



Citizens for Appropriate Transportation

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This letter is intended for inclusion in the Public Record

January 24, 2011

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

SUBJECT: Draft Purpose and Need Statement

Dear Mr. Harmet:

This letter contains comments on the "I-290 Phase 1 Study – Purpose & Need Summary (Draft)", dated November 24, 2010. We have two major points and some specific comments. Our major points are:

1. The Purpose and Need Statement suggests a predisposition toward the expressway.
2. The Purpose and Need Statement excludes important evaluation criteria.

1. The Purpose and Need Statement suggests a predisposition toward the expressway.

A Purpose and Need Statement that favors one mode over another is a "predisposition" to an alternative solution, even if alternatives have not been developed yet. We reach this conclusion based on the following:

a. Capacity analysis for the expressway, but not for the CTA Blue Line or the Metra lines suggests a predisposition to the expressway. IDOT has done extensive analysis of roadway capacity, but has not done equivalent analysis for either the CTA Blue Line or the Metra commuter rail lines. Without a capacity analysis for road and transit modes, it will be impossible to compare alternatives in terms of capacity. We understand IDOT is considering using the methodologies in the Transit Capacity and Quality of Service Manual, which may address this concern.

b. Crash analysis for the expressway but not for the CTA Blue Line or the Metra lines suggests a predisposition to the expressway. Similarly, IDOT has done extensive analysis on roadway crashes, but has not done equivalent analysis for either the CTA Blue Line or the Metra commuter rail lines. Your November 3, 2010 letter to us says IDOT requested crash data from the transit providers, so this may alleviate this concern.

c. NEPA regulations require a rigorous analysis of impacts and a fair evaluation of alternatives. The expressway capacity and crashes analyses will help IDOT do a rigorous analysis and a fair evaluation of roadway impacts, but the lack of similar analyses for CTA and Metra means IDOT cannot possibly do either for any multimodal alternatives.

d. The "Improve Facility Condition / Design" section only deals with the expressway. This section uses phrases like the "original design & construction of I-290," "the original pavement base," the "bridge structures over I-290," and "geometric design does not meet current standards." Improving the facility condition and design of CTA, Metra, and PACE facilities is also important.

e. We continue to be concerned about IDOT's choice for the eastern study area boundary. We raised this concern in previous letters. The Home-to-Work trip is critical for employers and employees. The largest concentration of jobs in the entire region is downtown Chicago.

2. The Purpose and Need Statement excludes important evaluation criteria.

Evaluation criteria should include all modes, as well as economic, environmental, and social problems related to transportation.

In the 12/1/2010 PowerPoint Presentation, IDOT quotes from the FHWA Environmental Guidebook, Guidance on "Purpose and Need." IDOT's selected quote says, "Every effort should be made to develop a concise purpose and need statement that focuses on the primary transportation challenges to be addressed."

There are other FHWA quotes that require a broader Purpose and Need Statement. Two examples are,

*"(b) 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 protection goals."*¹ (emphasis added)

"SAFETEA-LU Sections 3005, 2006, and 6001 require that:

- The transportation planning process provides for actions and strategies that protect and enhance the environment, promote energy conservation,*

¹ Code of Federal Regulation 23 CFR Section 771.105(b) emphasis added

*improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns*²

SPECIFIC COMMENTS ON THE NOVEMBER 24, 2010 DRAFT

1. The first paragraph uses the word "mobility," but the language on Pages 2 and 3 that expands on the summary paragraph at the top of Page 1 uses the word "access." IDOT should define both terms and identify the measures to be used. Page 2 says "access to regional jobs" and Page 3 says "access jobs in western Cook and eastern DuPage counties," but does not say anything about "mobility."
2. What is meant by "modal connections and opportunities?" (Page 1)? Does "modal connections" mean more mode choices for home-to-work trips or more mode transfer points, such as the multi-modal station at Harlem and Marion in Oak Park?
3. On Page 2, the claim that "mainline traffic volume is up to 136% percent of its available capacity in the six lane section" needs to be better explained. Intuitively, it is impossible to be over 100 percent capacity, because the term "capacity" implies there is a maximum limit. We know the Volume to Capacity Ratio can be over 100 percent, but most people involved in this process are not transportation experts.
4. Does IDOT have a Level of Service (LOS) Policy? If so, include it in the Purpose and Need Statement because it is an evaluation criterion. For example, some states have a policy of LOS D or better in the PM Peak Hour. Some specific places in the Draft Purpose and Need Statement where a LOS policy would be helpful are:
 - a. on Page 2 under the heading "Local Travel," where it says, "7 of 10 I-290 interchanges have failing movements." What constitutes a failing movement? Is it LOS D or worse, LOS E or worse? Is it during the PM Peak Hour now or projected 20 years or more into the future?
 - b. under the "Local Travel" heading where it says, "The five nearest east-west 'through' arterial streets (North Avenue, Lake Street, Madison Street, Roosevelt Road, and Cermak Road), experience congested or very congested conditions along 92% of their length through the study area."
 - c. on Page 3 in the fourth bullet point, which say, "Within the study area, all of the interstate segments and approximately 92% of the parallel arterial street segments are congested (see *Exhibit 4*)."

² FHWA, "1. The Environmental Review Process - Section 6002 - SAFEATEA-LU Environmental Review, Answer to Question 4.

Comments on the Draft Purpose and Need Statement

5. On Page 3 "Improve Access to Employment" in the third bullet point about Reverse Commuters, IDOT says the "Cook-DuPage Corridor Travel Market Analysis found that there are limited transit options for workers in Cook County who live east of Cicero Avenue to access jobs in western Cook and eastern DuPage counties." IDOT should also note many of these residents do not own cars. There are also other areas within the Study Area where many residents do not own cars.

Thanks for the opportunity to provide comments. We would very much like to see the Phase 1 Study succeed. Our comments are intended to be helpful. If you need further information, please feel free to contact either or both of us by telephone or e-mail. We look forward to the rest of the Phase 1 Study.

Sincerely,

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IDOT Study\CAT Ltr to IDOT Jan 2011

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