



KAPLAN KIRSCH ROCKWELL

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October 20, 2017
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October 20, 2016

Via electronic filing

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: *Alloy Property Company – Application for Adverse Abandonment – STB Docket
No. AB-1258*

Dear Ms. Brown:

The City of Chicago submits the attached letter in support of the above-referenced adverse abandonment application.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Allison I. Fultz
Counsel for City of Chicago, Illinois

cc: All Parties of Record

Enclosures



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

October 18, 2017

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: Alloy Property Company – Application for Adverse Abandonment – STB Docket
No. AB-1258

Dear Ms. Brown:

Please be advised that the City of Chicago (“City”) supports the application filed on October 11, 2017, by Alloy Property Company (“Alloy”) for adverse abandonment of that portion of Chicago Terminal Railroad’s line lying between the western side of North Elston Avenue and the intersection of N. North Branch and North Halsted Streets in the Goose Island area of Chicago (the “Line”) in the above-captioned proceeding.

The Line runs through the spine of the North Branch Industrial Corridor (“Corridor”), which generally flanks the North Branch of the Chicago River approximately two miles northwest of downtown Chicago. Most of the Line – in fact, all of it lying south of North Avenue – runs in City streets, a vestige of rights granted by City ordinance in 1872. That was a different time in the Corridor, when heavy industry lined the Chicago River and freight rail complemented active marine and vehicular transportation options for the Corridor’s businesses.

The Corridor has significantly changed in recent years, moving away from its heavy industrial roots in response to market forces. Changes in land use over the past quarter-century are illustrated at **Exhibit A**. Recognizing this, the City undertook a year-long intensive planning effort informed by widespread public input. The result is the North Branch Framework Plan adopted by the Chicago Plan Commission in May 2017 (the “Framework Plan”). On July 26, 2017, the Chicago City Council took an initial step toward implementing the recommended changes set forth in the Framework Plan by approving an ordinance establishing the Industrial Corridor System Fund, to address the impacts arising from the conversion of industrial uses to other uses within the defined Conversion Areas. The North Branch Framework Plan and the ordinance are available on the City’s website at:
https://www.cityofchicago.org/city/en/depts/dcd/supp_info/north-branch-industrial-corridor.html.

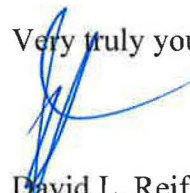
The Framework Plan embraces changes to land use policy within the Corridor to attract innovation and technology-oriented businesses (as opposed to new heavy industrial ones) with the goals of fostering new mixed-use neighborhoods and publicly accessible open space – particularly in the northern and southern portions of the Corridor.

Significantly, the Framework Plan recognizes that freight rail service is no longer needed on this Line to support current businesses or the Corridor's future. The Framework Plan specifically and publicly envisions transformation of the Line and its right of way into a transitway focused on passenger transit, bicycles and pedestrians (see excerpts and exhibits from the Framework Plan attached as **Exhibit B**, which envision as a prime option the “Potential North Branch Ped/Bike Transitway” where the Line sits today). In the northern portion of the Line – including that portion crossing the Chicago River – the Framework Plan similarly envisions as a prime option the conversion of the Line to an extension of the “606” pedestrian and bike trail (see Framework Plan excerpts that reference the “606 trail” extension in the area of the Line, attached as **Exhibit C**).

The City is also concerned about the railroad's recent decisions to use public way portions of the Line for rail car storage. The City demanded that the railroad remove rail tank cars the railroad had placed on the Line in the public way. These unattended tank cars create obstructions that increase safety risks for vehicular, bicycle, and pedestrian traffic. While the railroad recently moved these cars off of the Line and the public way, the City remains concerned that the railroad might attempt such usage in the future, and the City reserves its rights to pursue all legal remedies available to it to cause removal of rail cars from the public way.

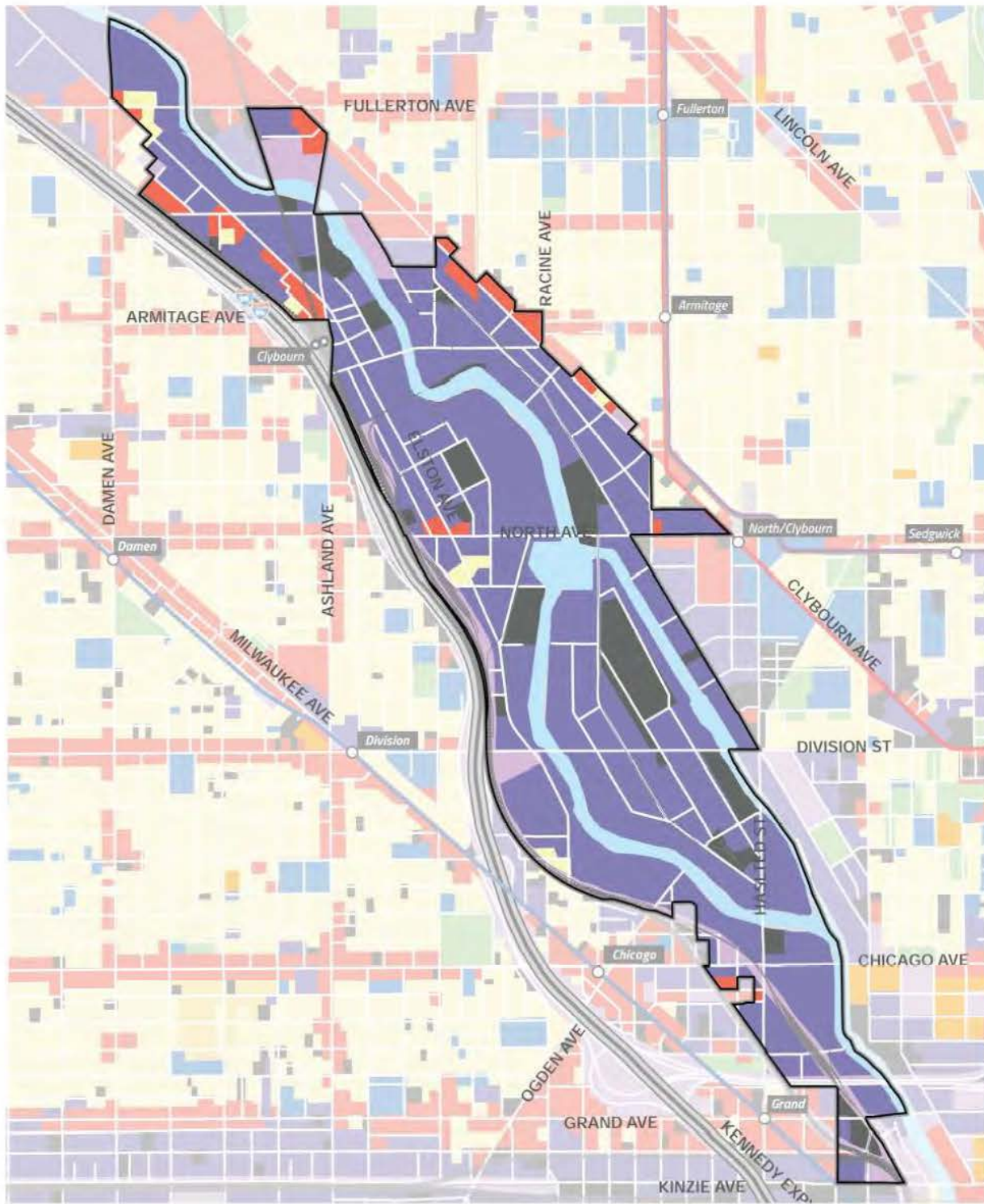
The purpose of this letter is to memorialize in short form what is already encapsulated in the Framework Plan: that freight rail service is not needed on this Line to support the Corridor's businesses or the City's official vision for the Corridor. The City has advised Alloy that it may file a request for public use condition and/or interim trail use in the 45-day period after Alloy's filing of its adverse abandonment application. If the City files such requests, it will provide detailed supporting documentation specific to those filings.

Very truly yours,



David L. Reifman
Commissioner

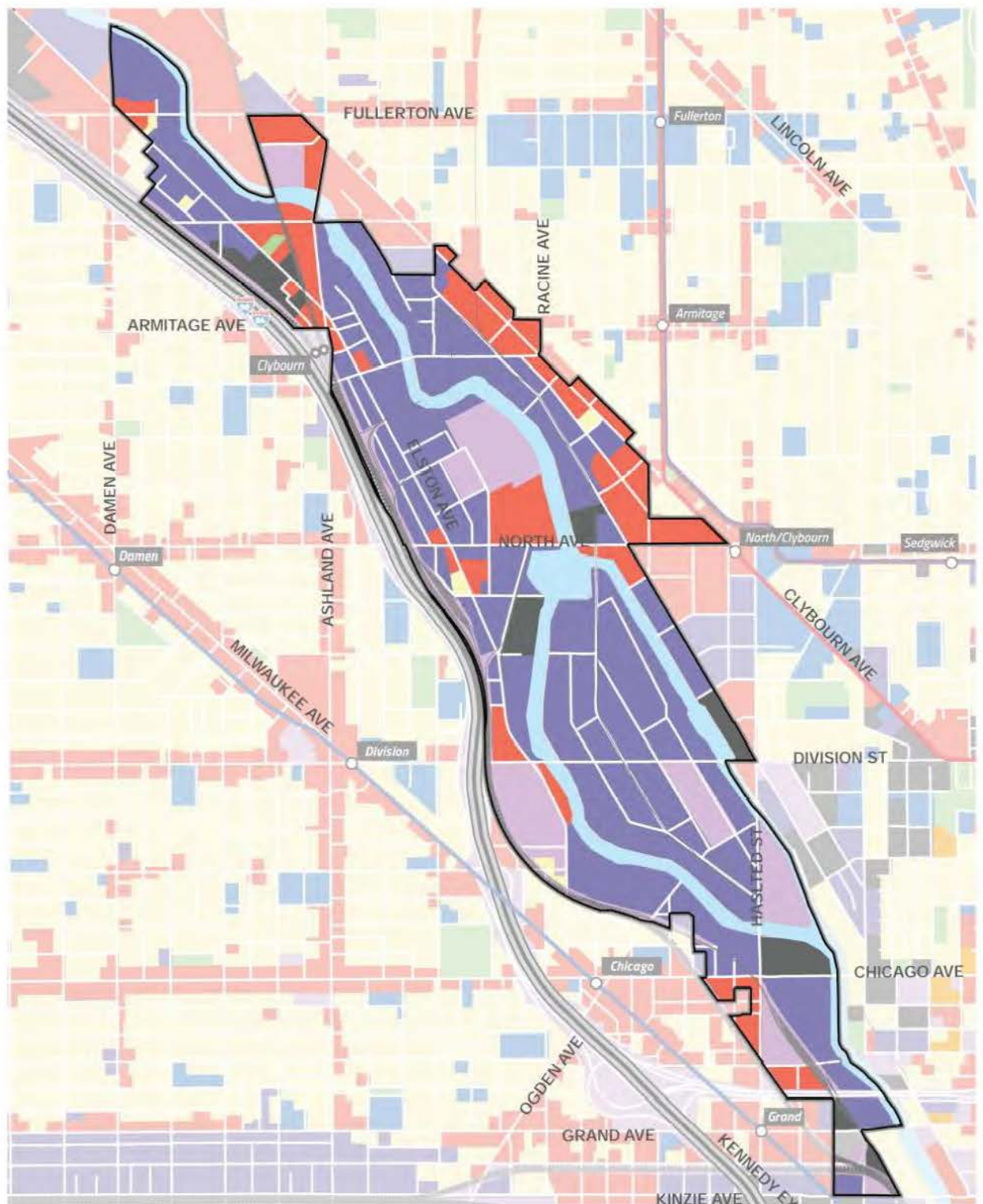
Exhibit A



1990 Land Use

Map Key

- | | | |
|---------------------------|----------------------------------|----------------------|
| Expressway | Residential | Parks and Open Space |
| Metra Line & Station | Commercial | Parking Lots |
| CTA Brown Line & Station | Public Facilities + Institutions | Vacant Land |
| CTA Purple Line & Station | Industrial + Manufacturing | |
| CTA Red Line & Station | Transportation + Utility | |
| CTA Blue Line & Station | | |



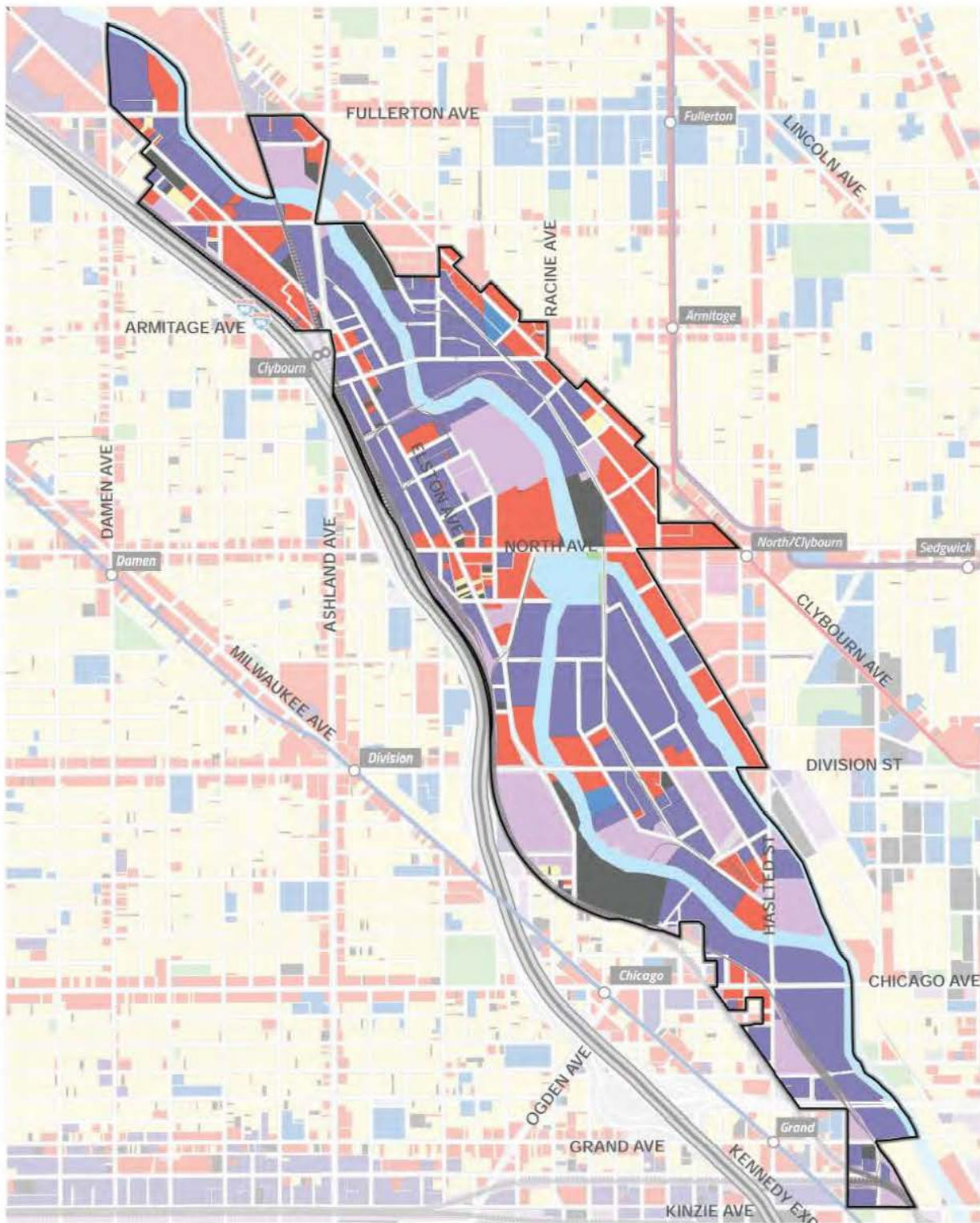
2001 Land Use

Map Key

-  Expressway
-  Metra Line & Station
-  CTA Brown Line & Station
-  CTA Purple Line & Station
-  CTA Red Line & Station
-  CTA Blue Line & Station

-  Residential
-  Commercial
-  Public Facilities + Institutions
-  Industrial + Manufacturing
-  Transportation + Utility

-  Parks and Open Space
-  Parking Lots
-  Vacant Land

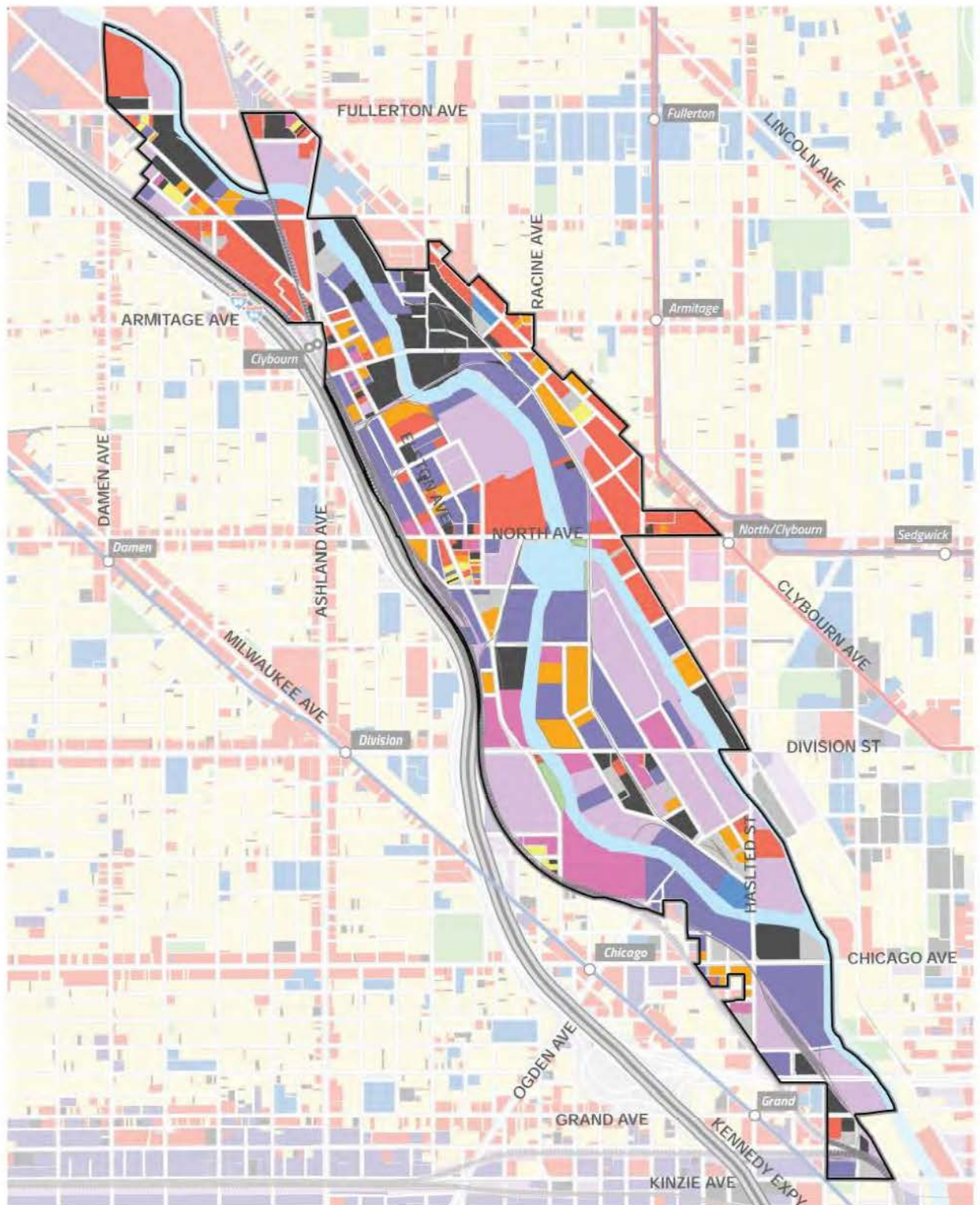


2010 Land Use

Map Key

- Expressway
- Metra Line & Station
- CTA Brown Line & Station
- CTA Purple Line & Station
- CTA Red Line & Station
- CTA Blue Line & Station

- Residential
- Commercial
- Public Facilities + Institutions
- Industrial + Manufacturing
- Transportation + Utility
- Parks and Open Space
- Parking Lots
- Vacant Land



2016 Land Use

Map Key

 Residential	 Transportation + Utility
 Commercial - Office	 Auto Sales + Repair
 Commercial - Retail	 Parks and Open Space
 Public Facilities + Institutions	 Parking Lots
 Industrial + Manufacturing	 Vacant Land

Exhibit B



Principle 2.6 - Concept for Transit-way

Principle 2.5: Manage vehicular traffic and improve circulation by considering increased multi-modal connections in new developments

Potential additional connections can be achieved by extending street networks and providing pedestrian bridges within development sites, depending on location.

Improved multi-modal connections can work collectively to relieve pressure from congested arterials.

Principle 2.6: Assess feasibility of a north-south transitway

A new right-of-way dedicated to transit, pedestrians, and cyclists would provide reliable high-capacity transit service and would create safe and convenient connections to surrounding neighborhood and transit hubs. This transitway would potentially help mitigate traffic congestion and support economic and population growth in the corridor.

This transitway is a complex proposal that would require feasibility and engineering studies to assess the multiple potential alignments that are currently presented as concepts. The development of this concept would have to be refined over the mid and long term.

Principle 2.7: Promote private partnerships to coordinate traffic management options

Developer- and stakeholder-led initiatives at specific development sites can take many forms, such as guaranteed ride home carpool programs, parking pay-outs for non-drivers, dissemination of information via real-time displays, and flexible employee work schedules that consider peak transportation demands, among other options.

The City's Office of Emergency Management and Communication (OEMC) can also help to manage traffic and provide Traffic Control Aides (TCAs) at critical intersections. The deployment of TCAs would require funding, which would have to be provided by property owners as part of Planned Development requirements.



Proposed Improvements Mid Term (5 - 10 years)

Map Key

 Viaduct & Street Projects

 Transitway Route

 Pedestrian Bridges

*All improvements are required to include a study



Proposed Improvements Long Term (10 to 20 years)

Map Key

 Viaduct & Street Projects

 Transitway Route

 Metra Station Redevelopment

*All improvements are required to include a study

Proposed Improvements (short-term)

Webster Bridge Reconstruction

Division Street Bridge Reconstruction Over Canal and River

Division Street Road Reconstruction (Goose Island)

Chicago Bridge Reconstruction

Intelligent Transportation System

Chicago/Halsted Viaduct Reconstruction

Weed St Ped/Bike Bridge

Cortland St. Bridge Reconstruction

Proposed Improvements (mid-term)

Erie St Ped/Bike Bridge

Hobbie St Ped/Bike Bridge

Blackhawk St Ped/Bike Bridge

Clifton/Wabansia Ave Ped/Bike Bridge

606 Extension

Potential Right-of-Way for North/South Ped-, Bike- and Transit-way

Elston Ave. Ped/Bike Bridge

Study Southport Connection to Throop

Proposed Improvements (long-term)

Potential North/South Ped-, Bike- and Transit-way

Viaduct Improvement at

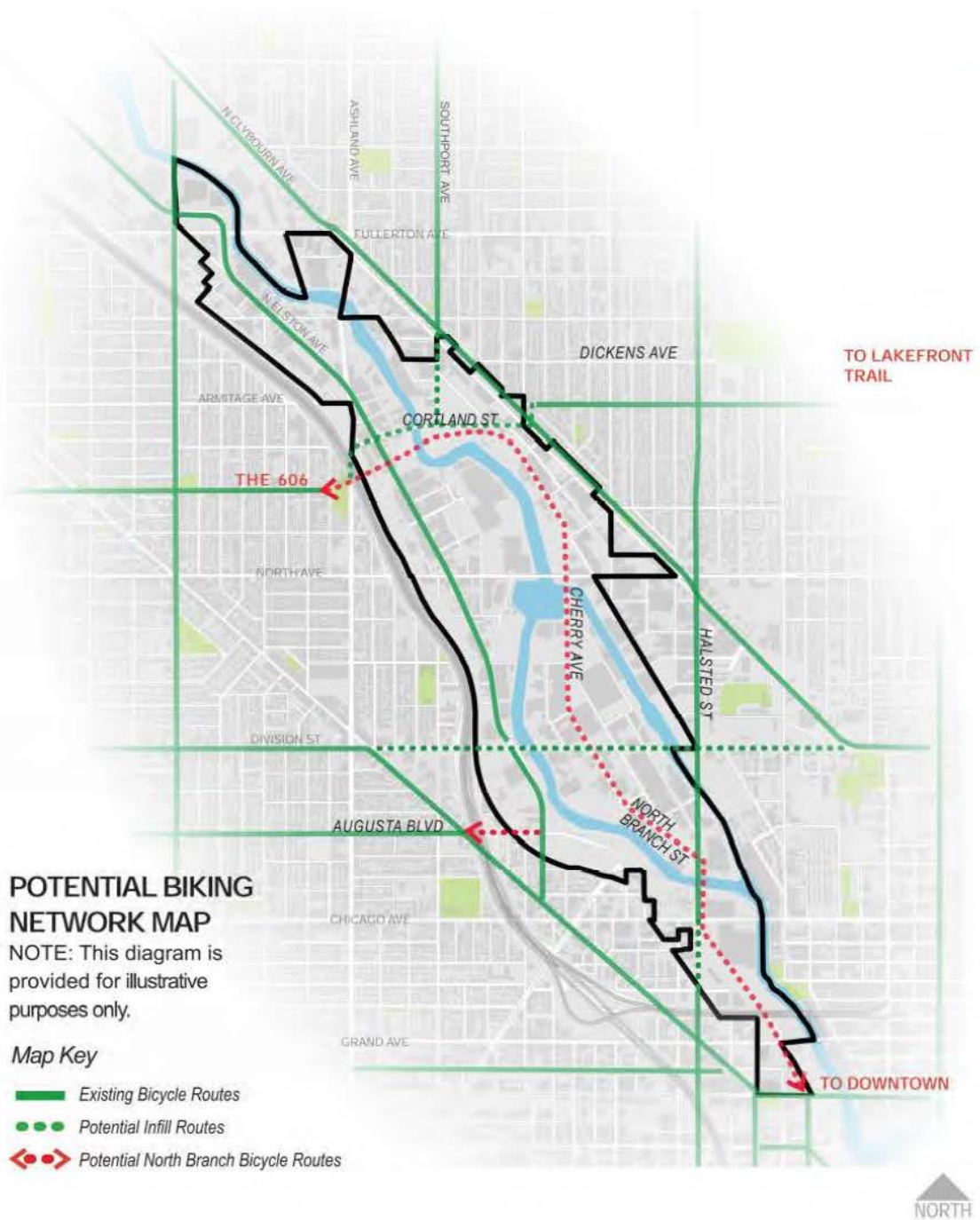
Ashland/Elston/Armitage/Cortland

Clybourn Metra Facility Upgrade

GOAL 2

Principle 2.5: Manage vehicular traffic and improve circulation by considering increased connections

Goal 2 supports all modes of transportation for the corridor. With this in mind, potential new vehicular and pedestrian/bike bridge locations as well as bike routes have been recommended for further study.



GOAL 2

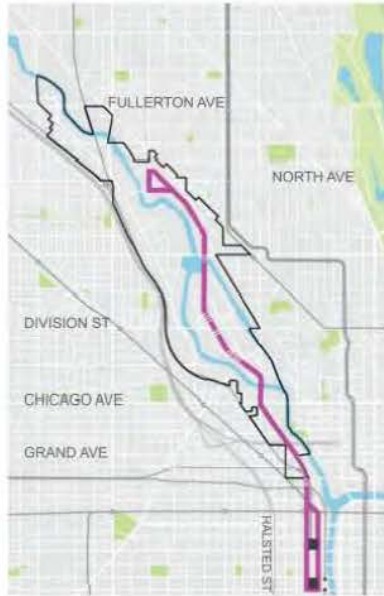
Principle 2.6: Assess feasibility of a north-south transitway

To increase connectivity with the central business district as well as to other transit modes, a north-south transitway is recommended to be further studied. This transitway would largely use existing public rights-of-way and could accommodate high capacity transit, such as bus/BRT or light rail, and bikes. Three different possible configurations were studied for the transitway and it is recommended that a deeper study be conducted for feasibility, engineering and cost. CDOT/CTA/DPD coordination as well as cooperation from private property owners and the railroads would be needed if this is pursued.





THROOP ST CONCEPT



KINGSBURY ST CONCEPT



SOUTHPORT AVE CONCEPT

Exhibit C

PRINCIPLES

Principle 3.1: Integrate a variety of public open spaces that are available year-round, designed for a range of ages and abilities, and enhance the health of the community and workforce

More than 60 acres of new, publicly accessible open space is envisioned for the North Branch through a variety of public and private improvements, primarily along the river and canal. The new spaces should be designed to foster activities like walking, biking, boating, contemplating, relaxing, observing nature, and other pursuits. No less than 10 acres of publicly accessible open space should be created for single-purpose activities like skate parks and athletic fields that cater to nearby residents and workers.

Principle 3.2: Continue the improvement of the riverfront for pedestrians, bicycles and connecting to existing trails

Much of the river edge is visually and physically inaccessible to the public. As corridor land continues to transition, new developments will be minimally required to provide a 30-foot setback from the waterfront to provide for multi-purpose trails, boardwalks and other public spaces. Approximately seven miles of new waterfront trails and walkways could be created over the next 20 years. The three residential areas within the planning area that are currently beyond a 10-minute walk from open space would be within that threshold through trail construction projects.

Principle 3.3: Connect the North Branch Loop Trail to The 606 with an active park near the intersection

A new North Branch trail system would enhance area connectivity between West Town, Logan Square, Lincoln Park and the Near North Side by connecting to the recently completed 606 multi-purpose path that terminates near the corridor's western boundary. The portion of the connection on underutilized land below the Kennedy Expressway could include an active recreational area.



Principle 3.3 - Concepts for 606 Trail Extensions



Short Term 1 to 5 years

Map Key

- North Branch River Trail
- Wetland and Instream Improvement
- Publicly Accessible Open Space within Planned Developments with Potential for Recreational Fields
- 606 Connection to North Branch with Active Park



TERM 5-10 YEARS

Mid Term 5 to 10 years

Map Key

- North Branch River Trail
- Wetland and Instream Improvement
- Publicly Accessible Open Space within Planned Developments with Potential for Recreational Fields
- 606 Connection to North Branch with Active Park



Long Term 10 to 20 years

Map Key

 North Branch River Trail

 Wetland and Instream Improvement

 Publicly Accessible Open Space within Planned Developments with Potential for Recreational Fields

 606 Connection to North Branch with Active Park

GOAL 2

Principle 2.5: Manage vehicular traffic and improve circulation by considering increased connections

Goal 2 supports all modes of transportation for the corridor. With this in mind, potential new vehicular and pedestrian/bike bridge locations as well as bike routes have been recommended for further study.

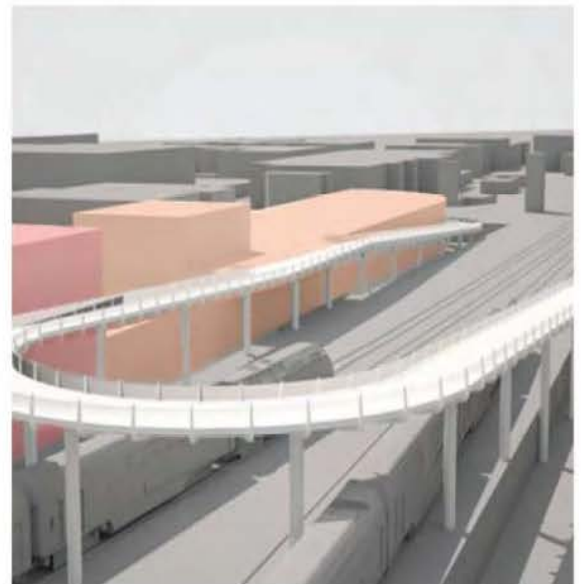


GOAL 3

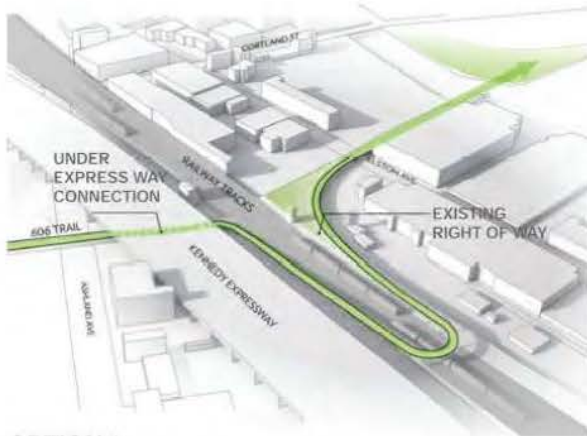
Principle 3.3: Connect the North Branch Loop Trail to the 606 trail with an active park near the intersection

The following diagrams illustrate concepts for connecting the North Branch Loop Trail to the 606, which currently terminates at Ashland Avenue. This connection may require replacing the former bridge over Ashland Avenue, extending the trail under the Kennedy Expressway and continuing east over or around the existing commuter rail tracks. Further engineering analysis is required to address these issues. This concept will be further studied for its feasibility by CDOT and DPD after the adoption of the design guidelines.

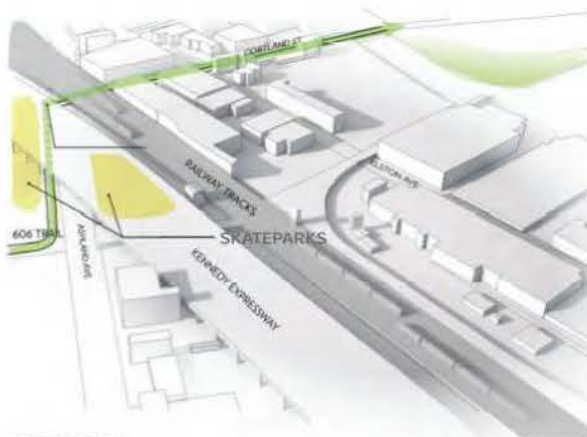
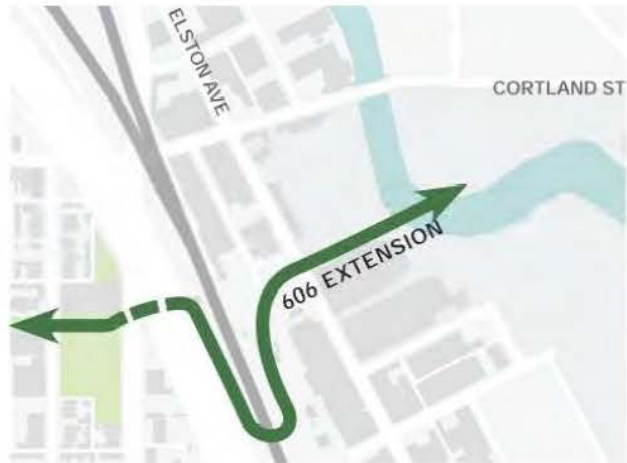
606 EXTENSION STUDIES



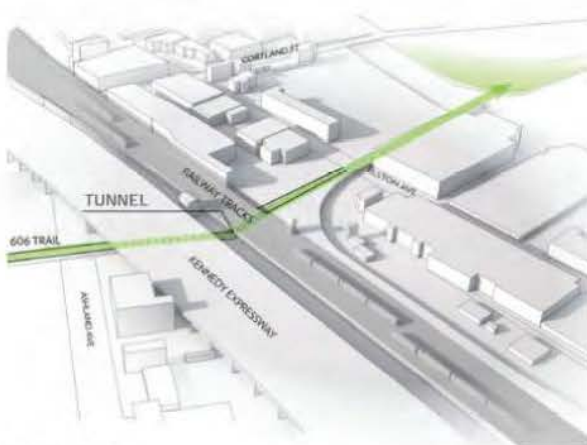
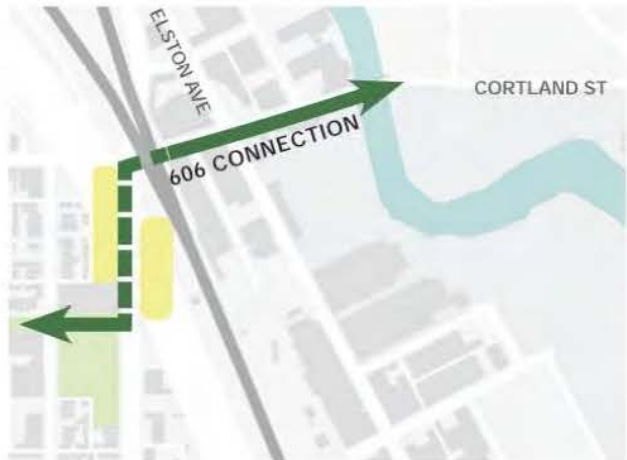
OPTION 1



OPTION 2



OPTION 3



OPTION 4



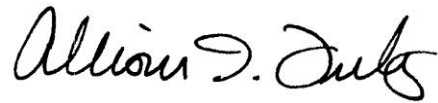
All Images for Illustrative Purposes Only.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served a copy of the foregoing LETTER OF THE CITY OF CHICAGO, IL, IN SUPPORT OF ALLOY PROPERTY COMPANY'S ADVERSE ABANDONMENT APPLICATION, upon the following parties of record in this proceeding by first-class mail with postage prepaid and properly addressed:

John D. Heffner
Strasburger & Price, LLP
1025 Connecticut Ave Nw, Suite 717
Washington, DC 20036-5439

Warren, Matthew
Sidley Austin LLP
1501 K Street N.W.
Washington, DC 20005



Allison I. Fultz

Dated: October 20, 2016