

**Citizens for Appropriate Transportation**

728 South Euclid Avenue  
Oak Park, Illinois 60304

[www.CitizensForAppropriateTransportation.org](http://www.CitizensForAppropriateTransportation.org)

**This letter is intended for inclusion in the Public Record**

February 10, 2017  
Illinois Dept. of Transportation  
c/o Mr. Peter Harmet and Mr. Mark Peterson  
201 West Center Court  
Schaumburg, IL 60196

**SUBJECT: Draft Environmental Impact Statement (DEIS)**

Dear Mr. Harmet and Mr. Peterson:

Thank you for the opportunity to submit comments on the DEIS. Please accept our thanks for an enormous amount of work. We have grouped our comments into six categories: Purpose and Need, Alternatives, Impacts, Evaluation, Citizen Participation, and General Comments.

**1. PURPOSE AND NEED**

***a. IDOT's Goal***

**IDOT should include their overall goal (“Create an asset for adjoining communities”) in Chapter 1: Purpose and Need.** To achieve this goal, both IDOT and the adjoining communities have important roles. The proposed IDOT and CTA investments in the Corridor are substantial, so they will have economic, social, and environmental impacts. The Chicago Metropolitan Agency for Planning Go To 2040 plan says most of our region’s future growth should occur in existing communities. Community economic development efforts benefit from transportation investments.

IDOT says, “*any redevelopment of the land uses along the I-290 corridor is beyond the scope of this (or any) transportation project.*”<sup>1</sup> Having IDOT do economic development is not appropriate, but having IDOT modify the design of the expressway to facilitate development is.

***b. Livability***

---

<sup>1</sup> Letter from John Fortmann and Peter Harmet at the Illinois Department of Transportation to Rick Kuner, Citizens for Appropriate Transportation, July 29, 2013, Page 4.

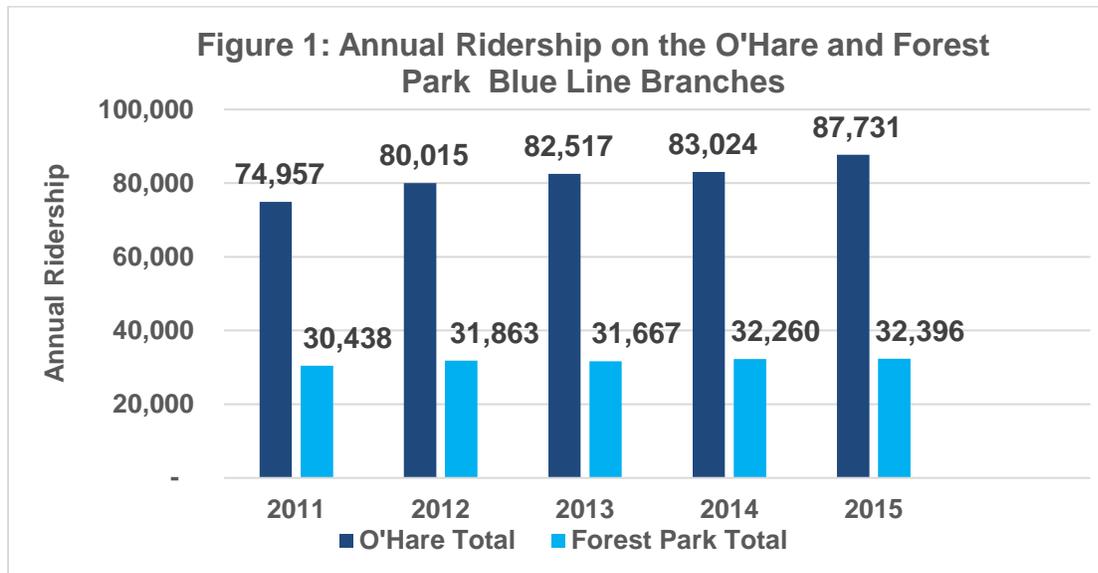
**IDOT should include livability features in the Purpose and Need Statement.** Pennsylvania DOT and New Jersey DOT include livability features in their projects<sup>2</sup>.

## **2. ALTERNATIVES**

Good solutions are multi-modal for both Traditional and Reverse Commutes. They create a better economic climate that will encourage investments in our communities. They meet social goals. They reduce negative impacts on the environment. They increase the livability of our communities. They make financial sense.

### **a. Capacity**

**IDOT's Preferred Alternative will not have enough capacity to eliminate congestion. The CTA Forest Park Branch has excess capacity. The more people who choose transit over driving, the less congestion on the expressway and the more revenue for the CTA.** For every rider on the Forest Park Branch of the CTA Blue Line, there are 2.5 to 2.7 riders on the O'Hare Branch, so there is unused capacity on the Forest Park Branch (see Figure 1). Driverless cars and crash avoidance systems may increase expressway capacity, but when and by how much is uncertain. The CTA already transports Captive Riders (no access to a car), but needs to attract more Choice Riders (access to a car, but choose transit).



**Hours of Congestion** – IDOT's prior analysis shows that weekday congestion on the existing general purpose lanes is about 17 hours a day, which is projected to be 18 hours a day by 2040 under the 2040 No Build Alternative. Of the four Build Alternatives IDOT considered, the best one would reduce this to 16¼ hours on a weekday for the

<sup>2</sup> "Smart Transportation Guidebook – Planning and Designing Highways and Streets that Support Sustainable and Livable Communities," New Jersey Department of Transportation and Pennsylvania Department of Transportation, March 2008.

general purpose lanes. For the HOT 3+ lanes, IDOT's analysis shows lower congestion levels. These numbers do not appear in the DEIS. Why did IDOT exclude them?

**Four of the eight lanes in the Preferred Alternative are 11 feet wide even though the interstate standard is 12 feet.** The other four lanes are 12 feet wide. Eleven-foot lanes tend to increase sideswipe accidents. IDOT's approach is to look at the impact of all design features on crashes and accept a higher crash rate for 11-foot lanes if there are design features that lower the crash rate elsewhere.

***b. Crashes***

The expressway section under study has about 2,500 crashes a year while the CTA has zero crashes in most years. This makes the CTA a desirable and viable option assuming a reduction in the number of pickpocket, theft, and robbery incidents.

***c. Blue Line Role***

Good transit service means a better quality of life for families without cars, young children, and senior citizens. The CTA Forest Park Blue Line branch can carry many more commuters with less negative impacts than widening the expressway.

Transit needs dense development to function effectively. The inner West Cook County suburbs have the necessary density. Recent development trends suggest density on Chicago's West Side will increase in the future, providing additional demands for CTA rail service. Requiring transit-oriented development around stations will help transit and land use work better. Zoning codes that allow transit-appropriate density within walking distance of stations is another good policy.

The Blue Line extension will have more riders if it includes large park-and-ride lots, feeder bus service to the stations, kiss-and-ride, and bicycle racks or storage lockers. A pricing structure that encourages the use of park-and-ride or feeder bus as an alternative to driving into downtown Chicago will also help.

The CTA should extend the Blue Line to at least 1<sup>st</sup> Avenue in Maywood. Not extending the Blue Line west of Forest Park will mean more expressway congestion and it hurts Maywood. The CTA already owns the right-of-way from the Forest Park Yards to the east side of the Des Plaines River. The further west the CTA intercepts drivers via Park-and-Ride facilities, the better because that will reduce the number of vehicles on the expressway. The CTA schedule for the Blue Line has 4 to 9 minute headways during peak periods. The CTA's signal system can handle headways of less than four minutes. The CTA is not extending it because other projects have higher priority and the lack of funding.

For IDOT, reconstructing and widening the expressway in the six-lane section is a priority. For the CTA, rebuilding the existing Forest Park Branch of the CTA is a priority; extending the Blue Line is not. Because of different priorities and funding programs, it is possible IDOT will improve the expressway years before any extension of the Blue Line takes place. Corridor residents and businesses may not see the full benefits from multi-modal planning for years.

***d. CSX Right-of-Way***

The CSX railroad says none of their right-of-way is available, which means higher bridges at Austin and Harlem and four 11-foot lanes. There is a provision in the Letter of Intent between IDOT and the Village of Oak Park to reopen this issue if some of the CSX right-of-way becomes available, but this is not mentioned in the DEIS.

**e. HOT 3+ Experience**

HOT lanes are hard to manage. They have five purposes: (1) decrease travel time, (2) increase the person capacity of an expressway, (3) increase trip reliability, (4) decrease air pollution, and (5) increase revenue. To use HOT 3+ lanes, the driver must find two more people, pick them up, and drop them off at convenient locations. People who work late or irregular hours, use their cars during the day, park free at work, have young children or aging parents, or who run errands during their commute are less inclined to car pool. The extra time required picking up and dropping off extra people reduces travel time savings. Too much traffic means motorists do not get the promised travel time reduction. Too little traffic wastes roadway capacity. Some projects have not met revenue projections. The major equity questions are: (1) do agency policies treat people in the same group equally, (2) do users pay the full cost, (3) do low-income groups pay a disproportionate share, (4) do tolls cause drivers to divert to neighborhood streets, and (5) are there better alternatives?

**f. Development Opportunities**

When properly designed, major transportation improvements have positive effects on social, economic, and environmental conditions in the corridor. Major roadways provide mobility for people and goods. Mobility clearly affects the choices we make about where to live, work, shop, and carry out other activities. *“Transportation decisions cannot be separated from community values and public policy. The point of CSD (Context-Sensitive Design) is to satisfy not just the user of the road, but also the community it impacts. A roadway must be safe for both the user and the community; be in harmony with the community; and preserve environmental, scenic, aesthetic, historic, and natural resource values of the area. It should cause minimal disruption and add lasting value to the community.”*<sup>3</sup> IDOT’s Build Alternatives create development opportunities. The Envision Oak Park Comprehensive Plan identifies eleven Transit Area Housing Development Opportunity sites along the corridor.<sup>4</sup>

**g. Design**

A good design for the Eisenhower Corridor must address the needs for all transportation modes, add value to the adjacent communities, and be compatible with the built and natural environments. Every transportation mode (expressway, rail transit, buses, pedestrians, and bicyclists) plays a role. When each mode is designed to do what it does best, the transportation system works better and is efficient. One fundamental

---

<sup>3</sup> “Context Sensitive Design, Designing with the Community,” Joan L. Suchomel, Citizens for Appropriate Transportation, Issue Brief 10: April 2003.

<sup>4</sup> Envision Oak Park – A Comprehensive Plan for the Oak Park Community. Adopted September 15, 2014. Pages 62 and 63

principle of transportation is good design is always better than good enforcement or regulation. Good design is there 24/7. Good enforcement cannot be there 24/7.

**The design of corridor edges is critical because both residential and non-residential uses are close to the Corridor.** The fact that neighbors in Oak Park built the wood fence on Harrison from Grove to Wenonah along the northern edge of the expressway more than twenty-five years ago is powerful evidence of the importance of corridor edge design. Neighbors have maintained and replaced sections as needed.

**IDOT's proposed shoulder widths are substandard**, putting police, fire/paramedics, and motorists at risk.

**Context Sensitive Solutions** - IDOT is following a Context Sensitive Solutions process for the Phase 1 Study, but there has never been a presentation from either an urban designer or architect at any of the Corridor Advisory Group/Task Force meetings.

#### ***h. Demand Management and Congestion Pricing***

**Using a combination of demand management techniques can have a significant impact.** Individual techniques to reduce demand have a limited impact, but in combination, they can have a significant impact. Some of these techniques are flextime, car and vanpools, working at home, and staggered work hours.

#### ***i. Interchanges***

IDOT's proposed right side ramps at Austin and Harlem are longer, higher, and closer to residential neighborhoods than the current center ramps. Right-hand side ramps will have negative air and noise impacts, and can hurt property values. Motorists who want to use the HOT 3+ lanes will enter the expressway on right side ramps and cross three lanes to get to the HOT 3+ lanes. This is likely to increase the accident rate.

#### ***j. Diversion of Traffic to Local Streets***

Alternatives with tolls divert traffic to neighborhood arterial streets as drivers seek to avoid paying to use the expressway.

### **3. IMPACTS**

#### ***a. Air Quality***

The air quality analysis is incomplete. IDOT should update it in Phase 2: Working Drawings and Specifications. IDOT says,

- *“According to this analysis, the build alternatives would have minimal effects on regional criteria pollutant burdens, with changes of less than one percent, as compared to the No Build Alternative.”<sup>5</sup>*

---

<sup>5</sup> Draft Environmental Impact Statement, Chapter 3: “Environmental Resources, Impacts, and Mitigation,” December 2015, Page 3-118.

- *“... the USEPA has classified the portion of Cook County in which the proposed project is located as a nonattainment area for O<sub>3</sub> and has designated the entire state as unclassifiable for the 2012 PM<sub>2.5</sub> NAAQS.”<sup>6</sup>*
- *“For the eight-hour ozone standards, Cook, DuPage, Kane, Lake, McHenry, and Will counties, as well as Aux Sable and Goose Lake townships in Grundy County and Oswego Township in Kendall County, have been designated as nonattainment areas for ozone.”<sup>7</sup>*
- *“In FHWA’s view, information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in MSAT<sup>8</sup> emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to MSAT exposure associated with a proposed action.”<sup>9</sup>*
- *“The methodologies for forecasting health impacts include emissions modeling; dispersion modeling; exposure modeling; and then final determination of health impacts with each step in the process building on the model predictions obtained in the previous step. All are encumbered by technical shortcomings or uncertain science that prevents a more complete differentiation of the MSAT health impacts among a set of project alternatives. These difficulties are magnified for lifetime (i.e., 70 year) assessments, particularly because unsupported assumptions would have to be made regarding changes in travel patterns and vehicle technology (which affects emissions rates) over that time frame, since such information is unavailable.”<sup>10</sup>*

The “Air Pollution Action Day History” prepared by Partners for Clean Air – Illinois (c/o Illinois EPA, [www.clearntheair.org](http://www.clearntheair.org)) shows that in the seven years from 2010 to 2016, the year with the highest number of Action Days was 2012 (12 days) and the year with the lowest number was 2015 (zero days). There were 12 Action Days for ozone in 2012 and 3 Action Days for Fine Particulates in 2010.

The DEIS says Fine Particulates (PM<sub>2.5</sub>) are “unclassifiable” for the entire state of Illinois. Because Fine Particulates are a health problem, this is of concern. Based on a conversation with U.S. Environmental Protection Agency personnel, our understanding of the “unclassifiable” classification is the Cook County laboratory found that the sample filters with monitors were outside specifications. Because the U.S. EPA does not have the data to make a determination, they say Fine Particulates are “unclassifiable” for the

---

<sup>6</sup> Ibid., Page 3-124. NAAQS are the National Ambient Air Quality Standards. O<sub>3</sub> is ozone. PM<sub>2.5</sub> are Fine Particulates.

<sup>7</sup> Ibid., Page 3-126

<sup>8</sup> MSAT = Mobile Source Air Toxics, which “are a subset of the 188 air toxics defined by the CAA.” CAA is the Clean Air Act.

<sup>9</sup> Ibid., Page 3-135

<sup>10</sup> Ibid., Page 3-135 to 3-136.

entire state of Illinois. The problem with the sample filters was corrected in mid-2016, but the U.S. EPA needs three years of data to compare, so they will not be able to make a determination until mid-2019. The Fine Particulate standard was last set in 2012. Because of unacceptable monitoring data, the U.S. EPA was unable to assess compliance with the 2012 standard. Standards must be reviewed every five years, so the U.S. EPA would revise the standard (if necessary) in 2017. By the time IDOT starts construction, estimated to be 2020, there may be a new Fine Particulate Standard.

In the DEIS, IDOT says, “Regardless, on a regional basis, USEPA’s vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be substantially lower than today.”<sup>11</sup> Given IDOT’s estimate that construction will not start earlier than 2020, updating the air quality analysis would provide better conclusions than expressed in the December 2016 Draft Environmental Impact Statement.

### **b. Noise Walls**

Because of changes in noise wall materials, IDOT agreed to Oak Park’s request to conduct another vote on whether eligible voters want or do not want noise walls.

### **c. Property Values**

The evidence on the impact of expressways on property values is mixed. IDOT says its proposals “stay within the ditch.” However, the ditch has three dimensions – width, height, and length. IDOT’s proposed Build Alternatives stay within the width of the ditch in Oak Park, but do not stay within the height of the ditch at the Austin and Harlem Interchanges.

### **d. Neighborhood Impacts**

What happens to property values during and after construction? Ideally, the project improves social and visual connections between South Oak Park and the rest of the Village. It should provide safe school walking routes from South Oak Park to both middle schools (Brooks and Julian) and the Oak Park River Forest High School, which are north of the expressway.

### **e. Sustainability**

We are pleased IDOT used the INVEST Sustainability Scorecard in the DEIS. We note the Bronze Rating and your belief that you can achieve Platinum status during the Working Drawings and Specifications phase.

### **f. Construction Impacts**

There was damage to the UIC’s CUPPA building when IDOT reconstructed the Morgan Street Bridge. In Oak Park, there are many buildings close to the expressway, some of which are fragile (the Oak Park Conservatory, for example), so the effects of ground vibration are a major concern. The Citizens for Appropriate Transportation Working Group suggested four actions: (1) video / photograph documentation of building foundations, doors, and windows prior to construction, (2) an insurance rider added to

---

<sup>11</sup> Ibid., Page 133.

the homeowner's policy, (3) dispute resolution by binding arbitration, and (4) use construction contract retainage to settle damage claims.

Additional construction measures worth considering are the location of staging areas, possible nighttime construction, noise and air pollution, alternative routes, and staged construction. Good communication between IDOT and the communities is mandatory.

During construction, IDOT, CTA, and Oak Park should consider shuttle bus service to the Green Line Stations when Blue Line Stations are rebuilt, parking restriction changes, discount fares on the Blue Line, and improvements to local streets because traffic will be diverted to them during construction.

#### **4. EVALUATION**

##### ***a. Impact Scores are projections to the Year 2040***

Table 1 summarizes the Number of Transportation Criteria that equal or exceed seven different percentages (50, 40, 30, 20, 10, 5, and 1). IDOT used ten transportation criteria but the Year 2040 No Build Alternative does not have managed lanes, so there are only nine criteria where it is possible to calculate the percentage improvement of the Build Alternative compared to the No Build Alternative.

**TABLE 1: Number of Transportation Criteria that Equal or Exceed the Given Percentage**

<b>Amount of Improvement</b>	<b>GP Lane</b>	<b>HOV 2+</b>	<b>HOT 3+ (Preferred Alternative )</b>	<b>HOT 3+ &amp; Toll</b>
50%	0	0	0	1
40%	0	0	0	1
30%	1	0	0	1
20%	1	1	1	1
10%	1	1	1	2
5%	3	3	4	4
1%	4	4	4	6

There are only four criteria where the Preferred Alternative (HOT 3+) is better than the No Build Alternative by five percent or more. IDOT's Preferred Alternative will affect the region and the communities in the Eisenhower Corridor for the next five or six decades. IDOT's recommendation of the HOT 3+ Alternative is based on many small differences in impact scores.

Projections to the Year 2040 are unlikely to be accurate, especially given the rapid social and technological changes taking place. It concerns us that the expenditure of such a large sum will result in such a small improvement in performance.

##### ***b. The Travel Demand Models have limitations even with IDOT's enhancements.***

The dollar value of travel time varies widely among drivers and depends on how important it is to the driver to be at their destination by a given time. IDOT will have to set tolls high enough to reduce congestion. Toll levels will also have an impact on the

general purpose lanes as well as alternative routes on arterial and local streets. Drivers can change routes, take the Blue Line, reschedule trips, and move or change jobs. Reliability is also important. IDOT’s efforts to provide real-time information to motorists will also help. Accounting for trends is difficult because they change over time. There are a wide-ranging set of possible trends listed in Table 2 to illustrate this point.

**TABLE 2: Illustrative List of Possible Trends**

Changes in Trip Generation Rates	Collision Avoidance Technology in Vehicles
Baby Boomers retiring and driving less	Reduction in Vehicle Miles of Travel
Recent college graduates who do not purchase a car	Growth in transit ridership, walking, and bicycling
Changes in good movement technologies	Better Parking Management
Growth in social media	Innovative car, taxi, and bicycle sharing using social networks
Real Time Information	Variable managed lanes and parking pricing policies

IDOT did not use the Chicago Metropolitan Agency for Planning’s Go To 2040 Policy-Based Forecasts. IDOT assumes more development in the outlying suburbs, while CMAP assumes more development in existing communities. In his ruling on the proposed Illiana Expressway that remanded the Environmental Impact Statement and the Record of Decision to IDOT, Indiana Department of Transportation, and the Federal Highway Administration, Judge Alonso said, “*it would seem unwise*” to reject the Policy-Based Forecasts. By using a Market-Based Population and Employment Forecast, IDOT’s Preferred Alternative could undermine CMAP Recommendations in the Go To 2040 Plan.

**c. Ordinal – Ratio Scale Problem**

We raised this issue in our letter to IDOT dated June 19, 2012. IDOT’s response was to develop a better evaluation process using Ratio Scales. Using Ordinal Scales to evaluate the Build Alternatives and compare them to the No Build Alternative is not statistically valid. When IDOT states that both evaluation methods lead to the same Preferred Alternative, you are giving a false impression. We think IDOT should delete the Ordinal Scale evaluation and just use the Ratio Scale evaluation.

**d. Scenario Planning**

Scenario Planning considers alternative futures and their impacts. Forecasts for the Year 2040 may not be accurate. Scenario Planning would help IDOT account for different futures. Making a multi-billion dollar investment in the expressway based on future projections is risky. Forecasting is imperfect, so IDOT should analyze several different scenarios. By considering plausible scenarios, IDOT would reduce their risk.

**e. Sensitivity Analysis**

Sensitivity analysis examines the extent to which changes affect the results. Given two Build Alternatives with small differences among impact scores, the recommendation for one over the other includes language that says it would not take much change to stop recommending one alternative and start recommending the other. In contrast, given two Build Alternatives with large differences among impact scores, the recommendation

is much stronger because it would take a large margin of error before we would stop recommending one and start recommending the other. Small differences among alternatives for the Year 2040 reinforce the need to do Scenario Planning and Sensitivity Analysis.

## **5. CITIZEN PARTICIPATION**

### ***a. Forty-five days to write and send comments on the Draft Environmental Impact Statement is too short.***

IDOT released the DEIS (with almost 400 megabytes of files) on Friday December 30, 2016. December 30 starts the 45 day Public Comment Period. Many people are busy over the New Year's weekend and will not read such a large DEIS from a study that started October 2009 and ended December 2016 (7+ years). With appendices, there are more than 2,200 pages. Within these pages are 192 figures and 78 tables. No one person has expertise in every aspect of a DEIS so people will want to talk with others before sending written comments to IDOT.

### ***b. A long response time by IDOT frustrates commenters and makes them wonder if IDOT is listening.***

A long response time casts serious doubt on IDOT's claim to value citizen participation. IDOT's Stakeholder Involvement Plan for Agency and Public Involvement (February 2010, Version 4) says, "*Mail and e-mail responses offer the opportunity to develop a personalized response, yet timeliness is important. The desired time-frame to develop, edit, approve and mail (or e-mail) a response is one week once it is received by the PSG.*" (Page 17) NOTE: PSG = Project Study Group.

IDOT responded to our June 27, 2010 letter on March 18, 2011 (415 days). IDOT responded to our June 19, 2012 letter on April 26, 2013 (311 days). IDOT's shortest responses were 29 days for our November 30, 2011 letter and 30 days for our June 28, 2011 letter.

### ***c. There was a long time between some of the Corridor Advisory Group / Task Force (CAG/TF) meetings.***

There were twenty-two CAG/TF meetings. The longest time gap between meetings was 426 days and the shortest was 29 days. The gap between meetings was longer than 180 days (about six months) four times. We are aware that IDOT met with individual communities. The Task Force includes people and agencies with specific interests, concerns, and expertise, which benefited IDOT in the preparation of the DEIS.

### ***d. Meaningful dialogue requires two-way communication so all participants learn from each other.***

IDOT has technical expertise. Citizens know their neighborhoods and have some technical expertise as well.

### ***e. Consider Creative Funding Opportunities.***

Some ideas to consider are Value Capture whereby the CTA would capture some of the added value accrued to adjacent development by having a nearby CTA station.

Another idea is to reduce the fare on the Forest Park Branch because its ridership is lower than the O'Hare Branch of the Blue Line.

## **6. GENERAL COMMENTS**

### ***a. Coordination between IDOT and CTA must occur.***

The IDOT – Village of Oak Park Letter of Intent says, “*Funding for the reconstruction of the CTA Blue Line and I-290 should be sought for both improvements as if they were one project.*” Because of different priorities and funding programs, it is possible IDOT will improve the expressway years before a Blue Line extension occurs. Corridor residents and businesses may not see the full benefits for years. IDOT estimates eight years for construction, but has not decided whether to rebuild the bridges between Austin and Racine. If IDOT decides to rebuild these bridges, the construction estimate of eight years could get longer.

### ***b. IDOT’s Study and the CTA’s Study are at different stages, so coordination between the two will be difficult.***

Under Chicago Metropolitan Agency for Planning (CMAP) Go To 2040 plan, the improvements to the expressway are “*fiscally constrained*” (funds are likely to be available) and improvements to the CTA’s Forest Park Branch of the Blue Line are “*fiscally unconstrained,*” (projects may be desirable and beneficial but require additional revenue). IDOT has completed the DEIS and the CTA will complete their Feasibility / Vision Study shortly. The CTA has not started to prepare an Environmental Impact Statement, although doing so is unlikely to be as complicated and time-consuming as the DEIS for the expressway.

### ***c. Proofreading Errors***

I did not make any effort to proofread the documents, but did notice the following errors.

- In the Table of Contents (*front\_matter.pdf*) on Page iii in the Table of Contents, 3.16 says Short-**Tem** Use instead of Short-**Term** Use.
- In the Purpose and Need document (*chapter\_01.pdf*), words are missing in the last sentence of the “No Build 2040” box on Page 1-4. The sentence stops in the middle.
- In the Environmental Resources, Impacts and Mitigation document (*chapter\_03.pdf*), the list of parks in Oak Park on Page 3-25, does not include the Conservatory. The Conservatory has outside gardens on the east and west sides.
- Also in Chapter 3, Table 3-13 on Page 3-29 does not include District 97 in Oak Park. The table does list elementary and Middle School districts in other communities. The text on 3-29 says, “*Three higher educational institutions are located at the eastern end of the Project Corridor in Oak Park and Chicago.*” The text mentions UIC, Rush University, and Malcolm X College all of which are in Chicago.

We have come a long way. The CTA joined the study in the Summer of 2012. IDOT extended the eastern boundary of the Study Area to Racine. The design in Oak Park

stays within the horizontal boundaries of the “ditch.” IDOT added a ratio-scale evaluation to help select the Preferred Alternative. IDOT incorporated recommendations from the West Central Municipal Conference Smart Corridors Study. The Village of Oak Park and IDOT have a Letter of Intent that will become an Intergovernmental Agreement later in the study. IDOT completed the INVEST Sustainability Scorecard.

Thanks again!

Sincerely,

**Citizens for Appropriate Transportation**

Rick Kuner

[www.CitizensForAppropriateTransportation.org](http://www.CitizensForAppropriateTransportation.org)

[rkuner@comcast.net](mailto:rkuner@comcast.net)

[708/848-0942](tel:7088480942)

COPY TO: Chicago Transit Authority