



Citizens for Appropriate Transportation

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This letter is intended for inclusion in the Public Record

July 21, 2010

Chicago Metropolitan Planning Agency
Go To 2040 Draft Plan Comments
233 South Wacker Drive – Suite 800
Chicago, IL 60606

SUBJECT: Go To 2040 Comprehensive Regional Plan Draft

Dear Sir / Madam:

Thank you for the opportunity to comment on the Go To 2040 Comprehensive Regional Plan Draft. We are impressed by the amount of good work represented by the draft and related documents that CMAP prepared.

We have grouped our comments into four categories:

1. The treatment of the I-290 Multimodal Corridor raises a fairness issue.
2. Downtowns are important.
3. We need to strengthen many communities.
4. General Comments.

1. The treatment of the I-290 Multimodal Corridor raises a fairness issue.

In particular, the lists of Fiscally Constrained Major Capital Projects and the List of Unconstrained Major Capital Projects troubles us. Consider the following:

- As part of IDOT's Phase 1 Engineering and Environmental Study, the District 1 office says, "The Phase I Study is taking a fresh look at the current and future transportation needs of the corridor, as required by NEPA and CSS. Although the pavement is nearing the end of its service

life, there is no predisposition toward a highway widening scenario in conjunction with the pavement reconstruction.”¹

- CMAP's List of Fiscally Constrained Major Capital Projects under the heading "Expansions and Improvements" has the I-290 Multimodal Corridor to be completed in the Year 2020. CMAP's List of Unconstrained Major Capital Projects under the heading "New facilities and extensions" has the Blue Line West Extension to be completed in the Year 2040. There is a twenty-year difference between the two projects. Widening the expressway is expected to have funding, but the Blue Line West Extension has no identified source of funding.
- CMAP shows the expressway widening project with a Revenue (Toll Assumption) of 10 percent, but the Blue Line Revenue Assumption is zero percent, despite the fare box recovery requirement in state law.
- IDOT has not made a recommendation for improvements to the Multimodal Corridor pending completion of their studies. Why is CMAP showing widening the expressway by 2020 (with anticipated funding) and a Blue Line West Extension at the very last year (2040) with no identified funding source? Further, you identify the Corridor as multi-modal, but do not recommend funding for a multi-modal solution.
- "Recommended capital improvements also include managed lanes on the I-90 and I-55 expressways and a multimodal corridor on I-290 that may include Bus Rapid Transit (BRT)."² The I-290 Corridor already has the CTA Blue Line to Forest Park. BRT that runs into downtown Chicago would compete with the CTA Blue Line, to the detriment of both.
- When talking about the Hillside Strangler improvements, CMAP says, "The data show that there was substantial improvement in travel times for certain time periods on the Eisenhower along the 31-mile segment from the Circle Interchange to the Jane Addams Tollway in Schaumburg. Although traffic volumes have increased significantly, travel times have actually decreased since the improvements."³ Our understanding is the study shows a minor reduction in travel times.

2. Downtowns are important.

Surprisingly, the Go To 2040 Draft Plan says almost nothing about the importance of downtowns in terms of services, jobs, and tax revenues.

¹ Letter from Illinois Department of Transportation, Division of Highways / Region One / District One (Diane M. O'Keefe and Peter E. Harmet) to Rick Kuner, Citizens for Appropriate Transportation, February 23, 2010.

² Chicago Metropolitan Agency for Planning, "Go To 2040 Comprehensive Regional Plan Draft," Page 200.

³ Ibid, Page 353.

Downtown Chicago has the largest concentration of jobs in the region. It provides a wide range of services and generates substantial tax revenues. Because of its importance, many of the interstate highways, CTA's rail rapid transit lines, and Metra's commuter lines focus on downtown.

The same arguments apply to the importance of downtowns in suburbs and cities such as Joliet and Waukegan.

The work of David Rusk demonstrates the important relationship between an economically healthy center city and the surrounding suburbs.

Out of curiosity, we used the Adobe "Search Function" for the word "downtown" in the 400+ page Go To 2040 Draft. There are 16 instances where the word "downtown" appears in the document. Nine of the 16 are in the section on Context and Best Practices. None of the 16 stresses the importance of jobs and tax revenues.

3. We need to strengthen many communities.

CMAP says, "For livable communities to take shape, most of our region's future growth should occur in existing communities that are already served by infrastructure."⁴ The draft plan is weak on policies that will help strengthen inner city neighborhoods and suburbs with limited demand. Some suburbs do not have a strong tax base. They face increasing expenses and declining revenues. Regional policies should focus on how to increase the demand, livability, and investments in these areas. What policies does CMAP recommend to increase the desirability and affordability of existing neighborhoods?

4. General Comments

We have some general comments:

1. **At 400+ pages, the plan is too long and repetitive.** We suspect the repetitiveness reflects CMAP's desire to allow people to read some, but not all, of the four theme chapters. In addition, there are a large number of stand-alone papers on topics of interest. Very few people will take the time to read every document.
2. **CMAP does not identify which managed lane techniques are suitable for different types of situations.** CMAP says there is a range of improvements possible for managed lanes. Some examples are tolling strategies, Bus Rapid Transit, and special accommodations for truck travel.
3. **Some of the studies that CMAP recommends will be very difficult to do.** Some examples are:

⁴ Ibid, Page 27.

- “Expensive new capacity projects should be built only if they yield benefits that outweigh their costs.”⁵ A true benefit-cost analysis requires all benefits and costs to be measured in dollars. In the public sector, social and political benefits are important, but difficult to measure in dollars. Benefit-Cost Analysis is based on linear marginal utility (i.e., a dollar equals a dollar), which ignores increasing and decreasing marginal utility. The results of a Benefit-Cost Analysis strongly depend on the discount rate and time period selected. There are evaluation techniques that get around these limitations, but it will still be difficult to do this in a credible way.
 - “Transportation user fees should better reflect the true costs to congestion, which include lost time and fuel, decreased productivity, inefficient freight movements, and pollution.”⁶ Congestion pricing is a term that includes many variations. Doing a comprehensive study of every variation will be time consuming and expensive.
4. **Good public policy analysis accounts for the “triple-E’s” – efficiency, effectiveness, and equity.** The theme chapter on Regional Mobility starts with the sentence, “This theme addresses the efficiency and effectiveness of our region’s transportation system.”⁷ You mention efficiency (outputs divided by inputs), effectiveness (how well a project performs), but do not mention equity (fairness).
 5. **Congestion pricing has some disadvantages.** The Go To 2040 Draft mentions some of the advantages, but to be fair, you should also mention the disadvantages. Some disadvantages include declining average vehicle occupancy (which works against HOV or HOT lanes), increasing vehicle miles of travel (which can increase air pollution), unused capacity, use of HOV or HOT lanes in off-peak periods and in the off-peak direction, ability to generate new car pools as opposed to diverting existing car pools to the HOV or HOT lanes, possible discrimination against people with lower incomes, the need for effective enforcement, the failure of HOV or HOT lanes to link transportation with land use, confusion among users especially during transition periods, and incident management on a single HOV or HOT lane.
 6. **Is congestion pricing a good solution in all situations?** What types of congestion pricing are good in different types of situations?
 7. **NEPA policy on environmental impacts is Avoid – Minimize – Mitigate.** **Avoid** negative environmental impacts if possible. **Minimize** negative impacts if you cannot avoid them. **Mitigate** negative impacts if you cannot avoid or minimize them.

⁵ Ibid, Page 8.

⁶ Ibid, Page 8.

⁷ Ibid, Page 151.

8. **CMAP deliberately decided to prepare a policy plan as opposed to a land use plan.** However, the plan has an expensive list of transportation projects classified as either fiscally constrained or unconstrained. More than likely, CMAP includes the transportation projects because you are the MPO for the Chicago region and are required by federal law to identify major transportation projects.

Thank you for considering our concerns. If you need further information, please feel free to contact either or both of us by telephone or e-mail. In addition, we would be happy to meet with you to discuss these issues in more detail.

Sincerely,

Citizens for Appropriate Transportation

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