



Citizens for Appropriate Transportation

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www.CitizensForAppropriateTransportation.org

This letter is intended for inclusion in the Public Record

June 28, 2011

Federal Highway Administration - Illinois Division Office
c/o Mr. Normal Stoner – Division Administrator
3250 Executive Park Drive
Springfield, IL 62703

SUBJECT: Draft Purpose and Need Statement for the Eisenhower Transportation Corridor (I-290)

Dear Mr. Stoner:

As a Lead Agency (along with IDOT) for the Phase 1: Engineering and Environmental Study for the Eisenhower Expressway, FHWA is required to review the project's Purpose and Need and work out any differences with IDOT before proceeding further into the Study.¹ IDOT held an Open House Meeting on May 18, 2011. After reviewing comments received from their Open House Meeting and revising the Draft Purpose and Need, we understand IDOT will submit a "final" version to you for your review.

IDOT's most recent draft of the Purpose and Need Statement (April 2011) does not meet FHWA policies and requirements. We have raised our concerns with IDOT and are providing them with a copy of this letter as a courtesy. We ask you to consider them during your review and request the opportunity to meet with you to discuss them further.

1. Two of the Project Needs ("Improve Safety for all Users" and "Improve Facility Deficiencies") suggest a predisposition toward expressway improvements in a Corridor with a significant transit presence.

¹ The document entitled, "The Environmental Review Process – Section 60002 – SAFETEA-LU Environmental Review Process – Final Guidance FHWA," says, "The lead agencies must agree on the project's Purpose and Need and work out their differences before proceeding." – Page 12, Answer to Question 32.

Comments on the Draft Purpose and Need Statement

2. The Purpose and Need Statement does not recognize the need to develop multi-modal solutions that will improve the livability of the communities in the Corridor.
3. The Purpose and Need Statement cannot lead to a fair evaluation based on a rigorous analysis of impacts because it excludes important economic, social, and environmental criteria.²
4. The Purpose and Need Statement does not reflect FHWA policy to avoid, minimize, or mitigate negative health and environmental impacts.
5. The Study Area does not have logical termini.
6. The Federal Transit Administration should also be a Lead Agency.

We can provide more detailed explanations for each of the points listed above.

FHWA has a national perspective and has learned lessons from the agencies across the country working to solve similar or related problems. SAFETEA-LU has provisions intended to reduce the controversies arising from transportation projects. Making mid-course corrections is the intent of providing reviews at milestones in the process instead of waiting to the Public Comment period after the Draft EIS is completed.

The attachments to this letter provide more information on Citizens for Appropriate Transportation and the two authors of this letter.

We are convinced major improvements are needed in the Corridor. The decisions made as a result of the Study will have a significant and long-term impact on the communities in the Corridor. If you want to proceed further, please contact Rick Kuner. Thank you for your consideration.

Sincerely,

Citizens for Appropriate Transportation

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COPY TO: Peter Harmet and Mark Peterson at IDOT

Sent by e-mail attachment and U.S. Mail

² FHWA Policy says, "alternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation, of the social, economic and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental goals." 23 CFR § 771.105(b)

Citizens for Appropriate Transportation (CAT) is a citizen group focused on the Eisenhower Transportation Corridor. A group of about 15 citizens founded CAT in February 2002. We have more than 600 members. Our web site is www.CitizensForAppropriateTransportation.org. The Download Page has copies of our letters to IDOT and we have attached our most recent letter to IDOT, which is based on the April 2011 Purpose and Need Statement.

Kevin Brubaker has 25 years experience in environmental and transportation policy. He has served as Deputy Chief of Staff to Governor Sundlun (D-RI) and is currently the Deputy Director of the Environmental Law and Policy Center. He serves on the board of directors of Earth Share of Illinois, the Institute for Conservation Leadership, and the Friends Committee on National Legislation. He is a graduate of Brown University.

Rick Kuner, AICP is a city and transportation planner, who has worked on projects in more than 70 communities in 23 states. His work includes transportation, land use / transportation relationships, parking, transit planning, new technology, city planning, environmental planning, computer models and their User Manuals, and report writing.

His work experience includes being President of New Alternatives, Inc., Senior Associate at Barton-Aschman Associates, and Chief Transportation Planner at the Boston Redevelopment Authority. He was an Adjunct Professor in the Graduate Program in Public Administration at the Illinois Institute of Technology for 25 years. He served as a Village Trustee in Oak Park from 1997 to 2001.

As a volunteer, he served on the RTA Cook-DuPage Corridor Citizens Committee, CATS Highway Working Group, Oak Park Regional Housing Center Board, Park District of Oak Park Infrastructure Committee, and as the transportation member of five American Institute of Architects Regional/Urban Design Assistance Teams.

He has written numerous articles and won several awards.

EDUCATION

- Masters in City Planning, Massachusetts Institute of Technology
- Bachelor of Arts in Political Science (with honors), University of Pennsylvania
- Seminar on Quantitative Methods in the Social Sciences (six-week course), Harvard University, Kennedy School of Government

IDOT Study\CAT Ltr to FHWA re Review of Purpose and Need June 2011