



Citizens for Appropriate Transportation

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This letter is intended for inclusion in the Public Record

December 2, 2009

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

SUBJECT: Eisenhower Corridor Study

Dear Mr. Peterson and Mr. Harmet:

Thank you for the opportunity to comment on the IDOT Phase 1: Engineering and Environmental Study.

We grouped our comments into four categories:

1. Cicero Avenue is a poor Study Area boundary
2. IDOT's planning process is flawed
3. IDOT needs valid public input
4. IDOT has a credibility problem

Cicero Avenue is a poor Study Area Boundary

We believe Cicero Avenue is **not** a good choice for the eastern boundary of the Study Area for the following reasons:

1. For IDOT's study to compare transportation alternatives effectively, it needs to define the problem accurately. The problem is **not** getting people from Mannheim Road to Cicero Avenue. The problem **is** getting people from west Cook, DuPage, and Kane Counties to downtown, the Near West Medical – Educational Center, and to the North-South expressways.
2. By terminating the project at Cicero Avenue, the study ignores the travel time delays associated with parking in Chicago's congested central

business district. The travel benefits of Metra and CTA become more apparent when the analysis takes into account congested roadway conditions between Wells Street and Michigan Avenue.

3. By terminating the project at Cicero Avenue, IDOT removes from consideration an obvious alternative – designating an existing lane (say from Hillside to Wells or Mannheim to Wells) as HOV. HOV could do this as a test case with no additional lane construction.
4. If the HOV lane connects to a general traffic lane east of Austin Boulevard as proposed by IDOT in the 1998 Feasibility Study, using Cicero Avenue does not account for the higher traffic volumes that occur east of Austin.
5. It is very unusual for an expressway to end at a traffic signal the way the Eisenhower now ends at Wells Street. IDOT should run a corridor simulation model to analyze traffic flow at the Dan Ryan connection, Wells Street, and elsewhere in the corridor.
6. The improvements to the Hillside Strangler just moved congestion further east. HOV lanes will move congestion east of Austin and add to the congestion that occurs at the Dan Ryan connection and at Wells Street.
7. When an agency prepares an Environmental Impact Statement (EIS) for a highway segment, NEPA regulations require that segment to have “independent utility.” That is, the proposed project must have a meaningful use independent of other projects. Therefore, IDOT’s study should look at a project with meaningful endpoints. Almost no one terminates his or her trip at Cicero Avenue.

As an alternative to having Cicero Avenue as the eastern boundary, we suggest using a north-south street east of Wells Street, such as Columbus Drive or Michigan Avenue.

IDOT’s Planning Process is flawed

We have three concerns about the planning process that IDOT is following.

1. IDOT needs to shift from listening mode to design mode.

IDOT started the public participation process by conducting two public meetings at the Best Western in Hillside to solicit reactions. IDOT deliberately started out in a listening mode, being careful not to suggest or tell participants what to say. Now IDOT needs to switch from listening mode to design mode. To develop good solutions that achieve consensus, IDOT and its consultants will have to sift through all the post-it note comments gathered at the October and November meetings, and decide how to deal with each one. We believe this will be a difficult process. IDOT knows there is a large amount of basic information needed to do planning effectively. We are puzzled why IDOT has not summarized this information in a way citizens can understand and use. Much of this basic information reflects current conditions. Some examples of basic information are population, employment, land use, average daily traffic volumes, peak hour traffic, vehicle classification, number of lanes, ramp volumes, transit

ridership, the number and condition of bridges, and pavement condition. We may differ with IDOT on what the best solutions are, but all of us need to account for the need to make trips.

2. RTA's Cook-DuPage Corridor Study Process makes sense.

We like the study process the RTA followed for the Cook-DuPage Corridor Study. As originally designed, the RTA Study had three phases.

1. Identify nine travel markets that fall into three Commute Categories: (1) Traditional Commute, (2) Reverse Commute, and (3) Intersuburban.
2. Develop a range of solutions to serve each of the nine travel markets.
3. Evaluate the range of solutions to identify a Preferred Alternative.

We regret the RTA's decision to stop the study after two phases. Nevertheless, the RTA's first two phases contain a wealth of data, projections, and possible solutions that IDOT should take into account.

3. IDOT's planning approach has not worked in the past.

Over the years, city planners have tried three general approaches to involve the public in the planning process.

1. **The Expert Approach.** In this approach, a team of professionals prepares a plan, then public relations experts market the plan to the public. This approach does not work because it does not account for citizen concerns and does not give the public any stake in making the solution work. The ITE Transportation Engineering Handbooks says, "No longer can transportation engineers wear the hat of benevolent expert designing 'for the good of the public.'"¹ The ITE Handbook also says, "Most profoundly, it is simply not possible for the transportation professional to develop a solution that benefits all, or even the majority, of affected parties without extensive input from them on their concerns."² The public will not support a project unless they believe it will meet their needs.
2. **The Blank Map Approach.** In this approach, which IDOT is apparently pursuing, the planning agency gives citizens a blank map or aerial photograph. The agency asks citizens to draw plans and/or provide comments. This approach tends to fail because citizens do not have the technical expertise needed to prepare viable plans. There is a long list of potentially affected people, many of whom are not involved in the process.
3. **The Collaborative Approach.** This approach values the expertise of citizens and transportation professionals, recognizing that each has valuable insights and knowledge that can lead to better decisions. It is

¹ Patricia B. Noyes, Traffic Engineering Handbook, "Chapter 6: Effective Public Involvement" 1999, Page 165.

² Ibid, Page 167.

difficult to make this approach work, but it can lead to consensus and better solutions. Keys to success are: have a good facilitator, meet in-person to share perspectives and work out differences, encourage good listening skills, foster respect for each other, and make decisions by consensus.

We have the following concerns about IDOT's approach:

1. It does not provide enough important background information to citizens. It is a Blank Map Approach.
2. The two Advisory Task Forces (Transportation / Engineering and Environmental / Land Use) do not exist yet, so they are not providing any input.
3. Feedback from IDOT is slow. IDOT promised to photograph the large sheets containing the post-it notes from the October 14th meeting and put them on the web site, but so far this has not happened.

IDOT needs valid public input

The two workshops at the October 14th meeting at the Best Western Chicago Hillside Hotel were poorly designed to gather the input IDOT and its consultants need to prepare a Problem Statement, write a Purpose and Need Statement, and identify possible Alternatives.

1. IDOT conducted two Group Exercise Workshops on October 14th: (1) Identify Issues and Concerns and (2) Defining Goals and Objectives.
2. IDOT did not provide the questions to participants in advance – a violation of a major principle of brainstorming, which says, participants should have the questions in advance so they can mull them over ahead of time.
3. At the first workshop (October 14th), IDOT asked for goals and objectives, but did not define them. There are multiple definitions of goals and objectives, so IDOT should have defined both terms to get accurate input from participants.
4. The issues for the Phase 1 Study are complex, so off-the-top-of-the-head answers will be less useful than carefully considered answers.
5. IDOT needs to understand the complexity of the concerns raised by citizens in order to develop Possible Alternatives. Two examples illustrate this point:
 - a. At the October meeting, at the table where one of the signers of this letter (Rick Kuner) sat, three people identified connections as being important. Each of the three had a different idea of what connections mean.
 - i. One person wanted to increase social contact across the Eisenhower Corridor in Oak Park. The Corridor splits South Oak Park from the rest of the Village. Designs that increase

social contact feature bridges with wider sidewalks, lookout points in the bridge, planters, and seating.

- ii. A second person wanted to add bridges across the Corridor to reduce daily trip and emergency response times.
 - iii. A third person wanted an interchange to improve the viability of an economic development project.
- b. Some participants asked for more transit, which could mean commuter rail, CTA rail rapid transit, bus service, express bus service, Bus Rapid Transit, light rail, or an automated system.

IDOT has a credibility problem

An article by Chicago Tribune reporter Jon Hilkevitch in his *Getting Around* column (September 28, 2009) contains statements that highlight our concerns about IDOT's ability to conduct a fair and unbiased study. We have quoted from the article below. There is only one paragraph in the article on transit and the RTA's Corridor Study. Every other quote leads to the conclusion that IDOT intends to widen the expressway. Unfortunately, many people do not trust IDOT. When trust among parties no longer exists, it takes a long time to recreate it. IDOT's decision to do the restudy reflects a level of distrust, so IDOT must address trust concerns.

- The headline is, "Eisenhower Expressway expansion project is the next big thing." The subhead is, "About seven miles could get wider from Mannheim Road to Cicero Avenue."
- "After promises for years that studies were in the works, preliminary engineering is finally under way for the Eisenhower Expressway expansion project, the next huge highway reconstruction planned for the Chicago area."
- "The long-term solution to the bottleneck is adding a fourth lane each way over about seven miles of the Eisenhower, from Mannheim Road to Cicero Avenue, according to the Illinois Department of Transportation."
- "IDOT began work this year on preliminary engineering and environmental studies to rebuild and widen the Eisenhower, one of the most congested highways in the Chicago area."
- "Very early cost estimates exceed \$1 billion. Currently, there is no money set aside. But Illinois' congressional delegation plans to make securing funding for the Eisenhower redo a major priority in the upcoming reauthorization of federal transportation spending legislation."

We fear that IDOT's recently announced "Information Expo" on the Eisenhower Expressway Project, scheduled for December 4, will further deepen public skepticism. The Expo flyer announces the opportunity to learn about "Highway Maintainer" jobs as well as the "corridor study exhibits." While we appreciate the importance of outreach to minority contractors, describing what appears to be

highway construction jobs before IDOT has even developed a purpose and needs statement suggests a process to arrive at a foregone conclusion.

Thanks again for the opportunity to provide formal comments. If you need further information, please feel free to contact either of us by telephone or e-mail. We look forward to the rest of the Phase 1 Study.

Sincerely,

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