



## 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**

May 20, 2013  
Illinois Dept. of Transportation  
c/o Mr. Peter Harmet and Mr. Mark Peterson  
201 West Center Court  
Schaumburg, IL 60196

**SUBJECT: Revised Purpose and Need Statement and Round 2: Combination Alternatives**

Dear Mr. Harmet and Mr. Peterson:

Thank you for the opportunity to provide comments on the April 2013 Draft Purpose and Need Statement and the Round 2 Combination Alternatives presented at the Corridor Advisory Group / Task Force Meeting on February 21, 2013. We have grouped our comments into the following categories:

1. Purpose and Need
2. Alternatives
3. Impact Scores
4. Evaluation Methodologies and Results
5. Citizen Participation
6. Lessons Learned from Round 2

### **1. PURPOSE AND NEED**

**Eastern Study Area Boundary** - We support IDOT's decision to extend the eastern Study Area Boundary to Racine Street – an action we advocated in our December 2, 2009 and January 27, 2010 letters to IDOT.

**Study Area Shape** – IDOT defines the Study Area as a rectangle (North Avenue, Cermak Road, west of Mannheim Road, and Racine Avenue).<sup>1</sup> It should be a wedge shaped corridor as we suggested in our letter to IDOT dated November 23, 2011. IDOT implicitly recognizes this by saying the Eisenhower Expressway “serves northwest Cook County and DuPage County.”<sup>2</sup>

**6 Lane Section** - IDOT states three general reasons for increasing the six-lane section on the expressway to eight lanes

1. Congestion levels are high (Level of Service D or worse)
2. Travel speeds are low so travel times are high
3. Accident rate is high

Our response to these three reasons is as follows.

1. **Congestion** - Eight lanes will not do much to reduce congestion and will not allow the expressway to meet IDOT’s Level of Service policy. To provide Level of Service D or better will require more than eight lanes. The person carrying capacity is much higher on the CTA Blue Line than on the expressway, even for the Build Alternatives where IDOT adds HOV, HOT, or Toll lanes. IDOT says there is no minimum threshold for performance improvements, but the cost to rebuild the expressway is high and the potential improvement is small.
2. **Travel Speeds** – Eight lanes will do little to improve travel speeds.
3. **Accidents** – For most years, the CTA Blue Line has no crashes, making rail transit commuting much safer than expressway commuting. IDOT cannot design the expressway in such a way to reduce accidents to zero. Diverting some drivers to transit would reduce the accident rate and increase travel speeds.

**Transportation – Land Use Connection** - IDOT ignores the fundamental connection between transportation and land use.

## 2. ALTERNATIVES

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**Context Sensitive Solutions** - IDOT is following a Context Sensitive Solutions process for the Phase 1 Study, but there has never been a presentation from either an urban designer or architect at any of the fifteen Corridor Advisory Group / Task Force meetings. Urban Designers and Architects routinely work with the context of each location. Not having a design professional on the Consultant Team limits the quality and scope of the alternatives. IDOT has said they will include a design professional later in the process, but this will only occur after IDOT excludes some alternatives from consideration. When IDOT eliminates alternatives in Round 2, they

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<sup>1</sup> Illinois Department of Transportation, Environmental Impact Statement, West of Mannheim Road to Racine Avenue, “Purpose and Need,” April 2013, Page 2.

<sup>2</sup> Ibid, Page 1.

cannot possibly evaluate them in Round 3 or the Draft Environmental Impact Statement.

**Two New Build Alternatives** - At the West Central Municipal Conference (WCMC) Policy Committee meeting at the Lombard Village Hall on January 30, 2013, Pete Harmet from IDOT said IDOT would consider alternatives developed by Citizens for Appropriate Transportation and the Village of Oak Park. IDOT under designed both alternatives. It appears IDOT used a flat rate toll based on a Congestion Pricing report prepared by the Chicago Metropolitan Agency for Planning (CMAP) instead of variable pricing. CMAP suggested \$.31 per mile for the Eisenhower Expressway - the highest per mile cost for any of the expressways CMAP included in their report.<sup>3</sup> Variable rate pricing based on traffic volumes works better than a flat rate toll.

**CTA Vision Study** - The CTA's Vision Study has the potential to add to the quality of the alternatives IDOT is considering.

**Diagrams for the Revised Round 2 Build Alternatives** – The revised diagrams illustrating the Round 2 Build Alternatives are nicely done and much clearer than prior diagrams.

**Round 3 Alternatives** - All four of the Build Alternatives IDOT wants to carry into Round 3 widen the I-55.

There are many ways to manage lanes. IDOT does not seem to have analyzed most of them.

### 3. IMPACT SCORES

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**Counter Intuitive Impact Scores** - Some impact scores on the Round 2 – Combination Mode Alternatives – Purpose and Need Evaluation Measures (February 21, 2013) are counter intuitive. IDOT needs to explain them. Two examples are:

1. For the two General Purpose Lane Alternatives, why are Truck Miles of Travel greater for the one with High Capacity Transit than for the one without High Capacity Transit? Having High Capacity Transit should free up some expressway capacity.
2. For the two General Purpose Lane Alternatives, the two HOV 2+ Alternatives, the two HOT 3+ Alternatives, and the two Toll Alternatives, why are there more Jobs Accessible by Transit within 60 Minutes for the one without High Capacity Transit than the one with High Capacity Transit?

**Small Differences among Alternatives for some Impact Scores** - There are very small differences among some alternatives for some evaluation criteria. IDOT is projecting to the Year 2040. For example, Table 1 compares the percentage

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<sup>3</sup> Chicago Metropolitan Agency for Planning, "Congestion Pricing – An Analysis of the Go To 2040 Major Capital Projects," October, 2012, Page 14. CMAP tolls per mile are \$.11 for I-90, \$.12 for I-55, \$.25 for Elgin – O'Hare Expressway, \$.29 for Central Lake County Corridor, and \$.31 for I-290 (Eisenhower Expressway).

difference between the two General Purpose Lane Alternatives. The largest difference between the two alternatives is 3.1 percent for Daily Hours of Congestion. Of the 24 criteria, 18 have differences on one percent or less. Does IDOT believe the models are accurate enough to distinguish such small differences that far out into the future? The same pattern of many small differences occurs when comparing the other pairs of alternatives.

**Table 1: COMPARISON OF THE PERCENT DIFFERENCE BETWEEN THE TWO GENERAL PURPOSE LANE ALTERNATIVES**

Measure Name	Measure	Impact Scores		Percent Difference
		GP & EXP	GP & EXP & HCT	
I-290 Average Travel Time Changes (Peak Period) All Lanes	Minutes	16.3	15.8	-3.1
Daily Hours of Congestion (I-290 in Study Area) GP Lanes	Hours	17.00	17.50	-3.0
Daily Person Throughput	Persons	441,435	446,763	-1.2
Vehicle Miles of Travel	Daily VMT	233,294,952	233,332,587	-.02
Vehicle Hours of Travel	Daily VHT	10,299,840	10,290,711	-.09
Congested VMT (Daily)	Daily VMT	17,880,998	17,860,655	0.1
Hours of Delay	Hours	5,219,927	5,210,529	0.2
Truck Miles of Travel	TMT	44,490,936	44,494,711	-.008
Truck Hours of Travel	THT	1,742,853	1,742,006	-.05
Congested TMT	TMT	2,343,884	2,341,107	0.1
Truck Hours of Delay	Hours	853,206	852,098	0.1
Peak Period Speed - E-W Arterials	MPH	18.96	18.96	0.0
Peak Period Speed - N-S Arterials	MPH	17.21	17.25	-.2
Vehicle Miles of Travel	VMT	3,314,277	3,304,204	-.3
Vehicle Hours of Travel	VHT	205,540	204,157	-.7
Congested Vehicle Miles of Travel	VMT	223,972	219,684	-1.9
Hours of Delay	Hours	97,866	96,787	-1.1
Jobs Accessible by Auto within 60 mins	Nr	5,159,250	5,225,620	1.3
Jobs Accessible by Transit within 60 mins	Nr	4,072,816	4,061,838	-.3
Jobs Accessible by Auto & Transit w/in 60	Nr	9,232,076	9,287,458	.6
Injuries & Fatalities - Arterial	Million Vehicle Miles / Year	0.4963	0.4956	.1
Injuries & Fatalities - Expressway	Million Vehicle Miles / Year	0.1872	0.1884	.6
Overall Injuries & Fatalities	Million Person Miles / Year	0.2337	0.2323	-.6
New Transit Trips (Regional)	Nr	2,009,000	2,010,480	.07
Households with .5 mile Transit Access	Nr		4,585	
Employment with .5 mile Transit Access	Nr		19,397	

## 4. EVALUATION METHODOLOGIES AND RESULTS

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### *Criteria*

**Transportation Criteria** - IDOT excludes important transportation criteria, such as travel time reliability, construction cost estimates, and operating cost estimates. For alternatives with High Capacity Transit (either a CTA Blue Line extension or Bus Rapid Transit), IDOT says the performance among the two are similar, but says nothing about capital and operating costs, which are significantly different. Making a major transportation investment decision without considering costs is a mistake. We understand why IDOT did not prepare engineering cost estimates during Round 2, but planning cost estimates are possible.

**Non-Transportation Criteria** - In Round 2, IDOT has not considered air and noise pollution, disruption of existing communities, economic development / redevelopment opportunities, loss of tax revenues, and transit access for communities with low auto ownership rates. IDOT plans to consider them in Round 3, but Round 3 occurs only for alternatives IDOT carries forward. IDOT risks excluding alternatives that score poorly on the limited set of Round 2 criteria, but would score much better on the broader set of Round 3 criteria.

### *Alternatives*

One of the best reports on multi-modal corridors is “Reinventing the Urban Interstate: A New Paradigm for Multimodal Corridors.”<sup>4</sup> IDOT ignores most of the expert advice contained in this report. IDOT clearly has an expressway focus. We recommended this report to IDOT in our January 23, 2012 letter, but IDOT has ignored our comments.

Among other things, this report says:

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.<sup>5</sup>
- 2. Park-and-Ride Access Multimodal Corridors** provide high levels of automobile access within, and high transit speeds through, the corridor.
- 3. Transit-Optimized / Freeway-Constrained Multimodal Corridors** give transit a performance advantage in the corridor by constraining the capacity and performance of the expressway.

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<sup>4</sup> Transit Cooperative Research Program Report 145, by Christopher E. Ferrell, Michael Carroll, Bruce Appleyard, David Reinke, Sennau Ashiabor, Richard Dowling, Herbert S. Levinson, Elizabeth Deakin, and Robert Cervero, Sponsored by the Federal Transit Administration, 2011.

<sup>5</sup> Ibid, Page 26.

“The old paradigm developed transit lines to compete directly with their freeway neighbors for long-haul corridor trips and as a congestion reliever service. New paradigm multimodal corridors provide market segmentation—distinct, separated, and optimized travel markets for each mode—between the transit line and freeway”<sup>6</sup>

“The degree to which transit competes directly or works cooperatively with its freeway neighbor is the critical determinant of transit success in a multimodal corridor. Multimodal corridor transit and freeway systems often are built to compete directly with each other for the same travel markets. When this happens, one mode can dominate, and the freeway typically attracts the most patrons. As a result, the surrounding land uses and activities will be shaped to serve the freeway, leaving transit under patronized.”<sup>7</sup>

The report identifies the five D’s to identify the important characteristics of transit station areas.<sup>8</sup>

1. **Density** – clustered trip origins (residential) and destinations (employment) around stations
2. **Diversity** – mixed land uses providing a range of clustered, mutually supportive trip destinations
3. **Design** – transit- and pedestrian-friendly street networks and urban design
4. **Distance** – The shorter the walking distances between a transit station and surrounding land uses, the better. However, since a freeway facility’s negative externalities (that is, noise, air, and sight pollution) tend to depress pedestrian activities, maximizing distances between a freeway and station areas or effectively mitigating the negative impacts of the freeway are desirable as well.
5. **Destinations** – When jobs and housing are located near transit stations in a multi-modal corridor, travel along the corridor is relatively balanced. This balance leads to effective use of the capacity of both the expressway and CTA rail line. When there is not a jobs – housing balance, such as near a downtown rail station, transportation capacity is not as effectively used.

### ***Projection of Impact Scores***

IDOT’s method of projecting impacts has three general steps.

1. Project impact scores to the Year 2040 without any changes to the Eisenhower Transportation Corridor for the 2040 No Build + Express Bus Scenario.
2. Project impact scores to the Year 2040 for each of the twelve Build Alternatives.

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<sup>6</sup> Ibid, Page 1.

<sup>7</sup> Ibid, Page 4.

<sup>8</sup> Ibid, Pages 51 and 52

3. Compare each of the Build Alternatives against the 2040 No Build alternative.

Projections to the Year 2040 are likely to have some margin for error. Math Modelers frequently call this “model noise.” As demonstrated in Table 1 and later in this letter, many of the differences among impact scores are very small.

### ***IDOT's Ranking System***

IDOT's Ranking System is seriously flawed.

IDOT uses Ratio Scales for their evaluation measures. A Ratio Scale has a meaningful zero, i.e., zero means nothing. Some of IDOT's ratio scales are travel time, vehicle miles of travel, jobs accessible within 60 minutes, and new transit trips. With a ratio scale, it is valid to say 60 miles is twice as long as 30 miles.

IDOT then uses an Ordinal Scale to rank each alternative for each evaluation measure from Best (=12) to Worst (=1). An Ordinal Scale lets you identify the order of alternatives, but not the difference between one alternative and the next. A question where the possible answers are “Good – Fair – Poor” is a good example of an Ordinal Scale. “Good” is better than “Fair” and “Fair” is better than “Poor,” but you cannot tell by how much.

IDOT then makes a serious error. IDOT uses the rankings from 12 to 1 to calculate averages. Instead of using the ratio scales, IDOT treats every impact score as being on a scale from 12 to 1. To calculate an average, the procedure is to add the individual scores and then divide by the total number of scores. When you look at IDOT's Purpose and Need Summary Table (February 21, 2013), it is clear the differences from one alternative to the next are different, but IDOT treats every difference as being equal to one because they stop using their original Ratio Scales and start using their ranking from 12 to 1. We described this problem in detail in our June 29, 2012 letter.

Table 2 illustrates the serious problem with IDOT's Ranking System. Columns 1 and 2 show the Daily Person Throughput (Regional Travel) for each of the twelve Build Alternatives ranked from best to worse. The Build Alternative with the highest Daily Person Throughput is the combination of toll lanes (TOLL), Express Bus Service (EXP) from the western most station, and High Capacity Transit (HCT – either CTA Blue Line Extension or Bus Rapid Transit). Because this is the highest scoring alternative, there is no prior alternative so the difference from the prior alternative is zero as shown in Column 3. IDOT's Ranking System (Column 4) ranks this as 12 because it is the best scoring alternative for this evaluation measure. The second best alternative is the combination of High Occupancy Toll Lanes with three or passengers in each vehicle (HOT 3+), Express Bus Service (EXP) from the western most station, and High Capacity Transit (HCT). The difference from the prior alternative is 1,885 (463,975 – 462,090). IDOT ranks this as 11 because it is the second best of the 12 Build Alternatives. The remaining rows work the same way. The range of differences from one alternative to another is a minimum of 147 and a maximum of 6,810. Because IDOT calculates an average score, their Ranking System treats every difference as equal to one, despite the wide range. Instead of

using projected Daily Person Throughput (Column 2), IDOT substitutes the Ranking as the impact score (Column 4). Column 3 clearly demonstrates there are differences from one alternative to another. The difference in rank is always one, for example, 12 – 11 equals 1.

**Table 2: DAILY PERSON THROUGHPUT**

<b>Daily Person Throughput - (Measure 1.5)</b>			
<b>Alternatives</b>	<b>Daily Person Throughput</b>	<b>Difference from Prior Score</b>	<b>IDOT's Rank</b>
TOLL & EXP & HCT	463,975	0	12
HOT 3+ & EXP & HCT	462,090	1,885	11
TOLL & EXP	459,416	2,674	10
HOT 3+ & EXP	458,848	568	9
HOV 2+ & EXP & HCT	455,848	3,000	8
HOT 3+ & TOLL & EXP & HCT	454,545	1,303	7
HOV 2+ & EXP	452,103	2,442	6
HOT 3+ & TOLL & EXP	450,777	1,326	5
Base (2GP) & HOT 3+ & HCT	446,910	3,867	4
GP & EXP & HCT	446,763	147	3
GP & EXP	441,435	5,328	2
Base (3GP) w / Value \$ & HCT	434,625	6,810	1

Table 3 shows the minimum and maximum scores for more of IDOT's evaluation criteria. Despite the wide range, IDOT treats every difference from one alternative to the next as equal to one.

**Table 3: SUMMARY TABLE OF MINIMUM AND MAXIMUM IMPACT SCORES FOR SELECTED EVALUATION MEASURES**

<b>Measure</b>	<b>Measure</b>	<b>Minimum</b>	<b>Maximum</b>
I-290 Average Travel Time Changes (Peak Period) All Lanes (Measure 1.3)	Minutes	0	3.8
Daily Hours of Congestion (General Purpose Lanes) - (Measure 1.4)	Hours	0	4.25
Daily Person Throughput - (Measure 1.5)	Number	147	6,810
Vehicle Miles of Travel (Daily VMT) - (Measure 1.6)	Miles	2,425	26,265
Congested VMT (Daily) - (Measure 1.8)	Miles	404	65,369
Truck Miles of Travel (TMT) - (Measure 1.10)	Miles	102	4,737
Truck Hours of Delay - (Measure 1.13)	Hours	158	1,016
Congested VMT - Local Streets - (Measure 1.20)	Miles	161	264,10



IDOT can solve the Ranking System problems in at least three ways:

1. Normalize Impact Scores so they all have a common base (probably 100). This would maintain the differences that exist when comparing one alternative to another for each evaluation measure. When we calculate percentages, we normalize all scores using 100 as the common base. This allows us to compare the percent for one group to another.
2. Prepare Comparison Tables to highlight the trade-offs between any two alternatives. Table 4 is an example of a Comparison Table between the two General Purpose Lanes alternatives (with and without High Capacity Transit). The first five columns are copied directly from IDOT's Evaluation Measures spreadsheet using actual scores rather than differences from the 2040 No Build Alternative. The Measure Name and Measure are identical to IDOT's column headers. The column "Pos / Neg" is conceptually the same as IDOT's Up Arrow to indicate the higher the impact score the better, and the Down Arrow to indicate the lower the impact score the better. The column headed "Differences" is the absolute difference between the two alternatives. For example, the first measure (I-290 Average Travel Time Changes [Peak Period] All Lanes) is 16.3 minutes minus 15.8 minutes = 0.5 minutes). The Advantage To: column assigns the difference (0.5 minutes for the first measure) as an advantage to one alternative or the other. The logic for the first measure is the measure is "Negative" (the less the travel time minutes, the better). 15.8 minutes is less than 16.3 minutes, therefore I assign the advantage for this measure to the General Purpose Lane alternative with High Capacity Transit. By scanning down the two "Advantage To" columns, it is easy to see the trade-offs. The final column is the percentage difference between the two impact scores. The calculation is  $0.5 / 16.3 \times 100 = 3.1$ . Note how small the differences are between these two alternatives. The largest difference is 3.1 percent and most differences are less than two percent. If there is a zero difference between the two alternatives, the "Advantage To" column shows "NSD," which means No Significant Difference. The correct interpretation of "NSD" is we considered this evaluation measure, but when comparing these two Build Alternatives, the evaluation measure did not help us decide which alternative is better.
3. Do a Sensitivity Analysis to make an informed judgment whether differences among alternatives are significant. Sensitivity analysis examines the extent to which changes affect the results. Given two Build Alternatives with very small differences among the impact scores, we would say there is not much difference between them, so the recommendation for one over the other includes language that says it would not take much change to stop recommending one alternative and start recommending the other. In contrast, given two Build Alternatives with large differences among the impact scores, the recommendation for one over the other can be much stronger because it would take a large margin of error before we would stop recommending one and start recommending the other. For the two General Purpose Lane alternatives used to illustrate Comparison Tables, most of the differences are well within any likely margin for error.

**Table 4: COMPARISON TABLE BETWEEN GP & EXP vs. GP & EXP & HCT**

				Impact Scores			Advantage to:		
	Measure Name	Measure	Pos / Neg	GP & EXP	GP & EXP & HCT	Difference	GP & EXP	GP & EXP & HCT	Pct Difference
Regional Travel	I-290 Average Travel Time Changes (Peak Period) All Lanes	Minutes	N	16.3	15.8	0.5		0.5	3.1
	Daily Hours of Congestion (Study Area)	Hours	N	17.00	17.50	0.50	0.50		(2.9)
	Daily Person Throughput	Persons	P	441,435	446,763	5,328		5,328	(1.2)
	Vehicle Miles of Travel	Daily VMT	N	233,294,952	233,332,587	37,635	37,635		(0.02)
	Vehicle Hours of Travel	Daily VHT	N	10,299,840	10,290,711	9,129		9,129	0.09
	Congested VMT (Daily)	Daily VMT	N	17,880,998	17,860,655	20,343		20,343	0.1
	Hours of Delay	Hours	N	5,219,927	5,210,529	9,398		9,398	0.2
Trucks	Truck Miles of Travel	TMT	N	44,490,936	44,494,711	3,775	3,775		(0.01)
	Truck Hours of Travel	THT	N	1,742,853	1,742,006	847		847	0.05
	Congested TMT	TMT	N	2,343,884	2,341,107	2,777		2,777	0.12
	Truck Hours of Delay	Hours	N	853,206	852,098	1,108		1,108	0.13
Local Travel	Peak Period Speed - E-W Arterials	MPH	P	18.96	18.96	0.00	NSD	NSD	-
	Peak Period Speed - N-S Arterials	MPH	P	17.21	17.25	0.04		0.04	(0.23)
	Vehicle Miles of Travel	VMT	N	3,314,277	3,304,204	10,073		10,073	0.3
	Vehicle Hours of Travel	VHT	N	205,540	204,157	1,383		1,383	0.67
	Congested Vehicle Miles of Travel	VMT	N	223,972	219,684	4,288		4,288	1.9
Hours of Delay	Hours	N	97,866	96,787	1,079		1,079	1.1	
Emp	Jobs Accessible by Auto within 60 mins	Nr	P	5,159,250	5,225,620	66,370		66,370	(1.3)
	Jobs Accessible by Transit within 60 mins	Nr	P	4,072,816	4,061,838	10,978	10,978		0.27
	Jobs Accessible by Auto & Transit w/in 60 mins	Nr	P	9,232,076	9,287,458	55,382		55,382	(0.6)
Safety	Injuries & Fatalities - Arterial	Million Vehicle Miles / Year	N	0.4963	0.4956	0.0007		0.0007	(0.14)
	Injuries & Fatalities - Expressway	Million Vehicle Miles / Year	N	0.1872	0.1884	0.0012	0.0012		(0.64)
	Overall Injuries & Fatalities	Million Person Miles / Year	N	0.2337	0.2323	0.0014		0.0014	0.6
Modes	New Transit Trips (Regional)	Nr	P	2,009,000	2,010,480	1,480		1,480	(0.07)
	Households with .5 mile Transit Access	Nr	P	-	4,585	4,585		4,585	
	Employment with .5 mile Transit Access	Nr	P	-	19,397	19,397		19,397	

## 5. CITIZEN PARTICIPATION

It took IDOT ten months to respond to our June 19, 2012 letter. Many other people who submitted comments to IDOT last June experienced the same 10-month delay.

A long response time casts serious doubt on IDOT's claim to value citizen participation. IDOT's Stakeholder Involvement Plan for Agency and Public Involvement (February 2010, Version 4) says "*Mail and e-mail responses offer the opportunity to develop a personalized response, yet timeliness is important. The desired time-frame to develop, edit, approve and mail (or e-mail) a response is one week once it is received by the PSG.*" (Page 17) NOTE: PSG = Project Study Group.

Table 5 is IDOT's summary of Stakeholder Comments.

**Table 5: IDOT'S SLIDE #13: CORRIDOR ADVISORY GROUP AND TASK FORCE MEETING #15 – February 20, 2013**

<p><b>Round 2 Stakeholder Comments</b></p> <p><b>79 comments received:</b></p> <ul style="list-style-type: none"> <li>• Unfamiliarity with managed lanes</li> <li>• Support for bike/pedestrian accommodations</li> <li>• Left hand ramps</li> <li>• Noise, Air</li> <li>• Additional Alternatives</li> </ul>
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IDOT's summary is neither accurate nor fair. By using the phrase "79 comments received" in the slide, IDOT confuses comments with stakeholders. Most stakeholders made more than one comment. In response to my Freedom of Information Request, IDOT mailed an Adobe PDF file on a disk with all the comments received. This file contained 87 sets of comments but one person (David Moehring) submitted two sets of comments and three stakeholder comments were included twice. By my count, 84 stakeholders (citizens, families, groups, and agencies) made substantially more than 79 comments.

Table 6 contains an alternative summary of the comments IDOT received.

**Table 6: ALTERNATIVE SUMMARY OF STAKEHOLDER COMMENTS**

<b>Sorted by Total</b>		
<b>Category</b>	<b>Total</b>	<b>Percent</b>
Consider Environmental Impacts	33	12.3
Expand Transit	31	11.5
Don't widen the expressway	29	10.8
Poor Planning Process	29	10.8
Need Better Alternatives	29	10.8
Extend the Blue Line	26	9.7

Fund Transit	24	8.9
Keep Center Ramps	20	7.4
Environmental Justice	12	4.5
Widen Expressway within the Ditch	10	3.7
Negative Impacts on Parks	9	3.3
Poor Communication by IDOT	6	2.2
Don't Convert Lane East of Austin	3	1.1
Move Ramps to Right Hand Side	3	1.1
Accident Information is inadequate	3	1.1
Use railroad right-of-way	2	0.7
<b>TOTAL</b>	<b>269</b>	<b>100.0*</b>

\*The total of the above percentages is 99.9, but is rounded to 100.

Table 6 does not include comments that convey personal information, such as where the stakeholder lives, the mode of transportation they use to get to work, or comments about their neighborhood or municipality. Three categories are similar: Expand Transit, Extend the Blue Line, and Fund Transit. Comments in favor of center ramps outnumber comments in favor of right-hand side ramps by almost 7 to 1. Comments opposing adding lanes outnumber comments in favor of widening by almost 3 to 1.

Several comments submitted to IDOT in June 2012 after the IDOT meeting with the Oak Park Village Board complain about the clarity of IDOT's explanations. Some examples are:

- "IDOT has not studied nor established a viable transit option."
- "You've locked us in to thinking about just five [alternatives] without being able to explain from a cost or environmental standpoint why these are the best ideas you are capable of generating."
- "... the consideration of transit seems to be little more than an afterthought."
- "Significant questions about the viability of HOV and HOT lanes are not included in the analysis."
- "IDOT gave a rushed presentation to the Oak Park community of the Build Alternatives in technobabble at the Village Hall meeting in early June. The information and data were presented in acronyms and graphs which, we believe, were intended to confuse and overwhelm the audience and make it easier to convince everyone that the five alternatives favored by IDOT are inevitable and preferable."

## **6. LESSONS LEARNED FROM ROUND 2**

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Round 2 Evaluation should help IDOT and others learn how to improve the combination alternatives to make them better within the context of the Eisenhower Transportation Corridor and the Chicago Region. The computer models help us learn how to them revise alternatives to make them better. Models allow us to try out an alternative in the computer without spending any construction money.

The following are a list of lessons learned based on my review of the IDOT documents.

1. IDOT correctly concludes transit by itself will not solve the problems. The expressway by itself will not solve the problem either.
2. The Federal Transit Administration's TCRP Report can help IDOT, CTA, Metra, and Pace structure combination alternatives to allow transportation modes to complement each other. In particular, households without cars need viable transit options.
3. IDOT should change the way it does transportation planning to better account for all evaluation criteria as well as land use issues. We need more effective coordination among the land use and transportation planning agencies.
4. We need more analysis on the impact of tolls. When a toll of \$.31 cents per mile for the Eisenhower Expressway (CMAP price from their Congestion Pricing Report) shows a high diversion of motorists to arterial streets, it makes sense to consider lowering the toll rate.
5. Congestion Pricing Projects in the United States have mixed results, so IDOT and CMAP should take advantage of research results from prior studies, such as the U.S. Government Accountability Office report of 2012. In the letter from IDOT to CAT dated April 26, 2013, IDOT noted that the GAO considered fourteen case examples out of more than 300 examples in the United States, but IDOT misses the point. The GAO selected the 14 case examples because they had either a complete or partial evaluation of the results using methodologies GAO deemed appropriate.

In past letters, we have offered to meet to discuss these issues further. We think such a meeting can help narrow our differences. Thank you for the opportunity to provide comments.

Sincerely,

**Citizens for Appropriate Transportation**

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

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

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