



## 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**

January 23, 2012  
Illinois Dept. of Transportation  
c/o Mr. Peter Harmet and Mr. Mark Peterson  
201 West Center Court  
Schaumburg, IL 60196

**SUBJECT: Alternatives Identification and Evaluation, Draft Interim Report: Initial Alternatives Identification and Round 1 Evaluation, Version 1.0, November 2011**

Dear Mr. Harmet and Mr. Peterson:

This letter contains our comments on the November 2011 Alternatives Identification and Evaluation Version 1.0 Report.

We organized our major comments as follows:

### **Build Alternatives**

1. IDOT is not considering the full range of viable alternatives.
2. IDOT's Build Alternatives fail to take full advantage of transit.
3. IDOT should use market segmentation.
4. IDOT does not have sufficient data to develop good transit alternatives.

### **Relative Comparisons**

### **Comments**

## **BUILD ALTERNATIVES**

### ***1. IDOT is not considering the full range of viable alternatives.***

All ten Build Alternatives add an extra lane. None of the ten Build Alternatives considers extending and improving the CTA Blue Line and Metra Commuter Rail Lines without adding capacity to the Eisenhower Expressway. Not considering a transit-oriented alternatives means IDOT cannot possibly evaluate it. Transit-oriented

alternatives have more person capacity than the expressway, and they provide access to jobs, education, and recreation for people without a car. They have the potential to improve neighborhood livability, change land uses patterns, have fewer negative environmental impacts than widening the expressway, and help the expressway function better.

## **2. IDOT's Build Alternatives fail to take full advantage of transit.**

"Reinventing the Urban Interstate: A New Paradigm for Multimodal Corridors" is Transit Cooperative Research Program (TCRP) Report 145 sponsored by the Federal Transit Administration.<sup>1</sup> This report examined every multimodal corridor in the United States as well as multimodal corridors in other countries.

TCRP Report 145 identifies three forms multimodal corridors can take.

**1. Transit-Oriented Multimodal Corridors** give transit a performance advantage in serving short- and medium-length trips and give the freeway a performance advantage in serving long-haul corridor trips. A Transit-Oriented Multimodal Corridor has short station spacings (one-half to three-quarters of a mile) and long interchange spacings (more than one mile). Except for terminal (end-of-the line) stations, trip origin stations are not near expressway ramps. Except for terminal stations, there are no (or few) park-and-ride lots and stations have good bus, pedestrian, and bicycle access. Development tends to be mixed use, relatively high density, and designed for pedestrians. According to TCRP Report 145, one example is the Blue Line on the Kennedy Expressway from Belmont (Blue Line) to Clinton (Green Line) stations.<sup>2</sup>

**2. Park-and-Ride Access Multimodal Corridors** provide high levels of automobile access within, and high transit speeds through, the corridor. A Park-and-Ride Access Multimodal Corridor has short interchange spacings of one-quarter to one-half mile and longer transit station spacings (more than three-quarters of a mile). There are employment centers and low residential densities with one mile or so of the transit line.

Transit trip origin stations outside of the Central Business District are close to the expressway off-ramps, have ample park-and-ride capacity, and a high capacity street network nearby to handle peak-period demand at stations from park-and-ride and pick-up/drop-off patrons. Transit trip destination stations are far from the expressway to promote pedestrian activities within the employment centers.

According to TCRP Report 145, an example is the Red Line on the Dan Ryan where the average station spacing is 1.1 miles versus the one-half mile interchange spacing for the Dan Ryan expressway. This divides the travel market in the corridor

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<sup>1</sup> Transit Cooperative Research Program, TCRP Report 145: "Reinventing the Urban Interstate: A New Paradigm for Multimodal Corridors," Christopher E. Ferrel, Michael Carroll, Bruce Appleyard, David Reinke, Senanu Ashiabor, Richard Dowling, Herbert S. Levinson, Elizabeth Deakin, and Robert Cervero, Sponsored by the Federal Transit Administration, Transportation Research Board, 2011.

<sup>2</sup> TCRP Report 145, Page 26.

into two segments: (1) long-haul, high-speed transit riders and (2) freeway-accessible more dispersed travel locations. This design helps the Red Line compete with and complement the expressway. The Red Line does not have park-and-ride spaces at its stations, but relies on bus-to-rail transfers and pedestrian access.<sup>3</sup>

**3. Transit-Optimized / Freeway-Constrained Multimodal Corridors** give transit a performance advantage in the corridor by constraining the capacity and performance of the expressway.

IDOT should ask the CTA, Metra, and PACE to give presentations at CAG/TF meetings in much the same way Claire Bozic presented CMAP's Travel Demand Model at the December 1, 2011 meeting.

**3. IDOT should use market segmentation.**

TCRP Report 145 recommends using market segmentation to provide separate, but complementary roles, for the expressway and transit. The two market segments are: (1) short and medium distance trips and (2) long distance trips.

TCRP Report 145 says, "The interstate was originally designed to serve the type of trips that its name implies: long-haul, interstate trips. However, as the interstate model evolved, interstate freeways became the infrastructure of choice for intraurban travel as well, often displacing transit services into playing a supplementary, congestion-reliever role to their freeway counterparts."<sup>4</sup>

Market segmentation would help the Eisenhower Expressway, CTA Blue Line, and Metra service complement each other, rather than directly compete. TCRP Report 145 says, "A combination of long station spacings and short interchange spacings (or the opposite) provide complementary travel services in a multimodal corridor and tend to carry more total passengers."<sup>5</sup> TCRP Report 145 found that "the most important station access variable affecting multimodal corridor transit ridership was the number of freeway ramps that touch down within a quarter-mile of a station."<sup>6</sup> Ramps near transit stations can discourage pedestrian access.

TCRP Report 145 distinguishes between Transit-Oriented Complementary Coordination and Automobile-Oriented Complementary Coordination.

1. "A Transit-Oriented Complementary Coordination has long interchange spacings on the expressway and short station spacings on the transit line. The result is a high level of local accessibility and slower speeds for transit, and higher speeds and lower accessibility for automobiles on the expressway."<sup>7</sup>

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<sup>3</sup> TCRP Report 145, Page 27.

<sup>4</sup> TCRP Report 145, Page 2.

<sup>5</sup> TCRP Report 145, Page 41.

<sup>6</sup> TCRP Report 145, Page 91

<sup>7</sup> TCRP Report 145, Page 42.

2. “An Automobile-Oriented Complementary Coordination has long station spacings on the transit line and relatively short interchange spacings on the expressway. The result is a low level of local accessibility and higher speeds for transit, and lower speeds and higher accessibility for automobiles on the expressway.”<sup>8</sup>

#### **4. IDOT does not have sufficient data to develop good transit alternatives.**

Although IDOT has extensive data and analysis for the expressway, an equivalent level of data and analysis for transit is not available, even though the Task Force includes the transit agencies. We understand IDOT has asked the CTA to share its expertise and prepare detailed studies on a time line that complements IDOT’s Phase 1 Study. We regard this as a positive action because the performance of the expressway will be better with good Blue Line service.

## **RELATIVE COMPARISONS**

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IDOT’s reliance on relative comparisons to the exclusion of absolute comparisons troubles us. We agree relative comparisons of Build Alternatives to the No Build 2040 Alternative are valuable, but believe comparisons to problems identified in the Purpose and Need Statement are also valuable. For example, IDOT has documented long hours of Level of Service D (or worse), so an analysis of how many hours each weekday each Build Alternative would be in LOS D or worse is valuable. Spending millions of dollars to make improvements that are relatively better than existing conditions but do not actually solve the problem does not make sense. If the expressway really needs more than eight lanes to meet IDOT’s Level of Service Policy, then a transit-oriented alternative is a better solution. High congestion levels are a good indication that widening the expressway is not a sustainable or viable solution. Continuing the mistakes of the past is not the way to achieve a good future.

We are aware of IDOT’s comments that the Corridor Study Area is relatively developed, but IDOT also points out many trips in the corridor start and end outside the Study Area. According to the Market-Driven Forecasts to the Year 2040 prepared by the al Chalabi Group (January 2012), some of the areas outside the Study Area are still developing, suggesting an increase in trips.

## **COMMENTS**

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**1. Summarizing the observations and conclusions from the CMAP models is helpful.** One valuable part of recent CAG/TF meetings is the summary of observations and conclusions IDOT and its consultants (usually Ron Shimizu) are drawing from running the CMAP Travel Demand Model. We hope this will continue.

**2. Table 3-2: Study Area and Regional Measures (Page 11) has an incorrect unit.** The unit of measure for Vehicle Miles of Travel (VMT) is not hours / day. Page 12 also has Vehicle Miles of Travel, but the unit of measure is correct on this page.

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<sup>8</sup> TCRP Report 145, Page 42.

**3. Table 3-8 Modal Connections Measures (Page 15) still has qualitative measures for three of the four measures.** Use quantitative measures instead.

We have summarized TCRP Report 145 comments on Chicago's multimodal corridors in an appendix to this letter. If you do not already have a copy of this report, we would be happy to provide you with a copy. IDOT has been responsive to our FOIA requests, so it is only fair that we reciprocate.

If you need further information or want to meet to discuss these issues further, please feel free to contact me by telephone or e-mail. Thank you.

Sincerely,

**Citizens for Appropriate Transportation**

Rick Kuner  
708/848-0942  
rkuner@comcast.net

*IDOT Study\CAT2011\CAT Ltr to IDOT Jan 2012*

COPY TO: U.S. Federal Highway Administration – Illinois Division Office  
U. S. Federal Transit Administration

Sent by e-mail attachment

## **APPENDIX A: TCRP REPORT 145 COMMENTS ON CHICAGO'S MULTIMODAL CORRIDORS**

TCRP Report 145 says there are three multimodal corridors in the Chicago Region - (1) CTA Blue Line – Eisenhower Expressway, (2) CTA Blue Line – Kennedy Expressway, and (3) Red Line – Dan Ryan Expressway. The following quotes or paraphrases are about the Blue Line – Eisenhower Expressway and come from TCRP Report 145.

“While the urban form of Eisenhower Corridor is automobile-oriented, its station access characteristics tend to be transit-oriented. This mismatch may be partially responsible for this transit line’s lower patronage levels than other Chicago area heavy rail lines. The corridor’s stations have the lowest number of park-and-ride spaces of any study case. Since park-and-ride spaces encourage automobile access to stations and discourage pedestrian, bicycle, and bus access, this implies the transit line is designed to primarily serve corridor trips for people living near the corridor’s stations rather than attracting automobile-to-transit transfers that often originate further away.”<sup>9</sup>

“That the corridor’s stations have a lower-than-median number of bus lines per station (3.2 versus 6.2 per station for all study corridors) reinforces the impression that the Blue Line’s stations in the Eisenhower corridor are designed to serve walk-access residents in its directly adjacent neighborhoods. However, its catchment area is limited because there are parallel rapid transit lines less than a mile to the north and about 1.5 miles to the south.”<sup>10</sup>

“The placement of Blue Line’s stations in relation to the freeway facility discourages non-automobile access as well. The average distance from the corridor’s stations to the freeway is roughly 0.02 miles to the freeway – essentially directly adjacent to the freeway and significantly lower than the median distance for the rest of the study corridors of 0.09 miles. This relatively short separation distance serves to increase the negative impacts of the freeway on the transit line.”<sup>11</sup>

The Kennedy Blue Line is better than the Forest Park Line in terms of urban form and station access. Its stations are 10 times as far from its expressway as the Ike. The number of park-and-ride spaces for the Kennedy is about double the number for the Eisenhower Corridor and Kennedy stations have more bus lines serving it. The Kennedy Expressway is relatively constrained, giving an advantage to high capacity transit.<sup>12</sup>

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<sup>9</sup> TCRP Report 145, Page 93.

<sup>10</sup> TCRP Report 145, Page 93. The Green Line is to the north and the Pink Line is to the south.

<sup>11</sup> TCRP Report 145, Page 93.

<sup>12</sup> TCRP Report 145, Pages 93 to 95.