

APPENDIX B

ALTERNATIVES ANALYSIS

- **Alternatives Analysis**
- **NLX Level 1 Analysis – Track Segment Descriptions**
- **FRA and MnDOT Correspondence**

Alternatives Analysis

Introduction

In accordance with FRA guidance, a three-level evaluation methodology was utilized to conduct an alternative analysis of potential rail corridors connecting Minneapolis and Duluth. Level 1 is an initial screening of rail alternatives, addressing operational characteristics, investment requirements, and environmental constraints at a broad conceptual level. Level 1 results in a reduced set of viable rail alternatives that are subjected to a more detailed process in Levels 2 and 3. Level 2 examines ridership and operations in more detail, done only when Level 1 screening identifies more than one reasonable rail alternative. Level 3 is a detailed evaluation of the rail alternatives surviving Levels 1 and 2 screening, and addresses operational and environmental issues as compared with other transportation modes such as intercity bus as well as the No Build alternative.

The three-level alternatives analysis process was initially carried out by the project team in consultation with agency stakeholders in fall of 2009. Consultation with FRA staff in early 2010 resulted in the purpose and need statement being revised and additional alternatives being identified for analysis. The routes were added because the Purpose and Need of the project was revised to indicate terminal station in Minneapolis. Since Minneapolis was chosen as the terminal, routes were added to provide service to St. Paul Union Depot. This is noted below, where relevant.

Level 1

The Level 1 screening for alternatives includes three steps.

In Step 1 a universe of route alternatives for passenger rail service between Minneapolis and Duluth were identified. 17 passenger rail routes extending as far west as Staples, Minnesota and as far east as Trego, Wisconsin, were identified. Four others were identified during the fall of 2009 process (Routes 10A, 11A, 12A, and 13A); two were added following FRA consultation in early 2010 (Routes 11 and 11A). See Figure X in Appendix A.

In Step 2, each of the seventeen route alternatives were screened according to the three criteria:

1. Route distance – from end point to end point.
2. Population and population centers – route corridor populations (2000 Census data; within a 20-mile band of each route (10 mile each side), and within a 20-mile radius of each of terminal stations in Minneapolis and Duluth) were compiled and used as an estimate of potential ridership.
3. The presence of route defects – conditions that would make the construction or operation of a passenger rail particularly costly or difficult. Any defects that would effectively prohibit rail line construction or operation and could not be mitigation were considered “untenable defects” and eliminated a route from further screening.

Based on the analysis, each route was assessed as either “comparable” or “unfavorable” with respect to each of the criteria. The comparable/unfavorable assessments were tallied for each route, and nine routes were eliminated from consideration (Routes 1, 2, 3, 4, 5, 6, 7, 13, and 13A). None of the routes added in early 2010 were eliminated as a result of Step 2 analysis.

In Step 3, the eight surviving routes (Routes 8, 9, 10, 10A, 11, 11A, 12 and 12A) underwent a more thorough quantitative screening and evaluation process. Step 3 included both a technical evaluation as well as a prioritization of evaluation criteria and scoring of alternatives conducted at a screening workshop. The process is detailed in the *Northern Lights Express High Speed Rail: Corridor Assessment Report* and is summarized here.

The technical evaluation consisted of an analysis of potential environmental impacts and cost and operational concerns. The environmental analysis was intended to determine what environmental factors would render a corridor infeasible or imprudent due to environmental concerns, or discriminate further between the five routes and assist in further screening the remaining corridor alternatives. Given the overall length and distribution of the corridors to be assessed as well as the number of corridors, the methodology for the environmental scan was based on readily available data that could be easily assessed for potential significance, and addresses federal requirements for avoidance, or secondarily, mitigation, for specific resources including historic and archaeological sites, parks and wildlife refuges, wetlands, threatened and endangered species, floodplains, and federally-designated wild and scenic rivers. In addition, the potential for cost and liability concerns resulting from impacts to EPA-listed “superfund” sites was addressed.

The analysis concluded that the only environmental factor that discriminated among the eight candidate routes at this phase of the project development was the presence of state trails within the corridor. Numerous and comparable historic and archaeological sites and wetlands were present at each of the candidate corridors and detailed comparisons of impacts to these resources could not be assessed at this stage of project development. Potential impacts to state parks, major rivers crossings and superfund sites were anticipated to be low, or had potential to be avoided or mitigation through project design. However, construction of a rail facility in state trail corridors was determined to be difficult for the project as the corridors had been fully abandoned without reversionary clauses, and further, to have a significant impact on these valued public facilities as relocation or mitigation within the existing corridor would be extremely difficult.

The operational and cost analysis addressed speed profiles and route travel times, the locations of existing and potential intermodal stations along each route, ridership potential based on route populations, and cost of improvements.

3.1.3 Level 2/3

Screening Workshop

Twenty-five stakeholders representing the Steering Committee and agencies participated in an interactive workshop on November 23, 2009 to select the one or more reasonable alternatives that would be subjected to the next level screening. Details of the screening workshop are presented in the *Northern Lights Express High Speed Rail: Corridor Assessment Report*. The workshop included review of the draft purpose and need statement, presentation of the Step 1 and Step 2 findings (as had been developed to date, not including routes 10A, 11A, and 12A), development of evaluation criteria (and weights based on importance) for the remaining routes, scoring of the routes against these criteria, and selection of routes for Level 2/3 evaluation. The evaluation included:

- Travel Time – the estimated route travel time between end points
- Proximity to Markets (Ridership) – population within 20 miles of the route and the terminal stations
- Conflicts with Freight or Future Rail Purposes – ability for high speed passenger rail to coexist successfully with freight rail
- Conflicts with Existing Ownership – transfer of corridor ownership to another entity with no reversionary clause
- System Connectivity – intermodal connections such as Amtrak, bus, commuter rail, Light Rail Transit, air, and intra-state connectivity (i.e. connections to Rochester, Eau Claire, Mankato)
- Capital Costs -- rough estimate for comparing routes against each other
- Political/Public Support - the perceived level of political/public support, either for or against, that a route has or would have should it be selected

The scoring matrix detailing the evaluation criteria and criteria weights is shown in Table B-1.

The scoring results are shown in Table B-2 (1=very poor, 2=poor, 3=good, 4=very good and 5=excellent). Route 9 was the highest scoring route with an average weighted score of 4.15, with Route 11 the second highest with a score of 3.51. Routes 8, 10, and 12 scored significantly lower.

Table B-1- Final Route Alternatives Scoring Matrix

Evaluation Criteria	Criteria Weight	Route 8		Route 9		Route 10		Route 11		Route 12	
Travel time	9	3.4	30.6	5	45.0	2.2	19.8	4	36.0	2	18.0
Proximity to Markets / Ridership	9	4	36.0	3.8	34.2	4	36.0	4	36.0	2.4	21.6
Conflict w/Freight, Future Rail Use	5.4	2.8	15.1	2.2	11.9	4.2	22.7	3.2	17.3	4.2	22.7
Conflict w/Existing Ownership	7.6	1.4	10.6	4.2	31.9	1.2	9.1	3.2	24.3	1.4	10.6
System Connectivity	6.6	4	26.4	3.8	25.1	3.2	21.1	3.2	21.1	2	13.2
Capital Cost	8.8	2.4	21.1	5	44.0	1.2	10.6	3	26.4	1.2	10.6
Political and Public Support	6.4	1.8	11.5	4.2	26.9	1.8	11.5	3.8	24.3	1.4	9.0
Total		151.4		219.0		130.8		185.4		105.6	
Weighted Average		2.87		4.15		2.48		3.51		2.00	

The participants agreed that Routes 8, 10, and 12 did not score high enough to warrant further consideration. One participant questioned whether either Route 8 or Route 10 would be scored higher if these routes continued along the Munger Trail into Duluth. It was agreed that, although the newly identified route segment would not likely increase the score such that either Routes 8 or 10 were one of the two highest scoring routes, this new segment should be analyzed in order to thoroughly evaluate all alternatives.[NOTE: This resulted in Munger Trail Analysis memo from the Corridor Assessment Report.]

As noted, four more routes were added to the analysis: Routes 10A, 11A, 12A, and 13A after the workshop and survived the Step 2 analysis.

Since these additional routes were not evaluated in the workshop, a Step 3 scoring analysis was performed on Routes 10A, 11A, and 12A by the project team.

The results of the scoring for Routes 9, 10A, 11, 11A, and 12A are shown in Table B-2.

Table B-2 - Summary Scoring Table

Routes 10A, 11A, and 12A vs. Two Highest-Scoring Route Alternatives

Criteria	Criteria Weight	Route 9		<i>Route 10A</i>		Route 11		<i>Route 11A</i>		<i>Route 12A</i>	
		Raw Score	Weighted Score	Raw Score	Weighted Score	Raw Score	Weighted Score	Raw Score	Weighted Score	Raw Score	Weighted Score
Travel Time	9	5	45	1.4	12.6	4	36	2.9	26.1	1.4	12.6
Proximity to Markets (Population)	9	3.8	34.2	4.2	37.8	4	36	4.2	37.8	2.6	23.4
System Connectivity	6.6	3.8	25.08	4	26.4	3.2	21.12	4	26.4	4	26.4
Conflicts w future rail purposes	5.4	2.2	11.88	3.5	18.9	3.2	17.28	2.8	15.12	3.5	18.9
Conflict w Existing Ownership ¹	7.6	4.2	31.92	1.2	9.12	3.2	24.32	3.2	24.32	1.4	10.64
Capital Costs	8.8	5	44	1.2	10.56	3	26.4	2.4	21.12	1.2	10.56
Political/Public Support	6.4	4.2	26.88	4.2	26.88	3.8	24.32	4.2	26.88	4.2	26.88
<i>Total Score</i>		<i>218.96</i>		<i>142.26</i>		<i>185.44</i>		<i>177.74</i>		<i>129.88</i>	
<i>Weighted Average Score</i>		<i>4.15</i>		<i>2.81</i>		<i>3.51</i>		<i>3.38</i>		<i>2.68</i>	
<i>Weighted Average Difference vs. Highest Score</i>		-		<i>-1.34</i>		<i>-0.64</i>		<i>-0.77</i>		<i>-1.47</i>	

¹ Please note that this score reflects environmental impacts resulting from necessary location of recreational trails built on fully abandoned right of way.

Table B-3 summarizes the screening steps used for the screening of the NLX.

Table B-3 – Summary of Level 1 Screening Steps

Screening Step	Screening Tasks	Description and Results
Step 1	Alternative Routes Identification	Identification of all route alternatives <i>Result:</i> Thirteen Potential Route Alternatives Identified
Step 2	Preliminary Analysis of Rail Routes	Preliminary Analysis of route alternatives <i>Result:</i> Five of Thirteen Route Alternatives Survive Screening Step 2
Step 3	Quantitative Analysis	Analysis of route alternatives surviving Step 2, including speed profiles, travel times, ridership, intermodal stations, capital costs, and environmental issues <i>Result:</i> Analysis and documentation developed for use in Level 1 Screening Workshop
Level 1 Screening Workshop	NLX Stakeholder Workshop	Evaluation and scoring of route alternatives by stakeholders <i>Result:</i> Quantitative route evaluations
Level 1 Screening Report	Summary of Alternatives Analysis Level 1 Screening	Summary and Results of Screening Process <i>Result:</i> Recommendation of route alternative for next level of screening
Functional Analysis of Routes 9, 11, and 11A	Supplement to Level 1 Screening Report	Assesses the functional characteristics (capital improvements, travel time, ridership, revenue, and benefit/cost) of Routes 9, 11, and 11A <i>Result:</i> Recommendation of Route 9 as the locally preferred alternative

Of the eight routes evaluated in Step 3, the top three scoring routes included Route 9 with a weighted average score of 4.15, Route 11 with a score of 3.51 and Route 11A with a score of 3.38. While a stop at St. Paul Union Depot augments Routes 11 and 11A in terms of access to markets and future connectivity and results in a lower potential for freight rail conflicts, significant differences in travel time, capital investment, and potential environmental impacts result in a significantly higher score for Route 9.

In terms of the capital cost criterion, these scores reflect a significant qualitative difference between Route 9 and 11 - the maturity of the right of way for build-out for a high speed rail system. Route 9 possesses greater “maturity” in that existing rail service exists within the right-of-way allowing a passenger rail system to be developed using the infrastructure already in place

for freight operation. In contrast, Route 11 requires reconstruction of this infrastructure for a significant portion of the corridor south of Hinckley, as that infrastructure has been removed. Furthermore, the purpose and need identified cost constraints as a definite consideration in project development. The NLX Alliance Board and Steering Committee anticipate that this project will be fiscally constrained. Therefore, the ability of the project route to provide sufficient design flexibility necessary to reduce construction costs when needed while fulfilling project objective will be imperative to project implementation.

Route 9 provides opportunities for further cost reduction by reducing maximum operational speeds in some segments to 90 mph, eliminating the need for a parallel track, and significantly reducing capital investments. Route 11 does not provide such opportunities for cost reduction since the segments designated for 110 mph operations are a complete reconstruction of abandoned rights of way requiring a fixed level of improvements, regardless of passenger rail operational speeds. In addition, from an environmental perspective, the social and community impacts associated with reconstructing a rail system through a corridor which has not seen rail operations for several decades would be substantial.

Regarding the number of corridors brought forward for additional analysis, the Route 9 score of 4.15 is considerably higher than the score of Route 11 which received a score of 3.51. The difference of 0.64 points on a five-point scale is significant. This difference, in combination with the discussion of maturity, flexibility in the amount of capital investment required, and environmental impacts suggests that Route 9 is the only prudent route to move forward at this time.

Additional analysis was conducted to assess the functional characteristics of Routes 9, 11, and 11A to determine if the group of alternatives should be narrowed before proceeding into the environmental document.

A higher level of capital investment is needed for Routes 11 and 11A than Route 9 (\$1.36 billion and \$1.49 billion versus \$0.82 billion respectively) due to corridor condition and level of improvements necessary to accommodate moves between segments and achieve reasonable operating speeds.

Ridership is higher for Route 11A due to the additional stop provided in St. Paul (981,000 year 2020 trips for Route 11A versus 938,000 and 834,000 trips for Routes 9 and 11 respectively). However, revenue is diminished for Route 11A (\$26.86 million versus \$27.66 million for Route 9 and \$26.34 million for Route 11) as the route configuration and overall travel times encourages shorter trips between Minneapolis and St. Paul and discourages longer trips throughout the remainder of the corridor.

The benefit-cost analysis found that only Route 9 yields a benefit-cost ratio greater than 1.0, with a ratio of 1.5 for the three percent discount rate and 1.03 for the seven percent discount rate. Routes 11 and 11A fail to meet the 1.0 ratio, scoring 0.98 and 0.9 respectively for the three percent discount rate and 0.65 and 0.6 respectively for the seven percent discount rate. Only route 9 achieves operating ratios greater than 1.0 in both 2025 and 2040 (1.02 and 1.14 respectively). Routes 11 and 11A achieve only 0.82 and 0.80 operating ratios in 2025 and 0.92

and 0.90 ratios in 2040.

There was subsequent refinement to concept engineering (Level 3) which served to confirm the rationale for selection of Route 9 as the Preferred Alternative.

NLX LEVEL 1 ANALYSIS - TRACK SEGMENT DESCRIPTIONS

TABLE 1
Northern Lights Express - Track Segment Descriptions

Track Segment	Approximate Limits	Owner(s)	No. of Existing Track(s)	Note
A	Bald Eagle, MN to Ambridge, WI	Canadian National; Canadian Pacific; Abandoned	1/None	Canadian Pacific owned (1 existing track) from Bald Eagle to Withrow; Canadian National owned (1 existing track) from Withrow, MN to New Richmond, WI. Abandoned C&NW line north of New Richmond, WI. Approximately 6 of the 130+ miles on the abandoned segment owned by the Wisconsin Great Northern RR
B	Bald Eagle, MN to Boylston, WI	Canadian National; Canadian Pacific; Abandoned	1/None	Canadian Pacific owned (1 existing track) from Bald Eagle to Withrow, WI. Canadian National owned (1 existing track) from Withrow, MN to Dresser, WI. Abandoned north of Dresser.
C	Bald Eagle, MN to Hinckley, MN	Minnesota Commercial; St. Croix Valley; Abandoned	1/None	Existing 'Rush Line' corridor. 1 existing track owned by Minnesota Commercial between Bald Eagle and Hugo; no existing track between Hugo and North Branch, MN; 1 existing track owned by St. Croix Valley north of North Branch, MN
D	Hinckley, MN to Boylston, WI	BNSF	1	Segment was studied in the 2007 report 'Minneapolis-Duluth/Superior Restoration of Intercity Passenger Rail Service Comprehensive Feasibility Study and Business Plan' by TEMS Inc.
E	Coon Creek, MN to Brook Park, MN	BNSF	1	Segment was studied in the 2007 report 'Minneapolis-Duluth/Superior Restoration of Intercity Passenger Rail Service Comprehensive Feasibility Study and Business Plan' by TEMS Inc.
F	Brook Park, MN to Hinckley, MN	BNSF	1	Segment was studied in the 2007 report 'Minneapolis-Duluth/Superior Restoration of Intercity Passenger Rail Service Comprehensive Feasibility Study and Business Plan' by TEMS Inc.
G	Hinckley, MN to Moose Lake, MN	Abandoned	None	Formerly owned by Northern Pacific Railroad; now the Willard Munger Trail
H	Minneapolis, MN to St. Cloud, MN	BNSF	2	Minneapolis-Coon Creek subsegment was studied in the 2007 report 'Minneapolis-Duluth/Superior Restoration of Intercity Passenger Rail Service Comprehensive Feasibility Study and Business Plan' by TEMS Inc.
I	Elk River, MN to Milaca, MN	Abandoned	None	Formerly owned by Great Northern Railroad

Track Segment	Approximate Limits	Owner(s)	No. of Existing Track(s)	Note
J	St. Cloud, MN to Milaca, MN	Abandoned	None	Formerly owned by Soo Line
K	Royalton, MN - Moose Lake, MN	Abandoned	None	Formerly owned by Soo Line
L	Little Falls, MN to Brainerd, MN	BNSF/Abandoned	1/None	1 existing track owned by BNSF between Little Falls and Camp Ripley; no existing track between Camp Ripley, MN and Brainerd, MN
M	Brainerd, MN to Boylston, WI	BNSF	1	
N	Moose Lake, MN to Boylston, WI	Abandoned	None	Formerly owned by Soo Line
O	Little Falls, MN to Staples, MN	BNSF	2	
P	Staples, MN to Brainerd, MN	BNSF	1	
Q	Milaca, MN to Brook Park, MN	St. Croix Valley/ Abandoned	1/None	1 existing track owned by St. Croix Valley between Mora, MN and Brook Park, MN; no existing track between Milaca, MN and Mora, MN
R	St. Cloud, MN to Royalton, MN	BNSF	2	
S	Royalton, MN to Little Falls, MN	BNSF	2	

TABLE 2
Northern Lights Express Route Alternatives

Route No.	Track Segments	Cities Served	Track Owner(s)
1	H-R-S-O-P-M	Minneapolis/St. Paul, MN St. Cloud, MN Little Falls, MN Staples, MN Brainerd, MN Aitkin, MN Superior, WI Duluth, MN	BNSF
2	H-R-S-L-M	Minneapolis/St. Paul, MN St. Cloud, MN Little Falls, MN Brainerd, MN Aitkin, MN Superior, WI Duluth, MN	BNSF; Abandoned
3	H-R-K-N	Minneapolis/St. Paul, MN St. Cloud, MN Genola, MN Moose Lake, MN Superior, WI Duluth, MN	BNSF; Abandoned
4	H-J-Q-F-G-N	Minneapolis/St. Paul, MN St. Cloud, MN Hinckley, MN Moose Lake, MN Superior, WI Duluth, MN	BNSF; St. Croix Valley; Abandoned
5	H-J-Q-F-D	Minneapolis/St. Paul, MN St. Cloud, MN Hinckley, MN Superior, WI Duluth, MN	BNSF; St. Croix Valley; Abandoned
6	H-I-Q-F-G-N	Minneapolis/St. Paul, MN Elk River, MN Milaca, MN Hinckley, MN Moose Lake, MN Superior, WI Duluth, MN	BNSF; St. Croix Valley; Abandoned
7	H-I-Q-F-D	Minneapolis/St. Paul, MN Elk River, MN Milaca, MN Hinckley, MN Superior, WI Duluth, MN	BNSF; St. Croix Valley; Abandoned

Route No.	Track Segments	Cities Served	Track Owner(s)
8	E-F-G-N	Minneapolis/St. Paul, MN Cambridge, MN Hinckley, MN Moose Lake, MN Superior, WI Duluth, MN	BNSF; Abandoned
9	E-F-D	Minneapolis/St. Paul, MN Cambridge, MN Hinckley, MN Superior, WI Duluth, MN	BNSF
10	C-G-N	Minneapolis/St. Paul, MN Rush City, MN Hinckley, MN Moose Lake, MN Superior, WI Duluth, MN	Minnesota Commercial; St. Croix Valley; Abandoned
11	C-D	Minneapolis/St. Paul, MN Rush City, MN Hinckley, MN Superior, WI Duluth, MN	Minnesota Commercial; St. Croix Valley; BNSF; Abandoned
12	B	Minneapolis/St. Paul, MN Dresser, WI Superior, WI Duluth, MN	Canadian National; Canadian Pacific; Abandoned
13	A	Minneapolis/St. Paul, MN New Richmond, MN Turtle Lake, WI Spooner, WI Superior, WI Duluth, MN	Canadian Pacific; Canadian National; Wisconsin Great – Northern; Abandoned



Minnesota Department of Transportation

395 John Ireland Boulevard
Saint Paul, MN 55155

June 28, 2011

Ms. Colleen Vaughn
Federal Railroad Administration
Office of Railroad Policy and Development
1200 New Jersey Avenue SE, MS-20
Washington DC, 20590

RE: Northern Lights Express Environmental Assessment Process

Dear Ms. Vaughn:

The Minnesota Department of Transportation (MnDOT) in consultation with the Wisconsin Department of Transportation (WisDOT) and the Northern Lights Express (NLX) Alliance has been working with you and other representatives from the Federal Railroad Administration (FRA) regarding the purpose and need, Level 1 Corridor Assessment, Functional Analysis Report and most recently the Concept Level Engineering Report for the proposed NLX project in Minnesota and Wisconsin.

On behalf of MnDOT, I want to thank you and others at FRA for the time and commitment made on the project; most notably the collaborative and productive project meeting that took place in Washington DC on May 5/6, 2011 to address and resolve the comments provided by the FRA on project related submittals.

As you are aware, Quandel Consultants, one of the firms under contract for the NLX project; submitted directly to you the revised Concept Engineering Report (Level 3 Analysis) for Routes 9, 11 and 11A on June 10, 2011; along with the referenced Appendices to that document. These documents reflect the direction/actions agreed upon at the project meeting held in May. Following the submittal on June 10, 2011, Mr. Quandel and Dave Christianson of MnDOT had further conversations/input from FRA and other members of the NLX Steering Committee regarding the content of the NLX Concept Engineering Report. On June 23, 2011 Quandel Consultants, at the request of MnDOT submitted revisions to the NLX Concept Engineering Report for Routes 9, 11 and 11A. Additionally, a document titled "Description of Changes Made between April 26, 2011 and June 23, 2011 to the Concept Engineering report (Level 3 Analysis) routes 9, 11 and 11 A was submitted to facilitate your review.

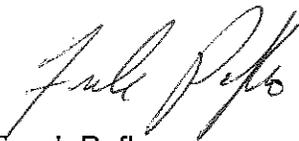
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With the resolution of comments provided by the FRA on the above noted documents submitted to date for the NLX project; we respectfully request FRA's written concurrence that Route 9 is the preferred passenger rail alternative and that the Minnesota Department of Transportation is authorized to proceed with detailed environmental evaluation of Route 9 and the No-Build alternative in the Environmental Assessment for the NLX project.

We look forward to your written response to the above noted concurrence request. Please let me know if you have any questions. I can be reached directly at 651-366-3602.

Sincerely,



Frank Pafko

Director

MnDOT Office of Environmental Stewardship

cc: Ramon Munoz-Raskin

Dan Krom, Director, MnDOT Passenger Rail Office

Tim Henkel, Director, MnDOT Modal Planning & Program Management Division

Dave Christianson, MnDOT

Bob Manzoline, NLX Alliance

Tom Beckman, WisDOT

Beth Bartz, SRF Consulting Group

Jeanne Witzig, Kimley-Horn and Associates

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U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

JUL 29 2011

Mr. Frank Pafko, Director
Office of Environmental Services
Minnesota Department of Transportation
395 John Ireland Boulevard, MS 620
St. Paul, MN 55155-1899

Re: Northern Lights Express High Speed Passenger Rail Environmental Assessment: Environmental Assessment Process

Dear Mr. Pafko:

Thank you for your letter dated June 28, 2011, in which you request Federal Railroad Administration (FRA) concurrence on the determination of Route 9 as the Preferred Build Alternative to be carried forward in the Environmental Assessment (EA). FRA staff have had the opportunity to review both the "Revised Concept Engineering Report for Routes 9, 11 and 11A" and the "Description of Changes made between April 26, 2011 and June 23, 2011 to the Concept Engineering Report (Level 3 Analysis) Routes 9, 11, and 11A". We appreciate the time and effort taken by the Minnesota Department of Transportation (MnDOT) to address FRA comments on the draft documents. At this time FRA agrees that routes 9, 11, and 11A have been evaluated to the extent that routes 11 and 11A can be eliminated and concurs with the request by MnDOT that Route 9 be carried forward as the preferred build alternative. MNDOT may proceed with the environmental evaluation of Route 9 and the No-Build Alternative, culminating in an Environmental document for FRA review and approval. We look forward to continued collaboration on this study.

Please contact Colleen Vaughn at 202-493-6096 or by email at colleen.vaughn@dot.gov if you have any questions.

Sincerely,

David Valenstein
Chief, Environment & Systems Planning Division

CC: Wynne Davis, FRA
Dan Krom, MnDOT
Dave Christianson, MnDOT
Julie Carr, MNDOT
Tom Beckman, Wisconsin DOT
Bob Manzoline, NLX Alliance

