aspects of this project. What is the goal here? To provide better transportation for the citizens of a neighborhood or to destroy all the historic restoration work done by our community and create a uniform industrial track that is out of place in this 100 year old community. All the communities in Chicago would benefit from this naming of important sites at each train stop. Thanks for listening.	identified. In addition, an interpretive exhibit highlighting the elevated track structure and its role in the development of Chicago will be displayed, in coordination with the Wilson Transfer Station Project.	
52	5/29/2015	<i>LeRoy Blommaert, Private Citizen, Member Edgewater Historical Society</i>	<p>The elevated structure north of Lawrence needs to be repaired and certain elements replaced; it does not need to be replaced in its entirety.</p> <p>The blessing and curse of Federal money.</p> <p>While Federal funds are realistically the only way needed rapid transit infrastructure improvements can made; they also bring with them the impression that it is free money, or really no money at all, that the sky is the limit, and one really not need bother with weighing the costs versus the benefits. I'm afraid that this is what is happening with respect to this plan.</p> <p>There is no question that if Federal funds were not available and that the project would have to be funded solely by Chicago, Cook County, or even State of Illinois taxpayers, we would be having an entirely different conversation than that which we are having today...if indeed we would be having any at all.</p> <p>We don't have to, and should not, start from scratch.</p> <p>If we were to be build a rapid transit system from scratch, we obviously would do things differently. The platforms would be wider and longer; there would be elevators and escalators at each station; we might want to have fewer stations. We would not have any curves or they would be banked, which would allow for wider and longer train cars and perhaps even double decked ones.</p> <p>But we have an existing infrastructure that has built in constraints. It is more cost effective and less disruptive to the public to make necessary modifications than to create new. It is also more responsible from an environmental perspective. We won't be wasting the energy that went into the construction of the infrastructure nor expending additional energy in the demolition of the existing infrastructure and the energy of creating new. The proposed plan is opposite of what it means to "be green."</p> <p>The difference between what is needed and what is nice to have</p> <p>Necessity represents a high bar. Safety is certainly a necessity. Most of what is nice to have is not necessary. Wider platforms and elevators are nice to have but they are not necessary.</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #1, 18.	Email Comment

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			<p>Responses to arguments made in justification of the proposed plan</p> <p>The CTA advances basically three arguments in support of its replacement plan: The structure is approximately 90 years old; it is “significantly past its intended lifespan”, and “the condition of the concrete walls is rapidly deteriorating.”</p> <p>The following will address these three main arguments:</p> <p>The structure is approximately 90 years old</p> <p>The age is not in question. The elevation project was begun in 1914 but was not completed until late 1921 or early 1922 because of interruption due to the US entry into the Great War. What is at question is the logic of the argument: that because it is 90 years old, it needs to be replaced. The argument is not logical. The overwhelming number of structures in Europe are well past 90 years old. Do they all need to be replaced? Closer to home: the majority of buildings in Chicago are over 90 years old. Do they also need to be replaced. Indeed, of Chicago's rapid transit infrastructure, most of pre-CTA era infrastructure is more than 90 years old: the remaining south side elevated, the Lake Street L, the Loop L, the north side L south of Wilson. Should all this infrastructure be replaced because it is older than 90 years? CTA has to be best of my knowledge not made this argument. (Indeed the infrastructure between Lawrence and Howard is the <i>newest</i> of the elevated structures in the pre-CTA era.)</p> <p>The structure is significantly past its intended lifespan.</p> <p>The concept of “intended lifespan” is a relatively modern one and is really not applicable to buildings and railroad infrastructure. It is applicable to machinery with working parts that wear out overtime and where is it cheaper to replace than to repair. In any event it is not something that can be applied retroactively. In the absence of any documentation CTA has showing that the builders specified a specific lifespan, it has to be assumed that they intended it to last forever or until no longer needed.</p> <p>It is important to understand the history of the structure: The embankment was built to mainline railroad standards and by a railroad not by the CTA's predecessor transit organization. The railroad was the Chicago Milwaukee & St. Paul RR. By the time this elevation was completed railroads had perfected the methods of track elevation. The elevation of these tracks represented the last in the efforts by railroads to elevate their tracks as required by Chicago City Council. Ordinances. The effort started in the 1890s. Of the many elevations within the city limits, none to my knowledge have been replaced, though a few have been torn down because they are no longer needed. Nor has there been any consideration given by their owners to replace them because they are “significantly past their intended lifespan.” Consider the Union Pacific line through Evanston. It was completed by 1910. An even better example is the Burlington-Santa Fe mainline out of Chicago: not only does it carry Metra and Amtrak passenger trains that place much more weight on the elevated structure than does CTA trains, but it carries a substantial number of freight trains—of many cars and substantial weight. There is no consideration of replacing the elevated structure. If CTA's north line embankment needs to be replaced because it is “significantly past its intended lifespan.” then so do all the railroad embankments in Chicago. The “past its intended lifespan” argument is a false argument that should not be</p>		

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			<p>given any weight.</p> <p>The condition of the concrete walls is rapidly deteriorating</p> <p>A distinction must be made between the various elements of the infrastructure: the viaducts, the elevated structure between the viaducts, and the retaining walls</p> <p>A number of viaducts need to be replaced (perhaps all). One option is to use the same technology that was used originally. All the parts were pre-fabricated and assembled on site; this could be done again, but perhaps it would be both cheaper and better to replace them with single span steel as was done along the Evanston section of the “L.” However, the fact that the viaducts need to be replaced does not mean that the rest of the structure needs to be replaced. Remember this was not done along the Evanston line. Nothing I have seen presented by CTA indicates that the support for the tracks is structurally unsound. Which brings us to the last element, the retaining wall. In parts (but only in parts), sections of the concrete have come off the wall. I submit that in the overwhelming majority of cases, this is primarily a cosmetic problem, not a structural one, where the “skim” coating has come off, and that the retaining wall can be repaired. In the few cases where it appears that the situation is more than a cosmetic problem, they are mostly at the approaches to the viaducts and those issues could be addressed at the time the viaducts are replaced. The retaining walls are very thick even the top, and at the bottom the thickness is huge.</p> <p>Again, the embankment and retaining walls of the structure is basically the same construction as those of other elevated railroad structures within Chicago, and not one of its owners is arguing that those structures are rapidly deteriorating and need to be replaced. Why is this structure unique?</p> <p>Benefits of the proposed plan</p> <p>At various times CTA identifies additional benefits of the plan; at other times it claims these as reasons for implementing the plan. The following addresses the main claimed benefits as benefits.</p> <p>It would make the stations ADA compliant by adding elevators</p> <p>There is no doubt that elevators at the stations would be of benefit to those who really need to use them and could not board at the station in their absence. But does this benefit for a few rise to the level of a general necessity? I submit not. For one, those who need to use the L to go downtown have other options, unlike in many other sections of the city.</p> <p>There are elevators at Loyola and at Granville and there will be one at Wilson. Paralleling the “L” line within less than one block is the Broadway bus; to the east also paralleling the line on Sheridan Road, two short blocks away are two bus lines, the 151 and the 147. (north of Foster). Those living between Granville and Wilson and unable to climb the stairs can take the Broadway bus either north to Granville or south to Wilson to use an elevator, or else take the 151 to either Granville or Wilson. The CTA could re-program the fare system to allow a free transfer for those</p>		

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			<p>transferring at Loyola, Granville, and Wilson. The 147 bus offers a fast alternative to the “L” in getting downtown.</p> <p>A better option than reconfiguring the entire right-of-way is to add an elevator at Bryn Mawr or Berwyn, where only the tracks at one station would need to be configured. Berwyn would probably be the best option as it is a transfer point for more than one bus line and there is space to the west at the Jewel parking lot to accommodate an expansion.</p> <p>But the reality is that an elevator could be added at every station on the embankment without widening the right-of-way at all. It was done at Loyola and Granville, without a re-build. But there is an even better way that would be considerably cheaper and would involve none of the disruption that the proposed replacement plan would impose. Each station on the line that does not already have an elevator has a platform that crosses a street. At one end of the street is the station with stairs to the platform. Across the street is an area that in some cases was an exit with stairs. An elevator could be built there where it would come up at the very end of the platform; the platform could be extended at the other (station) end to make up the difference of the shortened end at the elevator end.</p> <p>Wouldn't it be better to spend less money and cause almost no disruption to do this at all the stations than to spend more money and cause considerable more disruption to build elevators at just the four stations.</p> <p>The plan would provide wider platforms</p> <p>Yes, the plan would do that. But how much real benefit would that be? Are the current narrower platforms causing real problems? Have there been any accidents that were attributed to solely overcrowding on the existing platforms? If so how many and over what period? The only time there could be overcrowding is during the morning rush hour if there were an accident or malfunctioning affecting inbound trains. But there are ways that such potential overcrowding could be avoided. Once such an accident or malfunctioning would be brought to the attention of central control, along with the expected delay, central control would notify the station attendant who in turn, would warn incoming commuters of the delay, The display screens could flash warnings, and the turnstiles could even be programmed to not accept any new fares and would lock in place until released by central control or the attendant.</p> <p>The plan would facilitate future ridership or is required to so.</p> <p>It is difficult to understand how this would be the case (and CTA has not presented any facts or arguments for this assertion). One would think that adding more trains at rush hour would be the way to accommodate increased ridership, or even at current levels of ridership, to reduce travel time, and that rebuilding the elevated structure would have no effect. Currently, there are no slow zones on the red line tracks from Argyle to Granville.</p> <p>Projections of substantially increased rail ridership on the line are suspect. Projections are educated guesses. Sometimes they turn out to be correct; other times they turn out to be incorrect.</p> <p>One thing we do know for sure, and that is that according to the 2010 census statistics, population declined from 2000 in each of the three community areas through which the line from Lawrence north passes. In Rogers Park the decline was 13.3 %; in Edgewater it was 9.1%; and in Uptown it was 11.4%. Now while it is true that there is no direct</p>		

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			<p>one for one correlation between population declines (or increases) and rail ridership, the declines do not support projections of substantial increases in rail ridership on the line. What increases have occurred in the last five years, have been modest in terms of actual numbers and have been accommodated by the existing structure.</p> <p>****</p> <p>I want to add, that while I am critical of the proposed plan, I am a strong supporter of the city's rapid transit system and use it often, and I have no antagonism towards the CTA planners with whom I have had conversations. I found them to be both friendly and professional.</p>		
53	5/29/2015	<i>LeRoy Blommaert, Private Citizen, Member Edgewater Historical Society</i>	<p>Another argument against the rebuild plan is that it would waste the money just recently spent on improving the stations and track at the stations at approximately 8 million dollars per station.</p> <p>As I outlined in my earlier comments, there is an alternative to both the "No build alternative" and the "build alternative." It is a false choice.</p> <p>The executive summary (page 5) Station Improvements, lists "reduced wait times." I do not understand how the proposed plan would or could do that.</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #1, 7.	Email Comment
54	5/29/2015	<i>LeRoy Blommaert, Private Citizen, Member Edgewater Historical Society</i>	<p>Using the statistics at the CTA's website, I compiled two tables, one for average daily ridership during the regular week in June and another in December since 1999 for stations Granville south through Lawrence.</p> <p>For December average weekly ridership remained almost constant from 2000 through 2010 and increased from 2010 to 2014. For June, ridership increased earlier. However, in both cases, while the percentage increase was impressive, the actual numbers divided by the number of stations divided by 24 hours, was not.</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #1.	Email Comment
55	5/29/2015	<i>Bob Remer, Edgewater Historical Society</i>	<p>The Edgewater Historical Society thanks the CTA for its outreach to the community on the proposed changes on the Red Line, and for its expressed concern for historic preservation.</p> <p>Our board of directors on May 16th passed a unanimous resolution strongly recommending preserving the historic embankments between Foster and Devon.</p> <p>The coming of the "L" to Edgewater was a transforming event; it changed Edgewater from a suburban type community to part of the urban fabric. The appearance of the elevated structure has been part of the local landscape since the early 1920s. It is important that it be retained. We oppose the demolition of the embankment, to be replaced by a new higher structure without the embankments.</p> <p>There were additional concerns raised that the new sight lines looking west from the Winthrop alley and looking eastward from the Broadway commercial and residential properties would be forever dramatically altered. There were also concerns that noise reverberations, currently dampened by the embankments would be exacerbated on both sides of the tracks. Likewise considerable concerns were raised about worsened privacy, safety, and trash</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #1, 3, 4, 13, 14.	Email Comment

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			accumulation under the “L”, particularly for the residents living on Winthrop. If anything, the historic look of that part of Edgewater would be forever changed while the Edgewater public has not even had a chance to visualize what the new “see through” transit line would do the ambience of Edgewater.		
56	5/29/2015	Ivy Czekanski, Private Citizen	Please please do not run the red and purple line on the same track during Phase 1 and 2. That will cause needless congestion. Please consider suspending Purple Line Express service during these phases to allow the red line to continue functioning on its own tracks. Also as an Evanston bound commuter who lives in Uptown, please increase service on the Purple line going toward Evanston in the mornings.	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #9. We will forward your comment and recommendations related to existing services outside of the project corridor to CTA’s Planning Department.	Email Comment
57	6/8/2015	Tom Murphy, Private Citizen [Received after comment period end date]	<p>I was impressed with the content and the detail in the RPM EA document-with a couple of exceptions. In particular, the sections on Water [4.11.2] & Energy [4.11.5] seemed to be after thoughts to the report. They are devoid of useful or relevant content related to environmental effects and planning for the RPM project.</p> <p>Water P. 111 “There would be no adverse impacts on water resources from the Build Alternative. ... There are no aspects of this project that would increase the impervious surface area.”</p> <p>Not true! Currently the tracks outside of the stations run on an embankment, an open, permeable surface that permits precipitation to infiltrate. The RPM EA document: “... proposes a closed-deck, concrete aerial structure.” Its concrete base will collect all the precipitation that will need to be discharged. Chicago’s older, combined sewer system is now overtaxed by stormwater runoff when heavy rains occur, leading to flooded streets, viaducts and basements. A goal of ‘Sustainable Chicago 2015’ is to, “...reduce sewer overflows and basement flooding.” To address this flooding, Chicago has a Stormwater Management Ordinance, which requires stormwater to be managed on-site for impervious areas larger than 7,500 sq. ft. The proposed RPM project will have an impervious aerial structure with an area of about 350,000 sq. ft., well in excess of the size requiring remediation by the ordinance.</p> <p>Loyola Univ. and some businesses have built cisterns to manage this water. Also, as the soils under the tracks are quite permeable, there are a number of possible green infrastructure practices that could be applicable to managing the CTA system’s stormwater. Without effective management of this additional water, increased flooding in the immediate neighborhood and in the sewers downstream of the tracks will occur when an additional 2-400,000 gallons of water from heavy storm events is discharged from the CTA elevated structure to the sewers.</p> <p>Energy - The climate is warming and regardless of the cause, major steps need to be taken in the next decade or two to limit the emission of CO₂ and other greenhouse gases into the atmosphere. To address this problem, Chicago has a Climate Action Plan (2008) with the goal of reducing greenhouse gas emissions by 80% by 2050 (from 1990). The CTA is a major user of energy in the region, perhaps second only to the MWRD. The Red & Purple rail lines use electricity almost exclusively as their energy source. The CTA needs to contribute to reducing the use of fossil fuels as an energy source. As this is a project design for 100 years, the EA should document and discuss the components of the upgrade that will decrease energy use for normal train operations and in the stations. The design should be</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #18.	Email Comment

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			<p>flexible enough to allow for upgrades that will probably occur during its design lifetime.</p> <p>The energy efficiency planning should include:</p> <ul style="list-style-type: none"> ▪ The station and platform lighted areas; ▪ The lighting intensity and source (fluorescent, LED, other); ▪ The design and heating of the winter platform shelters for waiting passengers; ▪ The operation of the escalators (intermittent?) and elevators; ▪ The insulation of conditioned areas in the stations. <p>The CTA is currently dependent on the regional grid for its electricity. The CTA needs to become proactive in pushing for renewably sourced electricity for the grid. In addition, the roofs on new stations with their 22'x500' platforms should be designed, built and outfitted with solar photovoltaic (PV) panels, and perhaps a solar thermal panel or two for station hot water—replacing electric water heaters, to make the stations energy neutral, and perhaps even an occasional source to the system.</p> <p>In addition, the CTA should consider installing solar PV panels in other available locations, perhaps between the tracks, but certainly in the central, unused area between the northbound and southbound tracks between stations.</p> <p>Obviously, the procurement of replacement equipment—train cars, escalators, elevators, etc. should have energy efficiency as an important design criteria.</p>		
58	5/14/2015	<i>George Blakemore, Private Citizen</i>	[Oral transcript is provided at the end of this log.] Summary of comments related to employment of African Americans for construction and design activities and specific concerns about African American communities.	Thank you for your comment. Please see Comment ID #6 above for additional information on responses related to minority business practices and the ex-offender program.	Oral Transcript
59	5/14/2015	<i>Mary Hartsfield, Private Citizen</i>	[Oral transcript is provided at the end of this log.] Summary of comments related to the Ex-Offender Program and employment related opportunities of the project for ex-offenders. Written comment also related to this matter was received during the public hearing.	Thank you for your comment. Please see Comment ID #6 above for additional information on responses related to minority business practices and the ex-offender program.	Oral Transcript
60	5/14/2015	<i>Kevin Carl Peterson, Citizens Taking Action for Transit-Depending Riders</i>	<p>[Oral transcript is provided at the end of this log.] We're requesting shuttle buses on Broadway, on the Broadway bus, later 24-hour service on the 36 Broadway bus to cover for the closed up L stations.</p> <p>On the thing with the proposed re-routes for buses, they don't even cover the 146 which is a bus that terminates at the Berwyn station, which is going to be closed for over two years. They need to be adding more service. They need to actually somehow find a way to keep Berwyn open because there's a giant Jewel there which a lot of seniors use and work, going there to shop and all that. We need more bus services serving the alternate -- these buses also need</p>	Thank you for your comment. You will find the responses to your comments in the response sheet, under Response #10, 15.	Oral Transcript

**Lawrence to Bryn Mawr Modernization Project – Environmental Assessment
Agency and Public Comment and Response Log**

<i>Public Comment Log/ID</i>					
#	Date	Commenter	Comments/Responses	Response	Source
			to serve these alternate stations, and the connections with the buses on Sheridan like the 146, the 136, the 148, the 147 are now going to be messed up because if the Foster bus goes to the Argyle station, it will not be able to make connections with any of these buses. Again, we need more security on these new stations. We need these stations to be opened as long as possible. Again, the shuttle buses Broadway and late 24-hour service on the Broadway bus.		



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

JUN 01 2015

REPLY TO THE ATTENTION OF:

E-19J

Kelley Brookins
Federal Transit Administration
200 W. Adams Street, Suite 320
Chicago, IL 60606

Re: Draft Environmental Assessment for the Lawrence to Bryn Mawr Modernization Project, Chicago, Illinois

Dear Ms. Brookins:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Assessment (EA) for the Lawrence to Bryn Mawr Modernization Project in Chicago, Illinois. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Federal Transit Administration (FTA), in conjunction with the Chicago Transit Authority (CTA), propose several improvement measures along the Red-Purple Line between the Lawrence and Bryn Mawr Stations, inclusive, within the Chicago 'L' System. Based on our review of the Draft EA, we recommend the following be included in the Final EA. Any recommended mitigation measures should be committed to in the Finding of No Significant Impact (FONSI).

Hazardous Materials Management

- EPA notes the measures identified in Section 4.8.4, *Measures to Avoid or Minimize Harm*, include abatement and disposal of hazardous materials in accordance with federal, state, and local regulations. We recommend clarification of the word "abate." EPA recognizes this word to mean a permanent removal of specific hazardous materials. Abatement is sometimes ordered by a state or local government, and can involve specialized techniques not typical of most contractors. For lead abatement in particular, the Final EA should indicate that individuals and firms must be trained and certified to conduct lead-based paint abatement activities. Components of lead abatement include, among others, the use of containment and adequate barriers to prevent lead dust from moving from the site (fugitive dust), specific practices for eliminating the lead hazard (enclosure, encapsulation, removal, etc.), the use of personal protect equipment, protocols for entering and exiting the work area, posting of warnings at entrance of work area, and specific clean up and disposal protocols. EPA recommends more clarity in the Final EA and FONSI about hazardous materials abatement and mitigation.

Health Impacts

- We note that schools (as proxy for children) were included among sensitive receptors that might be impacted by demolition and construction. EPA recommends CTA work with the Chicago Department of Public Health to also identify child-care centers near the project. We also recommend CTA work with impacted schools and child-care centers to communicate with staff and parents about possible lead contamination and to provide information about where parents can have children's blood lead tested. We recommend reaching out to schools and child-care centers with ways to minimize exposure to lead (such as washing hands before eating and after coming in from outside, keeping away from demolition sites, keeping "outside" shoes outside of the school/child-care center, and wet washing floors, window sills, and window wells every day).
- EPA has included our Diesel Emission Reduction Checklist. We recommend incorporating these measures into general construction practices in order to be protective of human health as it relates to diesel emission exposure.

Environmental Justice - Outreach

- EPA commends FTA and CTA on extensive outreach efforts to communities living with environmental justice concerns, including communities who have limited English proficiency. We encourage FTA and CTA to continue these efforts as demolition and construction begin, particularly as it pertains to lead emissions from demolition of the viaducts or bridges, tracks, and station facilities. We recommend targeted outreach to communities with limited English proficiency (i.e., in native languages and with visual cues) on ways to minimize lead exposure during demolition, such as washing hands before eating or coming in from outside, keeping away from demolition sites, keeping "outside" shoes outside of the home, wiping down pets before entering the home, and wet washing floors, window sills, and window wells every day.

Thank you in advance for your consideration of our comments. We appreciate the opportunity to provide input early in the decision-making process. If you have any questions, feel free to contact me or Elizabeth Poole of my staff at poole.elizabeth@epa.gov or 312-353-2087.

Sincerely,



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

Enclosure (1): Diesel Emission Reduction Checklist

Cc: Dr. Cortland Lohff, Chicago Department of Public Health
Mark Assam, Federal Transit Administration
Carole Morey, Chicago Transit Authority

U.S. Environmental Protection Agency

Diesel Emission Reduction Checklist

- Use low-sulfur diesel fuel (15 ppm sulfur maximum) in construction vehicles and equipment.
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- 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 catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- 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.
- Regularly maintain diesel engines, which is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- 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.
- Repower older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards. Purchase new vehicles that are equipped with the most advanced emission control systems available.
- Use electric starting aids such as block heaters with older vehicles to warm the engine reduces diesel emissions.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.
- Per Executive Order 13045 on Children's Health¹, EPA recommends operators and workers pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Diesel emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

¹ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed. EPA views childhood as a sequence of lifestyles, from conception through fetal development, infancy, and adolescence.

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IN RE: CHICAGO TRANSIT AUTHORITY PROJECT, PHASE 1:
LAWRENCE TO BRYN MAWR MODERNIZATION

Report of proceedings in the above-entitled
cause, before Dina C. Corvino, a Certified
Shorthand Reporter, of Cook County, Illinois, on
the 14th day of May, 2015, at 5917 North Broadway
Avenue, Chicago, Illinois, at the hour of 6:30 p.m.

Reported by: Dina C. Corvino, CSR, RPR
License No.: 084-004475



1 PUBLIC APPEARANCES:
2

3 MR. GEORGE BLAKEMORE;

4 MS. MARY HARTSFIELD;

5 -and-

6 MR. KEVIN KARL PETERSON,
7 Citizens Taking Action for
8 Transit-Depending Riders.
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1 (whereupon, the following
2 proceedings were had in the
3 above-entitled cause.)

4 MR. BLAKEMORE: I'm here specifically to learn
5 about this project. I know it is a multimillion
6 dollar project. I'm wanting to see -- I'm wanting
7 to see that black unemployed people are working on
8 this project. I know they was on the Red Line out
9 South, but they're entitled to work on this project
10 up North also. They're entitled to get -- when it
11 comes to vendors, black vendors, when it comes to
12 goods, services, jobs and contracts.

13 So I hope that CTA will be hiring many
14 blacks dealing with the architecture, the design of
15 these stations, the artwork that will be in the
16 stations, from the brick layout, plumbers,
17 laborers, and all types of construction jobs
18 because this is an opportunity for the government
19 to step up because the unemployment on the west
20 side and South Side is over 50 percent with the
21 young people are unemployed, people of color, black
22 people. An idle man is the devil's workshop. Give
23 the young people to be able to be employed. They
24 would be good fathers, good husbands, and good



1 citizens, and crime in the black community is a
2 result of government refusing to give black people
3 jobs.

4 And these unions -- they should be able to
5 work on these projects even if they're not members
6 of the union because some of these plumbing unions,
7 skills unions, electrical unions from generation to
8 generation have blocked out black people from
9 working. And those unions that even have the
10 apprentice program and the blacks get certified as
11 union members, that doesn't guarantee that they're
12 going to give them jobs. What they're doing,
13 they're hiring them, put them on a project with the
14 CTA. They work a month or two and then lay them
15 off and then they go to another project. And
16 another thing, what some of them are doing to show
17 that they're not racist, they give some of their
18 union workers that's on another job and bring them
19 and place them on this one to just for show.

20 And I'm excited about this project, and I
21 just want -- I just hope that CTA do the right
22 thing because crime, violence is because people
23 don't have money. They're not working. And CTA in
24 the past has balanced their budget on the backs of



1 black -- poor black people when they don't give
2 them equal service on the bus line. They run up
3 the fare, no more transfers --

4 MS. HARTSFIELD: You're talking about the pass?
5 It's double.

6 MR. BLAKEMORE: The pass went up. Up in this
7 area, on the North Side, sometimes they have eight
8 and ten bus lines and subways that serve this
9 community. So they have -- they have the Red Line.
10 They have many bus lines. Sometimes one ward might
11 have five or six bus lines, plus the subway. So
12 they have extra transportation.

13 So I think that the CTA owes the black
14 community these jobs because the budget has been
15 balanced on the backs of black people. When they
16 only have -- they don't have enough of us, they
17 can't -- the fare is going up. And transportation
18 is very important because if one is seeking a job,
19 he needs to be located where it's good public
20 transportation. We have highways but public
21 transportation.

22 So I think that's a beautiful project to
23 update, give new -- and it's well-needed. The
24 Wilson Station, Bryn Mawr, these stations are old,



1 and they need to be renovated and repaired. But
2 CTA should be good to all its citizens by hiring
3 more black people.

4 So I'm glad that -- I thought that they
5 would have a public hearing, but this presentation
6 is very good the way they're -- they are displaying
7 and they will be having other community meetings I
8 hope. This is a process.

9 So have you been getting many people?

10 THE COURT REPORTER: You're the first.

11 MR. BLAKEMORE: Have you been getting many
12 inputs? Maybe they're not letting the people know
13 that, and everything should be transparent. Are
14 you doing this for a newspaper? The reason I asked
15 you that is they probably won't -- I think that
16 it's a lousy way that CTA has it set up when they
17 have a court reporter that's here and available and
18 if the people would know that, they could come and
19 put their written comments in but also their oral,
20 verbal comments to you. They should -- they got
21 people on the desk and they should specifically let
22 the people know that they could come and tell -- a
23 lot of them are homeowners, business people. They
24 have investments in the transportation because it



1 would affect their quality of life. And I'm sure
2 some of them will write it down, but also it should
3 be known that they have this option to come to the
4 court reporter and CTA will play this back.

5 Also, let them know that they should have
6 invited the other media, DNA, the radio stations,
7 the TVs, media, that they -- I've been to the park
8 district. They have used this format, but I think
9 it's more effective when they have the traditional
10 type of hearing. People speak. They can record
11 it. People listen. Because one advantage of the
12 old, we listen to other people's ideas. Then I get
13 up and speak, she would speak, then another, and
14 then we would be able to -- it's like when I come
15 to these meetings, it's like I'm receiving an
16 education. I come and this person speaks, this
17 person speaks, and we get ideas.

18 So this format I don't think is the best.
19 I think with the park district, they have this
20 format -- you know, the nature museum. They this
21 with a -- extending the Outer Drive, the near North
22 Side by Lincoln Park, for the trails, and they had
23 this same format, but they had several community
24 meetings. Like, they can have -- but they still



1 needs a public hearing because I don't know -- I
2 got to read about how the construction is going to
3 affect the actual movement of the train.

4 You understand, some stations will be
5 temporarily closed. How long? And then the bus
6 route. You know, like they did on 95th, you have
7 to get a bus to carry you to the next L stop. I
8 don't know. I don't want this to take up all of
9 your time, but it's not good for you to come here
10 and stay all these hours and I'm the only one.

11 Ms. Hartsfield may want to say something.

12 MS. HARTSFIELD: All I want to do is make a
13 statement to the CTA that they offer jobs for
14 people that are ex-offenders. They have that
15 program. I want that program to be extended so
16 ex-offenders can receive their jobs so they can be
17 able to take care of their family like anybody
18 else. They deserve to eat and live like everybody.
19 So I like that they got that program in our
20 community. That is a good program that should be
21 extended.

22 MR. BLAKEMORE: I'm sure she was talking about
23 that they hire ex-offenders --

24 MS. HARTSFIELD: Right.



1 MR. BLAKEMORE: -- to work at CTA, working in
2 their stations and their -- they take care of the
3 equipment. But they can -- like she said --

4 MS. HARTSFIELD: They can work for CTA. After
5 they complete that program, they go through that
6 process. It's a process that they go through.
7 Once they get certified, they can be hired through
8 CTA after a certain amount of time. I want to see
9 that program expanded. They're getting enough
10 money up here. You know, that's a big project, and
11 that brings in money. So we want to have jobs for
12 anybody who -- ex-offenders, African-Americans,
13 Hispanics, or whatever. They deserve to have a
14 job.

15 MR. BLAKEMORE: And that's a second chance
16 because the CTA, if you have bad transportation and
17 you can't work -- we know that CTA can't solve all
18 the negative things that's going on in our
19 community, but surely they can help improve
20 transportation and to be fair with these jobs
21 because the big elephant in the room is the unions
22 in the construction.

23 You just can't go and they hire you. You
24 have to have your union card. And the games that



1 unions are playing now, they are -- having blacks
2 going into these apprentice programs. I am the
3 union worker, just for an example. I'm using that
4 as an example. I'm a union electrician. well, a
5 welder, they're putting me on that site for two
6 months, then they'll lay me off. You understand?
7 There's a game that they play. I'm repeating
8 myself. I'm working on this site over here and
9 they call it rent-a-car? Rent-a-black. They get
10 me, I'm working on this project, to come over
11 there, and everybody comes, oh, look, the CTA got
12 him working, but I'm not a new hiree for that
13 project. They got me from another one and then the
14 next day, they'll go and get somebody else from
15 another project, but they really won't hire any
16 new. It's a game that they play.

17 Then I believe that CTA also hire
18 illegals, people to work on these projects because
19 these companies, contractors, CTA do not monitor
20 and comply. They just have an affidavit. You
21 know, you go and they put an affidavit out. But I
22 believe that most -- a lot of these big
23 construction projects, like, going on, they have
24 noncitizens working on those projects because these



1 developers and these big contractors, construction
2 contractors, they're about the money. What they
3 will do, they will make that person, that illegal
4 person, they might get the same rate, but they'll
5 make that illegal person pay union dues, too.

6 That's how tricky the union is. You understand?
7 Illegals, they're going to pay that same union due,
8 but they still going to hire them at a lower cost,
9 you understand, on the project.

10 So I don't think CTA should be given me no
11 A for what you got down here. I'm not around here
12 making a popularity contest with them. It's very
13 important -- and when those jobs are -- when those
14 jobs are not issued out fairly by all government
15 agencies, for example, one side of town is poverty
16 and high crime, another -- it affects the whole
17 city because these people move around.

18 Spike Lee now is getting ready to make a
19 movie about Chiraq or something. He's saying that
20 this is a bad town. So to have a global city, you
21 must have -- must have a fair city that people feel
22 like they're getting an equal piece of the pie when
23 it comes to these jobs, and that's one thing that
24 only happens in private industry.



1 Government is notorious, too, because they
2 say MBE, WBE, small business, blacks getting those
3 contracts, that's on paper. That's on paper. But
4 they don't actually go and monitor them. They can
5 have MB, WB, and all that and have nobody of color
6 because it could be a white woman. She comes in as
7 a minority. It could be a Hispanic. They come in
8 as a minority.

9 My specific purpose up here is to advocate
10 for black people to get these jobs, and the black
11 community out of the 18th ward, Emmanuel --
12 Emmanuel got the vote -- the majority of vote. I
13 don't know why, but he did. After closing up 50
14 schools, he did.

15 Sometimes I think black people have
16 amnesia, a little something wrong with them up
17 here. You could put that down, too. The legacy of
18 slavery, it's still in the mind. You understand?
19 It's over. No chains here, no chains there, but up
20 in this mind from one generation to another
21 generation and time is out. We want our
22 reparations, and this will be a good way of getting
23 it, hiring some black men and women on these
24 projects.



1 Thank you so much, young lady.

2 THE COURT REPORTER: Thank you.

3 (A short break was taken.)

4 MR. PETERSON: Kevin Karl Peterson, Citizens
5 Taking Action for Transit-Dependent Riders. We're
6 requesting shuttle buses on Broadway, on the
7 Broadway bus, later 24-hour service on the 36
8 Broadway bus to cover for the closed up L stations.

9 On the thing with the proposed re-routes
10 for buses, they don't even cover the 146 which is a
11 bus that terminates at the Berwyn station, which is
12 going to be closed for over two years. They need
13 to be adding more service. They need to actually
14 somehow find a way to keep Berwyn open because
15 there's a giant Jewel there which a lot of seniors
16 use and work, going there to shop and all that.

17 we need more bus services serving the
18 alternate -- these buses also need to serve these
19 alternate stations, and the connections with the
20 buses on Sheridan like the 146, the 136, the 148,
21 the 147 are now going to be messed up because if
22 the Foster bus goes to the Argyle station, it will
23 not be able to make connections with any of these
24 buses.



1 Again, we need more security on these new
2 stations. We need these stations to be opened as
3 long as possible. Again, the shuttle buses on
4 Broadway and late 24-hour service on the 36
5 Broadway bus.

6 Wow. That went pretty quick.

7 THE COURT REPORTER: Thank you.

8 (Proceedings concluded at
9 7:55 p.m.)

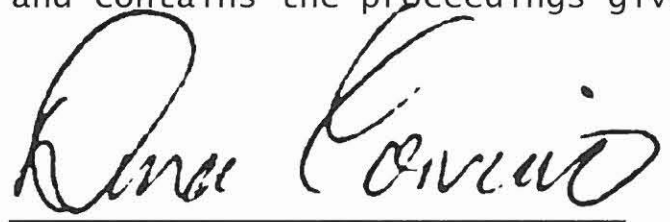
10 (which were all the proceedings
11 had in the above-entitled cause
12 for this date and time.)



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STATE OF ILLINOIS)
) SS:
COUNTY OF C O O K)

Dina C. Corvino, being first duly sworn,
on oath says that she is a court reporter doing
business in the City of Chicago; and that she
reported in shorthand the proceedings of said
hearing, and that the foregoing is a true and
correct transcript of her shorthand notes so taken
as aforesaid, and contains the proceedings given at
said hearing.



Dina C. Corvino, CSR, RPR
License No. 084-004475



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B. Mitigation Commitments Table

The mitigation measures and other features of the project that reduce adverse impacts, to which the Federal Transit Administration (FTA) and the Chicago Transit Authority (CTA) 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. CTA will establish a program for monitoring the implementation of the mitigation commitments as part of its project management oversight. FTA will oversee CTA’s program for monitoring environmental compliance through quarterly review meetings or other means specified by FTA. CTA will report on environmental compliance in the quarterly progress reports.

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
<i>Transportation - Construction Impacts</i>				
1	Construction activities would temporarily affect public transportation, pedestrians, bicycles, traffic, and parking. Impacts would include temporary station closures, rerouting of bus transit, slightly longer train travel times, intermittent train service disruptions, pedestrian walk time changes to access stations, displacement of bicycle parking, temporary roadway detours and lane restrictions, and temporary changes in parking.	A	CTA will increase the frequency of parallel and connecting buses in the project area (including the #36 Broadway bus) as necessary to accommodate passengers during Stages A and B of construction.	CTA
		B	CTA will reroute the #81 Lawrence bus, which currently serves Lawrence station, to serve Wilson station during Stages A and B.	CTA
		C	During Stage A, CTA will reroute the #92 Foster bus, which currently serves Berwyn station, to serve an adjacent open station, either Argyle or Bryn Mawr station. During Stage B, CTA will reroute the #92 Foster bus to serve the Foster/Winona temporary platform at the Foster Avenue temporary entrance.	CTA
		D	CTA will require the project contractor to schedule construction-related service disruptions to occur during weekends and/or off-peak periods to the extent possible.	Project Contractor Duties/Requirements, CTA
		E	CTA will provide notifications of any service changes to transit passengers as well as neighboring property owners, residents, and businesses as determined in the Construction Coordination and Outreach Plan, discussed in Mitigation 4A.	CTA
		F	CTA will require the project contractor to provide additional, temporary bicycle racks at stations that remain open during construction activities to accommodate diverted bicycle traffic.	Project Contractor Duties/Requirements, CTA

Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
	<p>G CTA will require the project contractor to develop detailed Maintenance of Traffic (MOT) Plans during subsequent engineering and design, in coordination with Illinois Department of Transportation (IDOT), the City of Chicago Department of Transportation (CDOT), and the City of Chicago Office of Emergency Management and Communications (OEMC). The MOT Plans will protect emergency vehicle access during construction. The MOT Plans will define how temporary closures or longer-term lane closures will be addressed. The MOT Plans will include specific measures to reduce impacts (developed during subsequent engineering and design) to determine peak and off-peak traffic period lane closures, traffic control, traffic rerouting measures, and scheduling of construction activities during off-peak traffic periods. MOT Plans will also consider locations of schools, parks and daycares when deciding where to route local traffic and construction equipment and to the extent possible, route traffic away from places where children congregate.</p>	<p>Project Contractor Duties/Requirements, CTA, CDOT, IDOT, OEMC</p>
	<p>H The project contractor will adhere to federal, state, and local guidelines and will acquire permits from the appropriate transportation and planning agencies for roadway disruptions, blockages, and closures.</p>	<p>Project Contractor Duties/Requirements, CTA</p>
	<p>I The project contractor, CTA, and/or the City of Chicago will provide notifications of roadway and sidewalk disruptions, blockages, or closures to neighboring property owners, residents, and businesses using signs along streets, in nearby CTA stations, and in applicable CTA trains and buses. Descriptions of alternate routes will be provided.</p>	<p>Project Contractor Duties/Requirements, CTA, City of Chicago</p>
	<p>J CTA will require the project contractor to coordinate deliveries and garbage collection alternatives when construction over or adjacent to alleys temporarily affects access to the alleys. CTA and/or the project contractor will coordinate with the City of Chicago Department of Streets and Sanitation as necessary.</p>	<p>Project Contractor Duties/Requirements, CTA, City of Chicago Streets and Sanitation</p>
	<p>K CTA will require the project contractor to maintain access to businesses and parking for deliveries to businesses throughout construction through the use of both permanent and temporary loading zones in coordination with CDOT.</p>	<p>Project Contractor Duties/Requirements, CDOT, CTA</p>

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
		L	CTA will require the project contractor to limit roadway detours and blockages during special events in the surrounding neighborhoods.	Project Contractor Duties/Requirements, CTA
		M	CTA will require the contractor to provide designated off-street parking areas for workers to maintain on-street parking availability for the general public.	Project Contractor Duties/Requirements, CTA
<i>Transportation - Permanent Impacts</i>				
None				
<i>Displacements and Relocations of Existing Uses - Construction Impacts</i>				
2	Temporary easements would be needed at four surface parking lots during construction.	A	CTA and/or the project contractor will obtain any necessary permits for temporary construction easements through the City of Chicago. CTA will work with the businesses and property owners temporarily impacted to establish reasonable compensation for the temporary use of property.	Project Contractor Duties/Requirements, CTA
<i>Displacements and Relocations of Existing Uses - Permanent Impacts</i>				
3	Permanent air rights would be needed at three properties (two surface parking lots and a commercial strip mall). Vacant CTA-owned retail buildings underneath the track structure at Argyle, Berwyn, and Bryn Mawr stations would be demolished. Two commercial properties (both associated with the same car dealership) would be acquired and the buildings demolished.	A	CTA will provide just compensation, measured by the fair market value of the property, as determined by CTA through an appraisal process, to the affected property owner.	CTA
		B	CTA will provide relocation assistance following FTA guidelines (49 Code of Federal Regulations [CFR] § 24 and FTA Circular 5010.1D, revised August 27, 2012), which will include payments for moving costs, tangible personal property loss as a result of relocation or discontinuance of operations, reestablishment expenses, and costs associated with finding a replacement site.	CTA
		C	CTA has undertaken early outreach to all potentially affected property owners by contacting each owner and lessee (based on available public records). CTA's Uniform Act public outreach specialists provided property owners and lessees with a single point of contact to answer specific questions regarding relocation rights, requirements, and processes and anticipated timelines. Outreach will continue through project development as a one-stop resource for potentially displaced businesses.	CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
		D	CTA, in coordination with the City of Chicago Department of Planning and Development (DPD) and the local Aldermen’s Offices, will provide informational resources, permitting support, and points of contact for displaced business owners to find suitable sites for relocation. Reference information and points of contact for displaced business owners will be made available on the CTA project website, and through other outlets, as deemed appropriate by the City of Chicago, Ward 46 and 48 aldermanic offices, and through CTA and aldermanic outreach to local chambers of commerce.	DPD, Ward 46 and 48 Alderman’s Offices, CTA
<i>Land Use and Economic Development - Construction Impacts</i>				
4	Businesses in the project area may be temporarily affected.	A	<p>CTA will develop and implement a Construction Outreach and Coordination Plan. The plan will be developed with input from the Ward 46 and 48 aldermanic offices, DPD, the community, and local businesses. The plan will include a Business Outreach Program to assist local businesses and residents affected by construction. The plan will be tailored to business and community needs, and will include a series of initiatives to minimize construction disruption to businesses and the surrounding community. These strategies could include, but are not limited to the following:</p> <ul style="list-style-type: none"> ▪ A community calendar to inform the construction schedule so that impacts on special events or festivals may be avoided ▪ Advertising campaigns to promote local business patronage during construction ▪ Additional parking during construction to maintain access to businesses ▪ Signs, for example, “We Are Open” and other signs, explaining changes in access for business patrons ▪ Other economic incentives or tax relief measures for businesses adversely affected by construction. 	Ward 46 and 48 Alderman’s Offices, DPD, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
5	Portions of acquired parcels would remain after construction.	A	CTA will work with DPD to provide incentives to encourage transit-oriented redevelopment, consistent with local and regional development plans, as soon as construction activities allow. The incentives will minimize the duration of temporary construction impacts and encourage mixed-use, pedestrian-friendly development. Incentives could include public/private partnerships, density bonuses, reduced development fees, reduced parking requirements, or expedited permitting. This measure could spur transit-oriented redevelopment and other land uses that support local and regional development plans after the project is complete by easing the path to construction for developers on parcels required for construction.	DPD, CTA
<i>Land Use and Economic Development - Permanent Impacts</i>				
None				
<i>Neighborhoods, Communities, and Businesses - Construction Impacts</i>				
6	Temporary construction impacts could include noise, dust, detours, temporary station closures, altered access to businesses and residences, negative visual and aesthetic changes, changes in emergency vehicle routing, construction vehicle emissions, and truck traffic throughout the corridor. Parcels used for construction may affect the community street life and cohesion.	A	During construction, CTA will require the project contractor to implement construction best management practices (BMPs) for coordination with city services, maintenance of access, directions to alternate services, screening of construction sites, erosion and dust control, maintenance of equipment, temporary noise barriers, vibration monitoring, and hazardous materials handling.	Project Contractor Duties/Requirements, CTA
		B	CTA will develop and implement a Construction Outreach and Coordination Plan as described in Mitigation 4A. The plan will include specific programs to assist local businesses and residents affected by construction.	CTA, DPD
		C	CTA will work with community chambers of commerce and/or development corporations to help develop advertising plans to strengthen local visibility and patronage for businesses affected by temporary access changes during construction. These plans will be part of the Business Outreach Program within the Construction Outreach and Coordination Plan, further described in Mitigation 4A.	CTA
		D	CTA will work with DPD and local community organizations to develop Station Area Plans or other redevelopment plans and policies that could serve as an appendix or update to existing neighborhood plans and business district plans. Plans will indicate appropriate locations for new commercial, residential, or mixed-use developments where property would	DPD, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
			be displaced.	
		E	CTA will require the project contractor to maintain access, or provide alternate access to businesses, residences, community facilities, and parks affected by temporary access changes during construction as described in Mitigation 1G.	Project Contractor Duties/Requirements, CTA, CDOT, Chicago Park District
		F	The project contractor, in coordination with CDOT, will provide detours and CTA will provide alternate transit service options around closed stations during construction, with enhanced service modifications during special community events and festivals.	Project Contractor Duties/Requirements, CTA, CDOT
		G	CTA will work with DPD, Ward 46 and 48 aldermanic offices, and developers to encourage the redevelopment of vacant areas in a timely manner after construction is complete as described in Mitigation 5A.	DPD, Ward 46 and 48 Alderman's Offices, CTA
<i>Neighborhoods, Communities, and Businesses - Permanent Impacts</i>				
None				
<i>Historic and Archeological Resources - Permanent Impacts</i>				
The mitigations below (Mitigations 7A – 10C) are stipulations required from the Memorandum of Agreement (MOA) for this project. The signed MOA is also attached to the project FONSI.				
7	The existing track structure would be subject to an adverse effect from implementation of the project because it would be reconstructed as a modern aerial structure.	A	During the pre-construction project design process, CTA will solicit visual preferences regarding the existing and proposed elevated track structure, including the embankment, viaducts, new aerial structures, and any open areas underneath the elevated track structures, from consulting parties through written communication and/or a meeting. A comment period of not less than 30 days will be established. CTA will incorporate the feedback received as appropriate into the reference materials provided to firms bidding on the Project. As part of the project contractor selection process, CTA will incorporate a selection criterion that provides additional points for proposals that consider the aesthetic qualities of the historic elevated track structure in their designs.	CTA
		B	As a coordinated effort between the Wilson Transfer Station Project (Wilson Transfer Station Project MOA Stipulation I.4.A) and the Lawrence to Bryn Mawr Modernization Project, CTA will develop an interpretive exhibit for installation at Wilson station discussing the history and context of the elevated North Red Line. The exhibit will be designed in consultation	CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
			with a qualified historian or architectural historian that meets the Secretary of the Interior's Standards in these disciplines who will assess the content and presentation to ensure it contains information on the important history and associations that contribute to the significance of the track structure. The exhibit will be displayed in a publicly accessible space within five (5) years of the signature of the MOA.	
		C	Prior to any demolition of the existing track structure (including the embankment) within the project limits, CTA will prepare Historic American Engineering Record (HAER) documentation for the existing track structure within the project limits. CTA will coordinate in advance of construction activities with the National Park Service (NPS) to assess the appropriate level of HAER documentation. CTA will provide draft documentation to NPS to verify that it meets the specified standards and formats. Upon NPS approval, CTA will finalize the documentation for submittal through the HAER Program to the Library of Congress. One paper copy and one electronic copy of the final HAER documentation will be provided to IHPA.	CTA
8	The Build Alternative would result in an adverse effect on the Uptown Square Historic District because the elevated track structure is a resource contributing to the district and would be modernized under the Build Alternative.	A	CTA, in coordination with IHPA, will prepare an updated National Register of Historic Places (NRHP) nomination form for the Uptown Square Historic District. The update will be prepared by a qualified historian or architectural historian that meets the Secretary of the Interior's Standards in these disciplines. The boundaries, period of significance, and narrative description for the updated nomination will be reevaluated to include properties that may have been too young for inclusion or overlooked in the original nomination. Aspects of the District's history and additional properties may need to be evaluated for inclusion in the District. The form will include additional photographs, information about the modernization of the track structure, and reassessments of contributing properties, specifically those that have been or will be removed or modified by recently completed and planned improvements to the North Red line. Similarly, buildings that were deemed non-contributing when the original nomination was prepared may have been restored and should be reevaluated. At the direction of the IHPA, the updated nomination form will indicate that the track structure remains a contributing element within the district. The updated nomination form will be submitted to the IHPA,	CTA, Illinois Historic Preservation Agency (IHPA)

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
			the Historic Preservation Division of the City of Chicago’s Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA. Once CTA addresses any review comments, the IHPA will submit the updated nomination form to the Illinois Historic Sites Advisory Council and/or the Keeper of the National Register to complete the update process.	
		B	CTA will ensure that a Historic Preservation Plan (HPP) for the Uptown Square Historic District is prepared. The HPP will be prepared by a qualified historian or architectural historian and will be consistent with the Secretary of the Interior’s Standards and Guidelines for Preservation Planning. The HPP will include a historical overview of the district that identifies themes and chronological periods, an inventory of contributing properties, and prioritized preservation goals specific to the district. A draft HPP will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago’s Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA.	CTA, IHPA
9	The Build Alternative would result in an adverse effect on the West Argyle Street Historic District because the CTA-owned retail underneath the station, as well as the Argyle station itself, are resources contributing to this historic district. Under the Build Alternative, the CTA-owned retail would be demolished and the station would be rebuilt.	A	During the pre-construction project design process, CTA will develop design plans for Argyle station that are consistent with the design of the Prairie-style Argyle station originally constructed in 1921, and that integrate into the setting of the encompassing historic district. CTA will offer preliminary station design schematics to IHPA and other consulting parties for review and comment over a period of not less than 30 days during the project design process and prior to construction.	CTA
		B	During the pre-construction project design process, CTA will examine the feasibility and cost implications of preserving existing Argyle station materials and reincorporating these features into the station design.	CTA
		C	CTA, in coordination with IHPA, will prepare an updated NRHP nomination form for the West Argyle Street Historic District. The update will be prepared by a qualified historian or architectural historian that meets the Secretary of the Interior’s Standards in these disciplines. The boundaries, period of significance, and narrative description for the updated nomination will be reevaluated to include properties that may have been too young for inclusion or overlooked in the original nomination. Additional aspects of the District’s history and additional	CTA, IHPA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
			properties may need to be evaluated for inclusion in the District. Similarly, buildings that were deemed non-contributing when the original nomination was prepared may have been restored and should be reevaluated. The updated nomination form will remove the CTA Argyle station and the CTA-owned retail building at 1117-1119 W. Argyle Street, which are currently contributing properties and will be demolished by the Project. The updated nomination form will be submitted to the IHPA and the Historic Preservation Division of the City of Chicago's Department of Planning and Development and any other interested community historic preservation groups for review and comment prior to completion of this MOA. After CTA addresses review comments, the IHPA will submit the updated nomination form to the Illinois Historic Sites Advisory Council and/or the Keeper of the National Register to complete the update process.	
		D	CTA will ensure that an HPP for the West Argyle Street Historic District is prepared. The HPP will be prepared by a qualified historian or architectural historian and will be consistent with the Secretary of the Interior's Standards and Guidelines for Preservation Planning. The HPP will include a historical overview of the district that identifies themes and chronological periods, an inventory of contributing properties, and prioritized preservation goals specific to the district. A draft HPP will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago's Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA.	CTA
10	The Build Alternative would result in an adverse effect on the Bryn Mawr Avenue Historic District because the CTA-owned retail underneath the station is a resource contributing to this historic district. Under the Build Alternative, the CTA-owned retail would be demolished.	A	During the pre-construction project design process, CTA will develop design plans for Bryn Mawr station that are consistent with the design of the Prairie-style Bryn Mawr station originally constructed in 1921, and that integrate into the setting of the encompassing historic district. CTA will offer preliminary station design schematics to the IHPA and other interested consulting parties for review and comment over a period of not less than 30 days during the project design process and prior to construction.	CTA
		B	CTA, in coordination with IHPA, will prepare an updated NRHP nomination form for the Bryn Mawr Avenue Historic District. The update will be prepared by a qualified historian or architectural historian that	CTA, IHPA

Impacts Requiring Mitigation		Mitigation Commitments	Responsible Agency
		meets the Secretary of the Interior’s Standards in these disciplines. The boundaries, period of significance, and narrative description for the updated nomination will be reevaluated to include properties that may have been too young for inclusion or overlooked in the original nomination. Additional aspects of the District’s history and additional properties may need to be evaluated for inclusion in the District. Similarly, buildings that were deemed non-contributing when the original nomination was prepared may have been restored and should be reevaluated. The updated nomination form will include additional photographs and reassess contributing properties that have been modified since the original NRHP nomination form was prepared. The updated nomination form will remove the CTA-owned retail building at 1116 W. Bryn Mawr Avenue, which is currently a contributing property and will be demolished by the Project. The updated nomination form will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago’s Department of Planning and Development, and any other community historic preservation groups for review and comment prior to completion of this MOA. After CTA addresses review comments, the IHPA will submit the updated nomination form to the Illinois Historic Sites Advisory Council and/or the Keeper of the National Register to complete the update process.	
		C CTA will ensure that an HPP for the Bryn Mawr Avenue Historic District is prepared. The HPP will be prepared by a qualified historian or architectural historian and will be consistent with the Secretary of the Interior’s Standards and Guidelines for Preservation Planning. The HPP will include a historical overview of the district that identifies themes and chronological periods, an inventory of contributing properties, and prioritized preservation goals specific to the district. A draft HPP will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago’s Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA.	CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
<i>Visual and Aesthetic Conditions - Construction Impacts</i>				
11	Construction of the Build Alternative would result in temporary adverse impacts on the surrounding visual environment due to construction work zones.	A	During construction, CTA will require the project contractor to attempt to maintain as much existing vegetation as practical.	Project Contractor Duties/Requirements, CTA
		B	CTA will require the project contractor to use light shielding, where possible, to limit light trespassing from night lighting needed for construction activities. BMPs and debris-free construction areas will minimize temporary visual impacts from construction sites.	Project Contractor Duties/Requirements, CTA
		C	CTA will work with the community to further minimize potential visual and aesthetic impacts during construction. These details will be noted in the Construction Outreach and Coordination Plan (discussed in Mitigation 4A).	Project Contractor Duties/Requirements, CTA
		D	CTA will require the project contractor to use off-street construction sites for pertinent machinery and materials storage as much as possible to minimize visual disruption to the surrounding neighborhoods and businesses.	Project Contractor Duties/Requirements, CTA
		E	After construction, CTA will maintain all property acquired for the project until such time that it may be redeveloped.	CTA
<i>Visual and Aesthetic Conditions - Permanent Impacts</i>				
12	The Build Alternative would rebuild stations in an existing, mature neighborhood that includes historic districts.	A	Because the elevated structure is an NRHP-eligible historic resource, CTA will solicit visual preferences regarding the elevated track structure from consulting parties. The feedback received will be incorporated, as appropriate, into the reference materials provided to firms bidding on the project. (See Mitigation 7A above.)	CTA
		B	As part of the project contractor selection process, CTA will also incorporate a selection criterion that provides additional points for proposals that consider the aesthetic qualities of the historic elevated track structure in their designs. (See Mitigation 7A above.)	Project Contractor Duties/Requirements, CTA
		C	At Argyle and Bryn Mawr stations, CTA will develop design plans that are consistent with the design of the Prairie-style Bryn Mawr station originally constructed in 1921, and that integrate into the setting of the encompassing historic district. (See Mitigation 8A above.)	CTA, IHPA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
		D	CTA will work with DPD and local community organizations to develop a Station Area Plan or other redevelopment plans and policies as an appendix or update to existing neighborhood plans and business district plans so that station designs are sensitive to the context of the surrounding community. (See Mitigation 6D above.)	CTA, DPD
<i>Noise - Construction Impacts</i>				
13	Construction of a modern closed-deck structure would require the use of heavy earthmoving equipment, pneumatic tools, and other equipment. Pile-driving is not proposed. The predicted construction noise levels exceed the FTA daytime impact thresholds for noise-sensitive receivers within 50 feet of the construction activities and would result in adverse impacts on noise-sensitive receivers.	CTA will require the project contractor to implement the described BMPs (A-E) where possible and practical in cases where noise could exceed the limits provided in the FTA guidance manual.		
		A	Provide adequate advance notification to the public of construction operations and schedules.	Project Contractor Duties/Requirements, CTA
		B	Whenever possible, conduct construction activities during the daytime and during weekdays.	Project Contractor Duties/Requirements, CTA
		C	Where practical, erect temporary noise barriers between noisy activities and noise-sensitive receivers. Where possible, CTA will use movable noise barriers at sources of construction noise.	Project Contractor Duties/Requirements, CTA
		D	Develop a Construction Management Plan with the following: <ol style="list-style-type: none"> 1. Uses the best available control technologies to limit excessive noise when working near noise-sensitive receivers. This may include high performance mufflers, high-grade engine exhaust silencers and engine-casing sound insulation. 2. Details and discusses, at minimum, how the following will be implemented: <ol style="list-style-type: none"> a. Use of noise-deadening measures for truck loading and operations b. Use of lined or covered storage bins, conveyers, and chutes with sound-deadening material c. Use of acoustic enclosures, shields, or shrouds for equipment and facilities d. Ways to limit use of public address systems, and minimize the use of generators or use whisper-quiet generators to power equipment 	Project Contractor Duties/Requirements, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
		E	<p>If nighttime work becomes necessary, the project contractor will use the following:</p> <ol style="list-style-type: none"> 1. Prohibit aboveground jackhammering 2. Use spotters and smart backup alarms during nighttime work to automatically adjust (lower) the alarm level or tone based on the background noise level 3. When possible, avoid the use of air horns when work crews are on the tracks 	Project Contractor Duties/Requirements, CTA
<i>Noise - Permanent Impacts</i>				
14	There were 68 clusters of noise-sensitive receivers identified within 350 feet of the alignment. Before mitigation, 18 are predicted to have a moderate permanent noise impact and 2 are predicted to have a severe permanent noise impact.	A	<p>CTA will require the project contractor to implement mitigation measures to reduce noise to levels below FTA impact thresholds. Options for mitigating permanent noise impacts include:</p> <ul style="list-style-type: none"> ▪ Installing monoblock or other low-impact frogs to minimize noise from crossovers. A “frog” refers to the crossing point of two rails. There are several alternatives for low-impact frogs, including monoblock frogs. Monoblock frogs are designed without bolted joints and rails, and result in a smoother running surface compared with traditional frogs. Monoblock frogs would reduce predicted noise levels at crossovers by 3 dB. ▪ Installing rail dampers. Rail dampers are tuned to absorb specific vibration frequencies to reduce the amount of noise radiated by the rail. The dampers are attached directly to the rail between the ties. Rail dampers would reduce predicted noise levels by 2 to 3 dB. <p>Utilizing a ballast-and-tie track rather than direct-fixation track. Ballast is an absorptive material, so it reflects less noise than a concrete deck and would result in lower noise levels. While direct-fixation track was identified for the Build Alternative for many engineering and maintenance reasons, this mitigation measure could be employed if other mitigation measures listed above are not used to reduce noise levels. Installing ballast-and-tie track in place of direct-fixation track would reduce predicted noise by 3 dB.</p>	Project Contractor Duties/Requirements, CTA
		B	Should the noise analysis and proposal of design elements in Mitigation 14A not reduce noise impacts to below FTA impact thresholds, residential sound insulation could be installed for upper-story receivers or receivers	Project Contractor Duties/Requirements, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
			without outdoor land uses. Assessment will be conducted for the existing sound insulation at noise-sensitive receivers following construction. This assessment would determine the noise reduction necessary to eliminate impact, and may show that additional sound insulation is not warranted.	
<i>Vibration - Construction Impacts</i>				
15	High-vibration activities during construction would include demolition of buildings, construction of aerial structures, pavement breaking, and ground compaction. Construction vibration levels may exceed the vibration risk of damage criteria at some of the closest receivers that are within 15 feet of the construction.	A	CTA will require the project contractor to develop a vibration-monitoring plan that identifies the appropriate measures to be taken in order to avoid any damage to buildings during construction.	Project Contractor Duties/Requirements, CTA
		B	CTA and/or the project contractor will identify any buildings where the predicted construction vibration level exceeds the damage risk criteria before construction. CTA will require the project contractor to conduct a pre-construction survey of these buildings, which will include inspection of building foundations and photographs of existing conditions. The survey will be used to establish baseline, pre-construction conditions.	Project Contractor Duties/Requirements, CTA
		C	CTA will require the project contractors to use less vibration-intensive construction equipment or techniques to the extent possible near vibration-sensitive buildings. Less vibration-intensive construction techniques may include non-vibratory compaction and drilled piles instead of impact pile-driving.	Project Contractor Duties/Requirements, CTA
<i>Vibration - Permanent Impacts</i>				
16	Changes in the permanent vibration levels because of the Build Alternative would result from a change in the track structure and the relocation of the structure closer to some sensitive receivers. 68 vibration-sensitive receiver clusters were identified within 350 feet of the alignment. Before mitigation, 12 clusters are predicted to have vibration impacts that meet or exceed the FTA impact threshold.	A	CTA will require the project contractor to include any necessary mitigation in their design to reduce vibration to levels to below impact thresholds. Options for mitigating permanent vibration impacts include, but are not be limited to the following: <ul style="list-style-type: none"> ▪ Locating support columns away from identified sensitive receivers. Conceptual design analysis assumed worst-case location of the columns—within 3 feet of existing buildings. Vibration levels would be reduced to below the impact thresholds if the columns were placed a sufficient distance away from vibration-sensitive receivers. The necessary distance away from vibration-sensitive receivers is 9 to 13 feet. ▪ Installing rubber bearing pads on the top of the columns to reduce the vibration transmitted through the columns into the ground. The specific details of this approach and predicted vibration reduction 	Project Contractor Duties/Requirements, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
			<p>would be investigated before construction.</p> <ul style="list-style-type: none"> ▪ Installing low-impact frogs, such as monoblock frogs, to minimize vibration impacts from special trackwork. Alternative designs for low-impact frogs, such as flange-bearing frogs, may also be used to reduce vibration levels from special trackwork. Monoblock frogs would reduce predicted vibration levels by 5 VdB. ▪ Installing high-resilience (soft) direct-fixation fasteners to reduce the vibration transmitted through the rail into the structure. High-resilience fasteners typically reduce vibration levels by 5 to 10 decibels at frequencies above 30 Hz. 	
<i>Hazardous Materials - Construction Impacts</i>				
17	Station reconstruction, viaduct replacement, structure construction, and embankment removal would require subsurface excavation throughout the majority of the project corridor. There would be the potential to encounter hazardous materials. The Build Alternative would include reconstruction and/or demolition of existing structures and stations that were constructed before 1978-1979. The structures and stations potentially contain asbestos-containing material and lead-based paint that could result in a release of asbestos fibers and lead dust during construction. There is also the potential for hazardous materials involved	CTA will require the project contractor to implement the described BMPs and develop the required plans (A-H).		
		A	Federal, state, and local laws and regulations regarding hazardous materials will be followed before and during construction.	Project Contractor Duties/Requirements, CTA
		B	CTA will require the project contractor to conduct Phase I Environmental Site Assessments (ESAs) for any property to be purchased as part of the Build Alternative in order to identify recognized environmental conditions and assess and limit environmental liability. Based on the Phase I ESA findings, a Phase II ESA could also be required before purchasing a property.	Project Contractor Duties/Requirements, CTA
		C	CTA will require the project contractor to conduct focused site assessments for areas where earthmoving activities would occur and on properties purchased for the project. The assessments will include characterization and evaluation of the potential for encountering hazardous materials and contaminated soils	Project Contractor Duties/Requirements, CTA
		D	CTA will require the project contractor to conduct asbestos, lead-based paint, and hazardous material surveys of buildings or structures before reconstruction or demolition, to identify any asbestos, lead-based paint particles, and hazardous materials, such as polychlorinated biphenyl or mercury-containing equipment. Any hazardous materials identified will be abated and disposed of in accordance with federal, state, and local regulations.	Project Contractor Duties/Requirements, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
	with construction activities, such as paints, solvents, fuels, and hydraulic fluids that could be accidentally released during construction.	E	The project contractor will implement a Contaminated Material Management Plan, which will cover the entire project area, as it is assumed that all material has at least some level of contamination associated with it in the project area. The plan will identify contaminated soils and will have set BMPs for disposing of contaminated soil and groundwater encountered during construction activities.	Project Contractor Duties/Requirements, CTA
		F	CTA will require the project contractor to implement a Spill Control and Prevention Plan to address the use, storage, and disposal of materials such as asphalt, fuel, paint, solvents, and cleaning agents will be required. The Spill Control and Prevention Plan will provide BMPs to limit the potential for accidental releases of potentially hazardous materials.	Project Contractor Duties/Requirements, CTA
		G	CTA will require the project contractor to develop Construction Stormwater Pollution Control Plans, which describe methods to prevent or minimize stormwater runoff from encountering contaminated soil or other hazardous materials.	Project Contractor Duties/Requirements, CTA
		H	CTA will require the project contractor to develop Health and Safety Plans for construction activities and construction contractors. The Health and Safety Plans will be read and signed by all workers before starting any work. The Health and Safety Plans will identify potential contaminants of concern, required personal protective equipment and procedures, and emergency response procedures.	Project Contractor Duties/Requirements, CTA
<i>Hazardous Materials - Permanent Impacts</i>				
18	Transit operation has the potential to result in the release of hazardous materials and/or petroleum products into the environment from accidental spills. Existing procedures are already in place to address the proper storage and handling of hazardous materials during operations.	A	CTA will adhere to all applicable federal, state, and local regulations, as well as CTA's existing system-wide hazardous material usage, storage, and disposal plans and procedures, further minimizing the potential for hazardous material impacts.	Project Contractor Duties/Requirements, CTA

Impacts Requiring Mitigation		Mitigation Commitments		Responsible Agency
<i>Environmental Justice – Construction and Permanent Impacts</i>				
None				
<i>Indirect and Cumulative – Construction and Permanent Impacts</i>				
None				
<i>Air Quality – Construction Impacts</i>				
19	The Build Alternative could result in some temporary adverse impacts on air quality during construction.	A	CTA will require the project contractor to implement appropriate construction BMPs. This will include requirements that the contractor incorporate measures set forth by the U.S. Environmental Protection Agency to reduce diesel emissions into construction practices to protect human health related impacts from potential diesel emission exposure.	Project Contractor Duties/Requirements, CTA
<i>Air Quality – Permanent Impacts</i>				
None				
<i>Water Resources – Construction and Permanent Impacts</i>				
None				
<i>Biological Resources – Construction and Permanent Impacts</i>				
None				
<i>Geology and Soils – Construction and Permanent Impacts</i>				
None				
<i>Energy – Construction and Permanent Impacts</i>				
None				
<i>Safety and Security – Construction and Permanent Impacts</i>				
None				

C. Section 106 Memorandum of Agreement

MEMORANDUM OF AGREEMENT

AMONG THE FEDERAL TRANSIT ADMINISTRATION, ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND ILLINOIS HISTORIC PRESERVATION AGENCY

REGARDING THE LAWRENCE TO BRYN MAWR MODERNIZATION PROJECT, CITY OF CHICAGO, COOK COUNTY, ILLINOIS

WHEREAS, the Federal Transit Administration (FTA) may provide federal funding to the Chicago Transit Authority (CTA) for the Lawrence to Bryn Mawr Modernization Project (the Project) in Chicago, Illinois; and

WHEREAS, the Project consists of reconstructing the existing Red and Purple line track structure as a modern aerial structure and modernizing four stations (Lawrence, Argyle, Berwyn, and Bryn Mawr stations) within the 1.3-mile Project limits from Leland Avenue to approximately Ardmore Avenue; and

WHEREAS, FTA has defined the Project's Area of Potential Effects (APE) as depicted in Attachment A; and

WHEREAS, FTA has determined that the Project would have an adverse effect on the National Register of Historic Places (NRHP) eligible elevated track structure, the NRHP listed Uptown Square Historic District, the NRHP listed West Argyle Street Historic District, and the NRHP listed Bryn Mawr Avenue Historic District, and FTA and CTA have consulted with the Illinois Historic Preservation Agency (IHPA) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, (54 U.S.C. § 306108) and its implementing regulations (36 C.F.R. § 800); and

WHEREAS, FTA and CTA have consulted with other consulting parties (listed in Attachment B) regarding the effects of the Project on historic properties; and

WHEREAS, FTA and CTA have consulted with the Miami Tribe of Oklahoma (listed in Attachment B), providing Project information throughout the Section 106 consultation process and inviting their participation; and

WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), FTA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination and the ACHP has chosen to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

WHEREAS, CTA has participated in consultation and has been invited to sign this Memorandum of Agreement (MOA) as an invited signatory; and

WHEREAS, consideration was given to alternatives and measures throughout the Project development process to avoid, minimize, and mitigate impacts to historic properties listed on or eligible for the NRHP while meeting the stated purpose of the Project;

NOW THEREFORE, FTA, ACHP, and IHPA agree that, upon acceptance of this MOA, the Project will be implemented in accordance with the following stipulations in order to take into account the effect of the Project on historic properties.

STIPULATIONS

FTA will ensure that the following stipulations of this MOA are carried out by CTA and will require, as a condition of any approval of federal funding for the undertaking, adherence to the stipulations set forth herein:

I. TREATMENT MEASURES

A. Elevated Track Structure

1. During the pre-construction Project design process, CTA will solicit visual preferences regarding the existing and proposed elevated track structure, including the embankment, viaducts, new aerial structures, and any open areas underneath the elevated track structures, from consulting parties through written communication and/or a meeting. A comment period of not less than 30 days will be established. CTA will incorporate the feedback received as appropriate into the reference materials provided to firms bidding on the Project. As part of the Project contractor selection process, CTA will incorporate a selection criterion that provides additional points for proposals that consider the aesthetic qualities of the historic elevated track structure in their designs.
2. As a coordinated effort between the Wilson Transfer Station Project (Wilson Transfer Station Project MOA Stipulation I.4.A) and the Lawrence to Bryn Mawr Modernization Project, CTA will develop an interpretive exhibit for installation at Wilson station discussing the history and context of the elevated North Red Line. The exhibit will be designed in consultation with a qualified historian or architectural historian that meets the Secretary of the Interior's Standards in these disciplines who will assess the content and presentation to ensure it contains information on the important history and associations that contribute to the significance of the track structure. The exhibit will be displayed in a publicly accessible space within five (5) years of the signature of this MOA.
3. Prior to any demolition of the existing track structure (including the embankment) within the Project limits, CTA will prepare Historic American Engineering Record (HAER) documentation for the existing track structure within the Project limits. CTA will coordinate in advance of construction activities with the National Park Service (NPS) to assess the appropriate level of HAER documentation. CTA will

provide draft documentation to NPS to verify that it meets the specified standards and formats. Upon NPS approval, CTA will finalize the documentation for submittal through the HAER Program to the Library of Congress. One paper copy and one electronic copy of the final HAER documentation will be provided to IHPA.

B. Uptown Square Historic District

1. CTA, in coordination with IHPA, will prepare an updated NRHP nomination form for the Uptown Square Historic District. The update will be prepared by a qualified historian or architectural historian that meets the Secretary of the Interior's Standards in these disciplines. The boundaries, period of significance, and narrative description for the updated nomination will be reevaluated to include properties that may have been too young for inclusion or overlooked in the original nomination. Aspects of the District's history and additional properties may need to be evaluated for inclusion in the District. The form will include additional photographs, information about the modernization of the track structure, and reassessments of contributing properties, specifically those that have been or will be removed or modified by recently completed and planned improvements to the North Red line. Similarly, buildings that were deemed non-contributing when the original nomination was prepared may have been restored and should be reevaluated. At the direction of the IHPA, the updated nomination form will indicate that the track structure remains a contributing element within the district. The updated nomination form will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago's Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA. Once CTA addresses any review comments, the IHPA will submit the updated nomination form to the Illinois Historic Sites Advisory Council and/or the Keeper of the National Register to complete the update process.
2. CTA will ensure that a Historic Preservation Plan (HPP) for the Uptown Square Historic District is prepared. The HPP will be prepared by a qualified historian or architectural historian and will be consistent with the Secretary of the Interior's Standards and Guidelines for Preservation Planning. The HPP will include a historical overview of the district that identifies themes and chronological periods, an inventory of contributing properties, and prioritized preservation goals specific to the district. A draft HPP will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago's Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA.

C. West Argyle Street Historic District

1. During the pre-construction Project design process, CTA will develop design plans for Argyle station that are consistent with the design of the Prairie style Argyle station

- originally constructed in 1921, and that integrate into the setting of the encompassing historic district. CTA will offer preliminary station design schematics to IHPA and other consulting parties for review and comment over a period of not less than 30 days during the Project design process and prior to construction.
2. During the pre-construction Project design process, CTA will examine the feasibility and cost implications of preserving existing Argyle station materials and reincorporating these features into the station design.
 3. CTA, in coordination with IHPA, will prepare an updated NRHP nomination form for the West Argyle Street Historic District. The update will be prepared by a qualified historian or architectural historian that meets the Secretary of the Interior's Standards in these disciplines. The boundaries, period of significance, and narrative description for the updated nomination will be reevaluated to include properties that may have been too young for inclusion or overlooked in the original nomination. Additional aspects of the District's history and additional properties may need to be evaluated for inclusion in the District. Similarly, buildings that were deemed non-contributing when the original nomination was prepared may have been restored and should be reevaluated. The updated nomination form will remove the CTA Argyle station and the CTA retail building at 1117-1119 W Argyle Street, which are currently contributing properties and will be demolished by the Project. The updated nomination form will be submitted to the IHPA and the Historic Preservation Division of the City of Chicago's Department of Planning and Development and any other interested community historic preservation groups for review and comment prior to completion of this MOA. After CTA addresses review comments, the IHPA will submit the updated nomination form to the Illinois Historic Sites Advisory Council and/or the Keeper of the National Register to complete the update process.
 4. CTA will ensure that a HPP for the West Argyle Street Historic District is prepared. The HPP will be prepared by a qualified historian or architectural historian and will be consistent with the Secretary of the Interior's Standards and Guidelines for Preservation Planning. The HPP will include a historical overview of the district that identifies themes and chronological periods, an inventory of contributing properties, and prioritized preservation goals specific to the district. A draft HPP will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago's Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA.

D. Bryn Mawr Avenue Historic District

1. During the pre-construction Project design process, CTA will develop design plans for Bryn Mawr station that are consistent with the design of the Prairie style Bryn Mawr station originally constructed in 1921, and that integrate into the setting of the encompassing historic district. CTA will offer preliminary station design schematics

- to the IHPA and other interested consulting parties for review and comment over a period of not less than 30 days during the Project design process and prior to construction.
2. CTA, in coordination with IHPA, will prepare an updated NRHP nomination form for the Bryn Mawr Avenue Historic District. The update will be prepared by a qualified historian or architectural historian that meets the Secretary of the Interior's Standards in these disciplines. The boundaries, period of significance, and narrative description for the updated nomination will be reevaluated to include properties that may have been too young for inclusion or overlooked in the original nomination. Additional aspects of the District's history and additional properties may need to be evaluated for inclusion in the District. Similarly, buildings that were deemed non-contributing when the original nomination was prepared may have been restored and should be reevaluated. The updated nomination form will include additional photographs and reassess contributing properties that have been modified since the original NRHP nomination form was prepared. The updated nomination form will remove the CTA retail building at 1116 W Bryn Mawr Avenue, which is currently a contributing property and will be demolished by the Project. The updated nomination form will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago's Department of Planning and Development, and any other community historic preservation groups for review and comment prior to completion of this MOA. After CTA addresses review comments, the IHPA will submit the updated nomination form to the Illinois Historic Sites Advisory Council and/or the Keeper of the National Register to complete the update process.
 3. CTA will ensure that a HPP for the Bryn Mawr Avenue Historic District is prepared. The HPP will be prepared by a qualified historian or architectural historian and will be consistent with the Secretary of the Interior's Standards and Guidelines for Preservation Planning. The HPP will include a historical overview of the district that identifies themes and chronological periods, an inventory of contributing properties, and prioritized preservation goals specific to the district. A draft HPP will be submitted to the IHPA, the Historic Preservation Division of the City of Chicago's Department of Planning and Development, and any other interested community historic preservation groups for review and comment prior to completion of this MOA.

E. Measures regarding Project Construction

1. To minimize the potential for construction impacts, CTA will comply with any relevant FTA standards and guidelines regarding noise and vibration impacts. CTA will also implement Best Management Practices during construction. Mitigation commitments and compliance requirements will be provided in the Final NEPA decision document for this Project.

2. CTA will conduct a conditions assessment for any NRHP listed, eligible, or contributing structures located within 15 feet of Project construction activities. If warranted based on structure type and condition, CTA will prepare a *Protection and Stabilization Plan* prior to construction. CTA will give IHPA and the respective property owner an opportunity to review and comment on the conditions assessment and the adequacy of any warranted plan over a period of not less than 30 days.
3. As a commitment from the NEPA process to offset potential community impacts, CTA will develop and implement a *Construction Outreach and Coordination Plan*. The plan will include a Business Outreach Program to assist local businesses and residents affected by construction. The plan will be tailored to business and community needs, and will include a series of initiatives to minimize construction disruptions. As historic properties and districts make up a substantial portion of the communities that will be potentially impacted, CTA will give the Section 106 consulting parties an opportunity to review and comment on this plan over a period of not less than 30 days.

II. DURATION

This MOA will expire if its terms are not carried out within fifteen (15) years from the date of its execution. Prior to such time, FTA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VII below.

III. MONITORING AND REPORTING

Every year on June 1 following the date of the signing of this MOA until it expires or is terminated (whichever comes first), CTA will provide the FTA, ACHP, IHPA and consulting parties (listed in Attachment B) with a summary report detailing the work undertaken throughout the previous year pursuant to the stipulations of this MOA. The last report will be submitted within 3 months of completion of construction of the Project or at completion of this MOA's terms if later. The summary will include any tasks undertaken relevant to stipulations within this MOA, scheduling changes, problems encountered, and any disputes regarding implementation of these stipulated measures.

IV. COORDINATION WITH OTHER FEDERAL REVIEWS

In the event any other federal agency provides funding, permits, licenses, or other assistance to CTA for the Lawrence to Bryn Mawr Modernization Project as it was planned at the time of the execution of this MOA, such funding or approving agency may comply with Section 106 by agreeing in writing to the terms of this MOA and so notifying and consulting IHPA and ACHP. Any necessary amendments will be coordinated pursuant to Stipulation VII.

V. POST-REVIEW DISCOVERIES

If properties are discovered that may be historically significant or unanticipated effects on historic properties found, then CTA will implement the following procedures. All work will stop immediately within 100 feet of the property; FTA and IHPA will be notified as soon as possible and no later than 7 days from the date of discovery; CTA, in consultation with FTA and IHPA,

will conduct an on-site evaluation of the discovery; FTA and CTA will consider eligibility and effects and will define reasonable measures to avoid or minimize harm to the property. IHPA will review and provide concurrence on the eligibility, effects and measures to avoid or reduce harm and provide concurrence within one week of receipt of this information. CTA will then implement these measures accordingly and resume work. This applies to not only aboveground resources but also any archaeological sites that may be discovered during the course of the Project. If human remains are discovered, then the Illinois Human Skeletal Protection Act (20 ILCS 3440) will be followed, which directs that work in the vicinity will cease and the coroner will be notified. In addition, CTA will notify FTA and IHPA about any discoveries.

VI. DISPUTE RESOLUTION

Should any signatory to this MOA object in writing at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FTA will consult with such signatory to resolve any objection. If FTA determines that such objection cannot be resolved, FTA will:

- A. Forward all documentation relevant to the dispute, including FTA's proposed resolution, to the ACHP. The ACHP will provide FTA with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA will prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.
- B. If ACHP does not provide its advice regarding the dispute within the 30 day time period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching a final decision, FTA will prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them to the ACHP with a copy of such written response.

The responsibility of FTA and CTA to carry out all other actions under the terms of this MOA that are not the subject of the dispute will remain unchanged.

VII. AMENDMENT

This MOA may be amended when such amendment is agreed to in writing by all signatories. The amendment will be effective on the date that a copy is signed by the last signatory.

VIII. TERMINATION

This MOA will terminate in fifteen (15) years or upon completion of its terms, whichever comes first. If FTA, ACHP, or IHPA determines that the terms of this MOA will not or cannot be carried out, that party will immediately consult with the other signatories to attempt to develop an amendment per Stipulation VII above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, FTA may terminate the MOA upon written notification to the other signatories. The regulations at 36 C.F.R. § 800.7 provide supporting information on all termination requirements of this MOA.

SIGNATORIES

FEDERAL TRANSIT ADMINISTRATION

Signature:  _____
Marisol R. Simón, Regional Administrator

Date: September 2, 2015

ADVISORY COUNCIL ON HISTORIC PRESERVATION

Signature: _____
John M. Fowler, Executive Director

Date: _____

ILLINOIS HISTORIC PRESERVATION AGENCY

Signature: _____
Rachel Leibowitz, Deputy State Historic Preservation Officer

Date: _____

Invited signatory:

CHICAGO TRANSIT AUTHORITY

Signature: _____
Carole Morey, Chief Planning Officer

Date: _____

SIGNATORIES

FEDERAL TRANSIT ADMINISTRATION

Signature: _____
Marisol R. Simón, Regional Administrator

Date: _____

ADVISORY COUNCIL ON HISTORIC PRESERVATION

Signature: John M. Fowler
John M. Fowler, Executive Director

Date: 9/28/15

ILLINOIS HISTORIC PRESERVATION AGENCY

Signature: _____
Rachel Leibowitz, Deputy State Historic Preservation Officer

Date: _____

Invited signatory:

CHICAGO TRANSIT AUTHORITY

Signature: _____
Carole Morey, Chief Planning Officer

Date: _____

SIGNATORIES

FEDERAL TRANSIT ADMINISTRATION

Signature: _____
Marisol R. Simón, Regional Administrator

Date: _____

ADVISORY COUNCIL ON HISTORIC PRESERVATION

Signature: _____
John M. Fowler, Executive Director

Date: _____

ILLINOIS HISTORIC PRESERVATION AGENCY

Signature:  _____
Rachel Leibowitz, Deputy State Historic Preservation Officer

Date: 9-1-15

Invited signatory:

CHICAGO TRANSIT AUTHORITY

Signature: _____
Carole Morey, Chief Planning Officer

Date: _____

SIGNATORIES

FEDERAL TRANSIT ADMINISTRATION

Signature: _____
Marisol R. Simón, Regional Administrator

Date: _____

ADVISORY COUNCIL ON HISTORIC PRESERVATION

Signature: _____
John M. Fowler, Executive Director

Date: _____

ILLINOIS HISTORIC PRESERVATION AGENCY

Signature: _____
Rachel Leibowitz, Deputy State Historic Preservation Officer

Date: _____

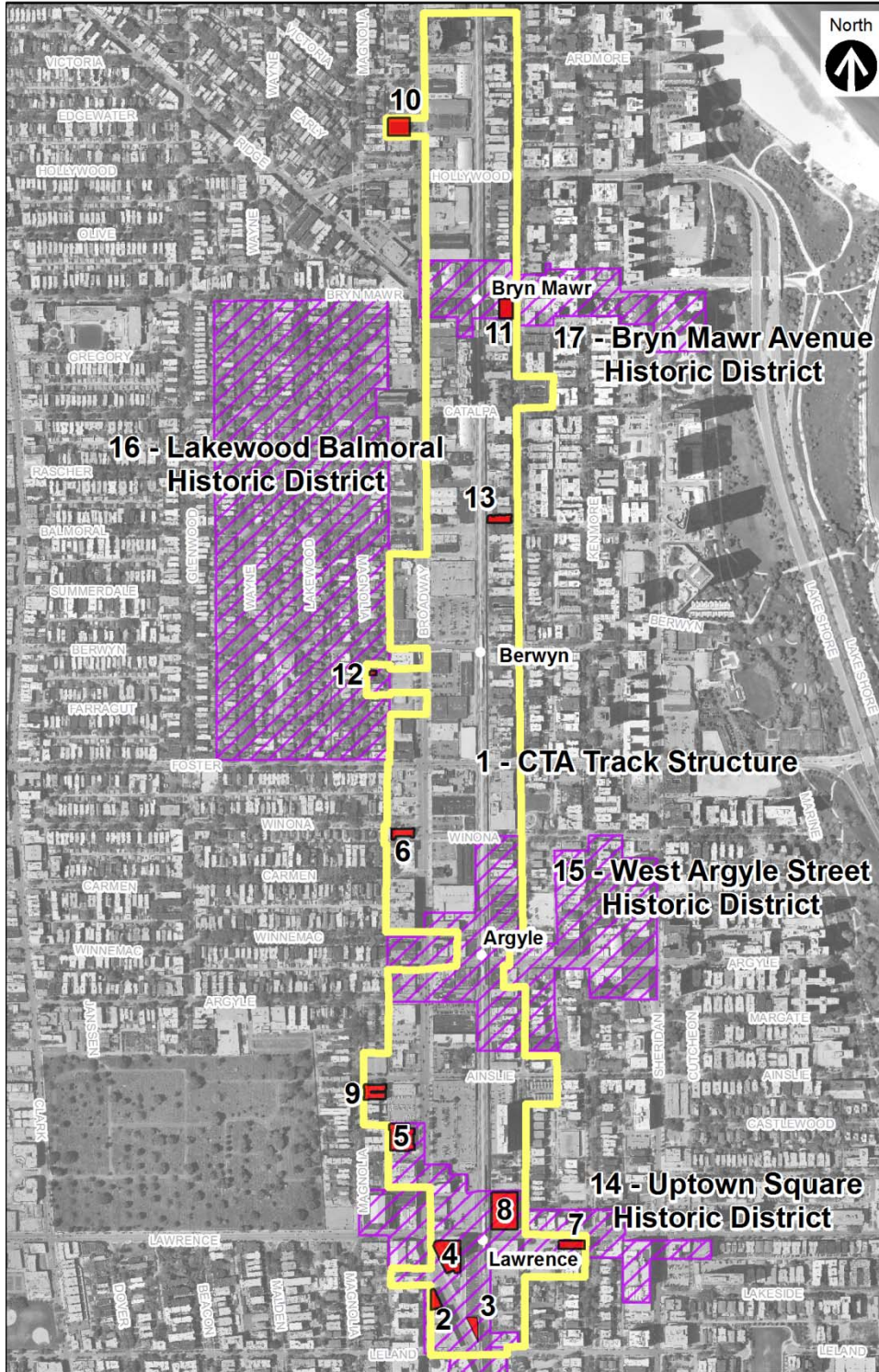
Invited signatory:

CHICAGO TRANSIT AUTHORITY

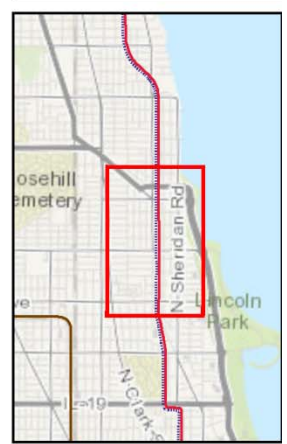
Signature: Carole Morey
Carole Morey, Chief Planning Officer

Date: August 6, 2015

Attachment A
Area of Potential Effect



Inset

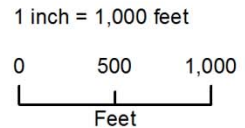


Legend

- Property Eligible for National Register of Historic Places
- Area of Potential Effect Boundary
- National Register of Historic Places Historic District

Lawrence to Bryn Mawr Modernization Project Detailed APE

Scale



LBMM Historic

Attachment B
List of Section 106 Consulting Parties

The State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP) participated in the consultation process for the Project:

Illinois Historic Preservation Agency
ATTN: David Halpin
One Old State Capitol Plaza
Springfield, IL 62701

Advisory Council on Historic Preservation
ATTN: Christopher Wilson
401 F Street NW, Suite 308
Washington, DC 20001-2637

CTA invited a number of organizations to participate as part of the Section 106 process in July 2012. In addition to the SHPO and ACHP mentioned above, the following is a list of those organizations that accepted the invitation to participate as a consulting party.

Chicago Historic Preservation Division
Department of Planning and Development
ATTN: Matt Crawford
121 N. LaSalle St., Room 1101
Chicago, IL 60602

Edgewater Historical Society & Museum
ATTN: LeRoy Blommaert
5358 N Ashland Ave
Chicago, IL 60640

Preservation Chicago
ATTN: Ward Miller
4410 N. Ravenswood
Chicago, IL 60640

Uptown Chicago Commission
ATTN: Cindi Anderson
937 West Lakeside Place
Chicago, IL 60640

Landmarks Illinois
ATTN: Lisa DiChiera
30 N. Michigan Avenue, Suite 2020
Chicago, 60602

Friends of the Parks
ATTN: Cassandra Francis
17 N State Street, Suite 1450
Chicago, IL 60602-3315

Miami Tribe of Oklahoma
ATTN: George Strack
202 S. Eight Tribes Trail
Miami, OK 74354

Uptown Historical Society
ATTN: Martin Tangora
4636 N Magnolia Ave
Chicago, IL 60640