

Executive Summary

Purpose

The Alternatives Selection Report identified the one reasonable and feasible passenger rail alternative within the Milwaukee-Twin Cities High-Speed Rail Corridor Program. This report will clearly indicate the following:

1. why and how the particular range of project alternatives (potential passenger rail alternatives) was developed,
2. how the results of the scoping process and other public and agency input was used in the alternatives analysis, and
3. the process used to evaluate and eliminate the alternatives to arrive at the reasonable and feasible passenger rail alternative

The Alternatives Selection Report will be presented to the Federal Railroad Administration, agencies, and the public for review and comment prior to the analysis leading to the identification of the preferred passenger rail alternative.

Background of the MWRRI

In 1996, nine Midwest states, including Wisconsin and Minnesota, and Amtrak formed the Midwest Regional Rail Initiative (MWRRI). The planned MWRRI elements include:

- Operation of a hub and spoke passenger rail system centered on Chicago
- Use of 3,000 miles of existing rail right of way to connect rural and urban areas
- Track and signal improvements and introduction of modern trains operating at speeds up to 110 mph
- Provision of multi-modal connections to improve system access
- Improvement in frequency, reliability, speed, and on-time performance

The work of this initiative (MWRRI) has resulted in a well coordinated and integrated 110-mph rail Business Plan that defines the way in which the rail system should be implemented. This Business Plan consists of various documents that were prepared - an Executive Summary (2004), MWRRI Project Notebook (2004), Appendices (2004), and Benefit Cost and Economic Analysis (2006).

Background of the Milwaukee-Twin Cities High-Speed Rail Corridor Program

On June 23, 2009, the FRA issued a Notice of Funding Availability (NOFA) for the High-Speed Intercity Passenger Rail (HSIPR) Program in the Federal Register. In response, Mn/DOT submitted an application to develop a Tier 1 EIS document for new passenger rail service on the Milwaukee-Twin Cities corridor, a segment of the Chicago to Twin Cities high-speed rail corridor. The FRA reviewed Mn/DOT's application for eligibility and

ranking with the criteria outlined in the NOFA. Based upon this evaluation, the FRA selected the State of Minnesota for an award of \$600,000 for this project, through a cooperative agreement between FRA and Mn/DOT (the Grantee).

Mn/DOT entered into a cooperative agreement with FRA to develop the Tier 1 EIS document for the Milwaukee-Twin Cities Corridor. Funding for the project has been committed through Minnesota and Wisconsin state funds and FRA's HSIPR Program described in the previous paragraph. In addition to funding the project cooperatively, Mn/DOT and WisDOT have been working together on public involvement throughout both states.

The project team was assembled specifically for the Milwaukee-Twin Cities High-Speed Rail Corridor Program. The team is comprised of Mn/DOT, WisDOT, Amtrak, and Quandel Consultants staff members that have the technical expertise and experience in high-speed rail planning to produce a successful project. The following persons are part of the project team:

- Mn/DOT
 - David Christianson – Freight Planning and Development, Minnesota Department of Transportation
 - Dan Krom – Director, Passenger Rail office, Minnesota Department of Transportation
 - Frank Pafko – Director, Office of Environmental Services, Minnesota Department of Transportation
 - Praveena Pidaparathi – Planning Director, Minnesota Department of Transportation

- WisDOT
 - Jeff Abboud – Urban and Regional Planner, Wisconsin Department of Transportation
 - Ron Adams – Chief, Railroads and Harbor Section, Wisconsin Department of Transportation
 - Tom Beekman – Regional Systems Planning and Programming Chief, Wisconsin Department of Transportation
 - Donna Brown – Passenger Rail implementation Manager, Wisconsin Department of Transportation
 - Carrie Cooper – Urban Regional Planner, Wisconsin Department of Transportation
 - Crystal DuPont – Urban and Regional Planner, Wisconsin Department of Transportation
 - Ethan Johnson – Program and Planning Analyst, Wisconsin Department

of Transportation

- Alyssa Macy – Program Planning Analyst, Wisconsin Department of Transportation
- Arun Rao – Urban and Regional Planner, Wisconsin Department of Transportation
- Amtrak
 - Walter Lander – Principal Officer, Corridor Planning, Amtrak
- Quandel Consultants
 - Charlie Quandel, P.E. – President & CEO
 - Melanie Johnson, P.E. – Project Engineer

Purpose and Need

The draft Purpose and Need Statement was prepared by Mn/DOT and WisDOT to identify the purpose (desired outcomes) and needs (problems that are in need of a solution) of the project. The alternatives analysis links the measures of effectiveness to the purpose and need to ensure continuity throughout the project.

The Purpose and Need document addresses the purpose and need for the proposed action. Need is driven by the limitations and vulnerabilities of available travel modes between Milwaukee and Twin Cities.

The purpose of the proposed action is to meet future regional travel demand and provide intermodal connectivity to existing and planned transportation systems in Minnesota and Wisconsin. The proposed action offers an opportunity to provide reliable and competitive passenger rail service as an attractive alternative transportation choice between Milwaukee and Twin Cities by:

- Decreasing travel times,
- Increasing frequency of service, and
- Providing safe and reliable service.

In addition, the project will:

- Improve overall system connectivity in the interstate transportation network in conformance with statewide and regional transportation plans
- Provide accessibility to major population centers,
- Improve freight rail mobility, and
- Minimize environmental impacts.

The need for the proposed action exists because:

- **Travel demand** is projected to increase within the corridor placing a significant burden on existing transportation infrastructure
- **Competitive and attractive alternative** modes of travel do not exist in the corridor
- As travel demand increases a new travel mode must be **reliable** to attract riders from existing travel modes ;
- **Intermodal connectivity** among existing transportation systems is limited.

Alternatives Analysis Methodology

The States prepared an alternative analysis methodology for use in developing, evaluating, and comparing alternatives that is completed in three levels of increasing specificity. For each level of analysis, criteria will be analyzed to both quantitatively and qualitatively describe the benefits and impacts and narrow the range of alternatives based on the Project Purpose and Need. As a result, the analysis will focus on progressively fewer alternatives with higher levels of scrutiny.

The alternative analysis will result in the preparation of a Tier 1 Environmental Impact Statement (EIS) that will identify preferred passenger rail alternatives and areas of the route or the entirety of the route designated for Project NEPA. In general, the screening will be completed as follows:

- Level 1 analysis identifies the universe of route alternatives within the project study area. Routes within the universe are pre-screened against the draft Purpose and Need including physical constraints along the alternatives, route distance and route population. Routes that are obviously not suitable for passenger service are eliminated from further study.
- Level 2 analyses utilize qualitative and quantitative measures to evaluate engineering, travel market and environmental criteria. Alternatives that are shown to have impacts that are extraordinary in nature will be eliminated. The result of the Level 2 analyses is the identification of the Reasonable and Feasible Passenger Rail Alternatives.
- Level 3 analyses compare alternatives to the No Build Alternative and to each other. The range of alternatives will be further reduced to those that perform well, minimize or avoid impacts and are more cost effective by comparison. The result of the Level 3 analyses will be reported in a Tier 1 EIS document, after which the study team will identify the Preferred Passenger Rail Alternative for the corridor.

Public Involvement

Public Involvement is a key activity within the NEPA process. The goals of public involvement are to engage the public in a meaningful and transparent way and build

community consensus around recommendations.

In November and December 2010, six public involvement meetings and two agency scoping meetings were held in Minnesota and Wisconsin to inform the public and agencies about the Milwaukee-Twin Cities High-Speed Rail Corridor Program. Representatives of Minnesota Department of Transportation, Wisconsin Department of Transportation, and Quandel Consultants presented to the public in the following cities:

- St. Paul, MN (Agency Scoping and Public Involvement)
- Rochester, MN (Public Involvement)
- Eau Claire, WI (Agency Scoping and Public Involvement)
- La Crosse, WI/La Crescent, MN (Public Involvement)
- Fond du Lac, WI (Public Involvement)
- Madison, WI (Public Involvement)

The Public Involvement Team presented on the following topics:

- NEPA Process Overview
- Purpose and Need of the Project
- Methodology to identify Potential Passenger Rail Alternatives
- Methodology to identify Reasonable and Feasible Passenger Rail Alternatives
- Methodology to identify Preferred Passenger Rail Alternatives
- Service Development Planning
- Project Schedule and next steps

Identification of the Universe of Routes

The Alternatives Analysis Methodology states that the Universe of Routes for the Milwaukee-Twin Cities corridor must be identified. The Universe of Routes is comprised of the existing, abandoned, and out of service rail lines within the corridor. Using geographic (GIS) data from Minnesota DOT and Wisconsin DOT, twenty-six routes were identified as the Universe of Routes. These routes included the following:

- Route 1 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Hastings-St. Paul-Minneapolis
- Route 2 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis
- Route 3 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Hastings-St. Paul-Minneapolis

- Route 4 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-St. Paul-Minneapolis
- Route 5 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis
- Route 6 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Hastings-St. Paul-Minneapolis
- Route 7 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Winona-St. Paul-Minneapolis
- Route 8 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis
- Route 9 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Hastings-St. Paul-Minneapolis
- Route 10 - Milwaukee-Watertown-Portage-Camp Douglas-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis
- Route 11 - Milwaukee-Watertown-Madison-Portage-Camp Douglas-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis
- Route 12- Milwaukee-Wauwatosa-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis
- Route 12A - Milwaukee - Wiscona Jct.- Wyeville – Merrillan - Eau Claire - St. Paul -Minneapolis
- Route 13 - Milwaukee-Neenah-Stevens Point-Marshfield-Chippewa Falls-Eau Claire-St. Paul-Minneapolis
- Route 14 - Milwaukee-Neenah-Stevens Point-Marshfield-Chippewa Falls-Withrow-St. Paul-Minneapolis
- Route 15 – Milwaukee-Watertown-Madison-Reedsburg-Sparta-La Crosse-Hastings-St. Paul-Minneapolis
- Route 16 - Milwaukee-Watertown-Madison-Reedsburg-Sparta-La Crosse-Winona-St. Paul-Minneapolis
- Route 17 - Milwaukee-Watertown-Madison-Reedsburg-Sparta-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis
- Route 18 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Rochester-Red Wing-St. Paul-Minneapolis
- Route 19 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-Rochester-Red Wing-St. Paul-Minneapolis
- Route 20 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Winona-Rochester-Red Wing-St. Paul-Minneapolis

- Route 21 - Milwaukee-Watertown-Madison-Reedsburg-Sparta-La Crosse-Winona-Rochester- Red Wing-St. Paul-Minneapolis
- Route 22 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Rochester-Dodge Center-Randolph-Inver Grove Heights-St. Paul-Minneapolis
- Route 23 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-Rochester- Dodge Center-Randolph- Inver Grove Heights-St. Paul-Minneapolis
- Route 24 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Winona-Rochester- Dodge Center-Randolph- Inver Grove Heights-St. Paul-Minneapolis
- Route 25 - Milwaukee-Watertown-Madison-Reedsburg-Sparta-La Crosse-Winona-Rochester- Dodge Center-Randolph- Inver Grove Heights-St. Paul-Minneapolis

Identification of Potential Passenger Rail Alternatives

In order to identify the Potential Passenger Rail Alternatives, each of the routes within the universe is assessed against a baseline route for the purpose of making comparative route evaluations. For this analysis, the baseline route defined in the MWRRI Project Notebook was used. It is defined as:

- Milwaukee, WI-Madison, WI-Tomah, WI-La Crosse, WI-Red Wing, MN-St. Paul, MN-Minneapolis, MN.

Three evaluation criteria were developed to compare the differences between the alternatives and the baseline route. These evaluation criteria include the following:

- Route Distance
- Route Population
- Physical Constraints

To evaluate the alternatives, a percentage difference between each route and the baseline is calculated for evaluation criteria #1 and #2. For evaluation criterion #3 (Physical Constraints), the presence of physical constraints along a route eliminates a route from further analysis.

Through assessments of the three evaluation criteria, the states identified fourteen routes, Routes 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12A, 13, and 14, as the Potential Passenger Rail Alternatives. The potential passenger rail alternatives, as described below, are subjected to a more detailed alternative analysis in this report in order to identify the “reasonable and feasible passenger rail alternatives:

- Route 1 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Hastings-St. Paul-Minneapolis
- Route 2 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis

- Route 3 - Milwaukee-Watertown-Portage-Tomah-La Crosse-Hastings-St. Paul-Minneapolis
- Route 4 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-St. Paul-Minneapolis
- Route 5 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis
- Route 6 - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Hastings-St. Paul-Minneapolis
- Route 7 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Winona-St. Paul-Minneapolis
- Route 8 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Winona-Rochester-Owatonna-Inver Grove Heights-St. Paul-Minneapolis
- Route 9 - Milwaukee-Watertown-Madison-Prairie du Chien-La Crosse-Hastings-St. Paul-Minneapolis
- Route 10 - Milwaukee-Watertown-Portage-Camp Douglas-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis
- Route 11 - Milwaukee-Watertown-Madison-Portage-Camp Douglas-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis
- Route 12A- Milwaukee - Wiscona Jct.- Wyeville – Merrillan - Eau Claire - St. Paul -Minneapolis
- Route 13 - Milwaukee-Neenah-Stevens Point-Marshfield-Chippewa Falls-Eau Claire-St. Paul-Minneapolis
- Route 14 - Milwaukee-Neenah-Stevens Point-Marshfield-Chippewa Falls-Withrow-St. Paul-Minneapolis

Process to Identify Reasonable and Feasible Passenger Rail Alternatives

Nine evaluation criteria and associated measures were developed in order to identify which of the potential passenger rail alternatives meet the project purpose and the project need for the proposed action. The measures for each evaluation criterion are assessed to ensure that a potential passenger rail alternative complements the project purpose and project need for the proposed action to qualify as a reasonable and feasible passenger rail alternative. The potential passenger rail alternative that does not meet the project purpose and the project need of the proposed action will be eliminated. The following are the nine evaluation criteria used to evaluate the potential passenger rail alternatives:

1. Route Characteristics
2. Travel Time

3. Market Size
4. Capital Costs
5. Operating Costs
6. Safety
7. Reliability
8. System Connectivity
9. Environmental Features

Workshops

A preliminary workshop was held on January 20, 2010 with the states and FRA to review the technical data that was developed for each of the fourteen potential passenger rail alternatives. This data is described above in section 2.1. Also at the workshop, the states and FRA discussed the use of “normative statements” in the evaluation of potential passenger rail alternatives. A normative statement is a value judgment given to data for the purpose of qualitatively assessing that data. The states and FRA agreed that a normative statement would be given to each measure to qualitatively assess the measure and to “rate” the routes using three colors; green, yellow, and red:

- Routes assessed as “green” are more likely to be reasonable and feasible when compared to other routes
- Routes assessed as “yellow” are sub-optimum when compared to “green” routes but can still be considered viable
- Routes assessed as “red” are a poor choice when compared to “green” and “yellow” routes

The measures for each evaluation criterion are assessed to ensure that a potential passenger rail alternative complements the project purpose and project need for the proposed action to qualify as a reasonable and feasible passenger rail alternative. The potential passenger rail alternative that does not meet the project purpose and the project need of the proposed action will be eliminated.

A workshop was held on March 11, 2011 with representatives of Mn/DOT, WisDOT, and Amtrak to review technical data associated with the Potential Passenger Rail Alternatives and to qualitatively evaluate this data in order to identify a set of reasonable and feasible passenger rail alternatives for further analysis in the Tier 1 EIS.

At the March workshop, the states were divided into three teams to assess the evaluation criteria and measures. The workshop was structured so that the measures were assessed independently for a given criterion and an overall assessment was given to that evaluation criterion based on the results of the assessment of the measures. The teams individually assessed and rated the routes, and then discussed the team

assessments to reach a consensus assessment. This process was completed for all measures and criterion.

Identification of Reasonable and Feasible Passenger Rail Alternatives

After the stakeholder workshop, four routes remained that could be identified as Reasonable and Feasible Passenger Rail Alternatives:

- Route 1 (Existing Amtrak) - Milwaukee-Watertown-Portage-Tomah-La Crosse-Winona-Hastings-St. Paul-Minneapolis
- Route 4 (MWRRI-Madison) - Milwaukee-Watertown-Madison-Portage-Tomah-La Crosse-Winona-St. Paul-Minneapolis
- Route 10 (Amtrak-Eau Claire) - Milwaukee-Watertown-Portage-Camp Douglas-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis
- Route 11 (Madison-Eau Claire) - Milwaukee-Watertown-Madison-Portage-Camp Douglas-Wyeville-Merrillan-Eau Claire-St. Paul-Minneapolis

A final evaluation was made to determine whether any of the remaining routes could be eliminated. In comparing these routes to one another, Route 1 had the following advantages over the other routes:

- Route 1 has 0.0 miles of significant grades while Route 4 has 4.87 miles, Route 10 has 14.38 miles, and Route 11 has 19.25 miles of significant grades.
- Travel time between MTI and Milwaukee is 33 minutes less than Route 4 (route that connects to Madison), 3 minutes less than Route 10 through Eau Claire, and 42 minutes less than Route 11 through Madison and Eau Claire;
- Capital cost of Route 1 is \$141 million less than Route 4, \$550 million less than Route 10, and \$690 million less than Route 11;
- Track maintenance cost of Route 1 is \$979,000 less than Route 4, \$630,000 less than Route 10, and \$1.608 million less than Route 11;
- 99.8% of Route 1 has CTC while only 85.4% of Route 4, 45.5% of Route 10, and 29.8% of Route 11 have CTC; and
- Route 1 serves more population of Minnesota with stops in La Crosse/La Crescent, Winona, Red Wing, and Hastings.

Additionally, Route 1 met each purpose and need for the proposed action to construct and operate a high-speed passenger rail corridor between Milwaukee and Minneapolis/St. Paul.

Route 1 provided the most competitive and attractive alternative mode of transportation. In order to attract rail users, the proposed action must provide conveniences that are competitive with or better than conveniences provided by other transportation modes. This need was addressed by decreasing travel time from the current 6 hours and 30 minutes, which is the existing travel time for the *Empire Builder* between the Twin Cities

and Milwaukee and also increasing the frequency of passenger rail service. Mn/DOT representatives were cognizant of the recent vacillation to completely fund the full high speed rail corridors in single funding cycle in favor of partial or incremental funding and building of a passenger rail route in phases allowing for incremental increases in frequency as well as “phased” reduction in travel time.

The Vision of the Minnesota Comprehensive Statewide Freight and Passenger Rail Plan is to develop a robust intrastate and interstate intercity passenger rail system which results in improved travel options, costs and speeds for Minnesota and interstate travelers. One of the priority program elements identified in the Statewide Rail Plan is to advance corridors incrementally and simultaneously with Mn/DOT’s support; sequencing depending on financing, ROW acquisition and agreements with freight railroads¹.

Mn/DOT representatives considered the Vision and priority program of the Minnesota Comprehensive Statewide Freight and Passenger Rail Plan in the final evaluation. Section 4.2.2 of the draft Project Purpose and Need acknowledged that improvements to infrastructure and mitigation of freight capacity issues could allow for increased train frequency and reduced travel times for passenger rail service in the corridor. Route 1 currently has passenger service in that Amtrak’s *Empire Builder* serves the corridor, and, therefore, provided the best opportunity to implement a phased approach for infrastructure improvements and freight mitigation. The proper phasing of the improvements will achieve incremental reduction in travel time for each improvement allowing for an incremental increase in frequency of passenger rail service. In fact, Mn/DOT and WisDOT are currently exploring with Amtrak the feasibility of increasing the frequency of the current service from one round-trip per day to two with the introduction of the second *Empire Builder* train between the Twin Cities and Chicago via Milwaukee.

Routes 4, 10, and 11 do not offer this benefit since each route required significant capital investment prior to the introduction of any passenger rail train service. Appendix L detailed the capital cost estimates for each alternative route. The Watertown- Madison-Portage segments needed building prior to the introduction of passenger rail service on Route 4. The estimated capital improvements for these segments are in excess of \$500 million. Route 10 required the complete build of the Camp Douglas-Eau Claire-St Paul segments from Camp Douglas. Route 11, which also serves Eau Claire, required the complete build of the Route 4 and Route 10 segments. The estimated capital improvements for Route 10 and 11 needed prior to introducing any passenger rail service was in excess of \$1.8 billion and 2.3 billion, respectively.

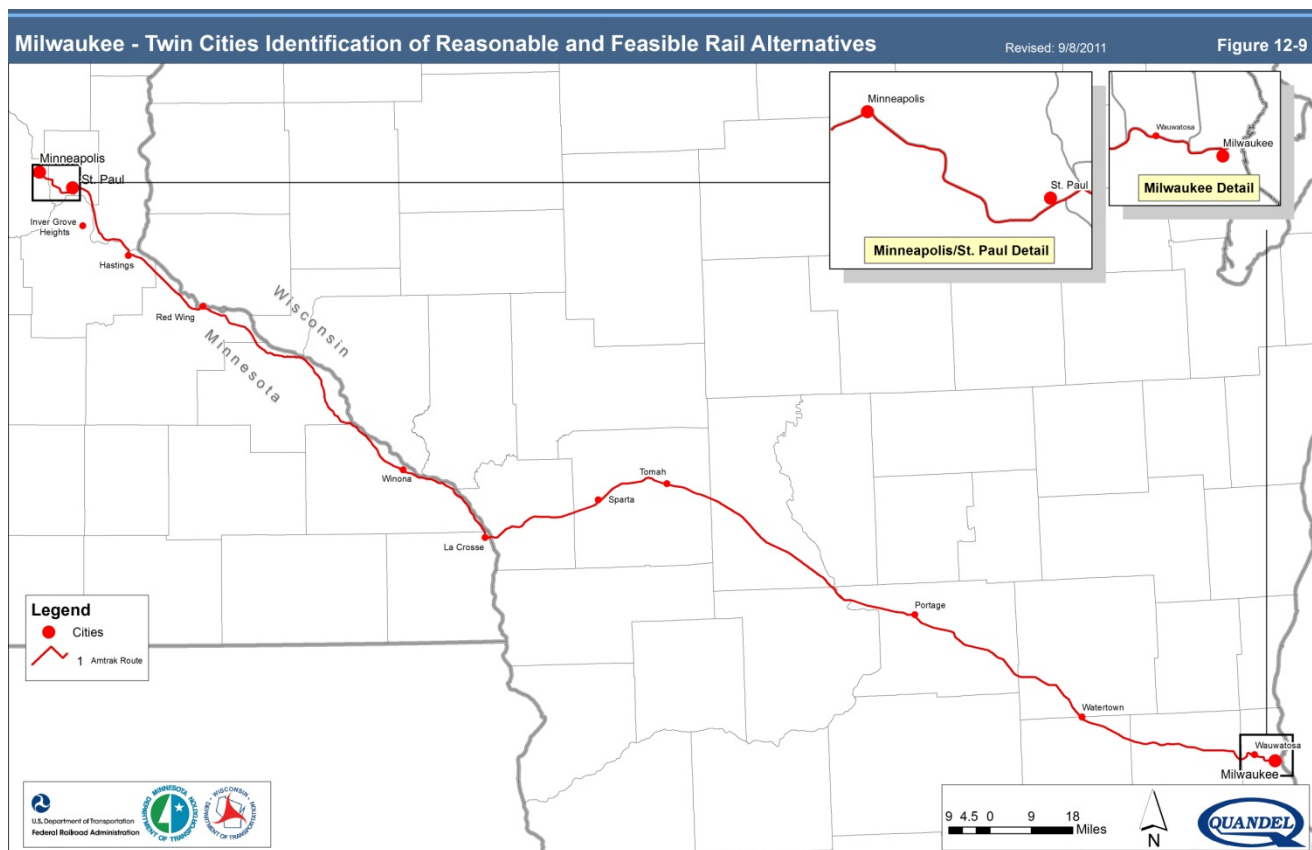
Therefore, the Mn/DOT representatives determined that one reason to identify Route 1 as the reasonable and feasible passenger rail alternative was because of the opportunities to incrementally implement a reduction in travel time and increase in frequency by phasing the build-out of the route. This phased approach recognized the constraints associated with funding requirements for major infrastructure improvements and is consistent with the Minnesota Statewide Rail Plan.

¹ Minnesota Comprehensive Statewide Freight and Passenger Rail Plan, February 2010

Finally, on August 31, 2011, Wisconsin's Secretary of Transportation sent a letter to Mn/DOT stating that the Wisconsin Department of Transportation will no longer pursue the continuation of the Milwaukee-Twin Cities Passenger Rail Study at this time. The letter further stated that WisDOT will continue to support intercity passenger rail by focusing Wisconsin's resources on the Hiawatha and Empire Builder routes that have successfully serviced Wisconsin residents over the last 20 years. The letter further states that improving and enhancing these routes is Wisconsin's first priority. The letter is attached as Appendix P.

Because Route 1 more clearly meets the purpose and need, specifically related to a phased approach for implementation of passenger rail service, Mn/DOT has identified Route 1 as the Reasonable and Feasible Passenger Rail Alternative.

The figure below depicts the Reasonable and Feasible Passenger Rail Alternative.



Next Steps

The next step in the project is to identify the preferred passenger rail alternative within a Tier 1 EIS document. The reasonable and feasible passenger rail alternatives and a no build alternative will be evaluated to identify the preferred passenger rail alternative. The

alternatives are evaluated based on:

- Conceptual Engineering
- Track Concepts
- Capital Cost Estimate
- Station Location Analysis
- Environmental Analysis
- Ridership
- Operating Costs
- Assessment of Benefits

Using the information gathered, a Draft Tier 1 EIS will be produced. A Final Tier 1 EIS will be circulated after agency reviews and public involvement hearings. A draft Record of Decision (ROD) will be completed, and once approved by FRA, a final ROD will be issued.