

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
September 1, 2017
Part of
Public Record

STB Docket No. AB-1258

**ALLOY PROPERTY COMPANY, LLC – ADVERSE ABANDONMENT –
CHICAGO TERMINAL RAILROAD IN CHICAGO, IL**

ENVIRONMENTAL AND HISTORIC REPORT

Pursuant to 49 C.F.R. §§ 1105.7 and 1105.8, Alloy Property Company, LLC (“Alloy”) hereby submits this Environmental and Historic Report. The Environmental and Historic Report contains the information required by 49 C.F.R. §§ 1105.7(e) and 1105.8(d), and it is organized to follow the language of those regulations.

I. Environmental Report

Alloy submits the following information required by § 1105.7(e):

(1) *Proposed action and alternatives.*

Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

Alloy proposes to file an application seeking adverse abandonment of the authority of the Chicago Terminal Railroad (“CTR”) to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island,

a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”).

Alloy’s abandonment application will show that abandonment of this unused Line is in the public interest because there is no current need for rail service. Since CTR’s acquisition of the Line, freight service on the Line has rapidly declined to the point where little to no freight has moved over the Line since at least September 2015. CTR has itself admitted that as of September 2016 no traffic had moved over the Line for more than one year.¹ And in fact there are indications that rail service is not possible given the state of disrepair of the Line. For example, vegetation growth around key structures, including a swing bridge that is necessary for access to the Line, suggests that the bridge may not have been capable of swinging into position to accommodate rail operations for some time (and thus that the Line had not been used during that time).² Photographic evidence shows that in August 2015 there was substantial vegetation growth obstructing the area in which the swing bridge would have to turn to allow for rail movement.³ CTR has represented in a legal filing that the bridge was damaged by vandalism and inoperable sometime

¹ See Email from D. Michaud to G. Bellas re: Burgoyne LLC dated September 9, 2016 (noting an “absence of a car load for over a year”), attached as Appendix D to Petition for Partial Waiver of Abandonment Regulations and For Exemption, *Alloy Property Co., LLC – Adverse Abandonment – Chicago Terminal R.R. in Chicago, IL*, STB Docket No. AB-1258 (filed June 1, 2017) (“Petition for Waiver”).

² See Report of Daniel Runyon (Feb. 14, 2017) (showing evidence of trees with five to six years growth in vicinity of swing bridge), attached to Petition for Waiver as Appendix E.

³ See Photos, attached as Appendix F to Petition for Waiver.

before November 9, 2015 and that it had not yet been repaired as of May 8, 2017.⁴

In the wake of recent litigation raising questions about CTR's nonuse of the Line,⁵ it appears that CTR has engaged in some maintenance efforts on the bridge, including trimming the vegetation, and the bridge was opened recently by a CTR maintenance crew. But it is not clear that the bridge has yet been fully restored to a state that could accommodate safe, ongoing regular operations.

There is little prospect of freight traffic being restored, since CTR's legacy freight customers on the Line have disappeared through company closures and property redevelopment. The land use in the area has changed from industrial to high-tech/research and development and office, and is slated to further accommodate retail/residential land uses, changes supported by the City of Chicago.⁶ These changes in land use minimize any possibility that freight rail service will be needed in the future.

⁴ See Defendants Emergency Petition for Temporary Restraining Order at ¶¶ 15-20, *Burgoyne, LLC v. Chicago Term. R.R. Co.*, No 2017 CH 06199 (Circuit Court of Cook County, Illinois) (filed May 8, 2017).

⁵ Specifically, the *Burgoyne* litigation described in the Petition for Waiver at page 8.

⁶ North Branch Framework, City of Chicago Department of Planning & Development, May 2017. See also Press Release, *Mayor Emanuel Announces Plan to Modernize Industrial Corridors* (Apr. 4, 2016), available at https://www.cityofchicago.org/city/en/depts/mayor/press_room/press_releases/2016/march/Mayor-Announces-Modernize-Industrial-Corridors.html. As a key step towards implementing the North Branch Framework Plan, the Chicago City Council passed in July 2017 comprehensive rezonings in the North Branch area that set the stage for the area's large-scale land use changes anticipated by the Plan. See City of Chicago Substitute Ordinance 2017-4840 (passed by the Chicago City Council on July 26, 2017, *Chicago City Council Journal of Proceedings*, July 26, 2017 at 53898, and enacted into law by signature of the Mayor on August 1, 2017).

Furthermore, CTR's actions suggest that it recognizes the unlikelihood of restoring rail service. For example, CTR has agreed to the removal of tracks on portions of the Line and has not objected to the erection of traffic signs in the middle of its tracks. A stop sign has been erected in the middle of the Line, rendering inoperable nearly all of the Line's southern terminus. And CTR has rejected funding to upgrade a grade crossing at North Avenue because of a lack of customers south of that crossing.⁷ These actions all point to a lack of current or future need for rail service on the Line.

Removal of the rail tracks would also improve public safety. Because the Line currently runs through city streets, it impedes traffic, increases public costs of maintaining the streets, and creates a greater risk of injury and property damage to motorists, bicyclists, and pedestrians. In a recent proceeding before the Illinois Commerce Commission, the City of Chicago testified that the tracks cause traffic safety concerns, in part due to motorists seeking to avoid driving over traffic lanes containing the unused rail tracks, resulting in motorists swerving into other lanes of traffic.⁸

The abandonment and removal of the rail line will also advance the redevelopment of properties in the area in accordance with the City's plans and would allow for the development of new publicly accessible open space at the bend

⁷ *Illinois Commerce Commission v. Iowa Pacific Holdings – Chicago Terminal Railway*, Ill. Comm. Comm'n No. T-16-0076, Administrative hearing Oct. 4, 2016, Tr. at 46. Attached to Petition for Waiver as Appendix L.

⁸ *Ill. Comm. Comm'n v. CTR*, Oct 4, 2016 hearing, Tr. at 14-15 (noting that "vehicles as they travel northbound, they will swerve into the center median area or turn area to avoid these northbound lanes").

in the Chicago River currently occupied by the Line's deteriorated river swing bridge. Abandonment of the Line would foster community revival and integration of riverfront access and recreational amenities with the mixed-use neighborhood.

(2) *Transportation system.*

Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

The proposed abandonment will have minimal impact on regional or local transportation systems and patterns, because little to no rail traffic is currently moving over the Line and there is minimal prospect of future rail traffic on the Line. Therefore, there is little to no traffic that would be diverted to other transportation systems or modes. The only effects of the proposed action on regional or local transportation systems or patterns will be to improve street traffic safety by removing unused rail tracks from city streets.

(3) *Land use.*

(3)(i) *Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies.*

The proposed abandonment will be consistent with existing land use plans. In May 2017 the City of Chicago concluded a year-long comprehensive review of land use policies in the area of the Line designed to promote economic growth in this and other areas where traditional industry is no longer the main focus by pursuing land

use policies that accommodate technology, commercial, residential, and retail development.⁹

Consistent with Mayor Emanuel’s goal, the Chicago Plan Commission adopted the North Branch Framework Plan (“Plan”) for the North Branch Industrial Corridor (“Corridor”) on May 18, 2017. The Plan reflects the shift within the Corridor from traditional manufacturing to high tech industry. The Plan also provides strategies for the development of open space and increased transportation options in the area. The original goals of the Plan have been threefold: (1) “Maintain the corridor as an economic engine and vital job center;” (2) “Provide better access for all transportation modes;” (3) “Enhance the area’s unique natural and built assets.”¹⁰ To achieve these goals, the Plan contains Key Recommendations. These include changes to land use policy within the Corridor which should result in the continued attraction of innovation and technology-oriented businesses while relaxing previous restrictions, fostering new mixed-use neighborhoods in the Corridor’s northern and southern sections; incorporating approximately 60 acres of publicly accessible open space, including new trails along the Chicago River; and

⁹ Press Release, *Mayor Emanuel Announces Plan to Modernize Industrial Corridors* (Apr. 4, 2016), available at https://www.cityofchicago.org/city/en/depts/mayor/press_room/press_releases_2016/march/Mayor-Announces-Modernize-Industrial-Corridors.html.

¹⁰ *North Branch Industrial Corridor –Framework Plan and Design Guidelines*, City of Chicago (July 12, 2017), available at https://www.cityofchicago.org/city/en/depts/dcd/supp_info/north-branch-industrial-corridor.html.

implementing over a dozen infrastructure projects, including the development of alternative travel routes for bicyclists and pedestrians.¹¹

On June 15, 2017, Alloy sent letters to the Chicago Department of Planning and Development and the Cook County Department of Planning and Development¹² requesting comments on whether the proposed abandonment is consistent with existing land use plans. As of the date of this Report, Alloy has received no response from these entities.

(3)(ii) *Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land.*

The proposed abandonment will have no effect on any prime agricultural land, because it entirely involves urban property and no prime farmland is in the vicinity. On June 15, 2017, Alloy sent a letter to the National Resources Conservation Service requesting comments on the effect of the proposed abandonment on any prime agricultural land.¹³ As of the date of this Report, Alloy has not received a response.

(3)(iii) *If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by Sec. 1105.9.*

The Illinois Department of Natural Resources, Coastal Management Program confirmed that the proposed abandonment “will not affect any land or water use or

¹¹ North Branch Framework, City of Chicago Department of Planning & Development, May 2017 at 3.

¹² See Exhibit 3 (Letter from M. Warren to D. Reifman); Exhibit 4 (Letter from M. Warren to S. Campbell).

¹³ See Exhibit 5 (Letter from M. Warren to I. Dozier).

natural resource of the coastal zone” and thus that a “Federal Consistency Determination will not be required.”¹⁴

- (3)(iv) *If the proposed action is an abandonment, state whether or not the right-of-way is suitable for alternative public use under 49 U.S.C. 10906 and explain why.*

The right-of-way is not suitable for alternative public use, given that much of the railroad right-of-way is already located in existing public right of way on city streets and sidewalks.

(4) Energy.

- (4)(i) *Describe the effect of the proposed action on transportation of energy resources.*

The proposed abandonment will have no effect on the transportation of energy resources, because the Line carries little to no rail traffic.

- (4)(ii) *Describe the effect of the proposed action on recyclable commodities.*

The proposed abandonment will have no effect on the transportation of recyclable commodities, because the Line carries little to no rail traffic.

- (4)(iii) *State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why.*

The proposed abandonment will have no effect on overall energy efficiency. The Line carries little to no rail traffic, and therefore minimal traffic increases, decreases, or diversions will result from the proposed abandonment.

- (4)(iv) *If the proposed action will cause diversions from rail to motor carriage of more than: (A) 1,000 rail carloads a year; or (B) An average of 50 rail carloads per mile per year for any part of the affected line, quantify the resulting net change in energy consumption and show the data and methodology used to arrive at*

¹⁴ See Exhibit 6 (Letter from J. Casey to M. Warren).

the figure given. To minimize the production of repetitive data, the information on overall energy efficiency in Sec. 1105.7(e)(4)(iii) need not be supplied if the more detailed information in Sec. 1105.7(e)(4)(iv) is required.

No response is necessary, because the Line carries little to no rail traffic and minimal diversions from rail to motor carriage will occur as a result of the proposed abandonment.

(5) Air.

- (5)(i) *If the proposed action will result in either: (A) An increase in rail traffic of at least 100 percent (measured in gross ton miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or (B) An increase in rail yard activity of at least 100 percent (measured by carload activity), or (C) An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49 U.S.C. 10901 (or 10505) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in subsection (5)(i)(A) will apply.*

No response is necessary, because the Line carries little to no rail traffic. The proposed abandonment will cause no increase in rail traffic or rail yard activity, and at most an insignificant increase in truck traffic.

- (5)(ii) *If the proposed action affects a class I or nonattainment area under the Clean Air Act, and will result in either: (A) An increase in rail traffic of at least 50 percent (measured in gross ton miles annually) or an increase of at least three trains a day on any segment of rail line, (B) An increase in rail yard activity of at least 20 percent (measured by carload activity), or (C) An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under 49 U.S.C. 10901 (or 49 U.S.C. 10505), or a case involving the reinstitution of service over a previously abandoned line, only the three train a day threshold in this item shall apply.*

No response is necessary, because the Line carries little to no rail traffic. The proposed abandonment will cause no increase in rail traffic or rail yard activity, and at most an insignificant increase in truck traffic.

- (5)(iii) *If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify: the materials and quantity; the frequency of service; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills; and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.*

No response is necessary, because the Line carries little to no rail traffic and no transportation of ozone depleting materials is contemplated.

(6) Noise.

If any of the thresholds identified in item (5)(i) of this section are surpassed, state whether the proposed action will cause: (i) An incremental increase in noise levels of three decibels Ldn or more; or (ii) An increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed.

No response is necessary, because the Line carries little to no rail traffic. The proposed abandonment will cause no increase in rail traffic or rail yard activity, and at most an insignificant increase in truck traffic.

(7) Safety.

- (7)(i) *Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings).*

Currently, the Line runs through city streets, which impedes traffic, increases public costs of maintaining the streets, and creates risk of injury and

property damage to motorists, bicyclists, and pedestrians. The Line has created safety hazards for motorists who swerve into oncoming traffic to avoid driving in lanes containing the rail tracks.¹⁵ Removal of the tracks would improve public safety by removing the existing hazard in the roadway, thus making use of the roads safer for motorists, pedestrians, and bicyclists.

- (7)(ii) *If hazardous materials are expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accidental release of hazardous materials.*

No hazardous materials are expected to be transported as a result of the proposed abandonment.

- (7)(iii) *If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and the types of hazardous materials involved.*

Alloy is aware of the existence of hazardous materials along the Line in the vicinity of the Swing Bridge (as hereinafter defined). Materials identified at this location include fuel oil, polynuclear aromatic hydrocarbons (PNAs), benzene, and total petroleum hydrocarbon (TPH) concentrations. Remediation of the property

¹⁵ *Ill. Comm. Comm'n v. CTR*, Oct 4, 2016 hearing, Tr. at 14-15 (noting that “vehicles as they travel northbound, they will swerve into the center median area or turn area to avoid these northbound lanes”); *see also* Order, *Ill. Comm. Comm'n v. Iowa Pac. Holdings – Chicago Terminal Ry.*, Docket No. T14-0075 (Dec. 9, 2015) at 1 (noting that “damaged rubber crossing surface panels [and] the settlement of the track [along North Avenue and Division Street imposed] subsequent impacts to motorists and their vehicles”).

would require removal of the rail tracks to access the soil below. Alloy is not aware of the existence of hazardous materials waste sites or spills in other areas of the right-of-way.

(8) Biological resources.

- (8)(i) *Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects.*

The proposed abandonment is not likely to adversely affect endangered or threatened species or areas designated as a critical habitat. On June 15, 2017, Alloy sent a letter to the U.S. Fish and Wildlife Service requesting comments on whether the proposed abandonment is likely to adversely affect endangered or threatened species or areas designated as a critical habitat.¹⁶ On August 3, 2017, the agency informed Alloy that it has “no concerns about impacts to Federally listed species in the proposed abandonment area or within the immediate vicinity.”¹⁷

- (8)(ii) *State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.*

The proposed abandonment will not affect wildlife sanctuaries or refuges or any National or State parks. The area traversed by the Line does not contain any wildlife sanctuaries or refuges or any National or State parks. On June 15, 2017, Alloy sent a letter to the National Park Service requesting comments on whether the proposed abandonment is likely to affect wildlife sanctuaries or refuges or

¹⁶ See Exhibit 7 (Letter from M. Warren to T. Melius).

¹⁷ See Exhibit 14 (Email from S. Cirton to M. Warren).

National or State parks or forests.¹⁸ As of the date of this Report, Alloy has not received a response.

(9) Water.

- (9)(i) *Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies.*

The proposed abandonment will be consistent with applicable Federal, State, and local water quality standards. Neither the Illinois Department of Natural Resources, Coastal Management Program nor the Illinois EPA identified any concerns with the proposed abandonment in response to Alloy's inquiries.¹⁹

- (9)(ii) *Based on consultation with the U.S. Army Corps of Engineers, state whether permits under section 404 of the Clean Water Act (33 U.S.C. 1344) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects.*

Alloy believes that permits under section 404 of the Clean Water Act are not required for the proposed abandonment. The proposed abandonment will not affect any designated wetlands or 100-year flood plains. On June 15, 2017, Alloy sent a letter to the U.S. Army Corps of Engineers requesting any comments on whether the proposed abandonment would require permits under section 404 of the Clean Water Act or would affect any designated wetlands or 100-year flood plains.²⁰ As of the date of this Report, Alloy has not received a response.

¹⁸ See Exhibit 8 (Letter from M. Warren to C. Sholly).

¹⁹ See Exhibit 6 (Letter from J. Casey to M. Warren); Exhibit 9 (Letter from A. Messina to M. Warren).

²⁰ See Exhibit 10 (Letter from M. Warren to C. Drew).

- (9)(iii) *State whether permits under section 402 of the Clean Water Act (33 U.S.C. 1342) are required for the proposed action. (Applicants should contact the U.S. Environmental Protection Agency or the state environmental protection or equivalent agency if they are unsure whether such permits are required.)*

Alloy believes that permits under section 402 of the Clean Water Act are not required for the proposed abandonment. On June 15, 2017, Alloy sent a letter to the U.S. Environmental Protection Agency requesting comments on whether the proposed abandonment would require permits under section 402 of the Clean Water Act.²¹ As of the date of this Report, Alloy has not received a response. The Illinois Environmental Protection Agency has advised Alloy that the Agency has no objections to the proposed abandonment, but that “if one or more acres of land are disturbed during abandonment, a construction site activity stormwater NPDES permit will be required from the Division of Water Pollution Control.”²² Alloy agrees to obtain the required permit from the Division of Water Pollution Control if it is necessary.

(10) *Proposed Mitigation.*

Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.

Mitigation is not necessary, because there are no adverse effects to mitigate.

(11) *Additional Information for Rail Constructions.*

Subsection (11) of § 1105.8(c) is not applicable to proposed abandonments.

* * * * *

²¹ See Exhibit 11 (Letter from M. Warren to R. Kaplan).

²² See Exhibit 9 (Letter from A. Messina to M. Warren).

In addition to the consultations identified above, Alloy consulted with the Federal and State bodies required pursuant to 49 C.F.R. § 1105.7(b). Alloy received certain additional information in response to those consultation efforts.

The National Oceanic & Atmospheric Administration (“NOAA”) informed Alloy that according to the National Geodetic Survey (“NGS”), approximately 3 geodetic survey marks may be located in the area of the right of way.²³ Alloy agrees to consult with NGS at least 90 days prior to the beginning of any salvage activities that will disturb or destroy any geodetic station marks.

II. Historic Report

Alloy submits the following information required by § 1105.8(d):

- (1) *A U.S.G.S. topographic map (or an alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older and are part of the proposed action;*

The required topographic map is attached to this Report as Exhibit 1.

- (2) *A written description of the right-of-way (including approximate widths, to the extent known), and the topography and urban and/or rural characteristics of the surrounding area;*

The remaining portions of the C&E and Bloomingdale lines originate at the Union Pacific Railroad’s North Avenue Yard and proceed east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the Goose Island district of Chicago. The right-of-way is situated in an urban area that has

²³ See Exhibit 12 (Response from NOAA).

experienced significant land use changes in recent years. The area was industrial in character, but is in the process of being redeveloped into high-tech/research and development, office and future retail/residential land use.

The right-of-way runs generally along the eastern bank of the North Branch of the Chicago River, through portions of private property and in public streets. Operations over private property are permitted by easement or trackage rights agreement, including easements permitting operations along the North Branch of the Chicago River, terminating at a swing bridge over the river. The portion of the right-of-way east of the Chicago River and through Goose Island runs predominantly through and along city streets.

The line includes three bridges, (1) the aforementioned swing bridge, which is a 118-year old swing bridge over the Chicago River (“Swing Bridge”); (2) the Cherry Avenue Bridge, which is owned by the City of Chicago; and (3) a highway bridge over Elston Avenue. The Swing Bridge provided access across the North Branch of the Chicago River, just south of W. Cortland Street, when it was operational. However, the Swing Bridge was damaged by vandalism and inoperable sometime before November 9, 2015 and had not yet been repaired as of May 8, 2017.²⁴ The bridge was opened recently by a CTR maintenance crew, but it is not clear that the bridge has yet been fully restored to a state that could accommodate safe, ongoing regular operations.

²⁴ See Defendants Emergency Petition for Temporary Restraining Order at ¶¶ 15-20, *Burgoyne, LLC v. Chicago Term. R.R. Co.*, No 2017 CH 06199 (Circuit Court of Cook County, Illinois) (filed May 8, 2017).

The Cherry Avenue Bridge crosses the North Branch of the Chicago River near W. North Avenue and N. Kingsbury Street to provide access to Goose Island. The Cherry Avenue Bridge is approximately 66 feet wide and 240 feet long. The Cherry Avenue Bridge was acquired by the City of Chicago from CTR in a transaction through which CTR retained an easement to provide rail service over the bridge. *See City of Chicago—Petition for Declaratory Order—Cherry Avenue Bridge*, STB Fin. Docket No. 35154 (Aug. 4, 2008). CTR is no longer serving shippers by running trains over the bridge. The City also installed a walkway for pedestrian and non-vehicle traffic. *See id.* at 4. Because the City owns the Cherry Avenue Bridge, abandonment of the Line would not affect the status of the bridge.

- (3) *Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area;*

Attached to this Report as Exhibit 2 are photographs of the Line and the immediate surrounding area. Exhibit 2 includes photographs of the three railroad structures on the Line: the Swing Bridge; the Cherry Avenue Bridge; and the highway bridge over Elston Avenue.

- (4) *The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent such information is known;*

Alloy does not possess independent information about the dates of construction of the railroad structures on the Line. However, Historic American Engineering Records are available for the Cherry Avenue Bridge and the Swing Bridge. According to these records, the Cherry Avenue Bridge was constructed in 1901-02. It was most recently modified in 2006 after the City's acquisition of the

bridge; this modification added a pedestrian walkway. The Swing Bridge was constructed in 1898-99.

- (5) *A brief narrative history of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action;*

The Line was owned and operated by the Chicago, Milwaukee, St. Paul and Pacific Railroad Company (“Milwaukee Road”). Following the Milwaukee Road’s bankruptcy, CMC Heartland Partners (“CMC”) became the corporate successor of the reorganized debtor Milwaukee Road in 1984. The Line was operated by Soo Line Railroad Company (“Soo”) pursuant to ICC Service Order No. 1500 (ICC served Jan. 17, 1986) and a trackage rights agreement between CMC and Soo. *See Soo Line R.R. Co. – Trackage Rights Exemption – CMC Heartland Partners*, STB Docket No. 32847 (served Mar. 11, 1997). CTR acquired the Line in 2006. *See Chicago Terminal R.R. – Acquisition and Operation Exemption – Soo Line R.R. Co. d/b/a Canadian Pac. Ry.*, STB Docket No. 34968 (served Dec. 22, 2006).

The proposed action would result in abandonment of the Line and no further rail service would be offered.

- (6) *A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic;*

Alloy does not have any documents in its possession related to the structures on the Line. Some documents are in the public record, including Historic American Engineering Records for the Cherry Avenue Bridge and the Swing Bridge.

- (7) *An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 CFR 60.4),*

and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies or universities);

For the following reasons, Alloy does not believe that any structure in the area of the Line meets the criteria for listing on the National Register of Historic Places. To Alloy's knowledge, none of the bridges on the Line are "associated with events that have made a significant contribution to the broad patterns of our history," nor are they "associated with the lives of persons significant in our past." 36 C.F.R. § 60.4. Neither the Swing Bridge nor any other structure "embod[ies] the distinctive characteristics of a type, period, or method of construction," represents "the work of a master or . . . possess high artistic values," or otherwise "represent[s] a significant and distinguishable entity." *Id.* Nor is any structure on the Line "likely to yield information important in prehistory or history." *Id.*

The Illinois Historic Preservation Agency ("IHPA") responded to Alloy's request for comment on the proposed abandonment on July 6, 2017.²⁵ The Agency stated that it has determined that the Swing Bridge is eligible for listing on the National Register of Historic Places on the grounds of its "long association for commerce and the movement of commodities in Chicago" and "its architectural and engineering attributes." Alloy will consult with IHPA about the basis for its determination and whether mitigation measures may be appropriate.

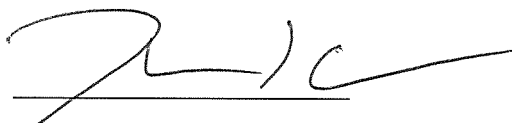
²⁵ See Exhibit 13 (Letter from R. Leibowitz to M. Warren)

Alloy does not believe that there is a likelihood of archeological resources or other previously unknown historic properties in the area of the Line. IHPA's response did not identify any such unknown resources or properties.²⁶

- (8) *A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic wastes), and the surrounding terrain.*

Alloy has no knowledge of any prior subsurface ground disturbance or fill or environmental conditions that might affect the archaeological recovery of resources and the surrounding terrain.

Respectfully submitted,



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Dated: September 1, 2017

²⁶ See *id.*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of September 2017, I caused the foregoing Environmental and Historic Report to be served by First Class Mail or more expedient method on the following:

John D. Heffner
Strasburger & Price LLP
1025 Connecticut Ave., NW, Suite 717
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69 West Washington Street, Suite 2900
Chicago, IL 60602

Alec Messina, Director
Illinois Environmental Protection
Agency
P.O. Box 19276
Springfield, IL 62794-9276

James P. Casey
Federal Consistency Coordinator
Illinois Department of Natural
Resources
Coastal Management Program
160 N. LaSalle Street, Suite S-703
Chicago, IL 60601

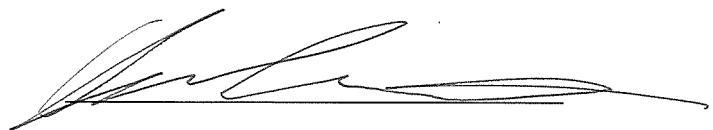
Cam Sholly, Regional Director
National Park Service – Midwest
Region
601 Riverfront Drive
Omaha, NE 68102-4226

Juliana P. Blackwell, Director
National Geodetic Survey, NOAA
1315 East-West Highway
Silver Spring, MD 20910-3282

Col. Christopher T. Drew,
Commander and District Engineer
U.S. Army Corps of Engineers
Chicago District (CELRC-PA)
231 South LaSalle Street, Suite 1500
Chicago, IL 60604

Tom Melius, Midwest Regional Director
U.S. Fish and Wildlife Service – Region
3
5600 American Blvd. West, Suite 990
Bloomington, MN 55437

Robert Kaplan, Acting Regional
Administrator
Environmental Protection Agency –
Region 5
Metcalf Building
Office of Strategic Environmental
Analysis
77 West Jackson Boulevard
Chicago, IL 60604

A handwritten signature in black ink, appearing to read 'Hanna Chouest', with a long horizontal flourish extending to the right.

Hanna Chouest

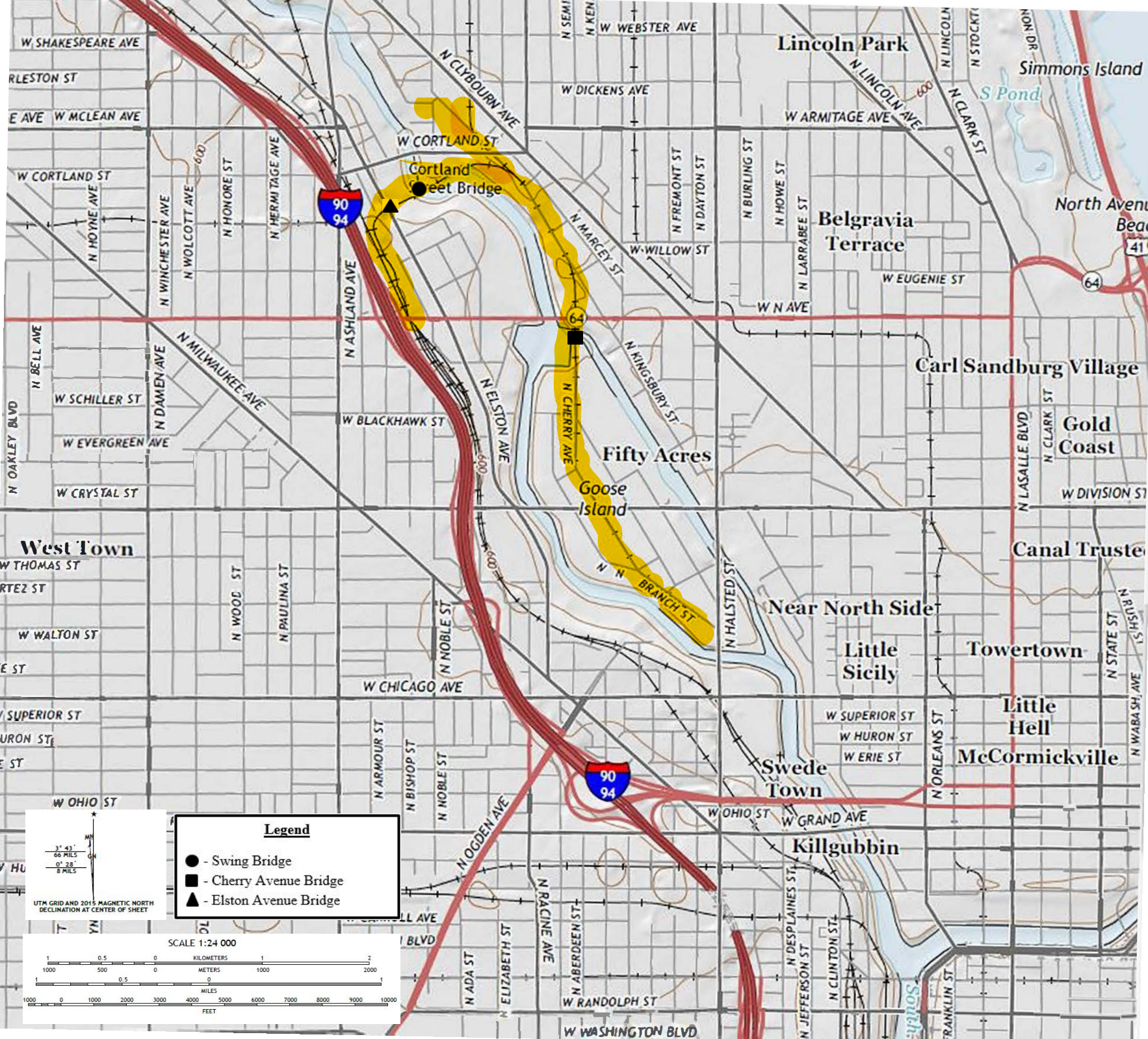


EXHIBIT 2



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mjwarren@sidley.com
 +1 202 736 8996

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FOUNDED 1866

June 15, 2017

David L. Reifman, Commissioner
 Department of Planning and Development
 City of Chicago
 121 North LaSalle Street, 10th Floor
 Chicago, IL 60602

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Commissioner Reifman:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

Alloy believes that the Line should be abandoned, because CTR is no longer providing rail service on the remaining portion of Line and prior rail customers have left the area as a result of company closures and property redevelopment.

Abandonment of rail operations on the Line requires STB approval, and the STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. Alloy does not believe that the proposed abandonment will result in any adverse impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issue:



David L. Reifman, Commissioner
Department of Planning and Development
City of Chicago
Page 2

- Whether the proposed action is consistent with existing land use plans.

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

Please send your reply to Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

A handwritten signature in blue ink, appearing to read "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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 1501 K STREET, N.W.
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FOUNDED 1866

June 15, 2017

Susan M. Campbell, Director
 Department of Planning and Development
 Cook County
 69 West Washington Street, Suite 2900
 Chicago, IL 60602

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Director Campbell:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

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Susan M. Campbell, Director
Department of Planning and Development
Page 2

- Whether the proposed abandonment is consistent with existing land use plans.

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

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Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

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Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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June 15, 2017

Ivan Dozier, State Conservationist
 National Resources Conservation Service
 USDA
 2118 West Park Court
 Champaign, IL 61821

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Mr. Dozier:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

Alloy believes that the Line should be abandoned, because CTR is no longer providing rail service on the remaining portion of Line and prior rail customers have left the area as a result of company closures and property redevelopment.

Abandonment of rail operations on the Line requires STB approval, and the STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. Alloy does not believe that the proposed abandonment will result in any adverse environmental impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issue:

- The effect of the proposed abandonment on any prime agricultural land.



Ivan Dozier, State Conservationist
National Resources Conservation Service
Page 2

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

Please send your reply to Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. J. Warren", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



Bruce Rauner, Governor • Wayne A. Rosenthal, IDNR Director
Diane Tecic, Coastal Management Program Director

160 N. LaSalle Street, Suite S-703 • Chicago, Illinois 60601
www.dnr.illinois.gov/cmp

June 24, 2017

Matthew J. Warren
Sidley Austin LLP
1501 K Street, NW
Washington, DC 20005

RE: IFC2017014; STB Docket No. AB-1258, Alloy Property Company, LLC – Adverse
Abandonment – Chicago Terminal Railroad in Chicago, IL

Dear Mr. Warren,

In response to the letter dated June 15, 2017 seeking comments on the above referenced rail line abandonment in Chicago, Illinois. Rail line abandonments are not listed in the Illinois Coastal Management Program Plan (ICMP) as an activity that will affect any land or water use or natural resource of the coastal zone. Therefore, an ICMP Federal Consistency Determination will not be required.

If you have any questions, feel free to contact me at (312) 793-5947 or
james.casey@illinois.gov.

Sincerely,

James P. Casey
Federal Consistency Coordinator



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FOUNDED 1866

June 15, 2017

Tom Melius, Midwest Regional Director
 U.S. Fish and Wildlife Service – Region 3
 5600 American Blvd. West, Suite 990
 Bloomington, MN 55437

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse
 Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Director Melius:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

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Abandonment of rail operations on the Line requires STB approval, and the STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. Alloy does not believe that the proposed abandonment will result in any adverse environmental impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issues:

- Whether the proposed abandonment is likely to adversely affect endangered or threatened species or areas designated as a critical habitat and, if so, please describe such effects;



Tom Melius, Midwest Regional Director
U.S. Fish and Wildlife Service – Region 3
Page 2

- Whether wildlife sanctuaries or refuges, National or State parks or forests will be affected and, if so, please describe such effects.

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

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Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

A handwritten signature in blue ink, appearing to read "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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 1501 K STREET, N.W.
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June 15, 2017

Cam Sholly, Regional Director
 National Park Service – Midwest Region
 601 Riverfront Drive
 Omaha, NE 68102-4226

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Director Sholly:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

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- Whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and what such effects might be.



Cam Sholly, Regional Director
National Park Service – Midwest Region
Page 2

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

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Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

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Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

July 6, 2017

Matthew J. Warren
Sidley Austin LLP
1501 K Street, NW
Washington, DC 20005

RE: Alloy Property Company, LLC

Dear Mr. Warren:

The Agency has no objections to the proposed railway abandonment; however, if one or more acres of land are disturbed during abandonment, a construction site activity stormwater NPDES permit will be required from the Division of Water Pollution Control. Disturbance of soil is considered to be any clearing, grading or excavation activities.

Please be advised that any solid or hazardous waste must be properly disposed of or recycled.

Cordially,

A handwritten signature in cursive script that reads "Alec Messina".

Alec Messina
Director



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 1501 K STREET, N.W.
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June 15, 2017

Col. Christopher T. Drew, Commander and District Engineer
 U.S. Army Corps of Engineers
 Chicago District (CELRC-PA)
 231 South LaSalle Street, Suite 1500
 Chicago, IL 60604

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse
 Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Col. Drew:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

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Abandonment of rail operations on the Line requires STB approval, and the STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. Alloy does not believe that the proposed abandonment will result in any adverse environmental impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issues:

- Whether permits under section 404 of the Clean Water Act (33 U.S.C. § 1344) are required for the proposed abandonment;



Col. Christopher T. Drew, Commander and District Engineer
U.S. Army Corps of Engineers
Page 2

- Whether any designated wetlands or 100-year flood plains will be affected, and please describe any such effects.

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

Please send your reply to Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

A handwritten signature in blue ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

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June 15, 2017

Robert Kaplan, Acting Regional Administrator
 Environmental Protection Agency – Region 5
 Metcalf Building
 Office of Strategic Environmental Analysis
 77 West Jackson Boulevard
 Chicago, IL 60604

Re: STB Docket No. AB-1258, *Alloy Property Company, LLC – Adverse Abandonment – Chicago Terminal Railroad in Chicago, IL*

Dear Administrator Kaplan:

The purpose of this letter is to advise you that Alloy Property Company, LLC (“Alloy”) plans to file an application with the Surface Transportation Board (“STB”) seeking abandonment of the Chicago Terminal Railroad’s (“CTR”) authority to operate over the remaining portions of the “C&E” and “Bloomington” lines in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east and south to Goose Island, a distance of approximately 2.875 miles in Chicago, Cook County, Illinois to a terminus near the intersection of Chicago Avenue and Halsted Street in the “Goose Island” district of Chicago (the “Line”). A map of the Line is attached to this letter.

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Robert Kaplan, Acting Regional Administrator
Environmental Protection Agency – Region 5
Page 2

- Any potential adverse environmental effects of the proposed abandonment on the surrounding area;
- The location of any known hazardous materials spills on the right-of-way of the Line, and list the types of hazardous materials involved;
- Whether permits under section 402 of the Clean Water Act (33 U.S.C. §1342) are required for the proposed abandonment.

Alloy will provide a preliminary environmental report in the coming weeks that will outline the scope of the proposed project and that will include any comments received from your office. We can send this draft report either by mail or electronically; please contact me at 202-736-8996 or mjwarren@sidley.com if you would like to receive the report electronically.

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Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment

From: Simon Monroe
To: [Warren, Matthew J.](#)
Cc: [SURFACE TRANSPORTATION BOARD](#); [Christine Gallagher](#); [Simon Monroe](#)
Subject: NGS Response, STB Docket AB-1258
Date: Monday, June 19, 2017 4:43:32 PM

> -----
 > Thank you for sharing your railroad abandonment environmental report for
 > CHICAGO, Cook County, ILLINOIS.
 >
 > Approximately 03 geodetic survey marks may be located in the area
 > described. If marks will be disturbed by the abandonment, [THE RAILROAD]
 > shall consult with the National Geodetic Survey (NGS) at least 90 days prior
 > to beginning salvage activities that will disturb, or destroy any geodetic
 > station marks. These marks are described on the attached file. Additional
 > advice is provided at <http://geodesy.noaa.gov/marks/railroads/>

> -----
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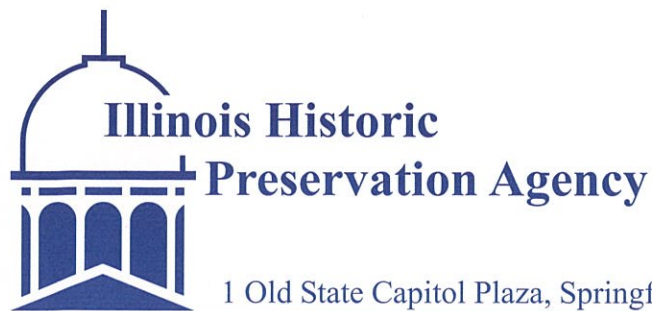
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|...|ME1904|UNK.|CNWRR.|
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>



FAX (217) 524-7525

www.illinoishistory.gov

Cook County

Chicago

Railway Abandonment, Chicago Terminal Railroad

From North Ave. Yard South of North Ave. and West of Elston Ave. going North then East and South to Halsted St.

STB-AB-1258

IHPA Log #025062017

July 6, 2017

Matthew Warren

Sidley Austin LLP

1501 K Street, NW

Washington, DC 20005

Dear Mr. Warren:

We have reviewed the information provided regarding the above referenced project. Our review is required by section 106 of the National Historic Preservation Act of 1966, as amended. We have determined that the swing bridge, constructed in 1899, is eligible for listing on the National Register of Historic Places. The bridge is eligible under Criterion A because of its long association for commerce and the movement of commodities in Chicago, and under Criterion C, for its architectural and engineering attributes.

The proposal to abandon this section of railroad will lead to the demolition of the bridge which constitutes an adverse effect as defined in 36 CFR 800.5.

At this time, you should begin consultation with this office to seek ways to avoid this adverse effect. Preservation in place is always our preference. You also should notify the Advisory Council on Historic Preservation of this finding to determine if they wish to join the consultation process.

If you have questions, please contact Cultural Resources Manager, David J. Halpin, at 217/785-4998 or at david.halpin@illinois.gov.

Sincerely,



Rachel Leibowitz, Ph.D.

Deputy State Historic

Preservation Officer

RL:djh

From: Cirton, Shawn
To: [Warren, Matthew J.](#)
Subject: STB Docket No. AB-1258, Alloy Property Company, LLC - Adverse Abandonment - Chicago Terminal Railroad in Chicago, IL
Date: Thursday, August 03, 2017 2:04:49 PM
Attachments: [Chicago Terminal Railroad Adverse Abandonment.pdf](#)

Mr. Warren,

This email is in response to your letter of July 17, 2017, to Mr. Tom Melius, Regional Director. After reviewing the information provided, we have no concerns about impacts to Federally listed species in the proposed abandonment area or within the immediate vicinity.

Sincerely,

Shawn Cirton
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Chicago Illinois Field Office
230 South Dearborn Street, Suite 2938
Chicago, IL 60604
(312)216-4728