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July 20, 2018

246106

VIA E-FILE

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

ENTERED
Office of Proceedings
July 19, 2018
Part of
Public Record

Re: STB Docket No. AB-1268X, Terminal Railroad - Abandonment
Exemption - Chicago, IL

Dear Ms. Brown:

Enclosed for filing Docket No. AB-1268X is a copy of the Environmental
and Historic Report for the Chicago Terminal Railroad.

Sincerely,

CLARK HILL STRASBURGER


John D. Heffner
Attorney

JDH:mf

CLARK HILL | Strasburger

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July 20, 2018

Cathy Stepp, 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-1268X, *Chicago Terminal Railroad—Abandonment Exemption—In Chicago, IL*

Dear Administrator Stepp:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment.

CTM 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:

- 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.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction by letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697(fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Cathy Stepp, Regional Administrator
Environmental Protection Agency – Region 5
July 20, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

John D. Heffner
Attorney

JDH:jdh



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mjwarren@sidley.com
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FOUNDED 1866

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.

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 issues:



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.

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 black ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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July 17, 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:

As described in my earlier letter dated June 15, 2017, 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”).

STB regulations require that Alloy consult with certain government entities regarding any environmental impacts of the proposed abandonment and that Alloy prepare an environmental report that includes any comments from those government entities. To date, Alloy has not received any comments from you regarding the proposed abandonment or any potential adverse environmental effects of the proposed abandonment on the surrounding area, including the location of any known hazardous materials spills on the right-of-way or whether permits under section 402 of the Clean Water Act are required for the proposed abandonment.



Robert Kaplan, Acting Regional Administrator
Environmental Protection Agency – Region 5
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Attached to this letter is a draft of the environmental report, which outlines the scope of the proposed project. Before the report is finalized and submitted, we will incorporate and address any comments that we receive from you.

If you have any comments on the proposed abandonment or the draft report, please send them to us as soon as possible. Alloy plans to file the application on August 31, 2017 and thus under STB regulations is required to submit a final environmental report by August 11, 2017. If your comments have not been received by August 9, 2017, Alloy will assume that your agency has no comments on this matter.

Should you have any comments regarding the abandonment or the preliminary environmental report, please send your reply by mail, email, or fax 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 black ink, appearing to read "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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AMERICA • ASIA PACIFIC • EUROPE

September 1, 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: Alloy Property Company, LLC -- Adverse Abandonment -- Chicago
Terminal Railroad in Chicago, IL, STB Docket No. AB-1258

Dear Administrator Kaplan:

On October 1 or soon thereafter, we expect to be filing with the Surface Transportation Board a petition for adverse abandonment of the authority of Chicago Terminal Railroad ("CTR") to operate over the remaining 2.875 miles its Line located in Chicago, Cook County, Illinois. Attached is an Environmental Report and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area.

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone (202) 245-0291 and refer to the above Docket No. AB-1258. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Matthew Warren who may be

SIDLEY

Page 2

contacted by telephone at 202-736-8996 or by mail at Sidley Austin LLP, 1501 K St NW, Washington DC 20005.

Sincerely,

A handwritten signature in black ink, appearing to read 'MJW', is written over a horizontal line.

Matthew J. Warren
Hanna M. Chouest
Sidley Austin LLP
1501 K St NW
Washington, DC 20005

Enclosure

CLARK HILL Strasburger

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July 20, 2018

Alec Messina, Director
Illinois Environmental Protection Agency
P.O. Box 19276
1021 North Grand Avenue East
Springfield, IL 62794

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—Abandonment Exemption—In Chicago, IL*

Dear Director Messina:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Environmental Protection Agency regarding any environmental impacts of the proposed abandonment and that CTM prepare an environmental report that includes any comments from those government entities. CTM 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:

- 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.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction, and you responded on July 6, 2017 that there were no objections. We have attached that response for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Strasburger & Price, LLP, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@strasburger.com or 202-247-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdj
Attachments



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

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120

9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
412 SW Washington St., Suite D, Peoria, IL 61602 (309)671-3022
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601

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clarkhill.com

July 20, 2018

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-1268X, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Director Melius:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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;
- Whether wildlife sanctuaries or refuges, National or State parks or forests will be affected and, if so, please describe such effects.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction. A response was received by email on August 3, 2017 and stated that there were no concerns about any impacts on Federally listed species. We have attached that response for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdh

Attachments

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

CLARK HILL | Strasburger

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July 20, 2018

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

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—Abandonment Exemption—In Chicago, IL*

Dear Director Blackwell:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental or historical impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse environmental or historical impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issue:

Juliana P. Blackwell, Director
National Geodetic Survey, NOAA
July 20, 2018
Page 2

- Whether there are any geodetic survey markers located within the area of the proposed abandonment.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the impacts of the abandonment in that transaction and you responded by email on June 19, 2017 regarding the presence of geodetic survey markers in the area. We have attached that response for your reference.

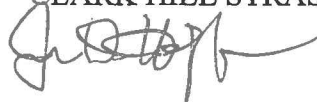
Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdh

Attachments

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/>

> -----
>
> |Dist|PID...|H V|Vert_Source|Approx.|Approx..|Stab|Designation>

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|...|ME1904|UNK.|CNWRR...|
1|88|ADJUSTED|N415447.....|W0873954.....|B...|G|RV 4

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July 20, 2018

Ivan Dozier, State Conservationist
Natural Resources Conservation Service
United States Department of Agriculture
2118 West Park Court
Champaign, IL 61821

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—Abandonment Exemption—In Chicago, IL*

Dear Mr. Dozier:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the Natural Resources Conservation Service regarding any potential environmental impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse environmental impacts, but we would appreciate your comments about these issues.

Ivan Dozier, State Conservationist
Natural Resources Conservation Service
July 20, 2018
Page 2

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction with letters sent on June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER


John D. Heffner
Attorney

JDH;jdh

Attachments



SIDLEY AUSTIN LLP
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FOUNDED 1866

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 dark ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

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

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STB regulations require that Alloy consult with certain government entities regarding any environmental impacts of the proposed abandonment and that Alloy prepare an environmental report that includes any comments from those government entities. To date, Alloy has not received any comments from you regarding the proposed abandonment or its possible impact upon prime agricultural land.

Attached to this letter is a draft of the environmental report, which outlines the scope of the proposed project. Before the report is finalized and submitted, we will incorporate and address any comments that we receive from you.

If you have any comments on the proposed abandonment or the draft report, please send them to us as soon as possible. Alloy plans to file the application on August 31, 2017 and thus under STB regulations is required to submit a final



Ivan Dozier, State Conservationist
National Resources Conservation Service
Page 2

environmental report by August 11, 2017. If your comments have not been received by August 9, 2017, Alloy will assume that your agency has no comments on this matter.

Should you have any comments regarding the abandonment or the preliminary environmental report, please send your reply by mail, email, or fax 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.

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Matthew J. Warren
Counsel to Alloy Property Company, LLC

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AMERICA • ASIA PACIFIC • EUROPE

September 1, 2017

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

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

Dear Mr. Dozier:

On October 1 or soon thereafter, we expect to be filing with the Surface Transportation Board a petition for adverse abandonment of the authority of Chicago Terminal Railroad ("CTR") to operate over the remaining 2.875 miles its Line located in Chicago, Cook County, Illinois. Attached is an Environmental Report and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area.

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone (202) 245-0291 and refer to the above Docket No. AB-1258. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Matthew Warren who may be

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Page 2

contacted by telephone at 202-736-8996 or by mail at Sidley Austin LLP, 1501 K St NW, Washington DC 20005.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Matthew J. Warren', written over a horizontal line.

Matthew J. Warren
Hanna M. Chouest
Sidley Austin LLP
1501 K St NW
Washington, DC 20005

Enclosure

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July 20, 2018

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

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—Abandonment Exemption—In Chicago, IL*

Dear Director Sholly:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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:

Cam Sholly, Regional Director
National Park Service – Midwest Region
July 20, 2018
Page 2

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

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction in letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdh

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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.

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:

- 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
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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).

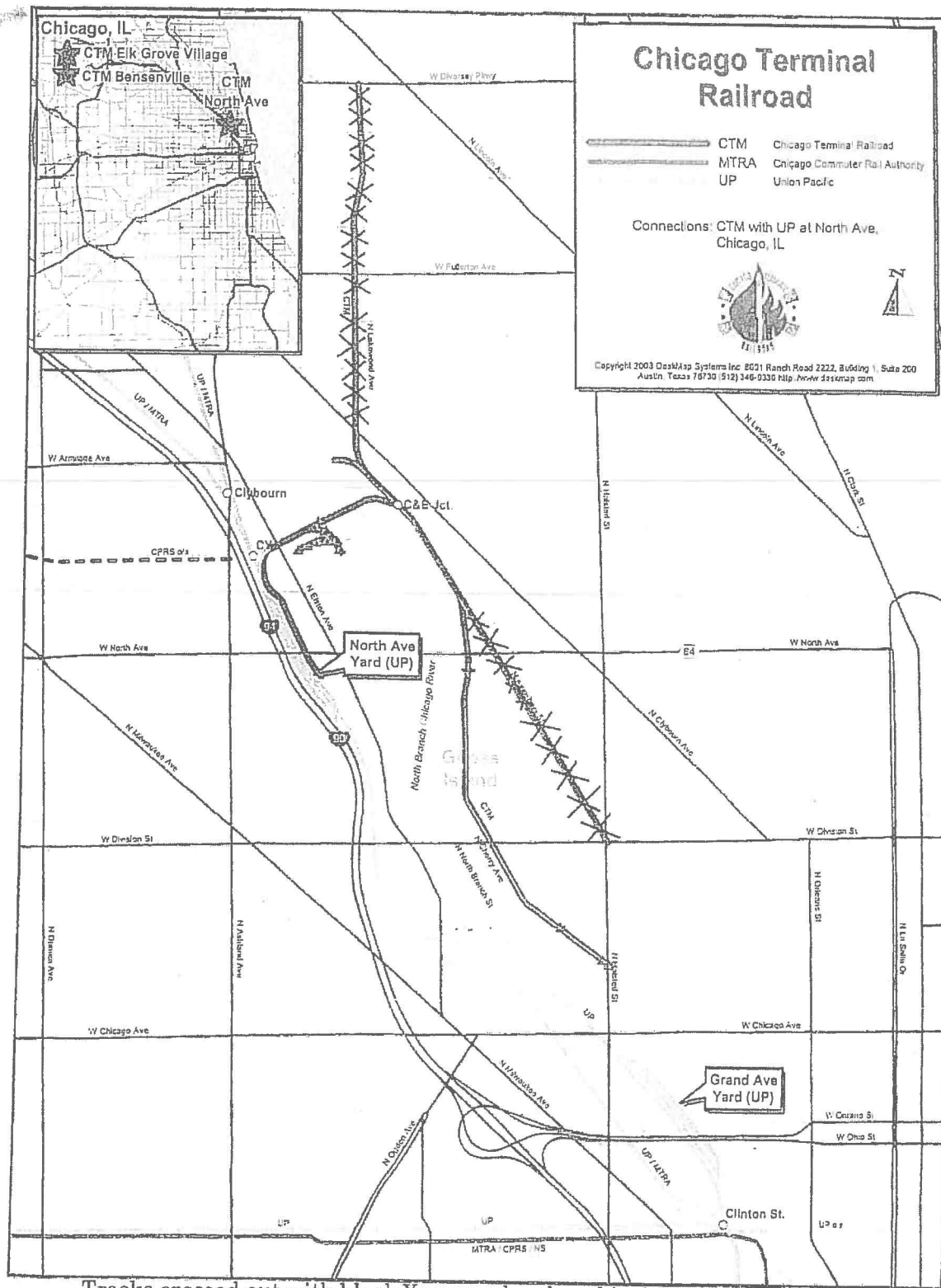
Alloy appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

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

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



Tracks crossed out with black Xs were abandoned in AB 1036 (June 15, 2010)

✦ Cherry Avenue Bridge
✦ Swing Bridge

△ Tracks have been removed
☆ Stop sign in middle of tracks

* This map of the Line was created from the system map that CTR has published on its website at <http://www.iowapacific.com/wp-content/uploads/2016/02/ChicagoTerminalRailroadNorthAveArea.pdf>. The map is for demonstrative purposes only and some details have been omitted.



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July 17, 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:

As described in my earlier letter dated June 15, 2017, 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”).

STB regulations require that Alloy consult with certain government entities regarding any environmental impacts of the proposed abandonment and that Alloy prepare an environmental report that includes any comments from those government entities. To date, Alloy has not received any comments from you regarding the proposed abandonment or its possible impact upon wildlife sanctuaries or refuges, National or State parks or forests.

Attached to this letter is a draft of that environmental report, which outlines the scope of the proposed project. Before the report is finalized and submitted, we will incorporate and address any comments that we receive from you.

If you have any comments on the proposed abandonment or the draft report, please send them to us as soon as possible. Alloy plans to file the application on August 31, 2017 and thus under STB regulations is required to submit a final environmental report by August 11, 2017. If your comments have not been received



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

by August 9, 2017, Alloy will assume that your agency has no comments on this matter.

Should you have any comments regarding the abandonment or the preliminary environmental report, please send your reply by mail, email, or fax 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 black ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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September 1, 2017

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

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

Dear Director Sholly:

On October 1 or soon thereafter, we expect to be filing with the Surface Transportation Board a petition for adverse abandonment of the authority of Chicago Terminal Railroad ("CTR") to operate over the remaining 2.875 miles its Line located in Chicago, Cook County, Illinois. Attached is an Environmental Report and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area.

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone (202) 245-0291 and refer to the above Docket No. AB-1258. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Matthew Warren who may be

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Page 2

contacted by telephone at 202-736-8996 or by mail at Sidley Austin LLP, 1501 K St NW, Washington DC 20005.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Warren', with a stylized flourish at the end.

Matthew J. Warren
Hanna M. Chouest
Sidley Austin LLP
1501 K St NW
Washington, DC 20005

Enclosure

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clarkhill.com

July 20, 2018

The Honorable Bruce Rauner
Office of the Governor
State of Illinois
207 State House St.
Springfield, IL 62706

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—Abandonment Exemption—In Chicago, IL*

Dear Governor Rauner:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any environmental or historic impacts of the proposed abandonment and that CTM prepare an environmental and historic report that includes any

The Honorable Bruce Rauner
Office of the Governor
July 20, 2018
Page 2

comments from those government entities. CTM does not believe that the proposed abandonment will result in any adverse environmental or historic impacts, but we would appreciate your comments about these issues.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction with letters sent on June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdH

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July 17, 2017

Governor Bruce Rauner
Office of the Governor
State of Illinois
207 State House St.
Springfield, IL 62706

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

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Governor Bruce Rauner
Office of the Governor
State of Illinois
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Counsel to Alloy Property Company, LLC

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June 15, 2017

Governor Bruce Rauner
Office of the Governor
State of Illinois
207 State House St.
Springfield, IL 62706

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Governor Bruce Rauner
Office of the Governor
State of Illinois
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Matthew J. Warren
Counsel to Alloy Property Company, LLC

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AMERICA • ASIA PACIFIC • EUROPE

September 1, 2017

Governor Bruce Rauner
Office of the Governor
State of Illinois
207 State House St.
Springfield, IL 62706

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

Dear Governor Rauner:

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Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Matthew Warren who may be

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Page 2

contacted by telephone at 202-736-8996 or by mail at Sidley Austin LLP, 1501 K St NW, Washington DC 20005.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew J. Warren', written over a horizontal line.

Matthew J. Warren
Hanna M. Chouest
Sidley Austin LLP
1501 K St NW
Washington, DC 20005

Enclosure

CLARK HILL | Strasburger

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July 20, 2018

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-1268X, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Commissioner Reifman:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

David L. Reifman, Commissioner
Department of Planning and Development
City of Chicago
July 20, 2018
Page 2

The STB's regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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:

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

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction in letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your Department prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

David L. Reifman, Commissioner
Department of Planning and Development
City of Chicago
July 20, 2018
Page 3

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

Sincerely yours,

CLARK HILL STRASBURGER

A handwritten signature in black ink, appearing to read "J D Heffner", written over a horizontal line.

John D. Heffner
Attorney

JDH:jdh

Attachments



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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 black ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment

* This map of the Line was created from the system map that CTR has published on its website at <http://www.iowapacific.com/wp-content/uploads/2016/02/ChicagoTerminalRailroadNorthAveArea.pdf>. The map is for demonstrative purposes only and some details have been omitted.



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WASHINGTON, D.C.

FOUNDED 1866

July 17, 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} Reifman:

As described in my earlier letter dated June 15, 2017, 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”).

STB regulations require that Alloy consult with certain government entities regarding any environmental impacts of the proposed abandonment and that Alloy prepare an environmental report that includes any comments from those government entities. To date, Alloy has not received any comments from you regarding the proposed abandonment or its possible impact upon land use plans.

Attached to this letter is a draft of the environmental report, which outlines the scope of the proposed project. Before the report is finalized and submitted, we will incorporate and address any comments that we receive from you.

If you have any comments on the proposed abandonment or the draft report, please send them to us as soon as possible. Alloy plans to file the application on August 31, 2017 and thus under STB regulations is required to submit a final



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

environmental report by August 11, 2017. If your comments have not been received by August 9, 2017, Alloy will assume that your agency has no comments on this matter.

Should you have any comments regarding the abandonment or the preliminary environmental report, please send your reply by mail, email, or fax 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 dark ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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AMERICA • ASIA PACIFIC • EUROPE

September 1, 2017

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

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

Dear Commissioner Reifman:

On October 1 or soon thereafter, we expect to be filing with the Surface Transportation Board a petition for adverse abandonment of the authority of Chicago Terminal Railroad ("CTR") to operate over the remaining 2.875 miles its Line located in Chicago, Cook County, Illinois. Attached is an Environmental Report and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area.

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone (202) 245-0291 and refer to the above Docket No. AB-1258. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Matthew Warren who may be

SIDLEY

Page 2

contacted by telephone at 202-736-8996 or by mail at Sidley Austin LLP, 1501 K St NW, Washington DC 20005.

Sincerely,

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

Matthew J. Warren
Hanna M. Chouest
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Washington, DC 20005

Enclosure

CLARK HILL | Strasburger

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July 20, 2018

Diane Tecic, Program Director
Illinois Department of Natural Resources
Coastal Management Program
160 N. LaSalle Street, Suite S-703
Chicago, IL 60601

Re: STB Docket No. AB-1268X, Chicago Terminal Railroad – Abandonment
Exemption – In Chicago, IL

Dear Ms. Tecic:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Coastal Zone Management Agency regarding any potential environmental impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse environmental impacts, but we would appreciate your

Diane Tecic, Program Director
Illinois Department of Natural Resources
July 20, 2018
Page 2

comments about these issues. In particular, we request any comments you have on the following issue:

- Whether the abandonment is consistent with federal, state or local water quality standards.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction, and you responded on June 24, 2017 stating that an Illinois Coastal Management Program Plan was not required. We have attached that response for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Diane Tecic, Program Director
Illinois Department of Natural Resources
July 20, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

A handwritten signature in black ink, appearing to read "JD Heffner", with a long horizontal flourish extending to the right.

John D. Heffner
Attorney

JDH:jdh

Attachments



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

CLARK HILL | Strasburger

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July 20, 2018

Rachel Leibowitz, Deputy State Historic Preservation
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Ms. Leibowitz:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Historic Preservation Office regarding any potential historical impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse historical impacts, but we would appreciate your comments about

these issues. In particular, we request any comments you have on the following issues:

- Any known structures on the Line that are historically significant and that are 50 years old or older; whether the proposed abandonment would have an adverse effect on such structures; and efforts that could be taken during removal of the tracks in the Line to mitigate any such adverse effects;
- Whether there is a likelihood of archaeological resources or any other previously unknown historic properties on the Line.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the historic impacts of the abandonment in that transaction, and you responded on July 6, 2017 regarding a swing bridge on the line at issue in that proceeding. We have attached that response for your reference. We note that the swing bridge at issue in AB 1258 is not on the line segment proposed for abandonment in this proceeding.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Rachel Leibowitz, Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency
July 20, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

A handwritten signature in dark ink, appearing to read 'John D. Heffner', with a stylized flourish at the end.

John D. Heffner
Attorney

JDH:jdh

Attachments



Illinois Historic Preservation Agency

1 Old State Capitol Plaza, Springfield, IL 62701-1512

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

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July 20, 2018

Colonel Aaron W. Riesinger
Commander
U.S. Army Corps of Engineers
Chicago District (CELRC-PA)
231 South LaSalle Street, Suite 1500
Chicago, IL 60604

Re: STB Docket No. AB-1268X, *Chicago Terminal Railroad—
Abandonment Exemption—In Chicago, IL*

Dear Colonel Riesinger:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

Colonel Aaron W. Riesinger, Commander
U.S. Army Corps of Engineers
July 20, 2018
Page 2

The STB's regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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;
- Whether any designated wetlands or 100-year flood plains will be affected, and please described any such effects.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction by letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8697(fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Colonel Aaron W. Riesinger, Commander
U.S. Army Corps of Engineers
July 20, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

A handwritten signature in black ink, appearing to read "J D Heffner", with a long horizontal flourish extending to the right.

JOHN D. HEFFNER
ATTORNEY

JDH:jd
Attachments



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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.

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 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 black ink, appearing to be "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



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SINGAPORE
SYDNEY
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WASHINGTON, D.C.

FOUNDED 1866

July 17, 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:

As described in my earlier letter dated June 15, 2017, 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").

STB regulations require that Alloy consult with certain government entities regarding any environmental impacts of the proposed abandonment and that Alloy prepare an environmental report that includes any comments from those government entities. To date, Alloy has not received any comments from you regarding the proposed abandonment or its possible impact upon designated wetlands or 100-year flood plans or whether there is a need to secure permits under section 404 of the Clean Water Act.

Attached to this letter is a draft of the environmental report, which outlines the scope of the proposed project. Before the report is finalized and submitted, we will incorporate and address any comments that we receive from you.

If you have any comments on the proposed abandonment or the draft report, please send them to us as soon as possible. Alloy plans to file the application on



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

August 31, 2017 and thus under STB regulations is required to submit a final environmental report by August 11, 2017. If your comments have not been received by August 9, 2017, Alloy will assume that your agency has no comments on this matter.

Should you have any comments regarding the abandonment or the preliminary environmental report, please send your reply by mail, email, or fax 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 black ink, appearing to read "MJW", written over a horizontal line.

Matthew J. Warren
Counsel to Alloy Property Company, LLC

Attachment



SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
+1 202 736 8000
+1 202 736 8711 FAX

AMERICA • ASIA PACIFIC • EUROPE

September 1, 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: Alloy Property Company, LLC -- Adverse Abandonment -- Chicago
Terminal Railroad in Chicago, IL, STB Docket No. AB-1258

Dear Col. Drew:

On October 1 or soon thereafter, we expect to be filing with the Surface Transportation Board a petition for adverse abandonment of the authority of Chicago Terminal Railroad ("CTR") to operate over the remaining 2.875 miles its Line located in Chicago, Cook County, Illinois. Attached is an Environmental Report and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area.

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone (202) 245-0291 and refer to the above Docket No. AB-1258. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Matthew Warren who may be

SIDLEY

Page 2

contacted by telephone at 202-736-8996 or by mail at Sidley Austin LLP, 1501 K St NW, Washington DC 20005.

Sincerely,

A handwritten signature in black ink, appearing to read 'MJW', is written over a horizontal line.

Matthew J. Warren
Hanna M. Chouest
Sidley Austin LLP
1501 K St NW
Washington, DC 20005

Enclosure

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Docket No. AB-1268X

**CHICAGO TERMINAL RAILROAD—ABANDONMENT
EXEMPTION—IN CHICAGO, ILL**

ENVIRONMENTAL AND HISTORIC REPORT

Pursuant to 49 C.F.R. §§ 1105.7 and 1105.8, Chicago Terminal Railroad (“CTM”) 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

CTM 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.

CTM proposes to file an application seeking abandonment of its authority to operate over a portion of the “Bloomingdale” line in Chicago, Illinois. The segment at issue is west of N. Elston Avenue and east of the Union Pacific North Avenue Yard. Exhibit 1 illustrates the line segment for which abandonment is sought (the

“Line”). A portion of the Line contains railroad tracks, and the remainder no longer has any tracks. No local or overhead traffic has moved over the Line in over two years.

The Board recently issued an order of abandonment and Certificate of Interim Trail Use (“CITU”) for other segments on the C&E and Bloomingdale lines. *See Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). The CITU authorized negotiations for interim trail use of a portion of the subject line beginning at Elston Avenue and proceeding east and south to Goose Island.

(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 no rail traffic is currently moving over the Line and there is no prospect of future rail traffic on the Line. Therefore, no traffic would be diverted to other transportation systems or modes.

(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. The City of Chicago supported abandonment and interim trail use of adjacent CTM

lines in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258.

On June 29, 2018, CTM sent letters to the Chicago Department of Planning and Development and the Cook County Department of Planning and Development¹ requesting comments on whether the proposed abandonment is consistent with existing land use plans. CTM is waiting for its reply and will furnish it to the Board upon receipt.

(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 29, 2018, CTM sent a letter to the Natural Resources Conservation Service requesting comments on the effect of the proposed abandonment on any prime agricultural land.² CTM is waiting for its reply and will furnish it to the Board upon receipt.

(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 proposed abandonment is unlikely to have any effect on land or water use or natural resources of the coastal zone. On June 29, 2018, CTM sent a letter to the Illinois Department of Natural Resources, Coastal Management Program

¹ See Exhibit A (Letter from CTM to D. Reifman).

² See Exhibit B (Letter from CTM to I. Dozier).

requesting comments on the effect of the proposed abandonment on the coastal zone.³ CTM is waiting for its reply and will furnish it to the Board upon receipt.

- (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 may be suitable for trail use, as it is located adjacent to line segments for which the City of Chicago and CTM are negotiating an interim trail use agreement.

(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 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 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 no rail traffic, and therefore no 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*

³ See Exhibit C (Letter from CTM to D. Tecic).

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 no rail traffic and no 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 no rail traffic. The proposed abandonment will cause no increase in rail traffic or rail yard activity, and no 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 no rail traffic. The proposed abandonment will cause no increase in rail traffic or rail yard activity, and no 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 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 no rail traffic. The proposed abandonment will cause no increase in rail traffic or rail yard activity, and no 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).*

The proposed abandonment will have no effect on public health and safety.

The Line carries no rail traffic, and therefore no traffic increases, decreases, or diversions will result from the proposed abandonment.

- (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.*

CTM is not aware of the existence of hazardous materials waste sites or spills in the immediate area of the Line.

(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 29, 2018, CTM 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.⁴ CTM is waiting for its reply and will furnish it to the Board upon receipt.

- (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 29, 2018, CTM sent a letter to the National Park Service requesting comments on whether the proposed abandonment is likely to affect wildlife sanctuaries or refuges or National or State parks or forests.⁵ CTM is waiting for its reply and will furnish it to the Board upon receipt.

(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. On June 29, 2018, CTM sent letters to the Illinois Department of Natural Resources, Coastal Management Program and the Illinois EPA requesting comments on whether the proposed abandonment would affect state or local water quality standards.⁶ CTM is waiting for its reply and will furnish it to the Board upon receipt.

⁴ See Exhibit D (Letter from CTM to T. Melius).

⁵ See Exhibit E (Letter from CTM to C. Sholly).

⁶ See Exhibit F (Letter from CTM to D. Tecic); Exhibit G (Letter from CTM to A. Messina).

- (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.*

CTM 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 29, 2018, CTM 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.⁷ The Corps acknowledged CTM's letter in an email received July 16 from Kathleen Chernich, copy attached.

- (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.)*

CTM believes that permits under section 402 of the Clean Water Act are not required for the proposed abandonment. On June 29, 2018, CTM 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.⁸ CTM is waiting for its reply and will furnish it to the Board upon receipt.

⁷ See Exhibits H (Letter from CTM to A. Riesinger) and H-1 (email).

⁸ See Exhibit I (Letter from CTM to C.Stepp).

(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.

* * * * *

In addition to the consultations identified above, CTM consulted with the Federal and State bodies required pursuant to 49 C.F.R. § 1105.7(b).⁹

II. Historic Report

CTM 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 Line runs from the Union Pacific Railroad's North Avenue Yard and proceeds east across the dead-end N. Belsy Court and further east to N. Elston Avenue. The total distance is less than 0.1 mile, and the width of the right-of-way is

⁹ CTM has consulted with the National Oceanic and Atmospheric Administration. It responded in an email dated July 16, 2018, copy attached as Exhibit I-1.

approximately 25 feet. The right-of-way is situated in an urban area that has 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. A small portion of the Line still has railroad tracks, but the remainder does not have tracks on the right-of-way.

- (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;*

CTM is unaware of any railroad structures that are 50 years old or older on the Line. CTM wrote to the Illinois Historic Preservation Agency (“IHPA”) on June 29, 2018 to seek its comments on the proposed abandonment.¹⁰ CTM is waiting for its reply and will furnish it to the Board upon receipt.

- (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;*

As explained above, CTM is not aware of any railroad structures that are 50 years old or older on the Line. CTM wrote to IHPA to seek the agency’s comments on this matter and the matters addressed below.¹¹

- (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

¹⁰ Exhibit J (Letter from CTM to R. Liebowitz).

¹¹ Exhibit J (Letter from CTM to R. Liebowitz).

bankruptcy, CMC Heartland Partners (“CMC”) became the corporate successor of the reorganized debtor Milwaukee Road in 1984. Soo Line Railroad Company (“Soo”) acquired the Line (along with other rail properties) from the bankruptcy trustee of the Milwaukee Road in 1985. CTM acquired an operating easement over the Line from Soo 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). Soo continues to own the underlying real estate for the Line.

The proposed action would result in abandonment of CTM’s operating easement and no further rail service would be offered by CTM.

- (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;*

As explained above, CTM is unaware of any railroad structures that are 50 years old or older on the Line. CTM has written to IHPA to seek its input.¹²

- (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);*

Because CTM is unaware of any historic railroad structures on the Line, CTM does not believe that any structure in the area of the Line meets the criteria

¹² Exhibit J (Letter from CTM to R. Liebowitz).

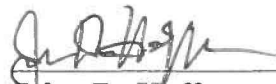
for listing on the National Register of Historic Places. CTM has asked IHPA whether it has any comments.¹³

CTM does not believe that there is a likelihood of archeological resources or other previously unknown historic properties in the area of the Line.

- (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.*
-

CTM 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,



John D. Heffner
Clark Hill Strasburger
1025 Connecticut Ave., NW, Suite 717
Washington, DC 20036

Dated: July 20, 2018

¹³ Exhibit J (Letter from CTM to R. Liebowitz).

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, I caused the foregoing Environmental and Historic Report to be served by First Class Mail or more expedient method on the following:

Charles Spitulnik
Kaplan Kirsch & Rockwell LLP
1001 Connecticut Ave., NW, Suite 800
Washington, DC 200036

Governor Bruce Rauner
Office of the Governor
State of Illinois
207 State House St.
Springfield, IL 62706

Rachel Leibowitz, Deputy State
Historic Preservation Officer
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701

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

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

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

Alec Messina, Director
Illinois Environmental Protection
Agency
P.O. Box 19276
1021 North Grand Avenue East
Springfield, IL 62794-9276

Diane Tecic, Program Director
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

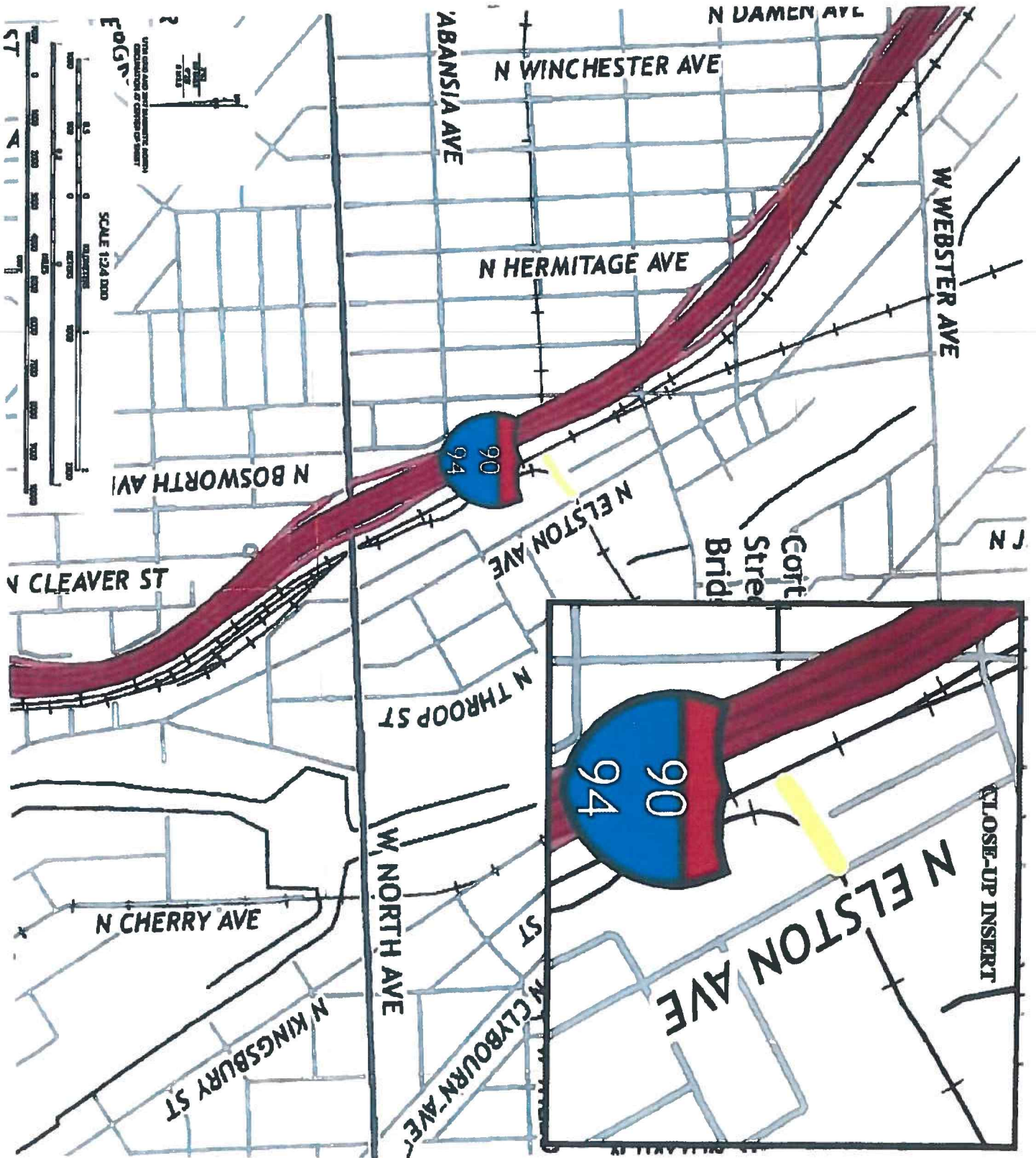
Juliana P. Blackwell, Director
National Geodetic Survey, NOAA
1315 East-West Highway
Silver Spring, MD 20910-3282

Col. Aaron W. Reisinger
Commander
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

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





Heffner, John D.

From: Chernich, Kathleen G CIV CELRC CELRD (US) <Kathleen.G.Chernich@usace.army.mil>
Sent: Monday, July 16, 2018 6:01 PM
To: Heffner, John D.; mjwarren@sidley.com
Cc: Murphy, Michael J CIV USARMY CELRC (US)
Subject: LRC-2018-578 Chicago Terminal Railroad

The U.S. Army Corps of Engineers Chicago District has received your request for a pre-application meeting/exemption letter. The request has been assigned number LRC-2018-578. The project manager assigned to your file is Michael Murphy.

The Regulatory Branch is committed to providing the highest level of Customer Service. I value your comments and would appreciate you contacting me if you have any comments/concerns regarding our customer service. Applicants are encouraged to contact the project manager for further information regarding the project.

Kathleen Chernich
Chief, East Section
Regulatory Branch
U.S. Army Corps of Engineers, Chicago District Telephone (312) 846-5531
Fax (312) 353-4110
<http://www.lrc.usace.army.mil/Missions/Regulatory.aspx>

Heffner, John D.

From: Deborah Brooks - NOAA Federal <deborah.brooks@noaa.gov>
Sent: Monday, July 16, 2018 8:13 PM
To: Heffner, John D.
Cc: Matthew J. Warren; Surface Transportation Board; Christine Gallagher - NOAA Federal
Subject: NGS RESPONSE, STB Docket No. AB-XX Chicago Terminal Railroad - Abandonment Exemption -Chicago IL

Thank you for sharing your railroad abandonment environmental report for
Chicago, Illinois

Approximately 00 geodetic survey marks are located in the area described. These marks may or may not be disturbed.

If mark 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 described on the attached file.

Additional advice is provided at <http://geodesy.noaa.gov/marks/railroads>

No stations found.

CLARK HILL Strasburger

John D. Heffner
T (202) 742-8607
F (202) 742-8697
Email: John.Heffner@clarkhillstrasburger.com

Clark Hill Strasburger
1025 Connecticut Avenue, N.W.
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T 202 742 8600
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clarkhill.com

June 29, 2018

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-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Commissioner Reifman:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse

David L. Reifman, Commissioner
Department of Planning and Development
City of Chicago
June 29, 2018
Page 2

impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issue:

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

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction in letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your Department prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8699 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

David L. Reifman, Commissioner
Department of Planning and Development
City of Chicago
June 29, 2018
Page 3

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

Sincerely yours,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdh

Attachments

CLARK HILL Strasburger

John D. Heffner
T (202) 742-8607
F (202) 742-8697
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June 29, 2018

Ivan Dozier, State Conservationist
Natural Resources Conservation Service
United States Department of Agriculture
2118 West Park Court
Champaign, IL 61821

Re: STB Docket No. AB-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Mr. Dozier:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the Natural Resources Conservation Service regarding any potential environmental impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse environmental impacts, but we would appreciate your comments about these issues.

Ivan Dozier, State Conservationist
Natural Resources Conservation Service
June 29, 2018
Page 2

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction with letters sent on June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8699 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdh

Attachments

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June 29, 2018

Diane Tecic, Program Director
Illinois Department of Natural Resources
Coastal Management Program
160 N. LaSalle Street, Suite S-703
Chicago, IL 60601

Re: STB Docket No. AB-XX, Chicago Terminal Railroad – Abandonment
Exemption – In Chicago, IL

Dear Ms. Tecic:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Coastal Zone Management Agency regarding any potential environmental impacts of the proposed abandonment. CTM 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:

- Whether the abandonment is consistent with federal, state or local water quality standards.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction, and you responded on June 24, 2017 stating that an Illinois Coastal Management Program Plan was not required. We have attached that response for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

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Diane Tecic, Program Director
Illinois Department of Natural Resources
June 29, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdH

Attachments

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June 29, 2018

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-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Director Melius:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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;
- Whether wildlife sanctuaries or refuges, National or State parks or forests will be affected and, if so, please describe such effects.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction. A response was received by email on August 3, 2017 and stated that there were no concerns about any impacts on Federally listed species. We have attached that response for your reference.

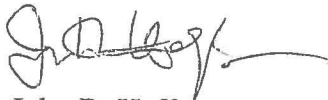
Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8699 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

Tom Melius, Midwest Regional Director
U.S. Fish and Wildlife Service – Region 3
June 29, 2018
Page 3

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June 29, 2018

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

Re: STB Docket No. AB-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Director Sholly:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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:

- 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
June 29, 2018
Page 2

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction in letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

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

Sincerely,

CLARK HILL STRASBURGER



John D. Heffner
Attorney

JDH:jdh

Attachments

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June 29, 2018

Diane Tecic, Program Director
Illinois Department of Natural Resources
Coastal Management Program
160 N. LaSalle Street, Suite S-703
Chicago, IL 60601

Re: STB Docket No. AB-XX, Chicago Terminal Railroad – Abandonment
Exemption – In Chicago, IL

Dear Ms. Tecic:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Coastal Zone Management Agency regarding any potential environmental impacts of the proposed abandonment. CTM 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:

- Whether the abandonment is consistent with federal, state or local water quality standards.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction, and you responded on June 24, 2017 stating that an Illinois Coastal Management Program Plan was not required. We have attached that response for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

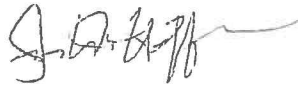
Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8699 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Diane Tecic, Program Director
Illinois Department of Natural Resources
June 29, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

A handwritten signature in dark ink, appearing to read "John D. Heffner", with a horizontal line extending to the right.

John D. Heffner
Attorney

JDH:jd

Attachments

CLARK HILL Strasburger

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June 29, 2018

Alec Messina, Director
Illinois Environmental Protection Agency
P.O. Box 19276
1021 North Grand Avenue East
Springfield, IL 62794

Re: STB Docket No. AB-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Director Messina:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Environmental Protection Agency regarding any environmental impacts of the proposed abandonment and that CTM prepare an environmental report that includes any comments from those government entities. CTM 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:

- 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.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction, and you responded on July 6, 2017 that there were no objections. We have attached that response for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8699 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

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

Sincerely,

CLARK HILL STRASBURGER

John D. Heffner
Attorney

Alec Messina, Director
Illinois Environmental Protection Agency
June 29, 2018
Page 3

JDH:jdj

Attachments

CLARK HILL Strasburger

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June 29, 2018

Colonel Aaron W. Riesinger
Commander
U.S. Army Corps of Engineers
Chicago District (CELRC-PA)
231 South LaSalle Street, Suite 1500
Chicago, IL 60604

Re: STB Docket No. AB-XX, *Chicago Terminal Railroad—
Abandonment Exemption—In Chicago, IL*

Dear Colonel Riesinger:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

Colonel Aaron W. Riesinger, Commander
U.S. Army Corps of Engineers
June 29, 2018
Page 2

The STB's regulations require consultation with certain government entities regarding any potential environmental impacts of the proposed abandonment. CTM 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;
- Whether any designated wetlands or 100-year flood plains will be affected, and please described any such effects.

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction by letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

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Colonel Aaron W. Riesinger, Commander
U.S. Army Corps of Engineers
June 29, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

A handwritten signature in black ink, appearing to read "J. D. Heffner", with a horizontal line extending to the right.

JOHN D. HEFFNER
ATTORNEY

JDH:jdj
Attachments

CLARK HILL Strasburger

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June 29, 2018

Cathy Stepp, 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-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Administrator Stepp:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomingdale” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

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environmental impacts, but we would appreciate your comments about these issues. In particular, we request any comments you have on the following issues:

- 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.
-

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the environmental impacts of the abandonment in that transaction by letters dated June 15, 2017, July 17, 2017, and September 1, 2017. No response was received. We have attached that correspondence for your reference.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

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Cathy Stepp, Regional Administrator
Environmental Protection Agency – Region 5
June 29, 2018
Page 3

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

Sincerely,

CLARK HILL STRASBURGER

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John D. Heffner
Attorney

JDH:jdH

CLARK HILL Strasburger

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June 29, 2018

Rachel Leibowitz, Deputy State Historic Preservation
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701

Re: STB Docket No. AB-XX, *Chicago Terminal Railroad—Abandonment
Exemption—In Chicago, IL*

Dear Ms. Leibowitz:

The purpose of this letter is to advise you that Chicago Terminal Railroad (“CTM”) plans to file a notice of exemption with the Surface Transportation Board (“STB”) for the abandonment of a less than 0.1 mile segment of the remaining portions of the “Bloomington” line in Chicago, Illinois originating at Union Pacific’s North Avenue Yard and proceeding east to N. Elston Avenue (the “Line”). A map of the Line is attached to this letter. The Line is immediately adjacent to former rail lines that the STB approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018).

CTM believes that the Line should be abandoned, because CTM is no longer providing rail service on the Line and there is no potential for future rail customers on the Line.

The STB’s regulations require consultation with the State Historic Preservation Office regarding any potential historical impacts of the proposed abandonment. CTM does not believe that the proposed abandonment will result in any adverse historical impacts, but we would appreciate your comments about

these issues. In particular, we request any comments you have on the following issues:

- Any known structures on the Line that are historically significant and that are 50 years old or older; whether the proposed abandonment would have an adverse effect on such structures; and efforts that could be taken during removal of the tracks in the Line to mitigate any such adverse effects;
 - Whether there is a likelihood of archaeological resources or any other previously unknown historic properties on the Line.
-

As noted above, the Line proposed for abandonment in this proceeding is immediately adjacent to lines that were approved for abandonment or trail use in *Alloy Property Co., LLC—Adverse Abandonment—Chicago Terminal R.R. in Chicago, Ill.*, STB Docket No. AB 1258 (STB served April 30, 2018). Your office was consulted about the historic impacts of the abandonment in that transaction, and you responded on July 6, 2017 regarding a swing bridge on the line at issue in that proceeding. We have attached that response for your reference. We note that the swing bridge at issue in AB 1258 is not on the line segment proposed for abandonment in this proceeding.

Enclosed is a preliminary Environmental and Historic Report that outlines the scope of the proposed project. We will integrate any comments received from your office prior to submitting the report to the STB. Please note that we are planning to file the Environmental and Historic Report with the STB on July 20, 2018. Please submit any comments you have before that date so that they can be reflected in the final report that is filed.

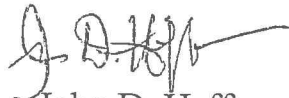
Please send your comments to John Heffner, Clark Hill Strasburger, 1025 Connecticut Avenue, NW, Washington, DC 20036, john.heffner@clarkhillstrasburger.com or 202-742-8699 (fax), and Matthew J. Warren, Sidley Austin LLP, 1501 K Street, NW, Washington, DC 20005, mjwarren@sidley.com or 202-736-8711 (fax).

Rachel Leibowitz, Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency
June 29, 2018
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CTM appreciates your assistance in this matter. If you have any questions, please feel free to call or email me.

Sincerely,

CLARK HILL STRASBURGER

A handwritten signature in black ink, appearing to read "J. D. Heffner", with a long horizontal flourish extending to the right.

John D. Heffner
Attorney

JDH:jd

Attachments