

Citizens for Appropriate Transportation

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This letter is intended for inclusion in the Public Record

January 27, 2010

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

SUBJECT: Combined Corridor Advisory Group / Task Force Meeting #2

Dear Mr. Peterson and Mr. Harmet:

Thank you for the opportunity to comment on the information that you presented at the Corridor Advisory Group and the Task Force held in Oak Park on January 19, 2010. IDOT presented some useful and helpful information, which we appreciate. Our intent in this letter is to provide constructive comments for you to consider as the study moves forward. All of us are dealing with the complex set of issues that IDOT is addressing in the Phase 1 Study.

We grouped our comments into seven categories:

1. Distinguish issues from problems.
2. Revise the Draft Problem Statement.
3. Clarify the goals and objectives
4. Draw conclusions from the maps.
5. Consider the Traditional and Reverse Commute.
6. Rework the limits of the Study Area.
7. Make the Design Year 2035 or 2040.

When we refer to slides in this letter, we are referring to the printed handout called "Combined CAG/TF Meeting #2 from the meeting held in Oak Park at the Carleton Hotel on Tuesday January 19, 2010. At this time, it is not on your web site, but we assume you will upload it in the near future.

1. Distinguish issues from problems.

Issues are not problems. The top slide on Page 6 lists ten “Identified Issues and Concerns.”¹ We believe you are correct in labeling the list “Issues and Concerns,” but incorrect in treating issues as problems.

Webster’s Dictionary defines an issue as “a matter that is in dispute between two or more parties.” A problem is a gap between a desired state and an actual state. Frequently, a policy analysis starts with an issue and then narrows the issue down into one or more problem statements.

For example, the second issue is “Deficient Transit.” What is the problem? Is the problem the need for transit access to jobs? If so, where are the jobs with deficient transit access located? Is the problem infrequent service or inadequate service at certain times of the day or night? Is there a personal safety problem on the trains? Is the problem long travel times? Is the problem the need for better access to stations? Are the problems with rail transit different from bus transit? Are all the problems listed above part of the Deficient Transit Issue?

You have valuable citizen input on issues. You do not have enough input to develop the consensus needed for a good problem statement. You have a number of comments, loosely organized into broad categories. You have separated out solution-oriented comments, which is a good to do when trying to solve complex problems. This is a case where professionals and citizens need to work together to be successful. Both bring valuable input to the table.

We suggest you clarify what a checkmark means on this slide. Does it mean that one person at a table identified the topic as an issue or concern? Does it mean that the majority of people at a table identified the topic as an issue or concern? How did you decide when to insert a checkmark?

2. Revise the Problem Statement.

The Draft Problem Statement needs major revisions. The slide on the top of Page 9 from the presentation to the Combined CAG/TF Meeting #2) has the title “Problem Statement – What is it and How will it be used?” It has the following five bullet points:

- “A concise narrative
- Defines a situation or circumstances to be solved
- Expresses a desired situation not being achieved
- Factors that contribute to unacceptable performance
- Does not describe specific solutions”

¹ The Issues/Concerns are Congestion/Traffic, Deficient Transit, Multi-Modal Needs, Safety, Economic Development, Environmental Sustainability, Land Use Compatibility, Environmental Impacts, Funding/Cost, and Study Process.

The “Draft Problem Statement” on the two slides on Page 10 fails to meet three of the criteria specified in the above bullet points. It is concise and it does not describe specific solutions, so it satisfies the first and last bullet points. However, conciseness is good only if you provide documentation in the main report and / or appendices. The Draft Problem Statement fails to satisfy the second, third, and fourth bullet points.

The Draft Problem Statement has almost no content on problems, but does contain observations and issues.

Some of the **observations** in the Draft Problem Statement are:

- It is a multimodal corridor
- It has a “complex network of roadway, public transit, freight railroad, and non-motorized facilities services”
- “The existing built environment presents significant challenges in improving the corridor’s transportation elements.”
- “... solutions may require substantial funding...”

The Draft Problem Statement identifies the following **issues**:

- Roadway related issues include “infrastructure condition, traffic congestion on the Eisenhower Expressway and arterial roads, safety, truck traffic, and the resultant noise and air pollution”
- “Public transit related issues include lack of modal choice, connectivity, access, speed of service, and infrastructure condition”
- Non-motorized transportation issues include “connectivity, accessibility, safety, and suitability of pedestrian and bicycle facilities...”

The Draft Problem Statement has elements of **goals and objectives**:

- “Improved mobility, modal options, and integration of transportation and land use are desired to support economic development and enhance the quality of life.”
- “Sustainable solutions to transportation problems need to be developed, while avoiding and minimizing impacts to the surrounding environment.”
- “... solutions need to be cost-effective...”
- “These solutions also need to be coordinated with all modes, promote economic development, and be integrated with community land use plans.”
- “Stakeholder participation in arriving at workable and effective solutions is a fundamental part of the process.”²

² This is a process goal or objective.

Problem Statements include a geographic location, scope, and magnitude of the problem – topics that you do not include in the Draft Problem Statement. It is clearly marked as a draft, suggesting the intention to revise it as needed.

3. Clarify the goals and objectives.

There is a difference between goals and objectives. Different people use the two terms differently. You already have a Glossary on the www.EisenhowerExpressway.com web site, but it does not define three important terms – Issue, Goal, or Objective. It does define the term “Evaluation Criteria,” a term many use as a synonym for objectives or performance measures.

Regardless of what terms you use, you need measurable objectives (evaluation criteria or performance measures) for the following purposes:

1. To build a consensus among people with different needs and interests
2. To define the “desired situation not being achieved” to use your phrase from the third bullet point on the top slide of Page 9
3. To generate alternative solutions
4. To determine what data to collect and analyze
5. To evaluate the alternative solutions against the measurable objectives
6. To monitor progress after building the projects included in the Preferred Alternative

The last bullet in the bottom slide on Page 6 says, “To minimize impacts to the surrounding environment.” “Minimize” is poor choice of words to use. The word “reduce” is better. The National Environmental and Policy Act (NEPA) is based on Avoid – Minimize – Mitigate, i.e., **avoid** negative environmental impacts. If you cannot avoid them, **minimize** them. If you cannot avoid or minimize them, **mitigate** them.

4. Draw conclusions from the maps.

The PowerPoint presentation contains six maps (Pages 17 to 19 in “Combined CAG/TF Meeting #2) with the following titles:

1. Socioeconomic: Population
2. Socioeconomic: Minority Population
3. Socioeconomic: Low Income Population
4. Socioeconomic: Zero-Car Households
5. Socioeconomic: Employment
6. Socioeconomic: Land Use

For each of these maps, and similar maps in the future, you need to explain what observations and conclusions you draw from each and how the data portrayed on each map impacts the work you are doing.

It is clear that IDOT has done some technical analysis and expects to do more analysis. IDOT also needs to educate citizens because the problems are complex and the solutions will be expensive. PowerPoint is not a good tool for long paragraphs of text, but it is good for summarizing reports. Your reports can contain the detailed information.

5. Consider the Traditional and Reverse Commute.

The RTA Cook-DuPage Corridor Study identified nine travel markets. The two largest by far are the Traditional Commute, followed by the Reverse Commute. The Eisenhower Expressway as well as the CTA Blue and Green Lines, and Metra's Commuter Rail Lines serve the Traditional Commute and to varying degrees serve the Reverse Commute.

6. Rework the limits of the Study Area.

We have four concerns about the Study Area Definition.

1. The Study Area should include Metra's Milwaukee District West Line.

IDOT should consider the Milwaukee District West Line (MD-W Line). Excluding it from the Study Area Definition may be unfair to multi-modal options that include improvements to commuter rail lines. Excluding it could lead to under designed solutions.

2. IDOT should enlarge and redefine the Study Area.

IDOT describes the Eisenhower Corridor as the Western Gateway to Chicago. The dictionary defines a Gateway as "an opening for a gate." One attribute of a gateway is that it allows people to go in and out. Downtown Chicago is small in size compared to the rest of the region, so the gateway funnels people from a very large area into a small area. Improvements to the expressway need to account for the traffic light at Wells Street and the backups at the Dan Ryan.

The proper shape for the Study Area is a trapezoid, not a rectangle. The location of the expressways suggests the need for a trapezoid.

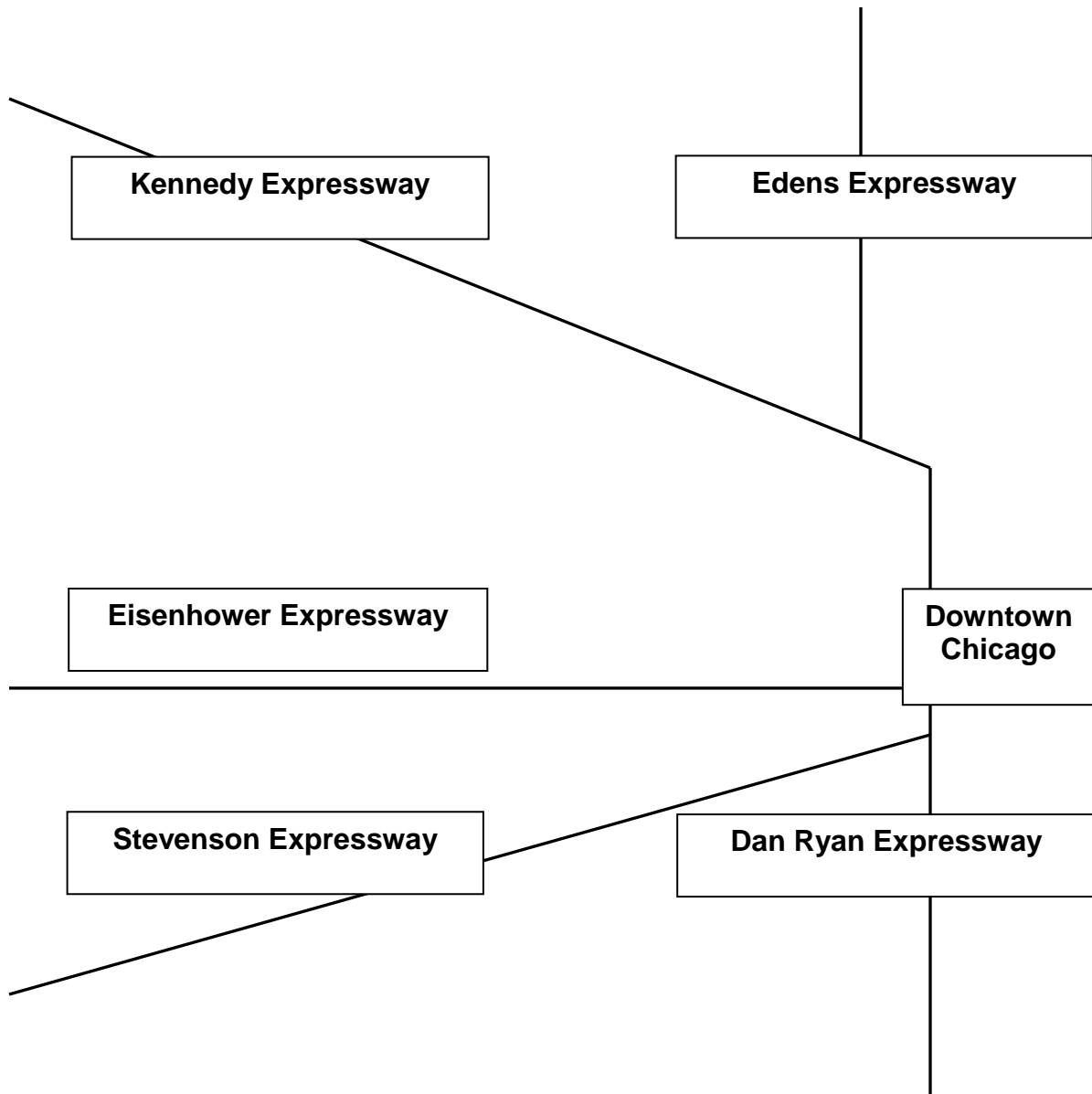
Most of the expressways in the Chicago Region are radial, focusing on downtown. The location of the expressways, especially the Kennedy, Eisenhower, and Stevenson Expressways suggests the need for a trapezoid shape for the Study Area. People living between any two expressways have a choice about which expressway to use.

The same argument applies to the Metra commuter lines and CTA rail lines, because their location suggests the need for a trapezoid shape, rather than a rectangle, for the Study Area.

The diagram on the next page illustrates the point.

3. IDOT should identify Employment Centers.

Serving employment centers is an important function of transportation facilities. The home-to-work trip is critical in transportation planning. Downtown Chicago has the largest concentration of jobs in the region, but its land area is very small compared to the land area of the region. Serving work trips is critical.



4. Explain the reasons for the Study Area boundaries.

The “Study Area Definition” Slide on the top of Page 14 has two bullet points: (1) “Broader Study Area – Considers the I-290 corridor as part of broader transportation network” and (2) Focused Study Area – Detailed evaluation of operations, safety and physical facilities.” The wide red line on the map indicates the Focused Study Area. IDOT’s speaker (Rick Powell) for this part of the presentation said the Focused Study Area included I-290, CTA Blue Line, parallel roadways and was the “location of the bulk of our analysis.”

It is impossible to tell from the slide how wide the Focused Study Area is. It looks too narrow for the area affected by air pollution and may be too narrow for the area affected by noise pollution. It excludes significant portions of north – south arterials, especially those that have interchanges with the expressway. The general point is that the impact area for each environmental impact is different, which means a single “Focused Study Area” is not appropriate.

7. Make the future Design Year 2035 or 2040.

We understand the federal requirement for major facilities to be at least 20 years into the future. Although it is now 2010 and IDOT is using 2030 as the design year, the IDOT Phase 1 Study will not be done until the middle of 2011, after which IDOT would enter Phase 2 to complete final designs, acquire property, relocate households and businesses, and demolish structures. Then IDOT would start construction in Phase 3. This schedule suggests a design year of 2035 or 2040. In addition, we understand CMAP’s GoTo 2040 study is scheduled to be completed this Fall and the 2010 U.S. Census will have some data useful for transportation planning in 2012.

At the Oak Park meeting, one of the presenters said there was a 30-page working document on the CTA Blue Line covering its performance, and ADA access concerns. We request a copy of this document.

Thanks again for the opportunity to provide comments. 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,

Citizens for Appropriate Transportation

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CAT 2010\CAT Ltr to IDOT Dec 2009

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